

Kelly Joyce
Gravesham Borough Council
Sent by email.

Our ref: KT/2024/131671/01-L01
Your ref: 20240234

Date: 10 June 2024

Dear Kelly,

Erection of emissions management building consisting of a baghouse and stack.

Britannia Refined Metals Ltd, Lower Road, Northfleet, Gravesend, Kent, DA11 9BG

Thank you for consulting us on the above planning application on 15 May 2024. We have reviewed the available documents via the planning portal and have the following comments.

Environment Agency position

In the absence of a flood risk assessment (FRA), we **object** to this application and recommend that planning permission is refused.

Reason(s)

The application site lies within Flood Zone 3, which is land defined by the planning practice guidance as having a high probability of flooding. The National Planning Policy Framework (paragraph 173, footnote 59) states that an FRA must be submitted when development is proposed in such locations.

An FRA is vital to making informed planning decisions. In its absence, the flood risks posed by the development are unknown. This is sufficient reason for refusing planning permission.

Overcoming our objection

For us to consider this application the applicant should submit an FRA which demonstrates that the development is safe without increasing risk elsewhere. The Environment Agency can provide site-specific flood modelling information. The applicant can request our most up to date flood data by contacting our Customers and Engagement Team at KSLE@environment-agency.gov.uk for further details.

If this cannot be achieved, we are likely to maintain our objection. Please consult us with a Flood Risk Assessment. We aim to respond within 21 days of receiving it.

Guidance on how to prepare a flood risk assessment can be found at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>.

Advice to applicant

Flood Risk Assessment

Our local Customers & Engagement team are able to provide any relevant flooding information that we have available, such as flood maps and modelled flood levels to be used within the FRA. For most sites, applicants should request a Product 4 for this purpose. All flood data requests are free. To request any flood risk data, please email ksle@environment-agency.gov.uk.

Please note that our advice is based upon the tidal and/or fluvial flood risk to the site. Other sources of flooding to the site such as surface water also need to be considered. We recommend that the applicant refers to the Strategic Flood Risk Assessment (SFRA) for the borough and seeks advice from the Lead Local Flood Authority (LLFA) and emergency planning teams, where appropriate.

The Flood Risk Assessment should provide finished floor levels to compare to the 1 in 100 year plus climate change flood level and to identify the potential impacts of flooding on the development. Please note the policies in the Gravesham Borough Council Strategic Flood Risk Assessment (SFRA) advise that “floor levels are to be situated a minimum of 300mm above the 1 in 100 year plus climate change flood level”. If this development is to proceed, we would recommend that the ground floor level is raised suitably above the modelled flood levels to manage the rate of inundation.

Note to applicant

Planning advice service

Should you wish us to review any technical documents or want further advice to address the environmental issues raised we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application. It should also result in a better quality and more environmentally sensitive development.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The standard terms of our charged for service are available [here](#).

If you would like more information on our planning advice service, including a cost estimate, please contact us at kslplanning@environment-agency.gov.uk.

Note to LPA

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

We have further advisory comments with respect to groundwater protection, which will be provided upon resolution of our outstanding objection on flood risk grounds.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Connor Bowman
Sustainable Places Planning Specialist

E-mail kslplanning@environment-agency.gov.uk