

Gravesham Borough Council
Development Control
Civic Centre Windmill Street
Gravesend
Kent
DA12 1AU

Our ref: KT/2023/130587/01-L01
Your ref: 20230137
Date: 12 April 2023

Dear Alison

Application For Approval Of Condition 5 Attached To Planning Permission Reference Number 20191122 Relating To Parts (i, ii, And iii) Of The Contaminated Land Strategy (The Erection Of Two Buildings To Provide A Total Of 227no Dwellings With Associated Vehicle Parking, Cycle Storage, Highway Works, And Landscaping. Building 1 Comprises The Erection Of A 23 Storey Tower On The North Side Of West Street To Provide 121no Dwellings With 1no Business Or Retail Unit (B1/A1) Comprising 90 Sqm Of Floor Space At Ground Floor Level; And Building 2 From Four Storeys To 10 Storeys On The South Side Of West Street Which Will Provide 106no Dwellings. The Proposal Includes The Restoration And Adaptation Of The Existing Pier Structure To Provide Public And Private Amenity Space To Include The Erection Of 16no Business(B1) Or Short Term Holiday Lets Units Comprising A Total Of 510 Sqm Of Floor Space; And A Cafe (A1/A3) Comprising Up To 60 Sqm Of Floor Space.)

Clifton Slipways, West Street, Gravesend, Kent

Thank you for consulting us on the above application. **We do not recommend the discharge of condition 5 for the reasons set out below.**

Groundwater and Contaminated Land

We have reviewed the 'Phase 1 and Phase 2 Geo-Environmental Assessment' (Ecologia, ref EES 18.376.2 & 18.376.3, June 2019) and the 'Remediation Strategy' (Ecologia, ref EES 18.376.6, February 2023).

The Phases 1 and 2 investigations have identified potential pollutant linkages including risks to controlled waters. Remedial options have been appraised in the remediation strategy, with a cover system and removal of some made ground proposed.

We agree with the conclusions and recommendations in these documents, in particular the recommendation for a piling risk assessment and associated monitoring. However, it is unclear from these documents whether a piling risk assessment is to be produced as part of remediation measures, or is needed to

further inform land contamination assessments and possible contaminant mobilisation. We also note the parent application's decision document does not include a condition for piling. Therefore, **we would not recommend the discharge of this condition** until this is clarified.

Overcoming our objection

A piling risk assessment should be completed and submitted for approval. Alternatively, confirmation should be provided that one will be produced as a result of the recommendations of these reports, before the contamination condition (parts 1, 2 and 3) are discharged.

Please do not hesitate to contact us should you require any further information.

Yours faithfully

Ms Laura Edwards

Planning Advisor

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