



Gravesham Borough Council
Civic Centre
Windmill Street
Kent
DA12 1AU

Your ref
20250730

Our ref
DSA000046957

Date
15th June 2026

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Proposal: Installation of electricity infrastructure including a battery energy storage system, sub station and ancillary electrical infrastructure.

Site: Land Adjacent to Thames Way, Northfleet, Gravesend, Kent, DA11 8HL.

Thank you for your correspondence. Please see our comments below regarding the above planning consultation application.

Insufficient Information provided

Condition

Construction of the development shall not commence until details of the proposed means of foul/surface water drainage disposal have been submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water.

Existing Southern Water, Wastewater Treatment Works (WWTW) located in proximity to the proposed development.

In determining the application, we ask that the Planning Authority take into account the provisions of Paragraphs 180, 182 and 183 of the National Planning Policy Framework (NPPF) regarding the proposed location of development in relation to existing uses that may be a source of pollution (in terms of odour). We apply a precautionary buffer zone for any development located within 500 metres of the boundary of a WWTW. The proposed development is located approximately 11 metres from the Northfleet Wastewater Treatment Works, and as such we have applied this requirement to our planning consultation response. Please contact Southern Water to discuss and agree the Scope of the odour assessment.

The outcome of the Odour Assessment should inform site layout, and any appropriate odour mitigation identified and agreed with Southern Water as necessary to avoid potential odour nuisance to future residents will also be funded by the developer.

Southern Water applies a target standard of 1.5 ouE/m³ as the 98th percentile of hourly averages contour to sensitive receptors in line with the NPPF recommendation for planning decisions to achieve a high standard of amenity for existing and future users.

Given that the 'agent of change' for planning applications is the developer, the service we provide to review third party assessments and/or accommodate a site survey etc. is chargeable. More information regarding our fees can be found on our website; Connection charging arrangements (<https://urldefense.com/v3/https://www.southernwater.co.uk/building-and-developing/our-services/water-services/connecting-charging-arrangements/>;!!OepYZ6Q!McDStnpyufhWKxeAVhh4j7i4AFLrDI5PyB-MKD8p88lCIHKJJcfsjT994P1NsPbyZEpQ6TDvt87hRFNFFPkmUPKO-WOZ8oOOHJwsoWvSP0\$)

Condition

Until a suitable and robust assessment demonstrates otherwise, due to the potential odour nuisance from a Wastewater Treatment Works, no sensitive development should be located within 500m of the WwTW site boundary. An Odour Assessment will need to be carried out by a specialist consultant funded by the developer to a scope that will need to be agreed in advance with Southern Water.

Access to Wastewater Treatment Works (WWTW) to be maintained

Southern Water requires existing access arrangements to Wastewater Treatment Works to be maintained with regards to unhindered 24 hour / 7 days a week access. Southern Water operates a closed gate policy during maintenance works for Health and Safety reasons.

Existing Southern Water Assets – General within boundary but no tree, buildings, assets within standoff distance (approximate)

Please see the attached extract from Southern Water records showing the approximate position of our existing sewer and water main assets crossing/in the vicinity of the development site. The exact position of the public assets must be determined on site by the applicant in consultation with Southern Water before the layout of the proposed development is finalised. To get in contact to confirm the exact position of the asset please

visit; https://www.southernwater.co.uk/media/ph4fk3pe/ds-location-of-rising-mains_pb.pdf.

For information on required stand-off distances from public sewers please refer

to: <https://www.southernwater.co.uk/media/st5orjvm/stand-off-distances.pdf>.

Existing Rising Main stand-off distance

The 400 mm diameter rising main requires a minimum clearance of 3 metres on either side of the rising main to protect it from construction works and to allow for future access for maintenance. We would recommend using stand-off distances as per our water mains, please refer to: <https://www.southernwater.co.uk/media/st5orjvm/stand-off-distances.pdf>

No development or tree planting should be carried out within 3 metres of the external edge of the public rising main without consent from Southern Water. All existing infrastructure should be protected during the course of construction works.

Condition

In order to protect public sewers, Southern Water requests that if consent is granted, the following condition is attached to the planning permission; The developer must agree with Southern Water, prior to commencement of the development, the measures to be undertaken to protect the public sewers.

Tree planting

We have restrictions on the proposed tree planting adjacent to Southern Water sewers, rising mains or water mains. Reference should be made to Southern Water's publication "A Guide to Tree Planting near water Mains and Sewers"

(https://www.southernwater.co.uk/media/pddob0vn/ds-tree-planting-guide-1_nwm.pdf) and the Sewerage Sector Guidance (<https://www.water.org.uk/sewerage-sector-guidance-approved-documents/>) with regards to any landscaping proposals and our restrictions and maintenance of tree planting adjacent to sewers, rising mains and water mains.

Condition

'In order to protect public apparatus, Southern Water requests that if consent is granted, the following pre commencement condition is attached to the planning permission; The developer must advise the local authority (in consultation with Southern Water) of the landscaping proposals in proximity of public apparatus in order to protect it in accordance with Southern Water's guidance, prior to the commencement of the development.

Possible Contamination on Redevelopment Site (Brownfield sites - former petrol, gas, oil etc. contamination)

The level of contamination on site should be investigated, as this may affect the materials used for the public water mains to service the development. Details of any contamination found on site should be declared to the statutory water undertaker, as part of a water connection application, as this will influence the materials used for construction of public water mains on the site.

Please visit [water-connection-technical-guidance_wca.pdf](#) for more information.

Proposed Development located in Flood plain

From the site location, it appears that the proposed development lies within an area identified as flood zone 2/3. Southern Water supports the Government's requirement to apply the sequential and exception tests to development sites located in flood zones 2 or 3. In flood events, additional surface water can inundate sewers, which may result in the overloading of the sewerage system. Southern Water will rely on the Council's consultations with the Environment Agency to ensure that any proposed development on a floodplain is appropriately assessed, and necessary mitigation measures adopted.

As this site is in a high-risk flood zone the new foul drainage system must be resilient to the flooding as we do not want flood waters to enter the system which would then impede foul drainage from this area and potentially downstream. The developer must ensure the new foul system draining the development does not create a new low spot on the network. If this is a possibility, then consideration should be given to having a pumped connection or other satisfactory mitigation. It appears the area



is also prone to high groundwater. The new system must be constructed to withstand high groundwater and should be watertight at pipe joints, within manholes and at ground level. The integrity of the system with respect to water tightness must be demonstrated by air testing.

Condition

In view of the risk of inundation of the proposed drainage system, Southern Water would request that the consent is subject to the following condition: The proposed drainage system shall be designed and constructed to prevent the ingress of flood water into the sewerage network.

S106 Connection application

Any new connections to the public sewerage system will require a Section 106 connection application to be submitted and approved by Southern Water Services.

To make an application visit Southern Water's Get Connected service:

<https://developerservices.southernwater.co.uk> and please read our New Connections Charging Arrangements documents which are available on our website via the following link:

<https://www.southernwater.co.uk/developing-building/connection-charging-arrangements>

Please note that, where there are separate systems available, Southern Water will not allow surface water to connect into the public foul sewer. If this is not possible, please provide evidence that all other options have been explored.

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction work, an investigation of the sewer will be required to ascertain its ownership before any work commences on site. If this happens, please call our Customer Service Desk on 0330 303 0119

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).

Website: southernwater.co.uk or by email at: SouthernWaterPlanning@southernwater.co.uk

Yours faithfully,

Future Growth Planning Team

southernwater.co.uk/developing-building/planning-your-development