

Amanda Cue  
Gravesham Borough Council

**Our ref:** KT/2025/132647/01-L01  
**Your ref:** 20250550

Sent by email

**Date:** 30 June 2025

Dear Amanda

**Erection of a workshop (Use Class E(g)(iii)), access, parking, and associated landscaping.**

**Land to the north west of Factory Road, Northfleet, Gravesend, Kent DA11 9HH**

Thank you for consulting us on the above application which we received on 18 June 2025. As part of this consultation, we have reviewed the following documents:

- Application Form, ref. PP-14040215, dated 27 May 2025
- Location Plan, ref. MRT-BPTW-S01-00-DR-A-0101 rev C02, dated 6 May 2025, by BPTW
- Drainage Layout, ref. 2408/01/3000, dated 6 May 2025, by RLT
- Drainage Technical Note, ref. 240802, by RLT

**Environment Agency position**

We **object** to this development because there is insufficient information to demonstrate that the risk of pollution to controlled waters can be appropriately managed. We therefore recommend that planning permission is refused.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome, our objection
- Section 2: Advice to the Applicant

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

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.

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

Yours sincerely,

**Gabrielle Delorme**  
**Sustainable Places Planning Specialist**  
E-mail [kslplanning@environment-agency.gov.uk](mailto:kslplanning@environment-agency.gov.uk)

## **Section 1: Reasons for, and how to overcome, our objection**

### **Reason(s)**

The previous use of the proposed development site as an infilled chalk pit presents a high risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the development site is located upon a principal aquifer. The Applicant has not submitted sufficient information to demonstrate that the risk of pollution to controlled waters can be appropriately managed.

This planning application, as currently submitted, therefore fails to meet the requirements of paragraphs 187 and 196 of the National Planning Policy Framework.

### **Overcoming our objection**

The Applicant should provide information to demonstrate to the local planning authority that the risk to controlled waters has been fully understood and can be addressed through appropriate measures. This information should include a detailed drainage strategy and a preliminary risk assessment. The drainage strategy should outline mitigation measures proposed to prevent the discharge of hazardous pollutants and limit the discharge of non-hazardous pollutants to groundwater via deep borehole soakaway in line with position statement G9 of [The Environment Agencies Approach to Groundwater Protection](#).

## **Section 2: Advice to the 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](mailto:kslplanning@environment-agency.gov.uk)