



Delegated Report

Condition Discharge Application

Planning Application No:	20250778
Location:	Land And Buildings at Seacon Site Tower Wharf Lower Road Northfleet
Description:	Application for the approval of condition 2 (Contamination Strategy), condition 3 (Sustainable Surface Water Drainage Scheme) and condition 4 (Construction Method Statement) attached to planning reference number 20250777.
Applicant:	Mr Lucky Gill
Site Visit Date:	Desktop assessment

Submitted Documents/Plans

Application form
Risk Assessment and Method Statement (18.11.2024)
Phase 2 Geoenvironmental Ground Investigation (August 2022)
Hydraulic Calcs 28/05/2025
Construction Phase Health and Safety Plan (11.11.2024)
Kent County Council Flood and Water Management letter dated 29 July 2025 re. discharge of KCC drainage condition.
Drawing no. LM25100-XX-D-XX-301 Rev. P01 (Drainage details (Sheet 1)
Drawing no. LM25100-XX-D-XX-302 Rev. P01 (Drainage details (Sheet 2)
Drawing no. LM25100-XX-D-XX-303 Rev. P01 (Drainage details (Sheet 3)
Drawing no. LM25100-XX-D-XX-0500 Rev. P04 (Drainage Strategy Plan)
Maintenance Schedule

Supplementary Information:

Agent response to KCC Drainage Comments (28 October 2025)
Drawing no. LM25100-XX-D-XX-0100 Rev. P01 (Impermeable Areas Plan Existing and Proposed)
Submersible Sludge Pump XJS 50 Specification
Drainage Strategy Report (April 2025)
Emergency Call-out Agreement
Surface Water Flow Discharge Assessment
Pollution and Hazards Mitigation Input Data
Pollution and Hazards Mitigation Results
Hydraulic Calculations 15/12/2025
Phase 4 Validation Report (May 2026)
Rhinoplast Amber 2000 Gas Barrier Data Sheet
Rhinoplast Amber 2000 Gas Barrier

Relevant Planning History

Reference	Description	Decision	Decision Date
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20250777	Application for removal of condition 3 attached to planning permission reference number 20241011 for extension of existing storage warehouse to provide a bagging and packaging facility for aggregates and cementitious products, incorporating extensions to both sides, a new warehouse section to the south and silos to the side; to allow the removal of the condition due to no new foul drainage.	Permission	15.10.2025
20241011	Extension of existing storage warehouse to provide a bagging and packaging facility for aggregates and cementitious products, incorporating extensions to both sides, a new warehouse section to the south and silos to the side.	Permitted	18.07.2025
20240466	Application for the approval of conditions 10 and 12 attached to planning permission 20201048 relating to a scheme detailing the proposed hard and soft landscaping associated with the development and an external lighting scheme, excluding street lighting or temporary construction lighting.	Permitted	10.07.2024
20230415	Application for a non-material amendment to planning permission reference 20201048 to allow correction to the existing AOD levels.	Permitted	17.05.2023
20200422	Consultation MLA/2019/00541- Marine Licence.	No objections	07.05.2020
20201048	Construction of replacement river jetty approach (existing landside approach ramp to be demolished - remainder of existing 1950's jetty approach to be retained but retired from use); erection of replacement office/mess facilities to south eastern corner of site and associated re-arrangement of existing employee/guest car park; demolition of existing office, site clearance and works to provide relocated open storage area; and other ancillary works.	Permission	10.05.2021
19960324	Erection of single storey industrial building to form warehouse and erection of temporary warehouse structure.	Permission	04.07.1996
19910781	A) Demolition of existing buildings, land reclamation, construction of two transit ware- houses and gatehouse. B) Outline application for the erection of linked office block.	Permission	02.03.1992
19920585	Display of externally illuminated sign on the south east elevation.	Consent	05.11.1992
19890464	Erection of two storey side extension to form 2 no mess rooms and toilets with offices over.	Permission	03.08.1989
19890099	Erection of detached single storey building to form warehouse, formation and laying out of 305 car parking spaces and 8 lorry spaces.	Permission	05.04.1989
19870960	Erection of a single storey building to form replacement office accommodation	Permission	21.01.1988
19860927	Erection of two storey building to form administration block	Permission	13.01.1987
19840473	Erection of two storey building for use as administration block	Permission	28.06.1984
19810489	Stationing of mobile office for a temporary period of 3 years	Permission	10.06.1981
19810066	External staircase to amenity admin block	Permission	24.02.1981

19800676	Erection of two storey extension to existing administration amenity block for amenity purposes at ground floor level and offices at first floor level	Permission	16.09.1980
19791035	Erection of two storey extension to form enlarged canteen area locker room drying and shower rooms and toilets on ground floor with offices over	Permission	28.12.1979
19790852	Erection of a single storey building to form a warehouse	Permission	11.06.1980
19790717	Erection of a single storey building to form switchroom and storeroom in the north western corner of the Tee Head Jetty	Permission	21.09.1979
19790587	Construction of a T head jetty	Permission	25.07.1979
19770190	Erection of a single storey office building	Permission	27.04.1977
19770097	Erection of a lean-to extension to maintenance workshop	Permission	13.04.1977
19740505	Erection of a metallurgical plant and erection of three extensions to existing plant for stokes charge, shower room and workshop. KCC GRANTED PERMISSION 3.4.1975 (CONDITIONS).	No objections	26.11.1974
19740288	Erection of a building for offices and a flat.	Permission	14.10.1974
19740180	Erection of a security building and gatehouse.	Permission	06.06.1974

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS18 – Climate Change
- CS19 – Design and Development Principles

National Planning Policy Framework (2026)

- Section 4 – Achieving Sustainable Development
- Section 17 – Pollution, Public Protection and Security
- Section 18 – Managing Flood Risk and Coastal Change
- Section 19 – Conserving and Enhancing the Natural Environment

Consultations, Publicity and Representations

External Consultees

Environment Agency

We have no objection to the discharge of conditions 2, 4, and 5.

Please refer to the following sections for our full response:

- Section 1: Technical comments

Section 1: Technical comments

Condition 2

We have reviewed the submitted Phase 2 Geoenvironmental Ground Investigation report. Overall, the risks to controlled waters, based on the reported sampling results, have been assessed in the report as low. Remediation works are proposed, but are mainly deemed required to address potential risks to human

health in relation to ground gas and asbestos. No specific remediation to protect controlled waters has been identified as necessary in the report.

Based on the reported information, we have no objections to the approval of condition 2. Please note that further comments should be sought on human health matters from the local authority's environmental health team.

Condition 4

The proposals include no infiltration drainage, therefore we have no comments from a groundwater protection perspective.

Condition 5

We have no comments on the submitted details.

KCC Flood and Water Management 14.08.2025

Kent County Council as Lead Local Flood Authority have reviewed the Drainage Strategy documents prepared by Leimen LTD (July 2025) and have the following comments:

We note that the drainage design differs from that which was submitted and approved as part of the Full planning application (ref: 20241011). Whilst we understand from the drawings provided that the presumed existing sewer was not located on site and that therefore an alternative pumped solution has been proposed we would expect for an updated technical statement to also be provided.

We would emphasise that pumps should only be considered as a last-resort option, and only where infiltration or discharge via gravity can be demonstrated to be unviable. Any pumped system can be prone to failure within the associated development's lifetime and cannot be considered to be fully sustainable owing to the carbon-cost of the pump's operation.

Further to this, on checking information available to ourselves, we have been unable to locate the network now proposed to be connected and as such assume this to be a private network. Given the original submission assumed the surface water from this catchment discharged to the Botany Marshes we require for information and evidence to be submitted which demonstrates that sufficient capacity exists within the network now proposed to be connected to.

We would also highlight the latest requirement of DEFRA's SuDS Technical Standards:

"7.16 The surface water drainage system shall be evaluated for flood risk and water quality impacts associated with potential system failure during the operation phase due to blockage of any structures and flow controls or failure of pumps"

No such evaluation appears to have been included.

Furthermore, the standards also require that:

"7.18 Where the surface water drainage system incorporates motorised equipment such as pumps, or proprietary below ground products such as separators, provision shall be made for automatic monitoring of the component's function and transmission of failure warnings to the body responsible for maintenance"

And ask that this also be confirmed as part of any resubmission.

We would advise a holding objection against this proposal, pending resolution of the concerns outlined above.

KCC Flood and Water Management 03.12.2025

Kent County Council as the Lead Local Flood Authority has reviewed the following documents:

Seacon Terminal, Tower Wharf_Drainage Strategy Report_r.02 (Report number: LM25100-DR-01) dated 22.05.2025

LM25100-XX-D-XX-500_P4 Drainage Strategy Plan,
LM25100-XX-D-XX-301 to 302 Drainage Details (Sheets 1, 2 & 3),
Hydraulic Calculations_Seacon Terminal, Tower Wharf_28.05.25
Seacon Terminal _SuDS Maintenance Schedule.

While we are accepting of the amended design in principle, we recommend maintaining a holding objection until the following matters have been addressed:

1. We would expect that a Cv value of 1.0 is applied within the hydraulic calculations to ensure accurate representation of runoff conditions.
2. We note that no climate change allowance has been applied to the 1 in 30-year event. This should be updated in line with current guidance to account for future rainfall intensity increases.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

KCC Flood and Water Management 13.01.2026

Kent County Council, as the Lead Local Flood Authority (LLFA), have reviewed the updated calculations dated 15/12/2025 and are satisfied that our previous concerns have been addressed. As such, we have no further objection to the discharge of Condition 4.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Southern Water

Southern Water is happy to discharge conditions 4 (Sustainable Surface Water Drainage Scheme) due to the submitted report showing the proposed SUDS scheme.

Southern Water has no further comment regarding conditions 2 & 5.

Internal Consultees

GBC Environmental Protection 18.08.2025

The following comments are made with regards to conditions 2 and 5:

Condition 2 – Contamination Strategy.

The condition is worded such that it only refers to the risk to water pollution and not human health. The condition is not what EP recommended, and it's assumed that this condition was suggested by the EA?

The same 'Phase 2 Geoenvironmental Ground Investigation' (dated August 2022, report Ref: 22/35405-1) by SAS that was submitted for the original application has been re-submitted. This addresses parts 1 and 2 of the condition which can be discharged. As advised on the original application, remediation options have been outlined with the preferred recommended option given in 6.12. A full remediation strategy will therefore be needed in order to address parts 3 and 4 of the condition.

As the condition refers to the risk to water pollution, the EA needs to be consulted and once this is agreed.

Condition 5 - Construction Method Statement

Although there has been some reference to noise and dust suppression, the submitted documents are more H & S risk assessments and plans. In particular, there is no dust management plan as required by the

condition. Based on the submitted documents, it is recommended that the condition is not discharged at this time.

GBC Environmental Protection 29.05.2026

This matter has been going on for some time now which is concerning as it appears that the works have been completed and the buildings built. As indicated in my email dated 29th January 2026 sufficient demonstration that the remediation works have been completed satisfactorily needs to be submitted in order to discharge parts 3 and 4 of Condition 2.

A Phase 4 Validation Report dated May 2026 (Report Ref: 26/41515) has been submitted to address the above. I can confirm that appropriate remediation appears to have been carried out to address the contamination risks and this includes a capping/cover system and gas protection measures.

However, verification and certification of the gas membrane/gas protection measures have not been provided. Although there are photos of the gas membrane in situ, there are no details as to what level of gas protection membrane (or type/specification of membrane) has been installed or details of ventilation of the sub floor area. It's not clear whether the measures installed are suitable to prevent the ingress of the ground gases in accordance with findings of the Phase 2 report. This report advised that the site would be classed as Characteristic Situation 2/NHBC Classification of Amber 2 requiring the following gas protection measures/advice:

- a gas membrane. Membranes should always be fitted by a specialist contractor
 - ventilated sub-floor void to create a permeability contrast to limit the ingress of gas into buildings.
- Ventilation of the sub-floor void should facilitate a minimum of one complete volume change per 24 hours. Certification that these passive protection measures have been installed correctly should be provided.

Further clarification and details on this are therefore needed.

GBC Environmental Protection Team 20.07.2026

Condition 2 (Contamination).

Noted that the construction is such that it does not incorporate a ventilated sub-floor void. The Rhinoplast Barrier Membrane is acceptable beneath a re-enforced concrete slab. Although a certificate from a third part hasn't been included, I will accept the details that include photos that demonstrate its installation.

Based on this, there is no objection to Condition 2 being fully discharged.

Condition 4 (CMS)

As far as I recall, we are still waiting for a Dust Management Plan. Although this does now seem somewhat redundant as the building works are more or less complete

Officer's Analysis

Condition 2 (Contamination Strategy)

Condition 2 states as follows:

2. Within one month of the date of this decision, a strategy to deal with the potential risks associated with any contamination of the site shall be submitted to and approved in writing by the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:

- *all previous uses;*
- *potential contaminants associated with those uses;*
- *a conceptual model of the site indicating sources, pathways and receptors; and*
- *potentially unacceptable risks arising from contamination at the site.*

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

The scheme shall be implemented in accordance with the approved details.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraphs 187, 196 and 197 of the National Planning Policy Framework 2024.

A Phase 2 Geoenvironmental Ground Investigation (August 2022) has been submitted in relation to this condition.

The Environment Agency reviewed the submitted Phase 2 Geoenvironmental Ground Investigation report. Overall, the risks to controlled waters, based on the reported sampling results, have been assessed in the report as low. Remediation works are proposed, but are mainly deemed required to address potential risks to human health in relation to ground gas and asbestos. No specific remediation to protect controlled waters has been identified as necessary in the report. They have no objections to the approval of condition 2.

The Environmental Protection team initially stated that the same 'Phase 2 Geoenvironmental Ground Investigation' (dated August 2022, report Ref: 22/35405-1) by SAS that was submitted for the original application has been re-submitted. This addresses parts 1 and 2 of condition 2, which can be discharged. As advised on the original application, remediation options have been outlined with the preferred recommended option given in 6.12. A full remediation strategy was therefore needed in order to address parts 3 and 4 of the condition.

A Phase 4 Validation Report dated May 2026 (Report Ref: 26/41515) has been submitted to address the above. The Environmental Protection team has confirmed that appropriate remediation appears to have been carried out to address the contamination risks and this includes a capping/cover system and gas protection measures. Further information was provided in relation to the gas protection membrane, sub-floor ventilation and verification, and based on this information, Environmental Protection have confirmed there is no objection to condition 2 being discharged.

It is therefore considered that sufficient detail has been provided to satisfactorily discharge condition 2. The details would consider water pollution, in accordance with the NPPF, and the reason for condition 2. Condition 2 can therefore be discharged.

Condition 3 (Sustainable Surface Water Strategy)

Condition 3 states as follows:

3. Within one month of the date of this decision a foul drainage strategy, detailing how appropriate foul drainage is implemented with a connection to the foul sewer, shall be submitted to and approved in writing by the Local Planning Authority in consultation with the water undertaker and Environment Agency. The development shall be constructed in line with the agreed detailed design and recommendations of the strategy.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraphs 186 and 196 of the National Planning Policy Framework 2024.

The following plans and documents have been submitted in relation to this condition:

Hydraulic Calcs 28/05/2025

Kent County Council Flood and Water Management letter dated 29 July 2025 re. discharge of KCC drainage condition.

Drawing no. LM25100-XX-D-XX-301 Rev. P01 (Drainage details (Sheet 1)

Drawing no. LM25100-XX-D-XX-302 Rev. P01 (Drainage details (Sheet 2)

Drawing no. LM25100-XX-D-XX-303 Rev. P01 (Drainage details (Sheet 3)

Drawing no. LM25100-XX-D-XX-0500 Rev. P04 (Drainage Strategy Plan)

Maintenance Schedule

Agent response to KCC Drainage Comments (28 October 2025)

Drawing no. LM25100-XX-D-XX-0100 Rev. P01 (Impermeable Areas Plan Existing and Proposed)

Submersible Sludge Pump XJS 50 Specification

Drainage Strategy Report (April 2025)

Emergency Call-out Agreement

Surface Water Flow Discharge Assessment

Pollution and Hazards Mitigation Input Data

Pollution and Hazards Mitigation Results

Hydraulic Calculations 15/12/2025

Following the submission of additional information, and having reviewed the updated calculations dated 15/12/2025, KCC as Lead Local Flood Authority, are satisfied that their initial concerns have been addressed. As such, they have no objection to the discharge of Condition 3.

Southern Water and the Environment Agency also raised no objections.

It is therefore considered that sufficient detail has been provided to satisfactorily discharge condition 3. The details would consider water pollution, in accordance with the NPPF, and the reason for condition 3. Condition 3 can therefore be discharged.

Condition 4 (Construction Method Statement)

Condition 4 states as follows:

4. Within one month of the date of this decision, a Construction Method Statement shall be submitted to and approved in writing by the Local Planning Authority. The document shall be produced in accordance with the Code of Construction Practice and BS5228 Noise Vibration and Control on Construction and Open Sites and shall include a Construction Dust Management Plan in accordance with the guidance in the Institute of Air Quality Management (IAQM) 'Guidance on the Assessment of Dust from Demolition and Construction'. The construction of the development shall then be carried out in accordance with the approved methodology.

Reason: To ensure acceptable methods of construction in line with Policy CS19 of the Gravesham Local Plan Core Strategy 2014.

A Construction Phase Health and Safety Plan (11.11.2024) and Risk Assessment and Method Statement (18.11.2024) were submitted in relation to this condition.

The Environment Agency and Southern Water had no comments on the details.

Environmental Protection had requested further information relating to dust, but as the development has been completed (and indeed was substantially underway when the application was submitted), such details were no longer deemed necessary.

It is therefore considered that condition 4 can be discharged.



Conclusion

The Local Planning Authority is satisfied with the details submitted in relation to planning permission 20250777 for the extension of the existing storage warehouse to provide a bagging and packaging facility for aggregates and cementitious products, incorporating extensions to both sides, a new warehouse section to the south and silos to the side. It is considered that conditions 2, 3, and 4 can be discharged and there are no further details required.

Recommendation

Approval of details.

(For informatives, see draft Decision)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Mrs Faye Walsh
Signed:	<i>K. Parkin</i>	Signed:	<i>F Walsh</i>
Dated:	1st September 2026	Dated:	01 September 2026