

Delegated Report

Application No:	20251198
Location:	Cascades Leisure Centre, Thong Lane, Gravesend DA12 4LG
Description:	Application for the approval of condition 5 (part a, b and c) attached to planning reference number 20221293 relating to a strategy to deal with the potential risks associated with any contamination of the site.
Applicant:	Gravesham Borough Council

Submitted Documents/Plans

Application form
Cover letter
Phase 1 Desk Study and Phase 2 Site Investigation Report (25/13244/KJC REV 1) and associated documents by Albury S.I. Ltd

Relevant Planning History

20221293 Demolition of the existing Cascades Leisure Centre and public house and redevelopment of the site to provide a new leisure centre with community pool, leisure water, cafe, soft play, 'clip n climb' facility, a six court sports hall, fitness suite, spin studio, 2 no. fitness studios, 2 no. squash courts, a new tennis/netball court, improvements to the existing play area, landscaping across the site and associated car parking.

Approved 03.03.2023

Consultations, Publicity and Representations

Environment Agency

Thank you for consulting us on the above application which we received on 2 December 2025. As part of this consultation, we have reviewed the following documents:

- Phase 1 Desk Study and Phase 2 Site Investigation Report, ref. 25/13244/KJC REV 1, dated 1 December 2025, by Albury S.I. Ltd

Environment Agency position

We have no objection to the part-discharge of condition 5 (parts A and B only).

Planning conditions related to contamination and worded like condition 5 should not be fully discharged until such time as all relevant works are completed and a closure report, detailing all

works at the site, has been submitted. The closure report should include summaries of all materials removed, details of validation sampling/monitoring carried out in remediation areas, relevant certificates for imported materials and confirmation that the site is fit for the proposed use.

Further clarification should be sought from the Local Authority Environmental Health Officer with respect to issues related to harm to human health.

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.

Decision notice

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Following on from updated information being provided the EA responded with the following:

Thank you for consulting us on the above application which we received on 2 December 2025. As part of this consultation, we have reviewed the following documents:

- Phase 1 Desk Study and Phase 2 Site Investigation Report, including Remediation Method Statement and Verification Plan, ref. 25/13244/KJC REV 1, dated 1 December 2025, by Albury S.I. Ltd

Environment Agency position

We have no objection to the discharge of condition 5 (parts A, B, C and D).

Any other planning conditions related to contamination should not be fully discharged until such time as all relevant works are completed and a closure report, detailing all works at the site, has been submitted. The closure report should include summaries of all materials removed, details of validation sampling/monitoring carried out in remediation areas, relevant certificates for imported materials and confirmation that the site is fit for the proposed use.

Further clarification should be sought from the Local Authority Environmental Health Officer with respect to issues related to harm to human health.

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.

Decision notice

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

GBC Environmental Protection Officer

The Phase 1 Desk Study and Phase 2 Site Investigation Report by Albury S.I. Ltd (Ref: 25/13244/KJC REV1) has been reviewed. The methodology and findings of the report are accepted.

Elevated levels of PAH's and asbestos fibres were found in some areas. In view of this, some localised remediation works are needed and therefore a Remediation Strategy is required.

Based on the submitted report, parts a) and b) of condition 5 can be discharged.

Part c) relates to the Remediation Strategy and d) to the Verification Plan. These parts of the condition can't be discharged at this stage.

Following on from the above, clarification was sought regarding part 5C and the EP Officer has confirmed that the remediation strategy and validation plan are satisfactory and part c can be discharged. Part d cannot be discharged yet and a verification report needs to be submitted for approval after the works have been completed.

Analysis

Condition 5 of 20221293 states:

5. No development approved by this planning permission shall commence until a strategy to deal with the potential risks associated with any contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

- a. A preliminary risk assessment which has identified:
 - o all previous uses;*
 - o potential contaminants associated with those uses;*
 - o a conceptual model of the site indicating sources, pathways and receptors; and*
 - o potentially unacceptable risks arising from contamination at the site.**
- b. 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.*
- c. The results of the site investigation and the detailed risk assessment referred to in (b) 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.*
- d. 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 as approved.

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 paragraph 174 of the National Planning Policy Framework 2021.

The information submitted is acceptable however the condition requires a verification plan to demonstrate the remediation has taken place which cannot be provided until these works are complete. Therefore parts a, b and c can be discharged only at this stage. A further application to discharge condition 5d will be required once the remediation works are complete.

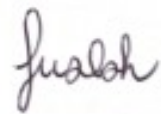
Recommendation:

Discharge condition 5 (part a, b and c) of 20221293.

See draft Decision

Case Officer: Alison Webster	Team Leader: Faye Walsh
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Signed: 	Signed: 
Dated: 22 January 2026	Dated: 22 January 2026