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people and wildlife



Alison Webster
Gravesham Borough Council
Sent via email

Our ref: KT/2024/132078/01-L01
Your ref: 20240856
Date: 06 November 2024

Dear Alison Webster

Demolition Of Existing Buildings To Provide An EV Charging Hub And Petrol Filling Station, Including 24 Charging Bays And Supporting Electrical Infrastructure (12 Charging Upstands, Three Substations And Two Network Cabinets), Six Pump Islands With Canopy Above, A Forecourt Shop/Amenity Building, Customer Parking, Two Air And Water Spaces And Associated Hardstanding And Landscaping, Accessed From The Wrotham Road/Eastbound A2 Roundabout Junction.

Former Tollgate Hotel, Watling Street, Gravesend, Kent

Thank you for consulting us on the above application on 23 October 2024. As part of this we have reviewed the application uploaded to the website, including the following documents:

- Geo-environmental Investigation Report, September 2012
- The Flood Risk Assessment, September 2024
- The Planning Statement, September 2024
- The Infiltration Test Report, December 2022
- The Appraisal of Below Ground Tank Installation, May 2024

Environment Agency Position

We **object** to the planning application, as submitted, because the proposed development would pose an unacceptable risk of pollution of groundwater. We recommend that planning permission should be refused on this basis, in line with paragraph 180 of the National Planning Policy Framework and Policy CS19: Development and Design Principles of the Gravesham Local Plan (2014).

Groundwater and Contaminated Land Reasons

Our approach to groundwater protection is set out in [‘The Environment Agency’s approach to groundwater protection’](#). In implementing the position statements in this guidance we will oppose development proposals that may pollute groundwater especially where the risk of pollution is high and the groundwater asset is of high value.

Groundwater is particularly sensitive in this location because the proposed development site:

- is within Source Protection Zone 2
- is located upon a chalk Principal Aquifer

In this case position statement D2 Underground storage (and associated pipework) applies. We consider that the proposed development poses an unacceptable risk of causing a detrimental impact to groundwater quality because:

- it presents a risk of pollution to groundwater supplies
- it proposes the underground storage of polluting substances (two 80,000L fuel storage tanks)

Overcoming our objection

The applicant should provide suitable assessment of the risks to groundwater associated with the proposed development and in particular to the implementation of underground storage tanks. This information must satisfactorily demonstrate to the local planning authority that the risks to controlled waters have been fully understood and can be addressed through appropriate measures. This information should include a suitable hydrogeological risk assessment (HRA) for the proposed development. We would consider further environmental based risk assessments to be required to support the use of underground storage tanks instead of below ground storage tanks in this location.

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/ certainty of our position as to what our response to your planning application will be. 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

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

Yours faithfully

Ms Laura Edwards

Planning Advisor

Direct email KSLPLANNING@environment-agency.gov.uk