

Gravesham Borough Council
Development Control
Civic Centre Windmill Street
Gravesend
Kent DA12 1AU

Our ref: KT/2022/129283/01-L01
Your ref: 20211582
Date: 24 February 2022

Dear Sir/Madam

Proposal: ERECTION OF A THREE STOREY BUILDING WITH ROOMS IN THE ROOF SPACE TO PROVIDE 14 X TWO BEDROOM SELF-CONTAINED FLATS, WITH ASSOCIATED ACCESS, CAR PARKING, CYCLE PARKING, REFUSE STORES AND AMENITY SPACE.

Location: BRT PROPERTIES KENT, TOP YARD, HARDYS CORNER, 2 VALE ROAD NORTHFLEET, DA11 8BZ

Thank you for your consultation. We **object** to this development, as the planning application does not demonstrate that the risks of pollution to controlled waters are acceptable, or can be appropriately managed. We therefore recommend that planning permission is refused.

Reason(s) : The previous use of the development site as landfill and transport yard 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 site is located:

- within source protection zone *1 and*
- upon a *principal aquifer*

As the planning application is not supported by an appropriate risk assessment, it does not meet the requirements set out in paragraphs 174 and 183 of the National Planning Policy Framework.

Overcoming our objection

The applicant should submit an appropriate risk assessment which includes a desk study, conceptual model and detailed risk assessment, including a piling risk assessment, drainage plan with no infiltration drainage and a Groundwater risk assessment.. This information must demonstrate to the local planning authority that the risk to controlled waters has been fully understood and can be addressed through appropriate measures.

Please note This application appears to be a duplicate of an existing permission, which has been granted permission, providing a suitable remediation strategy can make the site safe to develop that protects the local groundwater resources in a Source Protection Zone 1.

Our previous responses and concerns are outlined in our consultation for the application reference 20190727.

This application has only a desk study report submitted, which was originally submitted for the previous application.

The application requires all additional reports associated with the plot as with the original application because it indicates the site includes a landfill site and there is no risk assessment to show the site can be developed safely under these plans without impacting local abstractors of groundwater.

If the applicant does have access to the full set of reports previously submitted, it is recommended that they are submitted in support of this application and then a permission with similar conditions could potentially be agreed by ourselves, once it is clear a viable strategy to safeguard water resources is available.

If you require any further information, please do not hesitate to contact us.

Yours faithfully

pp Michelle Waterman-Gay

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Planning Advisor

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cc Offset Architects