

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

Our ref: KT/2023/130879/01-L01
Your ref: 20230745
Date: 11 August 2023

Dear Katherine

Application For Approval Of Conditions 3, 5(I & II) And 6 Attached To Planning Permission Reference Number 20221142 Relating To A Strategy To Deal With The Potential Risks Associated With Any Contamination Of The Site Details, Archaeological Field Evaluation Works, Any Safeguarding Measures To Ensure Preservation In Situ Of Important Archaeological Remains And The Materials To Be Used In The Construction Of The External Surfaces.

WER Packing Supplies, Unit J1, Lower Road, Northfleet, Gravesend, Kent, DA11 9BL

Thank you for consulting us on the above application. **We do not recommend the discharge of condition 3** for the reasons set out below. Conditions 5 (i & ii) and condition 6 are outside our remit.

Groundwater and Contaminated Land

Thank you for Geo Environmental Ground Investigation report ref:23/36590 dated May 2023. Given the intrusive investigation has identified elevated concentration of contaminants in shallow groundwaters and the depth and method of foundation design is yet to be finalised. We do not at this time recommend discharge of condition 3 and refer to condition 4.

Overcoming Our Objection

Please provide further information to address the points set out below.

Geo Environmental Ground Investigation report ref:23/36590 identifies elevated TPH concentrations in groundwater, however only refers to the risk to potable water supply pipe.

Section 5.5 states controlled waters have been identified as a potential receptor due to the designation of the underlying Alluvium and Taplow Gravel member as a Secondary Aquifer (undifferentiated).

However, we advise that the Secondary Aquifer is directly underlain by a Principal

Aquifer and the site lies within a Source Protection Zone 3. The evaluation of contaminant concentrations in the table in section 5.5 states the identified contaminants *are indicative of diesel fuels and lubricating oils. The site is used as a parking area for vehicles and some storage. Larger vehicles may have been parked/stored in the same area. However, similar contaminants were not identified in the ground and therefore they are considered to represent the condition of the groundwater in the area as a whole due to the surrounding land uses rather than originating from the site.*

We note that groundwater was encountered in all boreholes during the intrusive investigation, often at shallow depth. We acknowledge the condition of the groundwater in the area as a whole. However, the phase 2 conceptual model in Section 5.6 does not identify the risk to controlled waters from identified elevated contaminants to the underlying Principal Aquifer which may result from piling activities outlined in Section 6.

Section 6.4 correctly states that construction of a piled foundation is a specialist activity, and that the advice of a reputable contractor, familiar with the type of soil and groundwater conditions encountered at site should be sought prior to finalising the foundation design.

Further Information

Section 1.1 Outline and limitations states the supplementary ground investigation was carried out for the proposed development with information required for the design and construction of foundations and infrastructure. Information was also required in order to assess whether any remediation was required for the protection of the end user from the presence of the potential for contamination.

We advise that Condition 3 is applied 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.

Paragraph 174 e & f) are applicable to this proposed development and are provided below for ease of reference.

(e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

(f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Non statutory planning advice

If you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our cost recovery service. The cost is £100/hour plus VAT.

If you wish to request a meeting, or document review, please contact our team email address at KSLPlanning@environment-agency.gov.uk

Further information on our charged planning advice service is available at:
<https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions>

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

Yours sincerely

Ms Laura Edwards

Planning Advisor

Direct dial 02084749079

Direct email KSLPLANNING@environment-agency.gov.uk