

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

Our ref: KT/2022/130181/01-L01
Your ref: 20220989
Date: 15 November 2022

Extension Of Existing Coach Depot Building. Alteration To Location Of Coach Roller Shutter Access Doors

**Redwing Coaches, Unit 8 Industrial Estate, Norfolk Road, Gravesend, Kent
DA12 2PS**

Thank you for consulting us on the above application. **We object to the above application for the reasons set out below.**

Groundwater and Contaminated Land

We object to this proposal as it 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. Although the use proposed is an extended current use, it is important to understand the context and current practice of a potentially polluting site to ensure it does not pose further or additional risks to the environment.

Reason(s)

The previous use of the development site as presents a 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 upon a *principal aquifer/secondary aquifer A*.

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 a preliminary risk assessment which includes a desk study, conceptual model and initial 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.

Fisheries, Biodiversity and Geomorphology

The proposed extension seems to be adequately offset from the (Shorne and Higham Marshes) culvert that bisects the site. However, **please submit further information to confirm this to ensure that the extension and any associated ground works observe an adequate buffer zone of a minimum of 8 metres to the edge of the culvert.**

Please note that we have further comments to make should the above objections be overcome.

Advice to LPA If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2009.

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

Yours faithfully

Ms Laura Edwards

Planning Advisor

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