

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

Our ref: KT/2022/130198/01-L01
Your ref: 20221142
Date: 22 November 2022

Dear Planning Team

Erection Of Two Storey Side Extension To Existing Factory/Warehouse Unit With Mezzanine

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

Thank you for consulting us on the above application.

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.

Reason(s)

The previous use of the development site as a commercial/industrial site 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*.

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.

The initial appraisal should also detail how foundations and drainage can be managed to not involve any increased risks to the underlying strata.

Please note that the above comments only relate to Groundwater Protection. We have other comments to make in relation to issues within our remit, which will be provided once our above objection has been overcome.

If the applicant 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.

If they 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-and-marine-licence-advice-standard-terms-for-our-charges>

If you are minded to grant permission contrary to our advice, it will be necessary to re-consult us to ensure that groundwater protection, flood risk and any other environmental issues are appropriately addressed by planning conditions.

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

Yours faithfully

Ms Laura Edwards
Planning Advisor

Direct dial 02084749079

Direct email KSLPLANNING@environment-agency.gov.uk