



Gravesham Borough Council
Civic Centre
Windmill Street
Kent
DA12 1AU

Your ref
20250730

Our ref
DSA000046957

Date
4th September 2025

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Proposal: Installation of electricity infrastructure including a battery energy storage system, sub-station and ancillary electrical infrastructure.

Site: Land Adjacent to, Thames Way, Northfleet, Gravesend, Kent, DA11 8HL.

Thank you for your correspondence, please see our comments below regarding the above application.

Insufficient Information provided

Condition

Construction of the development shall not commence until details of the proposed means of foul/surface water drainage disposal have been submitted to and approved in writing by the Local Planning Authority in consultation with Southern Water.

Existing Southern Water, Waste Water Treatment Works (WWTW) located in proximity to the proposed development.

In determining the application, we ask that the Planning Authority take into account the provisions of Paragraphs 180, 182 and 183 of the National Planning Policy Framework (NPPF) regarding the proposed location of development in relation to existing uses that may be a source of pollution (in terms of odour). We apply a precautionary buffer zone for any development located within 500 metres of the boundary of a WWTW. The proposed development is located approximately 11 metres from the Northfleet Wastewater Treatment Works, and as such we have applied this requirement to our planning consultation response. Please contact Southern Water to discuss and agree the Scope of the odour assessment.



The outcome of the Odour Assessment should inform site layout, and any appropriate odour mitigation identified and agreed with Southern Water as necessary to avoid potential odour nuisance to future residents will also be funded by the developer.

Southern Water applies a target standard of 1.5 ouE/m³ as the 98th percentile of hourly averages contour to sensitive receptors in line with the NPPF recommendation for planning decisions to achieve a high standard of amenity for existing and future users.

Given that the 'agent of change' for planning applications is the developer, the service we provide to review third party assessments and/or accommodate a site survey etc. is chargeable. More information regarding our fees can be found on our website; Connection charging arrangements

(<https://urldefense.com/v3/https://www.southernwater.co.uk/building-and-developing/our-services/water-services/connecting-charging-arrangements/>;!!OepYZ6Q!McDStnpyufhWKxeAVhh4j7i4AFLrDI5PyB-MKD8p88lCIHKJJcfsjT994P1NsPbyZEpQ6TDvt87hRFNFFPkmUPKO-WOZ8oOOHJwsoWvSP0\$)

Condition

Until a suitable and robust assessment demonstrates otherwise, due to the potential odour nuisance from a Wastewater Treatment Works, no sensitive development should be located within 500m of the WwTW site boundary. An Odour Assessment will need to be carried out by a specialist consultant funded by the developer to a scope that will need to be agreed in advance with Southern Water.

Access to Wastewater Treatment Works (WWTW) to be maintained

Southern Water requires existing access arrangements to Waste Water Treatment Works to be maintained with regards to unhindered 24 hour / 7 days a week access. Southern Water operates a closed gate policy during maintenance works for Health and Safety reasons.

Existing Southern Water Assets – General within boundary but no tree, buildings, assets within standoff distance (approximate)

Please see the attached extract from Southern Water records showing the approximate position of our existing sewer and water main assets crossing/in the vicinity of the development site. The exact position of the public assets must be determined on site by the applicant in consultation with Southern Water before the layout of the proposed development is finalised. To get in contact to confirm the exact position of the asset please visit;

https://www.southernwater.co.uk/media/ph4fk3pe/ds-location-of-rising-mains_pb.pdf.

For information on required stand-off distances from public sewers please refer to:

<https://www.southernwater.co.uk/media/st5orjvm/stand-off-distances.pdf>.

Existing Rising Main stand-off distance

The 400 mm diameter rising main requires a minimum clearance of 3 metres on either side of the rising main to protect it from construction works and to allow for future access for maintenance. We would recommend using stand-off distances as per our water mains, please refer to:

<https://www.southernwater.co.uk/media/st5orjvm/stand-off-distances.pdf>

No development or tree planting should be carried out within 3 metres of the external edge of the public rising main without consent from Southern Water. All existing infrastructure should be protected during the course of construction works.

Condition

In order to protect public sewers, Southern Water requests that if consent is granted, the following condition is attached to the planning permission; The developer must agree with Southern Water, prior to commencement of the development, the measures to be undertaken to protect the public sewers.

Sewer/water main diversion not possible

From our initial assessment of the existing apparatus, it appears that there is limited opportunity to divert existing drainage/water apparatus. Southern Water therefore objects to the proposed development layout. If planning permission were to be granted, Southern Water (as the statutory undertaker) would request that the Council (as the Building Control Authority) refuse Building Regulations approval on the grounds that building over the public sewer/water main cannot be permitted. In order to progress the proposed development on the site, the layout should be amended to achieve the required stand-off distances

<https://www.southernwater.co.uk/media/st5orjvm/stand-off-distances.pdf>.

Southern Water requests that this application is not determined until such time as the applicant produces a suitable layout.

Condition

In order to protect drainage/water apparatus, Southern Water requests that if consent is granted, the following condition is attached to the planning permission; The developer must advise the local authority (in consultation with Southern Water) of the measures which will be undertaken to protect the public sewers/water supply mains, prior to the commencement of the development.

Sewer/water main diversion possible

The attached plan shows that the proposed development will lie over an existing public sewer/water main, which will not be acceptable to Southern Water. The exact position of the public apparatus must be determined on site by the applicant before the layout of the proposed development is finalised. It might be possible to divert the sewer/water main, so long as this would result in no unacceptable loss of hydraulic capacity, and the work was carried out at the developer's expense to the satisfaction of Southern Water under the relevant statutory provisions.

Condition

In order to protect drainage/water apparatus, Southern Water requests that if consent is granted, the following condition is attached to the planning permission; The developer must advise the local authority (in consultation with Southern Water) of the measures which will be undertaken to divert the public sewers/water mains, prior to the commencement of the development.

Tree planting

We have restrictions on the proposed tree planting adjacent to Southern Water sewers, rising mains or water mains. Reference should be made to Southern Water's publication "A Guide to



Tree Planting near water Mains and Sewers”

(https://www.southernwater.co.uk/media/pddob0vn/ds-tree-planting-guide-1_nwm.pdf) and the Sewerage Sector Guidance (<https://www.water.org.uk/sewerage-sector-guidance-approved-documents/>) with regards to any landscaping proposals and our restrictions and maintenance of tree planting adjacent to sewers, rising mains and water mains.

Condition

'In order to protect public apparatus, Southern Water requests that if consent is granted, the following pre commencement condition is attached to the planning permission; The developer must advise the local authority (in consultation with Southern Water) of the landscaping proposals in proximity of public apparatus in order to protect it in accordance with Southern Water's guidance, prior to the commencement of the development.

Possible Contamination on Redevelopment Site **(Brownfield sites - former petrol, gas, oil etc. contamination)**

The level of contamination on site should be investigated, as this may affect the materials used for the public water mains to service the development. Details of any contamination found on site should be declared to the statutory water undertaker, as part of a water connection application, as this will influence the materials used for construction of public water mains on the site.

Please visit [water-connection-technical-guidance_wca.pdf](#) for more information.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119)

Website: [southernwater.co.uk](https://www.southernwater.co.uk) or by email at: SouthernWaterPlanning@southernwater.co.uk

Yours faithfully,

Future Growth Planning Team

[southernwater.co.uk/developing-building/planning-your-development](https://www.southernwater.co.uk/developing-building/planning-your-development)