

Alison Webster
Gravesham Borough Council

Our ref: PA-0000543/01
Your ref: 20260294

Sent by email

24 March 2026

Dear Alison,

Change of use of part of existing industrial site (B2) to Hand Car Wash Facility (Sui Generis).

HARDYS CORNER 2 VALE ROAD GRAVESEND GRAVESHAM BOROUGH DA11 8BZ

Thank you for consulting us on the above application which we received on 20 March 2026.

As part of this consultation, we have reviewed the available documents via the planning portal and specifically the following documents:

- Drainage Plan (DS213 - PDP – 01, March 2026, Design Solutions Architecture and Planning)

Environment Agency position

We **object** to this application, as its planning application does not demonstrate that the risks of pollution from land contamination to controlled waters are acceptable, or can be appropriately managed with a viable and practicable remediation strategy. We therefore recommend that planning permission is refused.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome, our objection
- Section 2: Advice to the Applicant/Local Planning Authority

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

Should you have any queries regarding this response, please contact me.

creating a better place
for people and wildlife



Yours sincerely,

Gabrielle Delorme
Sustainable Places Planning Specialist
Email kslplanning@environment-agency.gov.uk

Section 1: Reasons for, and how to overcome, our objection

Potential for contamination and possible risk to controlled waters but no preliminary risk assessment is submitted

- The proposed development site is contaminated land which has been designated as a special site. [and/or]
- The previous use of the development site as an existing industrial site including petrol filling station (B2) presents a high risk of contamination that may mobilise during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the site is located:
 - within source protection zone 1
 - upon a principal aquifer
- The risk is considered unacceptable because there is no evidence to indicate otherwise.

As the planning application is not supported by an appropriate risk assessment, it does not meet the requirements set out in paragraphs 187 and 196 of the NPPF.

The applicant should submit a preliminary risk assessment which includes but is not limited to a desk study, site walkover, conceptual model, initial risk evaluation, details of any uncertainties, data gaps and limitations, conclusions and justification for the next steps in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) guidance.

This information must demonstrate to the LPA that the risks to controlled waters have been fully understood and can be addressed through appropriate measures

This is supported by our [Groundwater Protection Position Statements](#):

- A2 – Precautionary principle
- A4 – Responsibility for assessments
- A5 – Supply of adequate information
- J3 – Take responsibility and adopt good practice
- J7 – Promote appropriate sustainable remediation

Section 2: Advice to the Applicant/Local Planning Authority
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Should you wish us to review any technical documents or want further advice to address the environmental issues raised, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application. It should also result in a better quality and more environmentally sensitive development.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £115 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The standard terms of our charged for service are available [here](#).

If you would like more information on our planning advice service, including a cost estimate, please contact us at kslplanning@environment-agency.gov.uk