

FAO: Alison Webster
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Date: 24 November 2025
Our ref: 65610/02/NG/NWh/40393097v1

Dear Ms Webster

Cascades Leisure Centre, Thong Lane, Gravesend, DA12 4LG

Application to discharge Condition 5 of planning permission ref. 20221293

On behalf of our client, Gravesham Borough Council ('GBC'), please find enclosed an application seeking to discharge Condition 5 of planning permission reference number 20221293 ('the planning permission').

Alongside this covering letter, the application submission comprises:

- 1 Completed application form; and
- 2 Phase 1 Desk Study and Phase 2 Site Investigation Report, prepared by Albury S.I. Ltd.

The relevant fee of £298.00 plus the £85.00 service charge has been paid via the Planning Portal.

Background

Full planning permission was granted on 3 March 2023 for:

"Demolition of the existing Cascades Leisure Centre and public house and redevelopment of the site to provide a new leisure centre with community pool, leisure water, cafe, soft play, 'clip n climb' facility, a six court sports hall, fitness suite, spin studio, 2 no. fitness studios, 2 no. squash courts, a new tennis/netball court, improvements to the existing play area, landscaping across the site and associated car parking."

GBC are seeking to discharge the relevant pre-commencement conditions and are proposing to implement the permission, through the demolition of Regan's Bar which is sited where the new Leisure Centre would be located.

Condition 5

Condition 5 of the planning permission is a pre-commencement condition requiring the submission of a contamination risk assessment and strategy for the site which details any potential risks of contamination. It states:

“No development approved by this planning permission shall commence until a strategy to deal with the potential risks associated with any contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

- a A preliminary risk assessment which has identified:
 - i all previous uses;*
 - ii potential contaminants associated with those uses;*
 - iii a conceptual model of the site indicating sources, pathways and receptors; and o potentially unacceptable risks arising from contamination at the site.**
- b A site investigation scheme, based on (a) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.*
- c The results of the site investigation and the detailed risk assessment referred to in (b) and based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.*
- d A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (c) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.*

The scheme shall be implemented as approved.”

The enclosed report, prepared by Albury S.I. Ltd comprises a preliminary desk-based review of the site which provides an overview of the geographical, historical and environmental sources for information about the site. The desk-based study is supported by a walkover survey of the site. The findings are presented with an outline Conceptual Site Model and preliminary risk assessment, based upon identified potential sources of contamination.

Remedial measures are set out in the later sections of the report. It is also advised that the site manager maintains a discovery strategy during the lifting of hardstanding from the site. Should any potential sources of contamination be identified following the enabling works, they should be fully investigated by a competent person to ensure the correct remedial measures are employed if considered necessary.

On this basis, it is considered that the enclosed report suitably address the condition requirements and is sufficient to progress discharge.

Conclusion

We trust the submission documents provide you with sufficient information to enable the discharge of the above condition. Please do not hesitate to contact myself or my colleague Kelly Phillips should you need any further information.

Yours sincerely

A handwritten signature in green ink that reads "Nwheatley". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Nuala Wheatley
Associate Director
BSc (Hons) MSc MRTPI