

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

Our ref: KT/2022/130198/02-L01
Your ref: 20221142
Date: 14 February 2023

Dear Katherine

**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 do not have any objections subject to the following planning conditions and informative being applied to any planning permission granted.

Groundwater and Contaminated Land

Thank you for Land Quality Desk Study ref: P22526_RI dated Jan 2023.
The Environment Agency agree with Section 4.2 Recommendations that a suitable site investigation be undertaken.

The previous use of the proposed development site for industrial use presents a medium risk of residual contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are sensitive in this location because the proposed development site is located upon Principal aquifer overlain by a Secondary aquifer and within a Source Protection Zone 2.

The reports submitted in support of this planning application provides us with confidence that it will be possible to suitably manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. It is our opinion that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the Local Planning Authority.

In light of the above, the proposed development will be acceptable if planning conditions are included. Without these conditions we would object to the proposal in line with paragraph 174 of the National Planning Policy Framework because it cannot be guaranteed that the development will cause or be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition 1

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:

1. A preliminary risk assessment which has identified:
 - all previous uses;
 - potential contaminants associated with those uses;
 - a conceptual model of the site indicating sources, pathways and receptors; and
 - potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) 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.
4. 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 (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

The applicant is advised that this condition is sequential and may be discharged at any stage.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 174 of the National Planning Policy Framework.

Condition 2

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with paragraph 174 of the National Planning Policy Framework.

Flood Risk

We do not object to the proposal but would like to pass on the following information and recommendations.

Reason

The application site lies within Flood Zone 3 which is defined as having a 'high probability' of river and sea flooding by the national [Planning Practice Guidance](#) (PPG) ([Table 1: flood zones](#)). The site is within an Area Benefitting from Defences (ABD) due to the presence of the Tidal Thames flood defences.

It is a requirement for such development to produce a site specific Flood Risk Assessment (FRA). Considering the residual nature of fluvial and tidal flood risk at this site, we are not objecting to the proposal.

Informative

We recommend that the occupants sign up to the Environment Agency's Floodline Service. This can be done by calling 0345 988 1188.

We recommend that the applicant incorporates flood resistant and resilience measures into the scheme. Information on flood resilience can be found on the following link http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf.

Yours sincerely

Ms Laura Edwards

Planning Advisor

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Environment Agency

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