

Katherine Parkin
Gravesham Borough Council

Our ref: KT/2025/132730/02-L01
Your ref: 20250596

Sent by email

Date: 24 November 2025

Dear Katherine

Use of the land for open storage of construction related equipment and operations related to Dalefield Way Industrial Park (B8 use) with associated installation of hardstanding/surface treatment.

Land at Dalefield Way (West), Gravesend, Kent DA12 2FL

Thank you for consulting us on the above application which we received on 3 November 2025. As part of this consultation, we have reviewed the following documents:

- Application form, ref. PP-14096043, dated 13 June 2025
- Site location plan, ref. 25008-00-0-00, undated, by Darling Associates Architects
- Proposed site layout, ref. 25008- 0-3-00, undated, by Darling Associates Architects
- Preliminary Ecological Appraisal, ref. 1419, dated 20 May 2025, by ECO Assistance Ecologists
- Biodiversity Assessment, dated 2 July 2025, by ACJ Ecology
- Phase 1 Geo-Environmental Desktop Study, ref. 24054 rev 00, dated May 2025, by Manhire Associates
- Flood Risk Assessment Note and Preliminary Drainage Strategy, ref. 24054_WP01 rev02, dated October 2025, by Manhire Associates

Environment Agency position

We have **no objection** to the proposed development **subject to the following planning conditions** being included in any permission granted.

Please refer to the following sections for our full response:

- Section 1: Technical comments
- Section 2: Conditions and informatives
- Section 3: 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.

Decision notice

In accordance with the planning practice guidance ([determining a planning application, paragraph 019](#)), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

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

Yours sincerely,

Gabrielle Delorme

Sustainable Places Planning Specialist

E-mail kslplanning@environment-agency.gov.uk

Section 1: Technical comments

Flood risk

We have no objection to the installation of hard standing / surface treatment at the site with regards to flood risk. The tidal flood risk affecting the site is very low and the construction will take place more than 8 metres away from the main river.

Other sources of flooding to the site such as surface water have been considered within the submitted Flood Risk Assessment. We recommend that the applicant refers to the Strategic Flood Risk Assessment (SFRA) for the borough and seeks advice from the Lead Local Flood Authority (LLFA) and emergency planning teams, where appropriate.

Groundwater and contaminated land

The latest updated drainage document and drawings do cause some confusion as there appears to be typographical errors where diagrams should be saying 'impermeable' but instead say 'permeable'. Nevertheless, it appears the amended details result in a reduction in the permeable area overall. We are satisfied that our previous response and requested conditions suitably cover the issues in question and have no objections.

We consider that planning permission could be granted to the proposed development as submitted if planning conditions are included, as set out in Section 2 of this letter, to secure a remediation strategy in case of unsuspected contamination at the site and further details for any systems of infiltration of surface water to the ground. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application in line with paragraph 187 of the National Planning Policy Framework (NPPF).

Biodiversity and geomorphology

Development that encroaches on watercourses/ponds/wetlands can have a potentially severe impact on their ecological value. It is important to ensure (especially where hardstanding and polluted runoff is concerned) that an integrated buffer with sustainable urban drainage (SuDS) scheme is proposed. SuDS schemes will help attenuate and filter runoff before it enters the water course.

Networks of undeveloped buffer zones might also help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the river basin management plan.

More information is needed to establish buffer zones to the watercourse/ditch network. A minimum of 8m from top of bank should be observed.

The proposed development will therefore be acceptable if a planning condition is

included requiring a scheme to be agreed to protect an 8-metre-wide buffer zone around the watercourse.

Biodiversity net gain is a requirement from the Local Authority and will also need to be addressed, either on site or off site, in order that the application is successful.

Section 2: Conditions and informatives

Note to the LPA: Condition wording

If you wish to amend the wording of our requested conditions or if you wish to merge them with other Local Planning Authority/statutory consultees' conditions, please contact us to discuss the revised wording.

Condition 1 (Unsuspected contamination)

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 LPA) shall be carried out until further investigation and a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the LPA. The remediation strategy shall be implemented as approved.

Reason: To ensure that the development does not contribute to, and 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. This is in line with paragraph 187 of the NPPF.

Condition 2 (Infiltration of surface water into ground)

No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the LPA. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 187 of the NPPF.

Condition 3 (Undeveloped buffer zone)

No development shall take place until a scheme for the provision and management of an 8-metre-wide buffer zone alongside the watercourse/pond/wetland has been submitted to, and approved in writing by, the local planning authority. Thereafter, the development shall be carried out in accordance with the approved scheme. Any subsequent variations shall be agreed in writing by the local planning authority, in which case the development shall be carried out in accordance with the amended scheme. The buffer zone scheme shall be free from built development including lighting, domestic gardens and formal landscaping. The scheme shall include:

- plans showing the extent and layout of the buffer zone
- details of any proposed planting scheme (for example, native species)

- details demonstrating how the buffer zone will be protected during development and managed over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan
- details of any proposed footpaths, fencing, lighting, etc

Reason: Land alongside watercourses is particularly valuable for wildlife and it is essential this is protected. This approach is supported by paragraphs 180 and 186 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. This condition is also supported by legislation set out in the Natural Environment and Rural Communities Act 2006 and Article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity.

In addition the site is located near a SSSI and the applicant will need to liaise with Natural England to gain an assent for the works. The Assent will determine whether the proposal is ecologically acceptable to the features within the designation.

Informative 1 (Surface water drainage)

Only clean uncontaminated water should drain to the surface water system. Roof drainage shall drain directly to the surface water system (entering after the pollution prevention measures). Appropriate pollution control methods (such as trapped gullies and interceptors) should be used for drainage from access roads and car parking areas to prevent hydrocarbons from entering the surface water system. There should be no discharge into land impacted by contamination or land previously identified as being contaminated. There should be no discharge to made ground. There must be no direct discharge to groundwater, a controlled water.

Informative 2 (Waste on-site)

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the environmental permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. We recommend that developers should refer to the [waste management](#) page on GOV.UK.

We will consider any queries in relation to the use of Definition of Waste: Development Industry Code of Practice (DoWCoP) (which is to be updated) through our environmental permitting enhanced pre-application advice service, considering site conditions, the materials that are proposed to be used, and the potential for harm to the environment and to human health. We can also provide advice as to whether an environmental permit is required.

Informative 3 (Waste to be taken off-site)

Contaminated soil that is (or must be) disposed of, is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with [British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan'](#) and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off site is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to the [hazardous waste](#) pages on GOV.UK for more information.

Section 3: Advice to the Applicant / Local Planning Authority

Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction

<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

CIRIA Code of Practice for property flood resilience

https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience.aspx

British Standard 85500 – Flood resistant and resilient construction

<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

Flood risk issues not within our direct remit

The following issues are not within our direct remit or expertise, but nevertheless may be important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

Biodiversity net gain (rivers metric)

The Environment Act 2021 introduced a requirement for mandatory Biodiversity Net Gain (BNG) on most types of Town and Country Planning Act (TCPA) development. Biodiversity net gain offers an opportunity to promote and achieve our desired

environmental outcomes – nature recovery, natural flood management, nature-based solutions and green and blue infrastructure.

Please note, for this application we have not reviewed any submitted BNG information in detail and our position on this application does not mean the biodiversity gain objective has been met. In line with the “[Biodiversity Net Gain](#)” section of the Planning Practice Guidance, it is the role of the Local Planning Authority role to decide if the BNG requirement for development in scope has been met.

Applications subject to statutory BNG require completion of the Watercourse Unit Module by a competent person if:

- a watercourse is onsite,
- the watercourse bank top is within 10m of the redline boundary (i.e. the red line boundary intersects the riparian zone).
- For ditches, the Watercourse Unit Module is applied where the bank top is located within 5m of the red line boundary.
- a culvert lies within the red line boundary.

We recommend that you refer to the following to assist your assessment of the watercourse metric:

[Watercourse Metric \(within the Biodiversity Metric\) - checklist to aid the reviewer.pdf \(local.gov.uk\)](#)

Further information, data and advice on our rivers and catchments can be found using the [England | Catchment Data Explorer](#) and [River Basin Management Plans](#).

Note to the Applicant

Planning advice service

Should you wish us to review any technical documents or want further advice to meet the requirements of the conditions recommended, we may do this as part of our charged for planning advice service.

Further engagement will provide you with certainty of our position as to what our response to your planning application will be. 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

creating a better place
for people and wildlife



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