

Richard Hart
Gravesham Borough Council

Our ref: KT/2025/132906/01-L01
Your ref: 20250902

Sent by email

Date: 30 September 2025

Dear Richard

Application for the approval of condition 22 (Piling/Penetrative Ground Improvement Methods) attached to planning reference number 20231313.

Eastcourt Marshes Electricity Distribution Site, Mark Lane, Gravesend, Kent DA12 2HN

Thank you for consulting us on the above application which we received on 10 September 2025. As part of this consultation, we have reviewed the following documents:

- Gravesend Shaft Piling Risk Assessment, ref. 100116608/PRA/002/v02, dated 20 August 2025, by Atkins Réalis UK
- Gravesend Shaft Groundwater Risk Assessment, ref. 100116608/GWRA/002/v02, dated 20 August 2025, by Atkins Réalis UK

Environment Agency position

We **object** to the discharge of condition 22 as currently submitted.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome our objection(s)
- Section 2: Advice to the Applicant

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.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

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: Reasons for, and how to overcome, our objection(s)

Overall, the submitted Assessments and their recommendations are considered suitable for the proposed works.

We have two specific points to make that are not covered satisfactorily within the Piling Risk Assessment. These are presented here in the interests of completeness, but please note that we have already raised these points directly with the contractors in a pre-application meeting and have received positive commitments from those parties to address our points.

Reasons

1. The submitted Piling Risk Assessment makes no firm recommendation nor commitment to carrying out groundwater monitoring during works. This is only recorded in scenario PS3 as a mitigation to be “considered”. We note from discussions direct with the contractors that in fact the project works will be carrying out comprehensive groundwater monitoring before, during and after all relevant construction works (not just during piling). Therefore, this shortcoming in the report has been superseded by the wider project commitments. An accompanying note or revision to the Piling Risk Assessment itself should be considered to reflect this for the planning approval submission.
2. Lack of information on the potential for use of resins, polymers or other ‘contingency’ additives to the expected grout and cement mixes used in construction. There is suitable groundwater risk assessment on the cement and bentonite grouts themselves but not included the possible (perhaps ‘unplanned’) use of additional polymers, resins or the like. Though this does not affect our acceptance in principle, we have agreed with the contractor that they will need to provide further information to confirm what, if any, additional contingency fluids/additives may be required, and provide any relevant information (including MSDS, but possibly more) for our further review. Again, submission of a covering note should be considered if required to be included in this submission.

Overcoming our objection

The applicant should make good on the necessary mitigations to address points 1 and 2 set out above before we can recommend the discharge of condition 22.

Section 2: Advice to the Applicant

Planning advice service

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