

Alison Webster
Gravesham Borough Council

Our ref: PA-0000543/02
Your ref: 20260294

Sent by email

Date: 28 April 2026

Dear Alison,

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

BRT Properties Ltd, Hardys Corner, 2 Vale Road, Northfleet, Gravesend, Kent DA11 8BZ

Thank you for consulting us on the above application which we received on 7 April 2026. As part of this consultation, we have reviewed the following documents:

- Application form (ref. PP-14778537)
- Drainage Plan (ref. DS213-PDP-01, dated March 2026, by Design Solutions Architecture and Planning)
- Geo-Environmental Assessment Report (ref. PD/C3476/8382 Rev A, dated 14 June 2019, by Brownfield Solutions)
- Supplementary Phase 2 Site Investigation (ref. 3869-210913-ML, dated November 2021, by Lustre Consulting)

Environment Agency position

We **object** to this proposed development because the information submitted with the application does not demonstrate that the risk of pollution from land contamination to controlled waters is acceptable. We therefore recommend that planning permission is refused in line with paragraphs 187 and 196 of the National Planning Policy Framework (NPPF).

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome, our objection(s)
- Section 2: Note 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
Email kslplanning@environment-agency.gov.uk

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

Objection: Potential for contamination and risks to controlled waters but insufficient/unsatisfactory information submitted

We object to the proposed development, as submitted, because the information submitted with the application does not demonstrate that the risk of pollution from land contamination to controlled waters is acceptable. We therefore recommend that planning permission is refused.

Reason(s)

The previous use of the proposed development site as a chalk pit and a petrol filling station which included underground storage tanks presents an unacceptable risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the development site is:

- within source protection zone 1
- located upon a principal aquifer

The documents provided within the application do not demonstrate that the risks of pollution have been understood or provide adequate mitigation for the risks presented by the proposed new land use.

The Phase 1 & 2 assessment documents were created for a full redevelopment for residential use. The associated risk assessments have not been designed to reflect the new proposed land use change.

Whilst informative, the drainage plan/proposals require some clarity.

In particular:

- The documents provided relate to the previous proposed development and do not detail risks to controlled waters by the now proposed car washing facility
- The Phase 1 & 2 reports are out of date, it is not clear if the current land use/conditions are the same as were reported within the original reports
- The Phase 1 & 2 reports provided detail on risks to controlled waters from intrusive works. It is not clear if any intrusive works are intended for the proposed car washing facility.
- Details on the proposed drainage strategy are conflicting. The application form states that there will be no drainage to the foul sewer however, the drainage plan/drawing indicates surface water will be disposed of via the existing foul sewer.
- The applicant's drainage plan/drawing references an area of permeable surface. We require clarification on this. Due to the high sensitivity of the site and the past land use and remaining underground infrastructure there should be no discharge to ground on site. It is not clear where the car washing run off will be discharged to.

This planning application has therefore failed to meet the requirements of paragraphs 187 and 196 of the NPPF.

Overcoming our objection

The applicant should provide information to demonstrate that the risk to controlled waters has been fully understood and can be addressed through appropriate measures. This should include:

- An addendum to provide updated context of this proposed change of use. It is assumed the intellectual property rights to the Phase 1 & 2 reports have been agreed for use with this application.
- Confirmation on drainage design and what will happen to any car washing run off/trade effluent on site.
- Clarification provided on if the washing area is intended to be on permeable ground.
- Clarification on any intended intrusive works for the development.

Any additional detail should be provided in accordance with the Environment Agency's [Land Contamination Risk Management \(LCRM\)](#) guidance.

The applicant should also refer to [Groundwater protection position statements - GOV.UK](#) especially when considering the drainage strategy.

Section 2: Note 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 £119.37 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