

Environmental Protection COMMENTS

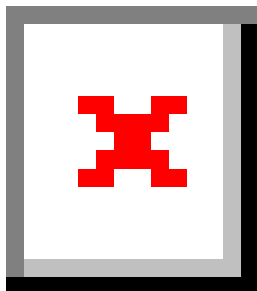
Case Number	20250300
Case Officer	Mrs Alison Webster
Address	BRT Properties Kent, Top Yard, Hardys Corner, 2 Vale Road, Northfleet, Gravesend, Kent,

Proposal	Application for the approval of conditions 3 (Code of Construction Practice), 4 (Telecommunications and Fibre network route), 6 (Land Contamination), 10 (External Facing Materials) and 11 (Noise mitigation) attached to planning reference number 20240998.
Consultation Expiry Date	21 April 2025
Date of Response	8 May 2025 (JO)

Apologies for the delay in replying to this consultation which is due to workload. The following comments are made with regards to the conditions relevant to Environmental Protection:

Condition 3 (Code of Construction Practice)

There is no objection to the condition being discharged.



Condition 6 (Land Contamination)

The reports condition requires the following and comments have been made in bold beside each section:

- i) 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 of the site. **Looking at previous applications, a report relating to this has already been submitted and approved.**
- ii) A site investigation scheme, based on (i) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site. **The 'Supplementary Phase 2 Investigation' by Lustre has been reviewed. The methodology and findings of this are accepted. Made ground on the site (with elevated levels of lead, PAHs, TPHs and asbestos) places the site at Moderate to Low risk therefore remediation works are required. This is agreed with and again, looking at past applications, this report has been submitted previously and approved.**
- iii) The results of the site investigation and the detailed risk assessment referred to in (ii) 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. **A Remediation Strategy also by Lustre has been submitted (Again submitted and approved previously).**
- iv) 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 (iii) are complete and identify any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. The scheme shall be implemented as approved. **The document entitled 'Vale Road Verification Plan' provides an outline of verification documents and actions to be taken. Although this is an unusual way of submitted a verification plan, it does comply with the requirements of this part of the condition. However, in order to fully discharge this section of the condition, satisfactory confirmation that the remediation measures have been carried out in accordance with the recommendations of the remediation strategy and provision of the verification data, information etc as given in the Verification Plan must be submitted for approval.**

To summarise, parts i), ii) and iii) can be fully discharged but part iv) can't be discharged until the work has been completed and relevant documentation submitted for approval.

Condition 11 (Noise mitigation)

The submitted details relating to the air handling/ventilation systems of the flats is comprehensive and the proposed systems and layouts are acceptable. The ventilation checklist has also been appropriately completed. (It's noted that the Air Quality Checklist has been used the reason for the condition is to mitigate against noise rather than air quality which is not an issue in this location). The above addresses the first part of the condition, which can be discharged.

However, the remainder of the condition relating to the commissioning reports and Local Authority inspection can't be discharged until these are submitted/undertaken.