

Folkestone Hythe District Council
Development Control
Civic Centre Castle Hill Avenue
Folkestone
Kent
CT20 2QY

Our ref: KT/2019/125542/01-L01
Your ref: Y19/0249/FH
Date: 26 April 2019

Dear Sir/Madam

Erection of a side and rear extension to existing sales building, provision of additional car parking and the decommissioning and removal of existing car wash

Shell Romney Marsh Service Station, Brenzett Roundabout, Romney Marsh, Kent TN29 9TZ

Thank you for consulting us on the above. We apologise for not providing a comment with regards to groundwater quality sooner. We **OBJECT** to this proposal for the reasons set out below.

Reasons:

The applicant has not supplied adequate information to demonstrate that the risks posed to groundwater can be satisfactorily managed.

The site is located upon tidal flat superficial deposits and are underlain by the Hastings Beds, both of which are classified as a Secondary A aquifer. Additionally, groundwater levels are anticipated to be extremely shallow in this location (less than 1m).

We have reviewed the documentation submitted as part of this application and have the following comments to make:

- We note on the application form that surface water is intended to be discharged to mains and soakaway. Due to the shallow groundwater table and the potential contaminative nature of the site we would object to the use of soakaways at this location as we have no information about the existence or extent of contamination (if present) at the site.
- According to the proposed site layout (12038443 PSL 19), the existing petrol interceptor is currently located under the east of the sales building, however the exact location is unknown. These structures must be accessible for routine maintenance and inspection as per our agreed management strategy for Shell sites. We would require further information/ an update on the interceptor and whether there are any records of it having been replaced.
- It is understood that the sales unit is to be extended, with some infrastructure due to be replaced. These works, due to ground breaking have the potential to cause an unacceptable risk to controlled waters. However, we note that a PRA has not been submitted as part of this application as per our agreement with Shell.

Based on the above, we therefore **OBJECT** to the planning application, as submitted, because the risks to groundwater are unacceptable.

Overcoming our objection

We recommend that planning permission should be refused on this basis in line with paragraph 170 of the National Planning Policy Framework until a Preliminary Risk Assessment is submitted and the requested additional information is provided.

If the Council is minded to granted permission against our advice we would ask them to contact us for further discussion.

Yours faithfully

Ms Jennifer Wilson
Planning Specialist

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