

creating a better place for
people and wildlife



Amanda Cue
Gravesham Borough Council
Sent via email

Our ref: KT/2024/132159/01-L01
Your ref: 20240600

Date: 11 December 2024

Dear Amanda Cue

Change of use of the land for the stationing of 2 static homes, 2 touring caravans and shared day room for gypsy / traveller occupation. Associated hard and soft landscaping.

Land South Of Pear Tree Lane, Pear Tree Lane, Shorne, Gravesend, Kent

Thank you for consulting us on the above application on 26 November 2024.

Environment Agency Position

We **object** to the proposed development as submitted because it involves the use of a non-mains foul drainage system but no assessment of the risks of pollution to groundwater has been provided by the applicant.

Reasons

The application form indicates that foul drainage is to be discharged to a non-mains drainage system. In these circumstances the planning practice guidance (PPG) (ref ID 34-020-20140306), supported by paragraph 180 of the National Planning Policy Framework (NPPF) advises that applications for developments relying on anything other than connection to a public sewage treatment plant should be supported by sufficient information to understand the potential implications for the water environment. In this instance no such information has been submitted.

The application does not, therefore, provide a sufficient basis for an assessment to be made of the risks of pollution to groundwater arising from the proposed development.

In particular, the submitted application fails to address the following in order to demonstrate that the proposed foul drainage system will be designed and sited such that

(a) it is not prejudicial to the health of any person

(b) it will not contaminate any watercourse, underground water or water supply

(c) there is adequate means of access for emptying work and future maintenance, including future replacement of any drainage field

(d) has failed to show that disposal of foul effluent to ground from the proposed package treatment plant would be effective at this location.

Overcoming our objection

The applicant should provide information to overcome our objection. This information should satisfactorily demonstrate to the local planning authority that the risk to controlled waters has been fully understood and can be addressed through appropriate measures. This information should include:

- A foul drainage assessment justifying why connection to a public sewer isn't possible/practical.
- A foul drainage assessment that demonstrates that the disposal of foul effluent to ground would be effective at this location.

Note to Local Planning Authority

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.

Please do not hesitate to contact us should you require any further information.

Yours faithfully

Ms Laura Edwards

Planning Advisor

Direct email KSLPLANNING@environment-agency.gov.uk