

Gary Edwards
Gravesham Borough Council

Our ref: KT/2025/132671/01-L01
Your ref: 20250558

Sent by email

Date: 02 July 2025

Dear Gary

Installation of 7 no. glamping pods/retreats and 4 no. barrel saunas with cold plunge for overnight guest use, external decking areas, permeable footpaths and vehicular track, parking and turning area, secure cycle storage and recycling/refuse storage, 2 no. private package treatment plants, landscaping and associated works.

East Court Farm, Church Lane, Gravesend, Kent

Thank you for consulting us on the above application which we received on 1 July 2025. As part of this consultation, we have reviewed the following documents:

- Application form, ref. PP-14052980, dated 03 June 2025
- Location Plan, ref. 230812-02-01, dated 14 April 2025, by Glampitect
- Proposed Layout Plan, ref. 230812-02-02, dated 14 April 2025, by Glampitect
- Proposed Drainage Plan, ref. ref. 230812-02-04, dated 14 April 2025, by Glampitect

Environment Agency position

We have **no objection** to the proposed development as we have assessed it as low risk.

Although we do not have any specific comments, please refer to the following sections for our standard advice:

- Section 1: Standard advice – Groundwater & Contaminated Land
- Section 2: Standard advice – Flood Risk

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.

Decision notice

In accordance with the planning practice guidance ([determining a planning application, paragraph 019](#)), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

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: Standard advice – Groundwater & Contaminated Land

Controlled waters are particularly sensitive in this location because the development site is located upon a principal aquifer.

The Environment Agency's Approach to Groundwater Protection

We recommend the applicant/enquirer refers to our groundwater position statements in '[The Environment Agency's approach to groundwater protection](#)', available from gov.uk. This publication sets out our position for a wide range of activities and developments, including:

- Waste management
- Discharge of liquid effluents
- Land contamination
- Ground source heat pumps
- Cemetery developments
- Drainage

Land contamination: risk management and good practice

We recommend that developers should:

- Follow the risk management framework provided in [Land Contamination: Risk Management](#), when dealing with land affected by contamination
- Refer to our [Guiding principles for land contamination](#) for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health
- Consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed
- Refer to the [contaminated land](#) pages on gov.uk for more information

Drainage and infiltration

Only clean uncontaminated water should drain to the surface water system. Roof drainage shall drain directly to the surface water system (entering after the pollution prevention measures). Appropriate pollution control methods (such as trapped gullies and interceptors) should be used for drainage from access roads and car parking areas to prevent hydrocarbons from entering the surface water system. There should be no discharge into land impacted by contamination or land previously identified as being contaminated. There should be no discharge to made ground. There must be no direct discharge to groundwater, a controlled water.

Discharge of treated sewage effluent

If a non-mains drainage solution is proposed, the following form should be completed: <https://www.gov.uk/government/publications/foul-drainage-assessment-form-fda1>

The discharge of domestic sewage associated with this development may be subject to General Binding Rules (GBRs) under the Environmental Permitting (England &

Wales) Regulations 2016, which provide a statutory baseline of good practice. More information can be found online at <https://www.gov.uk/permits-you-need-for-septic-tanks/permits> or by contacting us on 03708 506506. If the proposal cannot meet the GBRs, then a permit will likely be required.

Please note that the granting of planning permission does not guarantee the granting of an Environmental Permit. Upon receipt of a correctly filled in application form we will carry out an assessment. It can take up to 4 months before we are in a position to decide whether to grant a permit or not.

Domestic effluent discharged from a treatment plant/septic tank at 2 cubic metres or less to ground or 5 cubic metres or less to surface water in any 24-hour period must comply with General Binding Rules provided that no public foul sewer is available to serve the development and that the site is not within an inner Groundwater Source Protection Zone.

A soakaway used to serve a non-mains drainage system must be sited no less than 10 metres from the nearest watercourse, not less than 10 metres from any other foul soakaway and not less than 50 metres from the nearest potable water supply.

Where the proposed development involves the connection of foul drainage to an existing non-mains drainage system, the applicant should ensure that it is in a good state of repair, regularly de-sludged and of sufficient capacity to deal with any potential increase in flow and loading which may occur as a result of the development.

Where the existing non-mains drainage system is covered by a permit to discharge then an application to vary the permit will need to be made to reflect the increase in volume being discharged. It can take up to 13 weeks before we decide whether to vary a permit.

Further advice is available at: [Septic tanks and treatment plants: permits and general binding rules.](#)

Section 2: Standard advice – Flood Risk

The site's red line boundary encroaches within Flood Zones 2 & 3. However, we note that all construction work is proposed within Flood Zone 1. We therefore recommend that standing advice is followed.

Development must be safe and should not increase the risk of flooding

We recommend that the requirements of the [National Planning Policy Framework](#) and [National Planning Policy Guidance](#) (NPPG) are followed. If the proposed development is located within Flood Zone 2 and its vulnerability and flood zone are considered acceptable under the NPPG then a site-specific Flood Risk Assessment (FRA) is required to support any subsequent planning application. This is required by Paragraph 163 of the National Planning Policy Framework (NPPF).

Local Authorities should be satisfied that the FRA appropriately considers:

Finished floor levels

Local Authorities should be satisfied that, for any new developments within Flood Zone 2, finished floor levels are set no lower than 300 millimetres above the modelled 1 in 100 chance in any year including an allowance for climate change flood level, to protect people and property from flooding. Where this cannot be achieved owing to other planning constraints, floor levels must be set as high as possible (for extensions to existing buildings, no lower than the existing floor levels) and that flood resistance or resilience measures are considered, where appropriate, up to the design flood level.

Information on preparing property for flooding can be found within the following documents:

[Improving the flood performance of new buildings: flood resilient construction;](#)
[Prepare your property for flooding](#)

Increase in built footprint

We recommend that built footprint within the 1 in 100 chance in any year flood extent including an allowance for climate change is not increased. Local Authorities should be satisfied that the development is compliant with their Strategic Flood Risk Assessment (SFRA).

Appropriate mitigation or compensation needs to be incorporated to ensure flood flows are not impeded and, where appropriate, suitable compensatory flood storage needs to be provided. Please note that the use of voids, stilts or undercroft parking as mitigation for a loss in floodplain storage should be avoided, as they may become blocked over time by debris or domestic effects. We generally recommend against these methods as a means of compensation.

Safe access

The Local Authority's emergency planning team should be consulted to ensure they are satisfied that appropriate safe access and egress routes are achievable.

Flood Risk Standing Advice

We have produced a series of standard comments for local planning authorities and

planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.

These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice>

We recommend that you view our standing advice in full before making a decision on this application.