

Alison Webster
Gravesham Borough Council

Our ref: KT/2025/133093/01-L01
Your ref: 20251170

Sent by email

Date: 19 December 2025

Dear Alison

Application for the approval of condition 4 (Foul Water Strategy) and condition 6 (Surface Water Strategy) attached to planning reference number 20221293.

Cascades Leisure Centre Thong Lane Gravesend Kent DA12 4LG

Thank you for consulting us on the above application which we received on 18 November 2025. As part of this consultation, we have reviewed the following documents:

- Flood Risk Assessment (FRA) & Drainage Strategy Report, Part 1, ref. 7313-FUR-ZZ-XX-RP-D-0901, dated November 2025, by Furness
- Phase 2 Geo-environmental and Geotechnical Site Investigation, ref. 52511-R01(00), dated May 2023, by RSK Geosciences (Appendix D of the FRA)
- Application form, ref. PP-14481193
- Site plans and photos, and flood maps

Environment Agency position

We **object** to the discharge of condition 6.

We have **no objection** to the discharge of condition 4.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome our objection(s)
- Section 2: Technical comments
- Section 3: Advice to the Applicant

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
E-mail kslplanning@environment-agency.gov.uk

Section 1: Reasons for, and how to overcome, our objection(s)
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Objection: Condition 6 (Sustainable Surface Water Drainage)

Reason(s)

The Phase 2 Geo-environmental and Geotechnical Site Investigation report appended within the submitted FRA & Drainage Strategy report highlights the contaminants found on the site but has not clearly shown why these are not a risk to groundwater. Therefore, more information is required before we can be satisfied that these contaminants found in the made ground are not a risk to the groundwater below.

Without this additional information we are unable to approve this condition.

Discharging via permeable paving and/or soakaways presents a risk of mobilising contamination, particularly if it discharges through shallow made ground. The report shows contamination is present in the shallow soils, but there is no clear explanation in either this or the drainage report as to how this risk would be mitigated.

Overcoming our objection

The applicant should provide more information demonstrating that the development will not contribute to unacceptable levels of water pollution caused by mobilised contaminants.

Section 2: Technical comments

Condition 4 (Foul Drainage)

The drainage strategy proposed for the disposal of foul water to connect to the mains and discharge to a new private manhole north-west of the building is acceptable. We would also approve the backwash water from the pools being discharged to the sewer on the basis that the discharge rate agreed with Southern water is followed.

Section 3: Advice 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 £115 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