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people and wildlife



Kelly Joyce
Gravesham Borough Council
Sent via email

Our ref: KT/2025/132279/01-L01
Your ref: 20250028

Date: 22 January 2025

Dear Kelly Joyce

Construction Of Floodlit Synthetic Turf Pitch With Perimeter Fencing, Spectator Areas And Access Paths; Installation Of Flood Lighting Around Existing Multi Use Games Area (Muga); Installation Of Storage Container; And Formation Of Landscaped Bund.

Northfleet School For Girls, Hall Road, Northfleet, Gravesend, Kent DA11 8AQ

Thank you for consulting us on the above planning application on 22 January 2025.

Environment Agency Position

We have screened the application and have **no objection** in relation to groundwater and contaminated land. However, we have the following comments to make.

The Environment Agency's Approach to Groundwater Protection

We recommend the applicant reviews 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 the applicant 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 you are proposing a non-mains drainage solution the following form should be completed and submitted with any application:

<https://www.gov.uk/government/publications/foul-drainage-assessment-form-fda1>

The discharge of domestic sewage may be subject to General Binding Rules (GBRs) under the Environmental Permitting (England & Wales) Regulations 2016, which provide a statutory baseline of good practice. You can find more information online at <https://www.gov.uk/permits-you-need-for-septic-tanks/permits> or contact us on 03708 506506. If your proposal cannot meet the GBRs then a permit will likely be required.

Piling

Piling can result in risks to groundwater quality by mobilising contamination when boring through different bedrock layers and creating preferential pathways. It should therefore be demonstrated that any proposed piling will not result in contamination of groundwater. If piling is proposed, a Piling Risk Assessment should be undertaken to confirm the proposed design does not pose risks to the groundwater. This should be in accordance with our guidance document "*Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. National Groundwater & Contaminated Land Centre report NC/99/73*".

Waste on-site

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works is waste or has ceased to be waste. Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project
- some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to:

- The [position statement](#) on the Definition of Waste: Development Industry Code of Practice
- The [waste management](#) page on GOV.UK

Waste to be taken off-site

Waste soil that must be disposed of site is subject to waste management legislation. You must ensure that handling, transport, treatment and disposal of the waste is in line with the legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all wastes are adequately assessed and characterised in line with 'Technical Guidance WM3-Guidance on the classification and assessment of waste' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

Waste assessment and classification

It is the producer's legal responsibility to correctly classify a waste prior to it being moved off site. The procedure of which is described in the WM3 Guidance on the classification and assessment of waste:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719394/Waste-classification-technical-guidance-WM3.pdf

Under Section 34 of the Environmental Protection Act 1990 (the Waste Duty of Care), you are required to ensure the description of the waste you produce is accurate and contains all the information you are in a position to provide. This includes chemical analysis.

Please let us know if you require any further details.

Yours faithfully

Ms Laura Edwards
Planning Advisor

Direct email KSLPLANNING@environment-agency.gov.uk