

Katherine Parkin
Gravesham Borough Council

Our ref: KT/2025/132733/02-L01
Your ref: 20250701

Sent by email.

Date: 30 October 2025

Dear Katherine,

Installation of a new jet wash zone, new pedestrian route and increasing the total parking provision on site from 18 to 23 spaces.

Algeco UK Limited, Wharf Road, Gravesend, Kent, DA12 2RU

Thank you for consulting us on the above application which we received on 15 October 2025.

As part of this consultation, we have reviewed the available documents via the planning portal and specifically the following:

- Agent response to EA, by Peacock and Smith
- Geoeptor Range, by Turtle (ref: GNSB, dated: October 2024)
- Geoeptor Bypass Separator Product Brochure, by Turtle (dated: September 2025)
- Topographical Survey, by Utility Solutions (ref: 1387_T, dated: February 2025)

Environment Agency position

We **maintain our objection** to the application as submitted because the applicant has not supplied adequate information to demonstrate that the risks of pollution posed to surface water quality can be safely managed. We recommend that unless and until the applicant provides adequate information to demonstrate that the risks of pollution posed can be safely managed then planning permission should be refused.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome, our objection(s)
- Section 2: Advice to the Applicant / Local Planning Authority

Note to 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 £100 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

Note to LPA

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 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.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Connor Bowman
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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Reasons

Building upon our previous comments dated 11 August 2025 (KT/2025/132733/01-L01) and in line with paragraph 187 of the National Planning Policy Framework.

Having reviewed the above additional information, we support the use of an oil/petrol separator in those areas deemed appropriate i.e. the car parking area. However, as highlighted in our previous response the jet wash water is classified as trade effluent and must be managed accordingly. The use of an oil/petrol separator to dispose of trade effluent produced from the jet wash area is not appropriate.

Following the [Pollution prevention for businesses - GOV.UK](https://www.gov.uk/guidance/pollution-prevention-for-businesses) guidance it states that:

Activities that produce contaminated water

If your business produces contaminated water or other polluting liquids ('trade effluent') you must make sure it does not cause pollution.

Such activities may include:

- *vehicle washing, wheelie bin washing or yard cleaning*
- *manufacturing processes*
- *water cooling*
- *cleaning of food production areas or ovens*

Assess if it's possible to redesign your process to avoid or minimise creating contaminated water, for instance by using dry systems. If unavoidable, you should reuse or dispose of contaminated water by:

- *collecting it in a sealed system for reuse, treatment on site or removal by a [registered waste carrier](#)*
- *putting it down the foul water (or combined) drain if you've got permission from your water company - contact them to get consent*

Overcoming our objection

The applicant should update how the trade effluent from the jet wash area will be disposed of, in accordance with the above guidance.

Section 2: Advice to the Applicant / Local Planning Authority

Flood risk standing advice

The proposed development falls within Flood Zone 3, which is land defined in the [planning practice guidance](#) as being at risk of flooding.

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.

Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction
<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

CIRIA Code of Practice for property flood resilience
https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience.aspx

British Standard 85500 – Flood resistant and resilient construction
<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

Flood risk issues not within our direct remit

The following issues are not within our direct remit or expertise, but nevertheless may be important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge

- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

Connection to mains foul drainage

Government guidance contained within the national Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

- Connection to the public sewer
- Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation)
- Septic Tank

Foul drainage should be connected to the main sewer. Where this is not possible, under the Environmental Permitting Regulations 2016 any discharge of sewage or trade effluent made to either surface water or groundwater will need to be registered as an exempt discharge activity or hold a permit issued by the Environment Agency, additional to planning permission. This applies to any discharge to inland freshwaters, coastal waters or relevant territorial waters.

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.](#)