

Katherine Parkin  
Gravesham Borough Council

**Our ref:** KT/2025/132733/01-L01  
**Your ref:** 20250701

Sent by email

**Date:** 11 August 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 21 July 2025. As part of this consultation, we have reviewed the following documents:

- Application form, ref. PP-13889987, dated 9 July 2025
- Site location plan, ref. GRA-PHP-ZZ-XX-DR-A- 4779-001-P02, dated 20 May 2025, by pHp Architects
- Existing block plan, ref. GRA-PHP-ZZ-XX-DR-A-4779-002-P04, dated 27 June 2025, by pHP Architects
- Proposed block plan, ref. GRA-PHP-ZZ-XX-DR-A-4779-003-P05, dated 27 June 2025, by pHP Architects

### **Environment Agency position**

We **object** 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

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.

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](mailto:kslplanning@environment-agency.gov.uk)

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| <b>Section 1: Reasons for, and how to overcome, our objection(s)</b> |
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## **Objection - Insufficient information to determine risks to water quality**

### **Reasons**

Paragraph 187 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution.

The proposal includes the installation of a new jet wash zone. It is important to highlight that vehicle washing activities generate trade effluent, which typically contains oils, detergents, and suspended solids. If discharged without appropriate treatment, this effluent can pose a significant risk to the environment.

We consider that the proposed development may pose an unacceptable risk of causing a detrimental impact to surface water quality as we note the following points of concern:

- The application states that surface water will continue to discharge to a nearby brook via existing private sewers. If the jet wash effluent is directed to this surface water system, this would constitute an unauthorised discharge of trade effluent, which is not permitted under environmental regulations.
- The application also indicates that no trade effluent will be produced, which appears to be incorrect. Jet wash water is classified as trade effluent and must be managed accordingly.

To comply with environmental legislation, the applicant must ensure that:

- Jet wash effluent is discharged to the foul sewer, subject to approval from the relevant water company; or
- A discharge permit is obtained from the Environment Agency if the effluent is to be discharged to a watercourse.

### **Overcoming our objection**

The applicant should provide clarification on how effluent from the proposed jet wash zone will be managed, including confirmation of the discharge route and any necessary consents or permits.

## Section 2: Advice to the Applicant / Local Planning Authority

### Advice to LPA

#### 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](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

## **Advice to applicant**

### **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.](#)

### **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](mailto:kslplanning@environment-agency.gov.uk)