

Alison Webster  
Gravesham Borough Council

Our ref: PA-0012118/01  
Your ref: 20260896  
29 September 2026

Sent by email

Dear Alison,

**Change of use of part of existing industrial site (B2) to Hand Car Wash Facility (Sui Generis).**

**HARDYS CORNER 2 VALE ROAD GRAVESEND GRAVESHAM BOROUGH DA11 8BZ**

Thank you for consulting us on the above application which we received on 11 September 2026. As part of this consultation, we have reviewed the following documents and those available on the planning portal:

- Contaminated Land Review (Martin Environmental Solutions Ltd, August 2026)

#### **Environment Agency position**

We have **no objection** to the proposed development, **subject to the following planning conditions** being attached to any permission granted.

Please refer to the following sections for our full response:

- Section 1: Technical Comments
- Section 2: Conditions and Informatives
- Section 3: Advice to the Applicant

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application, paragraph 019](#)), please notify us by email within two weeks of a decision being made or application withdrawn.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,

**Carly Morrison**  
**Sustainable Places Planning Advisor**

**On behalf of Gabrielle Delorme**  
**Sustainable Places Planning Specialist**  
E-mail [kslplanning@environment-agency.gov.uk](mailto:kslplanning@environment-agency.gov.uk)

## **Section 1: Technical Comments**

### **Drainage**

The current proposals are for a sealed system involving ultimate discharge off-site to foul sewer. With no infiltration drainage proposed from this change of use we have no comments from a groundwater protection perspective for this aspect.

### **Land Contamination**

Remediation proposals for a hard surfacing to break the described source-pathway-receptor linkages within the development footprint were described in the submitted Contaminated Land Review (Martin Environmental Solutions Ltd, August 2026).

The scope of works at the above site is accepted, in principle, as being in line with relevant guidance for the re-development of a contaminated site, regarding issues of concern to the Environment Agency.

Planning conditions related to contamination should not be fully discharged until such time as all relevant works are completed and a closure report, detailing all works at the site, has been submitted (unless the requirement for a closure/validation/verification report is subject to a stand-alone condition).

The closure report should include summaries of all materials removed, details of validation sampling/monitoring carried out in remediation areas, relevant certificates for imported materials and confirmation that the site is fit for the proposed use.

Further clarification should be sought from the Local Authority Environmental Health Officer with respect to issues related to harm to human health.

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| <b>Section 2: Conditions and informatives</b> |
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**Note to the LPA: Condition wording**

If you wish to amend the wording of our requested conditions or if you wish to merge them with other Local Planning Authority / statutory consultees conditions, please contact us to discuss the revised wording.

**Condition 1: Verification Report**

Prior to any part of the permitted development being brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the LPA. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

**Reason(s)**

To ensure that the site does not pose any further risk to the land and water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph P3(1-2) of the NPPF.

**Condition 2: Previously Unidentified Contamination**

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the LPA) shall be carried out until further investigation and a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the LPA. The remediation strategy shall be implemented as approved.

**Reason(s)**

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph P3(1-2) of the NPPF.

### **Section 3: Advice to the 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 meet the requirements of the conditions recommended, we may do this as part of our charged for planning advice service.

Further engagement will provide you with certainty of our position as to what our response to your planning application will be. 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 £119.37 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)