

**From:** Wilson, Jennifer <jennifer.wilson@environment-agency.gov.uk>

**Sent:** 06 December 2022 08:56

**To:** Alec Arrol <Alec.arrol@hodsondevelopments.com>

**Cc:** Alan Hodson <a.hodson@hodsondevelopments.com>

**Subject:** RE: EA Pre-App Planning Advice - Nutrient Neutrality Assessment and Mitigation Strategy - ENVPAC/1/KSL/00591

Dear Alec

Thank you for your enquiry. Please see our comments below.

### **Groundwater Hydrology**

This proposal seeks to directly treat wastewater onsite before discharging to watercourses in the River Beult catchment and involves no direct river abstraction options as mitigation measures for addressing nutrient neutrality in the Stour and so from a Water Resources perspective there are no concerns raised regarding abstraction.

The site boundary contains tributary headwaters of the Beult with supporting spring feeds from the Hythe Formation geology, this provides essential baseflow to the SSSI designated River Beult which is predominately a Clay catchment. It's unclear for the current details but, the development designs must not impede the natural flow within these watercourses without the appropriate Impoundment licences from the Environment Agency.

### **Water Quality**

We have no objection to the proposal, dependent on the onsite wastewater treatment works being an OFWAT approved company. Should plans change, please consult with us because our position may be affected.

Please note that the River Beult is a Site of Special Scientific Interest (SSSI) which has agreed Common Standards Monitoring Guidance (CSMG) targets for water quality. The CSMG targets will need to be considered when calculated permit limits for a discharge affecting this waterbody.

### **Fisheries, Biodiversity and Geomorphology**

We have no objection to these proposals at this time and welcome the creation of onsite aquatic features and the creation of a new WwTW for this development. We look forward to further consultation regarding Nutrient Neutrality should any plans and/or proposals change.

### **Groundwater and Contaminated Land**

It is understood from the Overarching Nutrient Neutrality Assessment and Mitigation Strategy that waste water from the proposed development will be treated at an on-site facility and discharged to a local watercourse. No discharge to ground is proposed at present. We have no objection to the current content of this report from the perspective of groundwater quality. Should plans change this position may need to be re-evaluated.

### **Flood Risk**

Having reviewed the Overarching Nutrient Neutrality Assessment and Mitigation Strategy, we have no concerns regarding fluvial flood risk. The proposed WWTW on Magpie Hall Road sits within FZ1.

We hope you find our comments useful.

Kind Regards,

**Jennifer Wilson**

Planning Specialist

Sustainable Places – Kent and South London

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## Groundwater: underground and under threat

Did you know that over 70% of water supplied to Kent and South London area comes from local aquifers?

