



**Alison Webster**  
**Gravesham Borough Council**  
Civic Centre  
Windmill Street  
Gravesend  
Kent  
DA12 1AU

**Flood and Water Management**  
Sessions House  
County Hall  
Maidstone, Kent  
ME14 1XQ  
**Website:** [www.kent.gov.uk/flooding](http://www.kent.gov.uk/flooding)  
**Email:** [suds@kent.gov.uk](mailto:suds@kent.gov.uk)  
**Tel:** 03000 41 41 41  
**Our Ref:** GBC/2025/107917  
**Date:** 3 December 2025

**Application No:** 20250993

**Location:** Land Adjacent To, Longfield Road, Meopham, Gravesend Kent

**Proposal:** Outline application for the erection of up to 120 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Longfield Road and all other matters are reserved.

Thank you for your consultation on the above referenced planning application.

Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk and Drainage Strategy prepared by MEC Consulting Group Ltd dated September 2025 and have the following comments:

The report proposes that the surface water for the site will be managed through the use of infiltration utilising an infiltration basin.

The drainage strategy is indicative at this stage, as acknowledged in point 6.20 of the report that indicates that additional SuDs features such as permeable paving and rain gardens will be included as part of the future submission.

More detailed designs will need to be included within any layout proposals as they evolve. We will not support a final design that does not promote adequate 'source control' features or that follows a 'pipe-to-soakaway' approach, as these will not meet the latest National Standards for Sustainable Drainage Systems. Permeable paving, roof water soakaways / rain gardens and road side suds features spread throughout the development will need to be considered and featured within the design.

Notwithstanding the above, this is an outline planning application, and we accept that the strategy will be indicative and require further development. It would be appropriate to secure more detailed design information as part of any future reserved matters submissions via planning conditions. This will ensure those measures are suitably accommodated within the proposed layout and that the assessment utilises up to date and site specific input data (including rainfall methodology, ground investigations etc.).

Further to this, with regards to the basin depth proposed we would recommend the depth of basins/ponds within developments are not considerably deep (greater than 1.2 m deep). Whilst this would limit the amount of storage within the basin, we would

recommend consideration of other approaches to design, for example that geocellular tanks may be installed beneath the basin to provide any additional storage needed.

Should your authority be minded to grant permission for the development, we would recommend the following conditions are attached:

**Condition:**

No development shall take place in any phase until the details required by Condition 1 (assumed to be reserved matters condition for layout) shall demonstrate that requirements for surface water drainage for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm can be accommodated within the proposed development layout. The proposals shall demonstrate a 'SuDS approach' and include rainwater harvesting and source control features prior to discharge of surface water to piped drainage systems and 'site control' measures (unless these are demonstrated to be inappropriate).

**Reason:**

To ensure the development is served by satisfactory arrangements for the disposal of surface water and that they are incorporated into the proposed layouts pursuant to Paragraph 182 of the National Planning Policy Framework and the National standards for sustainable drainage systems (SuDS) June 2025.

**Condition:**

Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the the Flood Risk and Drainage Strategy prepared by MEC Consulting Group Ltd dated September 2025. The submitted scheme shall demonstrate compliance with the required technical standards at the time of submission and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of [within the curtilage of the site] without increase to flood risk on or off-site.

The detailed drainage scheme will also be required to demonstrate that any existing surface water flow paths can be accommodated and disposed of without increase to flood risk on or off site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

**Reason:**

To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off

site flooding. These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development.

**Condition:**

No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

**Reason:**

To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 182 of the National Planning Policy Framework.

**Condition:**

Where infiltration is to be used to manage the surface water from the development hereby permitted, it will only be allowed within those parts of the site where information is submitted to demonstrate to the Local Planning Authority's satisfaction that there is no resultant unacceptable risk to controlled waters and/or ground stability. The development shall only then be carried out in accordance with the approved details.

**Reason:**

To protect vulnerable groundwater resources and ensure compliance with the National Planning Policy Framework.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Yours faithfully,

**Emily Neale**  
Flood Risk Officer  
Flood and Water Management