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Our Ref: GBC/2024/099071
Date: 5 September 2024

Application No: 20231313

Location: Eastcourt Marshes Electricity Distribution Site , Mark Lane, Gravesend, Kent DA12 2HN

Proposal: Proposed construction of a new cable tunnel beneath the River Thames between Gravesend and Tilbury to provide additional transmission capacity. Above-ground infrastructure in the form of a new Cable Sealing End compound and a new head house building along with associated electricity infrastructure, access, parking, boundary treatment and two overhead gantry structures for future overhead lines. Temporary compound for the duration of the project to provide parking, staff welfare facilities, delivery vehicle parking, and equipment and machinery storage, including boundary treatment and lighting.

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

Kent County Council as Lead Local Flood Authority have reviewed the TKRE Drainage Management Plan prepared by BakerHicks dated 11.06.2024 and have the following comments:

We appreciate the clarification and information provided and have no objections to the proposals for managing the surface water for the site in principle at this stage. However as part of the detailed design condition we require for the following points to be addressed:

1. The arrangement of water treatment measures should ensure that pollution is suitably mitigated, taking into account that a factor of 0.5 is used to account for the reduced performance of secondary or tertiary components associated with already reduced inflow concentrations. Section 2 of the report suggests that the proposed drainage does not suitable meet the mitigation requirements for TSS when these factors are taken into account.
2. The site is within Flood Zone 2 and 3, with a proposed connection into a main river. Consultation with the Environment Agency early in the planning process is recommended to identify any constraints or specific requirements in this area that may impact the proposed SuDs methods.

3. We note that the area falls within the jurisdiction of the North Kent Marshes internal Drainage Board therefore we would advise that they are consulted with regards to the proposals also.

Should the Local Planning Authority be minded to grant permission, we would recommend for the following conditions are attached to any approval:

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 TKRE Drainage Management Plan prepared by BakerHicks dated 11.06.2024 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 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 175 of 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