



Gravesham Borough Council
Civic Centre
Windmill Street
Kent
DA12 1AU

Your ref
20260223

Our ref
DSA000051868

Date
24th March 2026

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Proposal: Application for Outline application with all/some matters reserved for the development of up to 50 residential dwellings (including affordable housing), vehicular access road from School Lane, internal roads, car parking, landscaping, public open space, and other associated works and infrastructure. All matters to be reserved with the exception of the main site access.

Site: Land North of High View School Lane, Higham, Rochester, Kent, ME3 7HP.

Thank you for your correspondence, please see our comments below regarding the above application.

Please see below comments following the hydrogeological review of this application site.

The Southern Water Catchment Hydrogeology Team have reviewed this planning application. The site lies within SPZ2 of the Higham groundwater catchment, approximately 330 m south of our public water supply abstraction. This is a sensitive hydrogeological location as the Seaford Chalk Principal Aquifer supplies drinking water to the public and water in the Chalk flows via fracture networks that can significantly reduce pollutant travel times.

No ground investigation report has been provided, and no hydrogeological assessment has been undertaken of the potential risks posed by the development to our groundwater supply.

The drainage strategy proposes to discharge surface water via deep borehole soakaways founded in the Seaford Chalk Formation. Discharging directly to the Seaford Chalk bypasses the natural attenuation and protection provided by the overlying Thanet Sand Formation and creates a preferential pathway into the Southern Water abstraction horizon. The increased risk to the public water supply has not been assessed. The drainage strategy must also be corrected to reflect that the trial pit infiltration tests were undertaken in the Thanet Sand Formation, not in the shallow Seaford Chalk.



The infiltration results have been incorrectly described as “very low” to “low”. This is not consistent with CIRIA C753: The SuDS Manual, which would classify the recorded infiltration rates as moderate for sandy strata. The trial pit tests were undertaken at depths of 1m, 3m and 4m, with starting water levels between 0.49 m and 1.92 m below ground level. Several of these tests therefore do not reflect the proposed soakaway invert levels and do not meet BRE 365 expectations for representative infiltration testing. Despite these limitations, the results still indicate locally good to moderate infiltration within the Thanet Sand Formation. Southern Water also notes that the Soakaway Testing Letter has been exported at such low resolution that the numerical results are illegible; a higher-resolution version must be provided.

The SuDS Manual is intended to support compliance with environmental quality standards and does not replace the need to protect drinking water sources. Given the site’s proximity to our abstraction boreholes and the potential for preferential fracture flow in the Chalk, enhanced treatment and mitigation measures are required. The SuDS Manual also notes that sensitive hydrogeological locations require enhanced treatment, yet no such measures are included in the current drainage design.

Southern Water does not object to this planning application subject to the following requirements.

- Surface water discharge must be restricted to the Thanet Sand Formation via shallow infiltration or attenuation basins, and deep borehole soakaways are strictly prohibited. A revised drainage design must be submitted to Southern Water for review prior to discharge of this condition.
- The drainage design must incorporate enhanced surface water treatment and mitigation measures appropriate for a sensitive groundwater location, and the revised design must be reviewed by Southern Water prior to discharge of this condition.
- All below-ground infrastructure, including but not limited to drainage, infiltration systems, foundations, piling, ground improvement, utilities, ducting, and any other penetrative construction, must be wholly contained within the Thanet Sand Formation. No penetrative construction of any type is permitted to extend into the Seaford Chalk Formation.
- Contractors must adhere to recognised best practice pollution prevention guidance to avoid environmental contamination during construction.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119)

Website: southernwater.co.uk or by email at:
SouthernWaterPlanning@southernwater.co.uk

Yours faithfully,

Future Growth Planning Team

southernwater.co.uk/developing-building/planning-your-development