



Head of Planning & Regeneration Services  
Gravesham Borough Council  
Civic Centre  
Windmill Street  
Gravesend  
Kent  
DA12 1AU

Your ref  
20240402

Our ref  
DSA000034447

Date  
10 June 2024

Contact  
Tel 0330 303 0119

Dear Sir/Madam,

**Proposal:** Demolition of existing buildings and erection of retirement living apartments (use class C3), together with the extension of the existing chapel and the provision of associated communal facilities and external amenity space, lodge keepers and guest accommodation, back-of-house facilities, parking, bicycle/mobility scooter parking, and associated works including the creation of a secondary, emergency access from College Road.

**Site:** 20240402: - Huggens College, College Road, Northfleet, Gravesend, Kent, DA11 9DL.

Thank you for your letter dated 20 May 2024.

Following the review of the submitted documents, we have the below comments for the Planning consultation.

### **Foul and Surface Water Drainage**

Our investigations indicate that Southern Water can facilitate foul sewerage disposal to service the proposed development. Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer.

To make an application visit Southern Water's Get Connected service: [developerservices.southernwater.co.uk](https://developerservices.southernwater.co.uk) and please read our New Connections Charging Arrangements documents which are available on our website via the following link: [southernwater.co.uk/developing-building/connection-charging-arrangements](https://southernwater.co.uk/developing-building/connection-charging-arrangements)

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS).

Under certain circumstances SuDS will be adopted by Southern Water should this be requested by the developer. Where SuDS form part of a continuous sewer system, and are not an isolated end of



pipe SuDS component, adoption will be considered if such systems comply with the latest Design and Construction Guidance (Appendix C) and CIRIA guidance available here:

[water.org.uk/sewerage-sector-guidance-approved-documents/](https://www.water.org.uk/sewerage-sector-guidance-approved-documents/)

[ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS](https://ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS)

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The Council's Building Control officers or technical staff should be asked to comment on the adequacy of soakaways to dispose of surface water from the proposed development.

**We request that should this planning application receive planning approval, the following informative is attached to the consent: Construction of the development shall not commence until details of the proposed means of foul sewerage and surface water disposal have been submitted to, and approved in writing by the Local Planning Authority in consultation with Southern Water.**

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

### **Water Connection**

Our investigations indicate that Southern Water can facilitate water supply to service the proposed development. Southern Water requires a formal application for a connection to the water supply to be made by the applicant or developer.

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

Website: [southernwater.co.uk](https://southernwater.co.uk) or by email at: [SouthernWaterPlanning@southernwater.co.uk](mailto:SouthernWaterPlanning@southernwater.co.uk)

Yours faithfully,

Future Growth Planning Team  
**Developer Services**

[southernwater.co.uk/developing-building/planning-your-development](https://southernwater.co.uk/developing-building/planning-your-development)