



Rebecca Harrison
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
Email: suds@kent.gov.uk
Tel: 03000 41 41 41
Our Ref: GBC/2026/111377
Date: 19 August 2026

Application No: 20260649

Location: Land North Of, The Drove Way, Istead Rise, Gravesend Kent

Proposal: Development for up to 100 residential dwellings (Class C3), including the formation of new accesses from The Drove Way, the provision of new areas of public open space and all other associated infrastructure and ancillary works (all detailed matters reserved other than means of access).

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

Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk Assessment and Outline Drainage Strategy (Ref. 16611A-30-R06-02, dated 29 May 2026) prepared by Logika Consultants Ltd and have the following comments:

The application is for outline planning permission for up to 100 dwellings on a greenfield site. The site lies within Flood Zone 1 and is generally at a low risk of flooding from all sources. The report sets out an outline surface water drainage strategy to manage surface water generated by the development and therefore ensure flood risk is not increased elsewhere.

Preliminary ground investigations indicate a relatively shallow depth to permeable strata (Chalk), which appears capable of supporting infiltration drainage. Given this is an outline application, the drainage strategy is not detailed and therefore takes a precautionary approach, sizing infiltration basins on the assumption that all runoff from the 1 in 100 year rainfall event with a 45% climate change allowance, inclusive of 10% urban creep, would reach the basins.

The submitted infiltration testing has been undertaken within a limited area of the site and preliminary testing was undertaken in the north-western part of the site only. Further BRE365 compliant infiltration testing will be required at the specific locations of all proposed infiltration features to verify the suitability of the detailed design. T

he preliminary infiltration assessment applies a factor of safety of 2 to the lowest recorded infiltration rate. The LLFA would expect a more robust factor of safety to be applied to the detailed design. A factor of safety of 5 would generally be expected for infiltration basins following the details set out in the National Standards for SuDS Standard 3, Table S3.1.

Should planning permission be granted, we will expect rainwater harvesting and re-use measures to be incorporated within the development in accordance with Standard 1 of the National Standards for Sustainable Drainage Systems. We would also expect source control measures, such as permeable paving, swales, rain gardens and, where appropriate, smaller-scale infiltration features such as soakaways serving individual properties or small catchments, to be incorporated throughout the site. The National Standards create an expectation that this 'SuDS Approach' is followed and therefore a condition is suggested to secure this when more detailed layouts are developed. SuDS features should be featured at multiple points throughout the layout on that basis.

The LLFA would not recommend approval of a detailed drainage scheme that relies solely upon end-of-pipe attenuation basins. Surface water should be managed through a treatment train incorporating source control and site control measures in accordance with the National Standards for Sustainable Drainage Systems. All detailed drainage proposals should be supported by further ground investigations, infiltration testing and drainage calculations.

Overall, the LLFA is satisfied that the submitted information demonstrates that the use of infiltration drainage appears feasible in principle and that a suitable surface water drainage strategy is capable of being delivered for this outline application. Should your authority be minded to grant planning 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 Policy F8 of the National Planning Policy Framework and the National standards for sustainable drainage systems (SuDS)

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 submitted scheme shall demonstrate compliance with the National Standards for SuDS 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 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, pursuant to Policy F8 of the National Planning Policy Framework and the National standards for sustainable drainage systems (SuDS). 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 Policy F8 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,

Alex Brauning

Senior Flood Risk Officer
Flood and Water Management