

Gravesham Borough Council
Development Control
Civic Centre Windmill Street
Gravesend
Kent
DA12 1AU

Our ref: KT/2022/130262/04-L01
Your ref: 20221174

Date: 5 April 2023

Dear Planning Team

Application for approval of conditions 3, 4 and 5 attached to planning permission reference number 20211541 relating to archaeological field evaluation works in accordance with a written scheme of investigation along with any safeguarding measures to ensure preservation of important archaeological remains and/or further investigation and recording (3 i, ii), a detailed sustainable surface water drainage scheme (4) and a lighting design plan for biodiversity (5)

Metropolitan Police Specialist Training Centre, Mark Lane, Gravesend, Kent DA12 2HN

Thank you for consulting us on the above. We **maintain our objection** to the discharge of condition 4 (surface water drainage).

We are not yet satisfied that the proposed drainage works present a low risk to the structural integrity of the main river culvert to the south of the proposed development, and that they will not impede future works to improve or replace the culvert.

Reason:

Drawing 77443.02 100 P03, dated March 2023, shows the open main river channel to the east of the site, and the associated 8m buffer zone. The recently submitted drawing indicates a 1500mm Dia. "Existing main culvert" to the north of the site, and its associated buffer zone. However this watercourse is understood not to be a main river and therefore is not within the remit of the Environment Agency to comment on as part of a planning application. It also shows an "Existing private drainage pipe" to the south of the site, which is understood to be a main river. However, the drawing neither confirms that this is the main river culvert or quantifies the offset from the drain to the new drainage works, including any SuDS tanks.

Overcoming our objection:

The applicant is required to,

- Confirm that the "Existing private water drain" shown on drawing 77443.02 100 P03 is the culverted main river watercourse.
- Confirm that the alignment of the above watercourse shown on drawing 77443.02 100 P03 has been confirmed on site and is not assumed.
- Illustrate the extent of the 8m buffer and demonstrate that either;
 - None of the below ground drainage infrastructure is within 8m of the culverted main river watercourse, or
 - All below ground drainage infrastructure has been located as far from the culverted main river watercourse as is reasonably possible and that it will not

have any adverse effect on the culvert or future works to improve or replace the structure.

For information, the indicative location of the main river about which we are concerned is shown in Fig 2 of the WYG Flood Risk & Drainage Assessment ref A111364 dated Sept 2020.

Flood Risk Activity Permit Informative:

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

To apply for consent we recommend you contact one of our Flood and Coastal Risk Management Officers at the following email address: PSO.SELondon&NKent@environment-agency.gov.uk

Please note that the above comments only relate to Flood Risk. We have other comments to make in relation to issues within our remit, which will be provided once our above objection has been overcome.

If the applicant would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our cost recovery service.

If they wish to request a meeting, or document review, please contact our team email address at KSLPlanning@environment-agency.gov.uk

Further information on our charged planning advice service is available at: <https://www.gov.uk/government/publications/planning-and-marine-licence-advice-standard-terms-for-our-charges>

Yours faithfully

Pp Jennifer Wilson

Ms Laura Edwards
Planning Specialist

Direct e-mail KSLPLANNING@environment-agency.gov.uk