



Lisa Fisher
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/2026/109335
Date: 19 March 2026

Application No: 20260223

Location: Land North of High View, School Lane, Higham, Rochester Kent

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.

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

Kent County Council as Lead Local Flood Authority has reviewed the Flood Risk Assessment and Drainage Strategy Report (November 2025) prepared by DHA Planning and have the following observations to provide:

- The LLFA understands that the site is currently undeveloped and no existing drainage features are present. With the proposal for up to 50 dwellings, a preliminary drainage strategy has been prepared, consisting of a managing surface water through deep borehole soakaways. To support this initial design, two boreholes extending to 20m have been installed on site, with constant head tests undertaken. The results of these tests returned a rate of 4l/s, limited to the flow from the bowser being emptied. The LLFA raises no objection to the strategy currently set out.
- It is noted within statement 5.3.20 that a swale and detention basin indicated as being included within the drainage design. The accompanying Proposed Drainage Plan drawing however does not detail such features. We do acknowledge that Outline planning permission is being sought and as such the layout and design of the drainage system is reserved. Therefore, there is potential to include these features depending upon the future layout and the gradient/ fall of the land.
- The Contributing Areas Plan shows the access road through the development is envisaged to be adopted by KCC Highways. It is viewed that this will not be of permeable paving but instead be of a traditional tarmac construction. Therefore, we would view that this segment of road would not benefit from the treatment provided by permeable paved areas. As such, we view further consideration is

required as part of any Reserved Matters application to ensure sufficient treatment of surface water prior to the boreholes.

- The current Microdrainage Source Control analysis utilises FEH1999 Rainfall Methodology. Whilst this is accepted for use at the Outline stage, we expect for the current FEH2022 dataset to be used at the future reserved matters and detailed design stages.

Should the Local Planning Authority grant planning permission, the LLFA would request for the following conditions to be 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.

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 Paragraph 182 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 detailed drainage scheme shall be based upon the principles contained within the Flood Risk Assessment and Drainage Strategy report (C5728/CS -November 2025) The submitted scheme shall demonstrate compliance with the National Standards for SuDS at the time of submission 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):

- The results of the constant head tests to support the use of deep borehole soakaways
- 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 Paragraph 182 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 paragraph 182 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,

Daniel Hoare

Senior Flood Risk Officer
Flood and Water Management