



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

Your ref
20240013

Our ref
DSA000031333

Date
08 March 2024

Contact
Tel 0330 303 0119

Dear Sir/Madam,

Proposal: Conversion of existing Victorian building into 6 flats. Demolition of existing outbuildings. Erection of a 3-storey medical centre. Erection of a building containing 7no flats. Erection of 41no houses. Associated works to include access, public open space and landscaping.

Site: 20240013: - Former St Joseph's Convent Preparatory School, 46 Old Road East, Gravesend, Kent, DA12 1NR.

Thank you for your letter dated 5 February 2024.

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

Groundwater Protection Zones

This planning application is located in the SPZ1 for our Gravesend groundwater abstraction and is located 370m from the abstraction borehole. Any contamination of groundwater will therefore be received by our groundwater abstraction within 50 days.

The Drainage Strategy proposes site surface water be discharged to ground via deep borehole soakaway into the Principal Chalk Aquifer. Our public groundwater supply abstraction is founded in the Principal Chalk Aquifer and there will be a direct pathway to our abstraction. The Drainage Strategy does not include reference to our groundwater abstraction or the Source Protection Zone 1. Therefore, the drainage treatment will lack the enhanced mitigation measures required to ensure there is no adverse impact to the groundwater quality.

Southern Water do not object to this planning condition on the condition that the drainage strategy will exclude deep bore soakaway and that any water discharged to ground will result in betterment to the Principal Chalk Aquifer groundwater quality.

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 foul sewer to be made by the applicant or developer.

To make an application visit Southern Water's Get Connected service: 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

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/

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.

Land uses such as general hard standing that may be subject to oil/petrol spillages should be drained by means of appropriate oil trap gullies or petrol/oil interceptors.

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.

Adoption of Sewerage System

This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991. Please note that non-compliance with the Design and Construction Guidance will preclude future adoption of the foul and surface water sewerage network on site. The design of drainage should ensure that no groundwater or land drainage is to enter public sewers.

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.

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

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
Developer Services

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