



Alison Webster
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/2025/107267
Date: 24 October 2025

Application No: 20250889

Location: Buckland Farm, Chalk Road, Higham, Rochester Kent

Proposal: Outline planning application for the demolition of existing buildings and erection up to 40 residential dwellings, public open space and associated works. Approval is sought for the principal means of vehicular access from Chalk Road and all other matters are reserved.

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

Council as Lead Local Flood Authority has reviewed the revised Flood Risk Assessment and Drainage Strategy (dated August 2025) prepared by MEC Consulting Group Ltd and have the following comments:

It is proposed to manage surface water for the site via a combination of permeable paving, three geo-cellular tanks and an attenuation basin, which will convey flows to the existing culvert to the north. The system provides a total attenuation volume of 774.26m³.

In line with the National SuDS Standards, the first 5mm of rainfall should be intercepted and managed on site.

The site is located within the North Kent Internal Drainage Board (IDB) district. As such, the IDB should be consulted regarding any proposed connection into the existing ditch network to ensure compliance with their requirements and to confirm the suitability of the discharge arrangements.

Based on the CCTV survey provided, it is understood that a highway drain runs through the site and culverts beneath the railway to discharge into the Medway and Thames Canal. However, it is not clear from the information provided that the section of existing culvert that is proposed to be used is clear and operational.

Furthermore, any connection / outfall into assets under the control of the highway authority can only do so by entering into a s.115 agreement between the Highway Authority and Statutory Sewerage Undertaker under the Water Industry Act 1991. For this to be possible, the on-site drainage networks must be adopted by a Statutory Sewerage Undertaker - connections from privately maintained drainage systems are not accepted. The developer must demonstrate that the highway drainage system

discharges via a positive outfall (i.e. into a watercourse or public sewer) and that the proposed flows do not result in an increased flood risk to the public highway or elsewhere. Any necessary upgrades to the drainage network will be the developer's responsibility to deliver prior to any discharge of surface water taking place. No evidence has been provided that KCC Highways will permit this connection, or indeed what alternative is proposed should this connection not be accepted. Please contact drainageta@kent.gov.uk with any queries or for further information.

We also recommend contacting Network Rail and the Environment Agency to confirm whether they hold any records of culverts crossing the railway and discharging into the canal, which is designated a 'main river'. To assist with our review, please provide details confirming ownership and outfall location of this drain, along with any relevant permissions or agreements for connection.

We recommend a holding objection until the above matters are addressed to our satisfaction.

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,

Ahaura Keighley

Graduate Flood Risk Officer
Flood and Water Management