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Our Ref: GBC/2025/106961
Date: 25 September 2025

Application No: 20250802

Location: Blackthorn Farm, Wrotham Road, Meopham, Gravesend Kent

Proposal: Outline planning application for up to 100No. residential dwellings (including affordable housing), with all matter reserved except for access and creation of a new access from A227/South Street.

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

Kent County Council, as Lead Local Flood Authority (LLFA), has reviewed the Flood Risk Assessment and Drainage Strategy Report 2500770-ACE-XX-XX-RP-C-0301- July 2025, along with the Preliminary Risk Assessment (DS-25054-25-101- June 2025) and have the following observations:

- The LLFA understands that the principal surface water strategy for the development involves capturing and infiltrating surface water via deep borehole soakaways. It is noted that the upper layer of chalk is structured and therefore unsuitable for infiltration. While this is acknowledged, on-site ground investigations will need to be undertaken. These investigations should identify the most suitable areas for infiltration into the underlying chalk, particularly within the area allocated for the attenuation basin and soakaways. The purpose of these tests is to ensure infiltration occurs at the shallowest possible depth.
- The Preliminary Risk Assessment identifies potential sources of contamination on site. Further work is recommended, including monitoring boreholes and trial pits, to confirm the extent of any contamination. The Environment Agency has requested a specific set of planning conditions in their response, which the LLFA supports. It is essential that areas designated for infiltration are free from any contaminants.
- We note that a climate change allowance of 40% has been applied. Table 2.1 of the report references a 40% allowance for the upper-end 2070s epoch. However, based on supplementary guidance, where the 2050s epoch has a higher allowance (45% in this case), the highest applicable allowance should be used for developments extending beyond the 2070s.
- The Causeway Flow simulations use default CV values of 0.75 for summer and 0.84 for winter. The LLFA recommends applying a CV value between 0.95 and

1.0 moving forward, to reflect that 95% of rainfall on the catchment will enter the drainage system.

As the applicant is currently seeking outline planning permission, we acknowledge that the site design and layout presented are preliminary and will be subject to a Reserved Matters application. To facilitate ground investigations, we request that the following planning conditions be attached should the application be granted consent:

Condition:

No development shall take place 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 demonstration of managing surface water runoff shall also be informed by ground investigations undertaken on site.

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.

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 Flood Risk Assessment and Drainage Strategy report (2500770-ACE-XX-XX-RP-C-0301- July 2025). The submitted scheme where possible shall comply 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 ground investigations undertaken on site to evidence the suitability of infiltration.
- 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. 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