

Delegated Report

Application No:	20251170
Location:	Cascades Leisure Centre, Thong Lane, Gravesend DA12 4LG
Description:	Application for the approval of condition 4 (Foul Water Strategy) and condition 6 (Surface Water Strategy) attached to planning reference number 20221293.
Applicant:	Gravesham Borough Council

Submitted Documents/Plans

Application form

Covering letter

Flood Risk Assessment and Drainage Strategy Parts 1, 2 and 3 and appendices (November 2025) by Furness rev 04

Phase 2 Geo-environmental and Geotechnical Site Investigation and appendices by RSK Geosciences

Relevant Planning History

- 20221293** Demolition of the existing Cascades Leisure Centre and public house and redevelopment of the site to provide a new leisure centre with community pool, leisure water, cafe, soft play, 'clip n climb' facility, a six court sports hall, fitness suite, spin studio, 2 no. fitness studios, 2 no. squash courts, a new tennis/netball court, improvements to the existing play area, landscaping across the site and associated car parking.

Permitted 03.03.2023

Consultations, Publicity and Representations

Environment Agency

Thank you for consulting us on the above application which we received on 18 November 2025. As part of this consultation, we have reviewed the following documents:

- Flood Risk Assessment (FRA) & Drainage Strategy Report, Part 1, ref. 7313-FUR-ZZ-XX-RP-D-0901, dated November 2025, by Furness
- Phase 2 Geo-environmental and Geotechnical Site Investigation, ref. 52511-R01(00), dated May 2023, by RSK Geosciences (Appendix D of the FRA)
- Application form, ref. PP-14481193
- Site plans and photos, and flood maps

Environment Agency position

We object to the discharge of condition 6.

We have no objection to the discharge of condition 4.

Please refer to the following sections for our full response:

- Section 1: Reasons for, and how to overcome our objection(s)
- Section 2: Technical comments
- Section 3: Advice to the Applicant

Please be aware that we wish to be re-consulted on this planning application once the required information has been submitted. Please also note that our subsequent advice may concern other important environmental issues.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

Updated information was provided and the EA responded with the following:

Thank you for consulting us on the above application which we received on 18 November 2025, with further correspondence received on 5 January 2026. As part of this consultation, we have reviewed the following documents:

- Flood Risk Assessment (FRA) & Drainage Strategy Report, Part 1, ref. 7313-FUR-ZZ-XX-RP-D-0901, rev P04, dated 5 December 2025, by Furness
- Phase 2 Geo-environmental and Geotechnical Site Investigation, ref. 52511-R01(00), dated May 2023, by RSK Geosciences (Appendix D of the FRA)
- Application form, ref. PP-14481193
- Site plans and photos, and flood maps

Environment Agency position

We have no objection to the discharge of conditions 4 and 6.

Condition 6 (Surface Water Strategy)

We have reviewed the latest updated FRA and are satisfied that it adequately covers the concerns raised in our previous letter. We have no further comments.

Condition 4 (Foul Drainage)

The drainage strategy proposed for the disposal of foul water to connect to the mains and discharge to a new private manhole north-west of the building is acceptable. We would also approve the backwash water from the pools being discharged to the sewer on the basis that the discharge rate agreed with Southern water is followed.

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

Decision notice

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

KCC Flood and Water

Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk Assessment & Drainage Strategy November 2025, reference 7313-FUR-ZZ-XX-RP-D-0901, and have the

following comments:

The submitted details set out the proposals for infiltration of surface water from the development via cellular soakaways. Permeable paving is also included within the parking areas. The present design is based on the lowest infiltration rate obtained, which would be a conservative approach.

We note some of the surface water drainage details appear to be subject to confirmation. At the discharge of conditions stage, there is an expectation that the design would be finalised for tender or construction issue purposes. We would also make the following comments on the submission:

- Part i of condition 6 concerns the performance of the drainage system. Currently the simulations for the drainage system are based on FSR rainfall. This should be updated to use the most up to date FEH 2022 rainfall data for modelling.
- Part ii of condition 6 is considered to be addressed through the analysis within section 4 and section 5.3.1 of the report, together with the provision of the new drainage network itself. We consider that this part of the condition is satisfied.
- Part iii of condition 6 concerns use of infiltration to ensure features are not located where contamination might be present. This is not specifically discussed in the report. We would seek clarification, with reference to the ground investigation, to ensure infiltration is proposed only within clean, uncontaminated ground.
- Part iv of condition 6 requires a timetable for implementation of the drainage system. No information is current submitted to satisfy this requirement. We would request an implementation timetable is provided.
- Part v of condition 6 requires submission of maintenance details. A high-level maintenance and management schedule is included within section 5.3.3 of the report and outlines an appropriate maintenance regime for the drainage system, including during completion and handover phases. We consider this is sufficient to satisfy this part of the condition.

In order to recommend the discharge of condition 6 in full, we would seek clarification on the above points and recommend the submission is updated / finalised, as the approved details are what should be subsequently implemented on the development.

We have no comments to make regarding the discharge of condition 4 as this falls outside of our remit as a statutory consultee.

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.

Further clarification was provided via an updated Flood Risk and Drainage Strategy and KCC offered the following advice:

Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk Assessment & Drainage Strategy, reference 7313-FUR-ZZ-XX-RP-D-0901, Revision P04 5th December 2025 and have the following comments:

Updates to the report have been made to address the queries raised in our letter dated 2 December 2025. These have been assessed as follows:

- Section 5.3 and Appendix J of the report include updated calculations based on FEH 2022 rainfall data. We note that the 1-in-30-year event has not been assessed with climate change;

however, the modelled network demonstrates that the climate change-adjusted 1-in-100-year event is accommodated, with only a small amount of flooded volume at two locations. As such, lower storm intensities would also be accommodated. Therefore, we are satisfied with the performance of the drainage system in relation to part (i) of condition 6.

- Section 5.3.4 of the report discusses the risks of encountering contamination and the suitability for infiltration. The report comments, with reference to the ground investigations, that the drainage systems should be sited outside any known contamination within the chalk geology. It is noted that some additional testing will need to be undertaken during construction. We consider part (iii) of condition 6 can be satisfied.
- Section 5.3.5 of the report briefly outlines a timetable for implementation of the drainage system. We consider part (iv) of condition 6 can be satisfied.

As noted previously, the submission is an outline design; however, the information provided is sufficiently detailed to satisfy the condition requirements. The applicant should be aware that any subsequent alterations to the design may require an amendment to the approved details. Notwithstanding this, we are satisfied that the details currently provided are sufficient to recommend the discharge of condition 6.

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.

Southern Water

Southern Water are happy to discharge conditions 4 (Foul Water Strategy) and condition 6 (Surface Water Strategy) due to the proposed use of SUDS and the site having adequate capacity within the network.

Analysis

Condition 4 of 20221293 states:

4. *No development approved by this planning permission shall take place until a foul drainage strategy, detailing how the developer intends to ensure that appropriate foul drainage is implemented (with a connection to foul sewer), has been submitted to and approved by, the Local Planning Authority in consultation with the Southern Water. The development shall be constructed in line with the agreed detailed design and recommendations of the strategy. No use premises can take place until the installed scheme is confirmed as meeting the agreed specifications.*

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 174 of the National Planning Policy Framework 2021.

The information submitted is acceptable and condition 4 can be discharged, as explained further within the relevant consultee comments.

Condition 6 of 20221293 states:

6. *No development approved by this permission shall be commenced until a scheme for sustainable surface water drainage has been submitted to and approved, in writing, by the Local Planning Authority. The detailed drainage scheme submitted shall*

(i) demonstrate that both the rate and volume of run-off leaving the site post-development will be restricted to that of the existing site during any rainfall event (up to and including the climate change adjusted 100yr critical storm)

(ii) demonstrate that the existing on-site surface water flow-routes and accumulation points will not be altered in such a way that the development places property at risk from flooding during any rainfall event, up to and including the climate change adjusted critical 100yr storm,

(iii) demonstrate that infiltration features are not located on parts of the site where contamination might be present

(iii) include a timetable for its implementation, and

(iv) include a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage system throughout its lifetime.

The surface water drainage scheme shall thereafter be implemented in full prior to first residential occupation of the development and thereafter maintained and managed in accordance with the approved scheme.

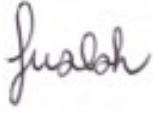
Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal; to ensure that the development does not contribute to, or is not put at risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants and to ensure ongoing efficacy of the drainage provisions, in accordance with policies CS18 and CS19 of the Gravesham Core Strategy 2014.

The updated submitted information is acceptable and condition 6 can be discharged, as explained further within the relevant consultee comments.

Recommendation:

Discharge conditions 4 and 6 of 20221293.

See draft Decision

Case Officer: Alison Webster	Team Leader: Faye Walsh
Signed: 	Signed: 
Dated: 19 January 2026	Dated: 19 January 2026