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Our Ref: GBC/2025/106436
Date: 14 August 2025

Application No: 20250778

Location: Land And Buildings At Seacon Site, Tower Wharf, Lower Road, Northfleet
Gravesend

Proposal: Application for the approval of condition 2 (Contamination Strategy),
condition 4 (Sustainable Surface Water Drainage Scheme) and condition 5
(Construction Method Statement) attached to planning reference number
20241011

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

Kent County Council as Lead Local Flood Authority have reviewed the Drainage Strategy documents prepared by Leimen LTD (July 2025) and have the following comments:

We note that the drainage design differs from that which was submitted and approved as part of the Full planning application (ref: 20241011). Whilst we understand from the drawings provided that the presumed existing sewer was not located on site and that therefore an alternative pumped solution has been proposed we would expect for an updated technical statement to also be provided.

We would emphasise that pumps should only be considered as a last-resort option, and only where infiltration or discharge via gravity can be demonstrated to be unviable. Any pumped system can be prone to failure within the associated development's lifetime, and cannot be considered to be fully sustainable owing to the carbon-cost of the pump's operation.

Further to this, on checking information available to ourselves, we have been unable to locate the network now proposed to be connected and as such assume this to be a private network. Given the original submission assumed the surface water from this catchment discharged to the Botany Marshes we require for information and evidence to be submitted which demonstrates that sufficient capacity exists within the network now proposed to be connected to.

We would also highlight the latest requirement of DEFRA's SuDS Technical Standards:

"7.16 The surface water drainage system shall be evaluated for flood risk and water quality impacts associated with potential system failure during the operation phase due to blockage of any structures and flow controls or failure of pumps"

No such evaluation appears to have been included.

Furthermore, the standards also require that:

“7.18 Where the surface water drainage system incorporates motorised equipment such as pumps, or proprietary below ground products such as separators, provision shall be made for automatic monitoring of the component’s function and transmission of failure warnings to the body responsible for maintenance”

And ask that this also be confirmed as part of any resubmission.

We would advise a holding objection against this proposal, pending resolution of the concerns outlined above.

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