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**Our Ref:** GBC/2024/101489  
**Date:** 13 August 2024

**Application No:** 20240679

**Location:** Former Site Of Fox And Hounds PH, 26 - 27 London Road, Northfleet, Gravesend Kent

**Proposal:** Application for the approval of conditions 4(i)(ii)(iii)(iv) and (v), 5 and 6(a)(b)(c)(d) and (e) attached to planning permission reference number 20220431 relating to details of (4(i)(ii)(iii)(iv) Scheme for sustainable surface water drainage, (5) measures to divert the public sewers and (6(a)(b)(c)(d) Contamination land assessment report.

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

Kent County Council as Lead Local Flood Authority have the following comments:

We note that this application for Discharge of Conditions (20240679) relates to conditions that were not recommended by us in association with the full application ref: 20220431. Indeed, our only comment in response to the full application was to inform the LPA that no drainage strategy had been submitted and that we would recommend the application is not determined until it had been reviewed. As such, we have had nothing to meaningfully review or make comment upon (NB: our response has been incorrectly attributed to the Biodiversity team on the planning portal). We were not reconsulted prior to Approval with Conditions.

We would also highlight that we had previously been consulted on application ref: 20180916 for the same site, where again, we advised that there was not enough information for us to make comment, and recommended that the application should not be determined.

Whilst we acknowledge that this is a brownfield site, and therefore it could be assumed that some existing means of discharging surface water existed, we are disappointed to note the lack of consultation in relation to both full applications. Given the minimal information contained within the initial planning applications, we are not certain how it was determined that the initial proposals were appropriate, with regards to meeting or at least appearing inline with the requirements as set out in the National Planning Policy Framework and the SuDS Non Statutory Technical Standards .

We would suggest that a collaborative approach to maintaining and improving standards in both submissions and designs is essential in ensuring that the risk of flooding is not

increased as a result of development proposals, and we would wish to be involved in any major development application from the outset. By way of example, the surface water condition applied to this application requires that post development runoff and volume are limited to at or below pre-development rates and volumes. Our drainage and planning policy requires demonstration that proposals achieve at least a 50% reduction on pre-development rates of runoff for brownfield sites.

Given that the imposed conditions were not recommended by ourselves we have no comment to make with regards to the appropriateness to discharge them, however, in the spirit of collaborative working, should you have any specific concerns relating to the information and design submitted we would be happy to discuss this with you.

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,

**Cathy Bishop**

Flood Risk Officer

Flood and Water Management