



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/2025/107974
Date: 10 December 2025

Application No: 20251116

Location: Land West Of, Norwood Lane, Meopham, Gravesend Kent

Proposal: Outline application with all matters reserved (except access) for a development of up to 150 dwellings (Use Class C3), including affordable dwellings, and associated landscaping, public open space and infrastructure works.

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

Kent County Council, as Lead Local Flood Authority, has reviewed the Flood Risk Assessment and Conceptual Drainage Strategy (Version 4) prepared in support of the outline planning application and provides the following observations:

- The LLFA understands that the preliminary design proposes the capture and infiltration of runoff via three dedicated basins. Soakage testing has been undertaken at four locations on site (locations not shown) within the underlying chalk. The results indicate favourable infiltration rates, supporting the use of basins to manage runoff.
- As the application seeks outline planning permission, with all matters reserved to be addressed at the next stage, we consider the current surface water strategy is subject to change as the scheme progresses. At present, the strategy assumes that all surface water will drain to the basins.
- We acknowledge that the report references the new National Standards for SuDS. We expect that, as part of any future Reserved Matters stage, these seven standards will be adhered to where possible. This includes giving higher priority to above-ground drainage features such as roadside swales. We will expect the refined layout to incorporate additional measures prior to the infiltration basins.
- Finally, it is noted that a climate change allowance of 40% aligns with the upper allowance for the 2070s epoch. While this upper allowance is generally accepted, the 2050s epoch contains a higher value of 45%. The Environment Agency's guidance on Peak Rainfall Intensity Allowance includes an exception whereby, if the development has a lifetime beyond 2061 and the 2050s epoch has a higher allowance than the 2070s, then the higher of the two allowances should be applied.

Should the Local Planning Authority be minded to grant planning permission, we would request for the following conditions to be attached:

Condition:

No development shall take place until the details required by Condition 1 (assumed to be reserved matters condition for layout) shall demonstrate:

- that the drainage provision for the site adheres where possible to supporting National Standards for Sustainable Drainage Systems.
- 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.

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 demonstrate compliance where possible to the National Standards for Sustainable Drainage Systems and shall evidence through modelling 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 any soakage testing undertaken on site to support the use of the infiltrating features.
- 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