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Our Ref: GBC/2025/107957

Date: 2nd December 2025

Application No: 20251170

Location: Cascades Leisure Centre Thong Lane Gravesend Kent DA12 4LG

Proposal: Application for the approval of condition 4 (Foul Water Strategy) and condition 6 (Surface Water Strategy) attached to planning reference number 20221293.

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

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.

Yours faithfully,

Alex Brauning

Senior Flood Risk Officer
Flood and Water Management