

Gravesham Borough Council
Development Control
Civic Centre Windmill Street
Gravesend
Kent
DA12 1AU

Our ref: KT/2022/130262/01-L01
Your ref: 20221174
Date: 12 December 2022

Dear Sir/Madam

APPLICATION FOR APPROVAL OF CONDITIONS 3, 4 AND 5 ATTACHED TO PLANNING PERMISSION REFERENCE NUMBER 20211541 RELATING TO ARCHAEOLOGICAL FIELD EVALUATION WORKS IN ACCORDANCE WITH A WRITTEN SCHEME OF INVESTIGATION ALONG WITH ANY SAFEGUARDING MEASURES TO ENSURE PRESERVATION OF IMPORTANT ARCHAEOLOGICAL REMAINS AND/OR FURTHER INVESTIGATION AND RECORDING (3 I, II), A DETAILED SUSTAINABLE SURFACE WATER DRAINAGE SCHEME (4) AND A LIGHTING DESIGN PLAN FOR BIODIVERSITY (5)

METROPOLITAN POLICE SPECIALIST TRAINING CENTRE, MARK LANE, GRAVESEND, KENT, DA12 2HD.

Thank you for consulting us on the above. We **object** to the discharge of the conditions due to the possible encroachment of the Sustainable Drainage Systems (SuDS), in particular the hydro-brake flow control, to the culverted main river. We ask the hydro-brake and other SuDS components are offset at least 8 meters to the near face of the culverted. It is not clear from the submitted drawings if this is the case. We also ask that the offset distance is labelled on a revised proposed plan drawing.

Reason

The Environment Agency requires an 8-metre offset between the outer edge of a culvert and any development. This is to ensure that there will be enough space to carry out maintenance or any works that may be needed on the asset. Historic records of culverted watercourses are often imprecise and do not incorporate the width of the culvert and currently the FRA and site plans do not clearly demonstrate sufficient offset.

Informative

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)

- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the riverbank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Yours faithfully

David Sankar
Planning Advisor

KSLPLANNING@environment-agency.gov.uk