



Delegated Report

Approval of Details Application

Planning Application No: 20240319

Location: Land At St Columbas Close Gravesend Kent

Description: Application for approval of conditions 7, 9 and 27 attached to planning permission reference number 20221179 relating to details of (7) Scheme of sustainable water drainage, (9) Foul and surface water sewage disposal and (27) Infiltration of surface water drainage.

Applicant: Mr Sam Duckett, Oakwood Building Contractors Ltd

Submitted Documents/Plans

Planning Application Form;
Drainage Statement;
Southern Water Acknowledgement Letter dated 20th May 2024 – received 12th June 2024
Technical Note - Drainage Statement Additional Information - received 12th June 2024.

Relevant Planning History

Reference	Description	Decision	Decision Date
20240456	Application for approval of condition 11 attached to planning permission reference number 20221179 relating to details (and samples where requested by the Local Planning Authority) of all the external facing materials to be used in the construction of the development.		
20240434	Application for approval of condition 12 attached to planning permission reference number 20221179 relating to details of crime prevention measures according to the principles and physical security requirements of Crime Prevention through Environmental Design (CPTED)	Under Consideration	
20240373	Application for approval of condition 10 attached to planning permission reference number 20221179 relating to details of how the development will offset biodiversity loss/enhance biodiversity.	Approval of Details	19.06.2024
20240372	Application for approval of condition 8 attached to planning permission reference number 20221179 relating to a arboricultural method statement being submitted and approved.	Under Consideration	
20240323	Application for approval of condition 6 attached to planning permission reference number 20221179 relating to the details of the lighting design and biodiversity.	Approval of Details	11.06.2024
20240261	Application for approval of the first part of condition 5 attached to planning permission reference number 20221179 relating to the implementation of an archaeological field evaluation works in accordance with	Approval of Details	23.05.2024

	a Written Scheme of Investigation and timetable.		
20240260	Application for approval of condition 4 parts a, b and c attached to planning permission reference number 20221179 relating to a strategy to deal with the potential risks associated with any contamination of the site.	Approval of Details	23.05.2024
20240258	Application for approval of condition 3 attached to planning permission reference number 20221179 relating to a comprehensive Code of Construction Practice covering all environmental impacts of this development.	Under Consideration	
20221179	Demolition of Nos. 1-12 St Patricks Gardens. Nos. 36-41 St Patricks Gardens and Nos. 28-42 even nos. only St Columbas Close, and the caretakers facility. Erection of 2no. 2 storey buildings, 1no. 3 storeys building and 1no. part 3 and part 4 storey building; to provide 46 residential dwellings (Class C3) residential use, with associated vehicle and pedestrian access, amenity space with hard and soft landscaping, car and cycle parking, refuse and recycling storage provision, and other associated works.	Permitted	06.04.2023

Development Plan

Gravesham Local Plan Core Strategy (September 2014):

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS11 - Transport
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles

Paragraph 33 of the NPPF (2023) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2023), the Council will also seek to replace these.

National Planning Policy Framework (2023)

- Section 2 – Achieving Sustainable Development
- Section 4 – Decision-making
- Section 12 – Achieving well-designed and beautiful places

Consultations

Southern Water

Southern Water cannot recommend discharge of condition 09 related to foul drainage.

It appears that the applicant is proposing to abandon/divert a public foul sewer. Any public sewer diversion proposals shall be approved by Southern Water under Section 185 of the Water Industry Act. An application should be made using Southern Water's Get Connected Service at developerservices.southernwater.co.uk

The Council's Building Control officers or technical staff should be consulted regarding the discharge condition 07, 09 and 27 for surface water disposal.

12.06.24 – In response to Southern Water's comments, the applicant's have confirmed that an application to divert the public sewer has been made to Southern Water under Section 185 of the Water Industry Act. A copy of the letter of acknowledgement has been provided.

KCC Flood and Water Management

Kent County Council as Lead Local Flood Authority have reviewed the Drainage Statement prepared by Gurney Consulting Engineers dated 02.04.2024 and have the following comments:

1. It is understood from the report that the surface water for the site is to be managed through the use of cellular soakaways and permeable paving. Whilst we have no objection to this in principle, we note that within the hydraulic calculations both side and base infiltration has been used. As per the requirements of the Ciria SuDS design manual, section 25, care should be taken when assuming infiltration rates for designs that are greater than 1×10^{-5} m/s, because, above this, the impact of silt on performance becomes more significant, especially where infiltration from the bottom of a system is assumed. We request for the simulations to be rerun without the use of base infiltration.
2. Further to this we require further clarification regarding the area used within the hydraulic calculations for the permeable paving. The total area for the permeable paving is 0.064ha within the Network Distribution Plan (Drawing number: 451, dated March 2024) however the total contributing area within the hydraulic calculations is 0.013ha.
3. Within the hydraulic calculations, the rate utilised for the permeable paving is 2.41920 m/hr we would seek for the lowest rate obtained to be used for this given that the permeable paving will not be infiltrating at the same depth of the tests undertaken.
4. With regards to the climate change allowances, in this location the allowance for the 2050s epoch is higher than that for the 2070s epoch for the 100 (1%) year storm scenario. We would expect that for a development that has a lifetime beyond 2061, the higher of the two allowances is to be used.

We would request for a holding objection until further information is provided to respond to the comments 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.

12.06.24 – In response to KCC's comments, a Technical Note - Drainage Statement Additional Information was submitted to address the concerns raised.

Environment Agency

Thank you for consulting us on the above application. We have **no objections** to discharge of conditions 7, 9 and 27.

We have reviewed the Conditions 7, 9 and 27 - Drainage Statement produced by Guernsey Consulting Engineers (Ref: 11270/24002/DS, dated 2 April 2024) and understand that surface water is to be discharged via suitable Sustainable Drainage Systems features to soakaway.

Suitable consideration has been undertaken with regard to pollution prevention measures. It is also understood that foul water is to be discharged via mains sewer. This is considered acceptable from a groundwater quality perspective and as such we would recommend the discharge of

conditions 7, 9 and 27 for this application.

Please do not hesitate to contact us should you require any further information.

Officer's Analysis

Submitted Details

The following information has been submitted to discharge conditions 7, 9 and 27:

Planning Application Form;

Drainage Statement;

Southern Water Acknowledgement Letter dated 20th May 2024 – received 12th June 2024

Technical Note - Drainage Statement Additional Information - received 12th June 2024.

Condition 7

Sustainable Surface Water Drainage

7. *No development approved by this permission shall be commenced until a scheme for sustainable surface water drainage has been submitted to and approved, in writing, by the Local Planning Authority. The detailed drainage scheme submitted shall*

(i) demonstrate that both the rate and volume of run-off leaving the site post-development will be restricted to that of the existing site during any rainfall event (up to and including the climate change adjusted 100yr critical storm)

(ii) demonstrate that the existing on-site surface water flow-routes and accumulation points will not be altered in such a way that the development places property at risk from flooding during any rainfall event, up to and including the climate change adjusted critical 100yr storm,

(iii) demonstrate that infiltration features are not located on parts of the site where contamination might be present

(iii) include a timetable for its implementation, and

(iv) include a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage system throughout its lifetime.

The surface water drainage scheme shall thereafter be implemented in full prior to first residential occupation of the development and thereafter maintained and managed in accordance with the approved scheme.

Reason: *To ensure that the principles of sustainable drainage are incorporated into this proposal; to ensure that the development does not contribute to, or is not put at risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants and to ensure ongoing efficacy of the drainage provisions, in accordance with policies CS18 and CS19 of the Gravesham Local Plan Core Strategy (September 2014).*

In relation to Condition 7 the submitted plans and documents, together with the additional information received on 12th June 2024 contain sufficient information to satisfy the condition fully and to address the initial concerns raised by KCC Flood and Water Management.

The submitted details are considered acceptable and therefore sufficient detail has been submitted to satisfy Condition 7 of 20221179 as proposed.

Condition 9

Foul and Surface Water Sewerage Disposal

9. *Notwithstanding the details shown on the approved plans, submitted documents and application form, before any above ground works commence details of the proposed means of foul and surface water sewerage disposal shall be submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern Water. The development shall be carried out in accordance with the approved details.*

Reason: *To ensure that the principles of sustainable drainage are incorporated into this proposal; to ensure that the development does not contribute to, or is not put at risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants and to ensure ongoing efficacy of the drainage provisions in accordance with Policies CS18 and CS19 of the Gravesham Local Plan Core Strategy (September 2014).*

In relation to Condition 9 the submitted plans and documents, together with the additional information received on 12th June 2024 contain sufficient information to satisfy the condition fully and to address the initial concerns raised by Southern Water.

The submitted details are considered acceptable and therefore sufficient detail has been submitted to satisfy Condition 9 of 20221179 as proposed.

Condition 27

Infiltration of Surface Water Drainage

27. *No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority.*

Reason: *To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 174 of the National Planning Policy Framework (2021) and in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy (2014).*

In relation to Condition 27 the submitted plans and documents contain sufficient information to satisfy the condition fully.

The submitted details are considered acceptable and therefore sufficient detail has been submitted to satisfy Condition 27 of 20221179 as proposed.

Conclusion

Sufficient information has been submitted to discharge Conditions 7, 9 and 27 of planning approval 20221179 relating to details of how the development will address Sustainable Surface Water Drainage, Foul and Surface Water Sewerage Disposal, and Infiltration of Surface Water Drainage.

Recommendation

ADET - Approval of Details

(For detailed conditions / reasons for refusal and informatives, see draft Decision)

Case Officer:	Ms Amanda Cue	Team Leader:	Miss Faye Hobbs
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Signed:	<i>A Cue</i>	Signed:	
Dated:	29 th May 2024	Dated:	26 June 2024