

Delegated Report

Application No:	20260119
Location:	The Builders Yard, Lower Range Road, Gravesend
Description:	Application for the approval of condition 4 (Surface Water Drainage) attached to planning reference number 20250262.
Applicant:	Gravesham Borough Council

Submitted Documents/Plans

Application form
Drainage Strategy Report
Cover letter dated 11 March 2026
Deep Bore Soakaway Details
Southern Water Map
Drawing no. 3100 rev T05 (drainage layout)
~~Drawing no. 3100 rev T01 (drainage layout)~~

Relevant Planning History

20250262 Application for variation of condition 2 attached to planning permission reference number 20190520 for erection of three storey building to form 14no. two bedroom self-contained flats; to allow increase in building height, a new ramped and stepped approach to both principle entrances along with omitting private gardens to Units 2, 3, 4 & 5.
Approved 20.08.2025

Consultations, Publicity and Representations

KCC Flood and Water Management (2 March 2026)

Kent County Council as Lead Local Flood Authority has reviewed the Drainage Strategy Report (2580/RAC/260120 – 20/01/2026) submitted in support of condition 4 and have the following comments to provide the LPA:

The LLFA understands from the report that the original surface water drainage scheme of directing runoff to the surface water sewer beneath Havengore Avenue is not possible and as such a revised scheme has been proposed. The report and Drainage Layout drawing indicate the continued incorporation of permeable paving (with below ground-base) for the parking area, coupled with an attenuation tank, prior to discharging into a deep borehole soakaway.

Before the condition is discharged, the LLFA would seek to ascertain further details around the Remark featured on the borehole test sheet detailing "Groundwater level measured previously as

2.3m below ground level". As per guidance, infiltrating features should not be infiltrating into groundwater and a 1m separation distance should usually be observed. Therefore, clarification as to whether the surface water would be discharging into the groundwater is requested.

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.

KCC Flood and Water Management (13 April 2026)

Kent County Council, as the Lead Local Flood Authority (LLFA), has reviewed the letter from Wilson Building Consultants (MS/2580/10-11/03/2026), which provides additional clarification on the reasons for proposing a deep borehole soakaway. The LLFA can confirm that we do not raise an objection to the use of a borehole soakaway, subject to the borehole being able to adequately discharge surface water runoff from the development.

A review of the British Geological Survey Borehole Viewer shows a historic borehole record titled TQ67SE3. This 1924 borehole encountered groundwater at a depth of 19 ft (5.7 m). It remains uncertain whether the 2.3 m depth recorded in the recent ground investigation represents a perched water table and whether the true groundwater level is closer to the earlier recorded depth of 5.7 m. If the actual groundwater depth is around 5.7m or deeper, the proposed borehole would discharge directly to the water table. As the Environment Agency is the statutory body responsible for groundwater protection, we advise that they are consulted to confirm their position before Condition 4 is discharged.

If the Environment Agency raises no objection to the design, the LLFA would expect the borehole soakaway to be monitored during construction and for appropriate constant-head tests to be undertaken to demonstrate that the design performs as intended. The results should be submitted as part of Condition 5 (Surface Water Drainage Verification Report).

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.

Analysis

Condition 4 of 20250262 states:

The surface water drainage scheme approved under reference 20220092 shall 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 Gravesham Local Plan Core Strategy Policy CS18: Climate Change and CS19: Development and Design Principles.

KCC Flood and Water Management were consulted on the application and required further information. The further information is acceptable however KCC have requested that the Environment Agency are consulted. The wording of the condition is such that it does not require a submission but merely requires the surface water drainage scheme that was approved under reference 20220092 to be implemented and therefore the EA has not been consulted. Condition 5 of 20250262 requires a verification report, once the works have been undertaken, to be submitted

which will require the EA's comments.

Recommendation:

Discharge condition 4.

See draft Decision

Case Officer:	Team Leader: Richard Hart
Signed: 	Signed: <i>R Hart</i>
Dated: 20 April 2026	Dated: 20 th April 2026