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Our Ref: GBC/2025/103786
Date: 11 February 2025

Application No: 20250028

Location: Northfleet School For Girls , Hall Road, Northfleet, Gravesend Kent

Proposal: Construction of floodlit synthetic turf pitch with perimeter fencing, spectator areas and access paths; installation of flood lighting around existing Multi Use Games Area (MUGA); installation of storage container; and formation of landscaped bund

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

Kent County Council as Lead Local Flood Authority have reviewed the Drainage Strategy prepared by JPP (Aug 2024) and have the following comments:

The applicant's consultant has recommended a separation distance of 10 m between soakaways and foundations. Ground instability is a risk that should be managed appropriately. Kent County Council guidance recommends separation distances that reflect the depth of the drainage measures i.e. 5m for conventional soakaways and 10m for deep bored soakaways. The CIRIA report C574D "Engineering in Chalk" recommends specifically:

- In areas where dissolution features are known to be prevalent, soakaways should be avoided if at all possible, but if unavoidable, should be sited at least 20 m away from any foundations.
- Where the chalk is of low density, or its density is not known, soakaways should be site at least 10 m away from any foundations
- Where the chalk is of medium density (or higher), the closest part of the soakaway should be at least 5 m from any foundation.

Usually, we would follow the recommendations as provided by the professional consultants, but no evidence has been provided to demonstrate that known dissolution features are present or the information as to the chalk density. We would recommend that the justification for this recommendation is sought from the applicant as it impacts the overall layout and drainage provision.

Additionally, Kent County Council as Lead Local Flood Authority would be sceptical to accept that infiltration is entirely unviable at this stage and would highlight firstly, testing was not undertaken in line with BRE 365 standards, and secondly, the Drainage

Strategy states it was "possible that the fines (clay/silt) content limited the permeability or smearing of the borehole surface and that deeper deposits or testing in machine pits could show improved infiltration potential". We would not expect for this to have been completely disregarded at this stage and expect for this to be further considered in order to demonstrate categorically that compliance with the more preferable solutions of the Drainage Hierarchy can not be complied with.

It is also noted that the current calculations use the FeH 1999 dataset, this is dataset is no longer accepted by KCC and we would request that the latest FEH 2022 dataset is used (2013 is acceptable but ideally 2022). Can the applicant provide amended hydraulic calculations using an updated FeH dataset?

Whilst it is proposed for the system to tie into the existing school private network no details of the capacity of the existing system or its final outfall has been provided. As such we can not be certain that the system will cope with additional flows or indeed if it would be acceptable to connect - should the final outflow be shown to be to a combined or surface water sewer this would cause serious concern.

Unless the applicant provides additional information responding to the above comments, Kent County Council as Lead Local Flood Authority would not recommend the application be progressed at present.

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,

Euan Allen

Graduate Flood Risk Officer
Flood and Water Management