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Our Ref: GBC/2024/101489
Date: 8 November 2024

Application No: 20240679

Location: Former Site Of Fox And Hounds PH, 26 - 27 London Road, Northfleet, Gravesend Kent

Proposal: Application for the approval of conditions 4(i)(ii)(iii)(iv) and (v), 5 and 6(a)(b)(c)(d) and (e) attached to planning permission reference number 20220431 relating to details of (4(i)(ii)(iii)(iv) Scheme for sustainable surface water drainage, (5) measures to divert the public sewers and (6(a)(b)(c)(d) Contamination land assessment report.

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

Kent County Council as Lead Local Flood Authority have reviewed the Sustainable Drainage Systems Strategy dated 17th July 2024 by STM and have the following comments:

- A detailed design would ordinarily be required at this stage for discharge of conditions, and therefore we would suggest that full detailed calculations, design and drawings (including developed layout and details) are needed to properly assess the design with a view to discharge of conditions.
- We welcome the approach to infiltrate surface water into the ground since testing reveals good rates at the tested depth of 1.3m into chalk. Please confirm that the minimum rates from the repetitions of each test has been taken as the basis for the design rate.
- We note that direct infiltration from permeable paving is proposed, however this would involve infiltration into made ground which is not supported, and especially so where potential contamination is a consideration. We also note that direct infiltration from the base of permeable paving will not work where the paving is placed directly over the proposed soakaway, and a revised design should consider this key point.
- Revised design should consider the required distance from infiltration SuDS to foundations, roads and boundaries, as per Building Regs Part H and CIRIA C754 Engineering in Chalk, which requires min 10m clearance where the density of chalk is low or unknown. If further information is available on chalk density this would be welcomed.
- A detailed assessment of contamination locations with regard to infiltration measures is specifically referenced in the conditions and this has not been addressed in the submission.

- Modelling comments:
 - modelling should cover event durations up to the 2 day storm and illustrate that this is not the critical event (to ensure that the critical duration has been captured).
 - we would appreciate application of the appropriate climate change allowances to the 1 in 30 year and 1 in 100 year event as per latest guidance
 - we note that a number of model long-sections appear to show lack of level connectivity through the network which should be resolved
 - confirmation of impermeable areas on a plan would be appreciated such that the modelled areas can be verified.

We note that the conditions applied with regard to surface water are not the standard conditions recommended by the LLFA and have provided these comments at the request of the LPA to assist them in responding to the submission made.

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,

Cathy Bishop

Flood Risk Officer

Flood and Water Management