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Flood and Water Management

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Our Ref: GBC/2024/100793
Date: 24 June 2024

Application No: 20240473

Location: Kesson House Care Home , Council Avenue, Northfleet, Gravesend Kent

Proposal: Demolition of Annex and Extension to the original Kesson House. Erection of extension to Kesson House and use of building as 9 x 1 bedroom units for supported living use and overnight staff accommodation (Class C3b). Erection of 4 x 1 bed flats and 16 x 2 bed flats (Class C3a) in two separate blocks, hard and soft landscaping, parking spaces and cycle storage.

Thank you for your consultation on the above referenced planning application. This application is supported by a Flood Risk Assessment (dated April 2024) prepared by Richard Jackson Engineering Consultants. The proposed method of surface water discharge for the site is infiltration, with an assumed minimum infiltration rate of 1x10⁻⁵m/s. No soakage testing has yet been carried out for the site, with the assumption that infiltration is suitable based on historic borehole data and the current informal drainage provision for the site.

Kent County Council as Lead Local Flood Authority have no objections to the proposed drainage strategy, however we have the following advisory comments:

- We would emphasize that additional ground investigation will be required at detailed design stage to support the use of infiltration. It is recommended that soakage tests be compliant with BRE 365, notably the requirement to fill the test pit several times. Detailed design should utilise a modified infiltration rate and demonstrate that any soakaway will have an appropriate half drain time.
- Should infiltration prove infeasible and a connection to the on site foul sewer is the only means of surface water discharge, it should only be permitted at a restricted maximum rate of 2.0l/s.

If your authority is minded to approve the application we would ask that the following conditions are included:

Condition:

Where infiltration is to be used to manage the surface water from the development hereby permitted, it will only be allowed within those parts of the site where information is submitted to demonstrate to the Local Planning Authority's satisfaction that there is no resultant unacceptable risk to controlled waters and/or ground stability. The development shall only then be carried out in accordance with the approved details.

Reason:

To protect vulnerable groundwater resources and ensure compliance with the National Planning Policy Framework.

Condition:

Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the submitted Site Specific Flood Risk Assessment and SUDS Assessment (Rev B dated April 2024) and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of within the curtilage of the site without increase to flood risk on or off-site.

The detailed drainage scheme will also be required to demonstrate that any existing surface water flow paths can be accommodated and disposed of without increase to flood risk on or off site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

Reason:

To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding. These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development.

Condition:

No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs)

of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason:

To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 175 of the National Planning Policy Framework.

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,

Elizabeth Kurton

Flood Risk Officer

Flood and Water Management