



Katherine Parkin
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Flood and Water Management

Invicta House
Maidstone
Kent
ME14 1XX

Website: www.kent.gov.uk/flooding
Email: suds@kent.gov.uk
Tel: 03000 41 41 41
Our Ref: GBC/2023/095677
Date: 7 November 2023

Application No: 20230355

Location: Hevercourt Residential Home, Goodwood Crescent, Gravesend, Kent DA12 5EY

Proposal: Application for approval of condition 5, 6 and 7 attached to planning permission reference number 20211215 relating to a detailed sustainable surface water drainage scheme for the site (5), details and/or samples of all external facing materials (6) and a scheme detailing all plant, machinery, chimneys, ducting, filters or extraction vents to be used in connection with the use (7)

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

Kent County Council as Lead Local Flood Authority have reviewed the Proposed Drainage Layout drawing number: 539121-100, dated 27.07.23, the Hydraulic calculation dated September 2023 and the Soakaway design dated 03.07.23 and have the following comments:

1. We appreciate the information provided however would ask for clarification regarding the hydraulic calculations as to why all the nodes/pipes are not represented. For example, the hydraulic calculations only show pipe numbers 1.000, 2.000 and 1.001. Pipe numbers 1002, 1.003 and 1.004 do not appear in the calculations and as such we cannot be confident that the hydraulic analysis provided reflects the design proposed, we ask for the final **full** network analysis to be provided.
2. 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. In this location the climate change allowance to apply to the design is 45% for the 100 year (1% AEP) rainfall event, rather than the 40% currently applied within the calculations dated September 2023.
3. We are still unable to locate the results of the infiltration testing as previously requested, although the soakaway design sheet utilising the final infiltration rates has been submitted. Some confusion may have been caused by our request for the results of infiltration testing, to clarify we require for the ground investigation report, which we assume includes the full results of the infiltration testing, undertaken on

site to be provided. In order to demonstrate compliance with the requirements of BRE365 we would expect for the report to include a location plan confirming the location at which testing was undertaken and for it to demonstrate the depths at which the testing was also undertaken.

Upon review of the soakway design report submitted there is some confusion with regards to the information supplied which we would appreciate clarified:

The report supplied references a soakaway/infiltration trench 9098mm deep and that the depth of the trial pit used was 400mm. On reviewing drawing number 539121-100, dated 27.07.23 and the Hydraulic calculations dated September 2023 the depth of the soakaway feature is given as 1.6m. We would expect for the depths of soakaway and the trial pit utilised within the soakaway design report to be reflective of the final feature proposed.

Until this matter has been clarified we cannot be certain that the results supplied are reflective of the final proposed depths and location of the infiltration feature, that the infiltration testing undertaken and the soakaway design complies with BRE365 and that therefore the proposed design operates effectively.

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.

Yours faithfully,

Emily Neale

Graduate Flood Risk Officer
Flood and Water Management