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Flood and Water Management

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Our Ref: GBC/2022/090039
Date: 24 May 2022

Application No: 20220432

Location: Former Police Station, 133 Windmill Street, Gravesend, Kent

Proposal: Demolition of existing structures on site and the erection of 75 Retirement Living apartments for older people (comprising 48 no. 1-bed and 27 no. 2-beds) including communal facilities, access, car parking and landscaping.

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

Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk & Drainage Technical Note prepared by Awcock Ward Partnership dated 12 April 2022 and have the following comments:

The report details the proposed drainage arrangements to serve the new development. It is understood that runoff from the impermeable areas of the site is to be captured and directed towards an attenuation tank beneath the proposed car park/access. From the attenuation basin, surface water will then discharge to a new manhole connection on Southern Water Storm Sewer beneath Wrotham Road at 5 l/s.

1. Part of the drainage strategy proposed indicates that the surface water will drain and connect to a Southern Water Storm Sewer beneath Wrotham Road. Any proposed connection into the surface water sewer should be made in discussion with Southern Water and we would advise that they are consulted with these proposals also.
2. We note that the Microdrainage calculations on page 32 of the report use rainfall model FSR data rather than FEH data. The Rainfall details on page 32 use Rainfall model FSR with rainfall depth M5-60 of 20.00mm rather than the 26.25mm suggested in the Kent County Council Drainage and Planning Policy. We would expect to see the drainage system modelled using 2013 FeH rainfall data in any appropriate modelling or simulation software. Where 2013 FeH data is not available, 26.25mm should be manually input for the M5-60 value, as per the requirements of our latest drainage and planning policy statement (June 2019).

3. As of the 10th of May 2022, the Environment Agency's climate change allowances have been updated. As part of this update, revisions have been made to the 'Peak Rainfall Intensity Allowances' that are used in applying climate change percentages to new drainage schemes. We would seek that these values are applied to all new development/ drainage schemes. The latest information on the allowances and map can be found at the following link:
<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>
4. The topography of the site means that not all of the site would naturally fall towards the north west corner. The preliminary drainage layout plan provided indicates that some of the surface water is directed towards the open space in the southwest corner of the site. This would be an ideal opportunity to integrate full SuDS design by utilising the open space with an above ground attenuation feature. This would allow greater enhancement to the local environment and increase biodiversity and we would appreciate it if the design would include all open spaces as part of the SuDS features.

We would therefore recommend a holding objection for this application until the above information is provided.

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