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Our Ref: GBC/2024/099975
Date: 02 May 2024

Application No: 20240319

Location: Land At, St Columbas Close, Gravesend, Kent

Proposal: Application for approval of conditions 7, 9 and 27 attached to planning permission reference number 20221179 relating to details of (7) Scheme of sustainable water drainage, (9) Foul and surface water sewage disposal and (27) Infiltration of surface water drainage.

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

Kent County Council as Lead Local Flood Authority have reviewed the Drainage Statement prepared by Gurney Consulting Engineers dated 02.04.2024 and have the following comments:

1. It is understood from the report that the surface water for the site is to be managed through the use of cellular soakaways and permeable paving. Whilst we have no objection to this in principle, we note that within the hydraulic calculations both side and base infiltration has been used. As per the requirements of the Ciria SuDS design manual, section 25, care should be taken when assuming infiltration rates for designs that are greater than $1 \times 10^{-5} \text{ m/s}$, because, above this, the impact of silt on performance becomes more significant, especially where infiltration from the bottom of a system is assumed. We request for the simulations to be rerun without the use of base infiltration.
2. Further to this we require further clarification regarding the area used within the hydraulic calculations for the permeable paving. The total area for the permeable paving is 0.064ha within the Network Distribution Plan (Drawing number: 451, dated March 2024) however the total contributing area within the hydraulic calculations is 0.013ha.
3. Within the hydraulic calculations, the rate utilised for the permeable paving is 2.41920 m/hr we would seek for the lowest rate obtained to be used for this given that the permeable paving will not be infiltrating at the same depth of the tests undertaken.
4. 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.

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