



Delegated Report

Application No:	20230140
Location:	Site Of Former Police Station, 133 Windmill Street, Gravesend Kent
Description:	Application for approval of condition 8 attached to planning permission reference no. 20220432 relating to the sustainable surface water drainage scheme.
Applicant:	Mr James Fitz-Costa, Churchill Retirement Living

Submitted Documents/Plans

Application form
Cover letter
Drawing no. 10 (Proposed Levels and Drainage)
Drawing no. 11 (Manhole Schedule).
Drawing no. 20 (Proposed surface finishes)
Drawing no. 51 (Construction details sheet 1 of 2)
Drawing no. 52 (Construction details sheet 2 of 2)

Relevant Planning History

20220432 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.
Approved 15 February 2023

Consultations, Publicity and Representations

KCC Flood

13.03.2023

Kent County Council as Lead Local Flood Authority have the following comments:
Unfortunately, there is presently insufficient information submitted to recommend the discharge of
condition 8 related to the provision of a sustainable drainage scheme. We would therefore
recommend the application is not determined until further details have been provided for review.

As a minimum, a discharge of conditions application for the submission of a sustainable drainage
scheme must comprise:

- A summary statement or covering letter giving an overview of the proposed sustainable drainage
system.
- 'For construction' drainage layout drawings, annotated with pipe numbers, manhole cover and

invert levels and key drainage features (such as attenuation devices, flow controls, soakaway locations etc.). General arrangement drawings of key drainage features or structures should also be provided.

- Information to support any key design inputs (e.g. greenfield and / or brownfield run-off rate calculations, existing and / or proposed impermeable area plan, ground investigation logs and infiltration test results (where applicable) and phasing plans (where applicable)) Final full network calculations and model details to demonstrate the drainage system's operation and performance for the critical duration 1 year, 30 year, 100 year +20% and 100 year +40% storm intensities.
- Where there is any exceedance of the drainage network above the 30 year event, an exceedance plan should be provided illustrating where exceedance occurs and the extent and depth of flooding. Exceedance must be controlled within the site boundary.
- A description of the measures included within the drainage scheme to manage the quality of surface water runoff so that the receiving surface waters and / or groundwater are adequately protected against pollution.

In this instance the application is only accompanied by drainage layout drawings. Additionally, the discharge of condition 8 requires the submission of the maintenance details of the proposed sustainable drainage scheme. We recommend submission of an operation and maintenance manual that comprises:

- An approximate timetable for the implementation of the drainage system during construction of development.
- A description of the SuDS components associated with the proposed drainage system and the key features that affects their operational performance if not properly maintained. This should be accompanied with a drawing which shows the drainage arrangement.
- Details of the operation and maintenance activities associated with each of the SuDS. This should consider the frequency of inspections and the types of maintenance activities required on a regular, periodic or remedial basis.
- Details of who will undertake inspections and maintenance activities. This should include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage system throughout its lifetime.

In this instance no information has been submitted with respect to the proposed maintenance of the drainage system.

We would highlight the importance of submitting sufficient detail to fully address the requirements of the conditions being discharged.

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.

The applicant submitted further information on 12 April 2023 in the form of a Technical Note and a Designer's Response.

KCC Flood responded to this on 28 April 2023:

Kent County Council as Lead Local Flood Authority have reviewed the Technical Note V1.0 dated 12 April 2023 prepared by The Civil Engineering Practice and have the following comments:

We appreciate the updated information provided, however as part of the hydraulic analysis we would also seek for the latest Environment Agency climate change analysis to be used (10th May 2022). 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. The LLFA would now seek the 'upper end' allowance is designed for both the 30 (3.3%) and 100 (1%) year storm scenarios. 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>

This analysis must determine if the impacts of the greater allowance are significant and exacerbate any flood risk. The design may need to be minimally modified but may also need additional mitigation allowances, for example attenuation features or provision of exceedance routes. This will tie into existing designing for exceedance principles.

Further to this we would also request that a copy of the Agreement with Southern Water for the connection to the existing sewer network is also provided.

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.

The applicant then provided a letter from Southern Water confirming they are satisfied with the connection method and details of a storm sewer design. KCC Flood responded with the following on

Kent County Council as Lead Local Flood Authority have reviewed the Section 106 letter from Southern Water dated 24th April 2023 and the Designer's Response 2 dated 30th August 2023 prepared by The Civil Engineering Practice and have following comments:

Whilst we appreciate the updated calculations provided, we note that the Section 106 letter from Southern Water dated 24th April 2023 is to connect to the public foul sewer. We seek for a copy of the agreement with Southern Water for the connection to the Surface Water Sewer to be provided. 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.

Following further clarification KCC Flood responded on 19 September 2023 with:

Kent County Council as Lead Local Flood Authority have reviewed the Designer's Response 3 dated 21st September 2023 prepared by The Civil Engineering Practice and have no objection to the discharge of Condition 8.

We do however note that there is discrepancies between the hydraulic calculations provided and the Proposed Levels and Drainage Layout Plan drawing (drawing number 10 Revision A dated 12.04.23) invert levels. We would seek for the invert levels on the drawing to be identical to those within the model. This can be provided as part of the Verification Condition, Condition 9.

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.

Analysis

Condition 8 of application reference 20220432 states:

8. No development (excluding demolition work) shall 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

Flood Risk & Drainage Technical Note prepared by Awcock Ward Partnership dated 12 April 2022 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 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, pursuant to the requirements of paragraph 169 of the National Planning Policy Framework (NPPF), 2021.

The applicant has submitted the information listed above as well as a Technical Note, confirmation letter of connection to mains from Southern Water, technical information and a designer's response. Although there appear to be some discrepancies, as confirmed by KCC Flood, these can be dealt with within condition 9 and therefore this information is considered acceptable and the condition can be discharged.

Recommendation:

Discharge condition 8.

See draft Decision

Case Officer:	Team Leader: Richard Hart
Signed: 	Signed: <i>R Hart</i>
Dated: 31.10.2023	Dated: 31 st October 2023