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**Our Ref:** GBC/2023/095114  
**Date:** 5 May 2023

**Application No:** 20230367

**Location:** Milton Mount Hall , Old Road East, Gravesend, Kent DA12 1NQ

**Proposal:** Application for the approval of conditions 3, 7, 8, 10, 11, 14 and 15 attached to planning permission reference number 20211092. (3) Construction Management Plan, (7) Archaeological WSI, (8) Drainage, Sustainable Surface Water Scheme Drainage Design Report (10) Levels and Retaining Works Site Layout and Ground Floors, (11) Materials, External Facings Site Layout and Roof Plan, (14) Boundary Treatments Site Layout and Roof Plan and (15) Detailed Energy and Sustainability Measures specification notes.

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

Kent County Council as Lead Local Flood Authority have reviewed the Drainage Strategy Report including Management and Maintenance Requirements prepared by Hodel Consulting Engineers dated 11th May 2022 and the Engineering layout drawing number 21-080\_C01 revision E dated 21/03/23 and have the following comments:

1. We note that the layout of the site shown in the Engineering layout (drawing number 21-080\_C01 revision E dated 21/03/23) has changed since that provided within the Drainage strategy report provided. We will require an updated copy of this report reflecting these changes to ensure the features tie in with the updated design and for this to include the latest catchment areas with regards to permeable and impermeable surfaces.
2. Further to this we require the updated supporting hydraulic calculations to demonstrate the drainage systems operation and performance.

Please note, 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.

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.

3. We note that the report highlights that BRE365 testing is to be undertaken at the locations of the soakaways to confirm the infiltration rate and soakaway sizing. We would ask for infiltration testing to be undertaken in all locations where it is proposed for soakaway features to be installed and for the results of ground investigation to be provided. This is to check that the geological layer proposed to be infiltrated to exists across the site at the depths required.
4. Condition 8 also requires for the submission of appropriate operational, maintenance and access requirements for each drainage feature, however the soakaway features have not currently been included within the management and maintenance requirements.
5. Any use of soakaways should also demonstrate adequate pollution control measures being in place, in adherence to the Ciria SuDs manual 2015 part E section 26.

We would request for a holding objection until further information is provided to respond to the comment 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