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Our Ref: GBC/2023/095677
Date: 23 June 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 Drainage Strategy Report prepared by VKHP Consulting Ltd. dated 27th March 2023 and have the following comments:

Unfortunately, there is presently insufficient information submitted to recommend the discharge of condition 5 related to the provision of a sustainable drainage scheme.

A discharge of conditions application for the submission of a sustainable drainage scheme must comprise of the following:

- '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)). Section 3.02 of the report highlights that infiltration tests have been carried out to BRE 365. We would ask for the results of this to be provided.

- 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 storm intensities + climate change allowances.

We note that the hydraulic calculations in the report use rainfall model FSR data with an M5-60 value of 20.00mm. At this stage, 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 (November 2019).

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>

- 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. This should be in adherence to the Ciria SuDs manual 2015 part E section 26 in regards to required pollution treatments.

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