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Our Ref: GBC/2025/103894
Date: 20 February 2025

Application No: 20250013

Location: Land To The North And South Of Station Road, Southfleet, Gravesend, Kent DA11 8HX

Proposal: Proposed construction, operation and maintenance of a Battery Energy Storage System (BESS) with associated infrastructure (including batteries in storage containers, a substation and inverters) and works including highway access, landscaping and biodiversity enhancements

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

Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk Assessment and Drainage Strategy prepared by Wardell Armstrong LLP dated 17 December 2024 and have the following comments:

It is understood from the report that the surface water for the site is to be managed through the use of infiltration with trench soakaways. The current sizing of the soakaways has been based upon an infiltration rate obtained from soakaway test SA03 with a rate of $4.46 \times 10^{-4} \text{ m/s}$ or 1.6056 m/hr achieved within the chalk formation. However it is noted that the geology of the site is split with three of the repeat infiltration tests not being permissible except SA03. Furthermore, the use of SA03 across all proposed soakaway locations may not be an accurate representation of the underlying condition at that proposed location and depth that areas soakaway would be situated at. For instance the two soakaways proposed within area 5 (shown within the surface water drainage management plan, drawing number: CA12848-007, revision A, dated 17.12.24) are closer in proximity to trial pit SA01 rather than SA03. We seek for further clarification to be provided regarding this.

Further to this, we seek for supporting calculations to be provided to demonstrate the drainage system's operation and drainage model network schematic for the critical duration 1 year, 30 year, 100 year + appropriate climate change allowances storm intensities. 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>

The infiltration rates used within the hydraulic analysis should be reflective of the areas where the testing was undertaken.

We note that part of the area is located in a groundwater Source Protection Zone 2. Consultation with the Environment Agency early in the planning process is recommended to identify any constraints or specific requirements in this area that may impact the proposed SuDs methods.

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

Flood Risk Officer

Flood and Water Management