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Flood and Water Management

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Our Ref: GBC/2021/086980
Date: 6 December 2022

Application No: 20211251

Location: Former Fleet Leisure, Nelson Road, Northfleet, Gravesend Kent

Proposal: Application for approval of conditions 8, 9, 20, 21 and 32 attached to planning permission reference number 20200001 relating to drainage strategy, materials, boundary treatment and Section 278 Agreement - Access/Highway Works.

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

Kent County Council as Lead Local Flood Authority have reviewed the Drainage Strategy prepared by SDS Consulting dated 15th September 2021 and the Drainage layout E02 P2 dated December 2021 and have the following comments:

It is understood from the report that the surface water for the site will be managed using infiltration through using cellular soakaways and trench soakaways.

1. On the Drainage layout E02 P2 dated December 2021, the cellular soakaways under the car park area are not shown. We recommend that all surface water drainage features are clearly shown on the drainage layout drawing.
2. As raised in our previous response dated 2nd November 2021, we note that the Microdrainage calculations in the report use rainfall model FSR data rather than FEH data. As per Kent County Council's Drainage and Planning Policy Statement (2019), we would request for the drainage system to be modelled using the 2013 FeH rainfall data. 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 (June 2019).
3. Further to this, the soakage tests that are located at closest proximity of the proposed infiltration devices are not currently compliant with BRE Digest 365. It is recommended that soakage tests be compliant with BRE 365, notably the requirement to fill the test pit several times within the areas proposed for infiltration.

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