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Our Ref: GBC/2024/099939
Date: 23 April 2024

Application No: 20240300

Location: Land To The Rear Of, Bridge Bar And Club, 24 Stone Street, Gravesend
Kent

Proposal: Application for the approval of conditions 7 and 21 attached to planning permission reference number 2011196 relating to details of (7) sustainable surface water drainage scheme and (21) foul surface water sewage disposal.

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

Kent County Council as Lead Local Flood Authority have the following comments:

Having reviewed the information submitted we note that this reflects the application made under reference 20240036 with regards to conditions 7 and 21 to which recommended a holding objection be raised (attached).

Whilst appreciative of the latest information provided with this application it would appear that those concerns raised in the previous response (attached) to 20240036 remain, namely the incorrect M5-60 value being used in the hydraulic calculations and the failure to apply the current recommend climate change uplift figures.

Further to the previous response we note that the latest calculations provided demonstrate moments of surcharging within the 1 year critical rainfall event which we would not normally expect to see.

Also whilst it is appreciated that existing discharge rates from site are quoted on drawing 7691-MBP-XX-XX-DR-C-0504/P02 we require for the information and calculations used to derive at these figures be provided.

Further to these matters we would also ask for information to be provided as to how the required drainage hierarchy (as detailed in part H of current building regulations) was considered and ultimately why the system proposed for managing surface water is connecting to a combined sewer. Should we have been consulted as part of the full application we would require for this to have been addressed prior to recommending any approval be granted.

Until the above matters have been addressed to our satisfaction we would recommend that a holding objection be put in place.

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,

Neil Clarke
Flood and Water Management
Kent County Council