

Delegated Report

Condition Discharge Application

Planning Application No:	20230355
Location:	Hevercourt Residential Home, Goodwood Crescent, Gravesend, Kent
Description:	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)
Applicant:	Mr Dean Fuller, Ash Construction Ltd
Site Visit Date:	Desktop assessment

Submitted Documents/Plans

Application form
Drawing no. 539121-101 Rev. A (Manhole Schedule)
Drainage Strategy Report (ref. 531921, Issue B dated 27 March 2023)
Drawing no. MBS 2022/1 Rev. T3 (Proposed Domestic and Drainage Services Layout)
Drawing no. MBS 2022/2 Rev. T3 (Proposed Domestic and Drainage Services Layout)
Drawing no. MBS 2022/3 Rev. T2 (Proposed Heating and Ventilation Services Layouts)
Drawing no. MBS 2022/4 Rev. T2 (Proposed Heating and Ventilation Layouts)
Drawing no. MBS 2022/5 Rev. T2 (Proposed Boiler Room Layout and Schematic Details of New CWDS Connection into Existing)
Drawing no. EBS 2022/1 Rev. T3 (Proposed Small Power and Ancillary Services Layout)
Drawing no. EBS 2022/2 Rev. T3 (Proposed Small Power and Ancillary Services Layout)
Drawing no. EBS 2022/3 Rev. T3 (Proposed Lighting and Fire Alarm Layout)
Drawing no. EBS 2022/4 Rev. T3 (Proposed Lighting and Fire Alarm Layout)
Drawing no. EBS 2022/5 Rev. T2 (Electrical Distribution Schematic Roof Layout and Site Plan Electrical Services Layout)
Electrical Engineering Services Specification Parts A, B, C and D (dated July 2022)
Mechanical Engineering Services Specification Parts A, B, C and D (dated June 2022)
Materials for Planning Condition No. 6 – Rev. A (dated Jan 23)

Revised Drawings (24.10.2023):

~~Drawing no. 539121-100 Rev. E (Proposed Drainage Layout)~~
Soakaway Design Rev. 1 (03/07/2023)
~~Storm Network (V10.6.234, March 2023)~~
Pollution Prevention (Document no. 539121-01, dated 18 July 2023)

Revised Drawings (20.09.2023)

~~Storm Network (V10.6.234, September 2023)~~

Email response 09/08/2024

Revised drawings (24.09.2024):
 Email response 24.09.2024
 Drawing no. 539121-100 Rev. F (Proposed Drainage Layout)
 Storm Network (V10.8, September 2023)

Relevant Planning History

Reference	Description	Decision	Decision Date
20211215	Single storey 'wing' extensions to north, east, south and west elevations to provide 21 new ground floor ensuite bedrooms, increasing the total number of ground floor bedrooms by 23 (including converting 2 existing staff rooms to bedrooms) from 11 to 34 (and from 41 bedrooms in total to 64), plus additional care home facilities, together with internal and external alterations including a new entrance and entrance canopy to the south elevation, external courtyards, a new compound area, 7 additional car parking spaces and landscaping.	Permitted	02.08.2022

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS12 – Green Infrastructure
- CS19 – Development and Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards

Paragraph 33 of the NPPF (2021) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2021), the Council will also seek to replace these.

National Planning Policy Framework (2021)

- 2 – Achieving sustainable development
- 12 – Achieving well-designed places

Consultations, Publicity and Representations

Consultees

GBC Environmental Protection

These conditions do not fall within Environmental Protection's remit. Although Condition 7 relates to plant, machinery, ducting, extraction vents etc, this is in relation to visual appearance rather than noise (which is covered by Condition 8 re. Noise Impact Assessment).

Comments 23 June 2023:

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.

Further Comments 10 August 2023:

Kent County Council as Lead Local Flood Authority have reviewed the Pollution Prevention report prepared by VHHP-Consulting dated 18th July 2023, Hydraulic calculation dated March 2023 and the Soakaway design calculations dated 03/07/23 and have the following comments:

1. Whilst we appreciate the additional information provided, we note that the hydraulic calculations do not show the final full network analysis of the system, for example pipe numbers 1002 and 1003 do not appear in the calculations. Further to this we expect to see analysis provided for the 2 year rainfall event scenario and 30 year +35% climate change allowance rainfall event scenario.

With regards to the climate change allowances, in this location the allowance for the 2050s epoch is higher than that for the 2070s epoch for the 100 (1%) year storm scenario. We would expect that for a development that has a lifetime beyond 2061, the higher of the two allowances is to be used.

2. The Hydraulic calculation dated March 2023 and email dated 24th July 2023 from MKA highlights that there are flood incidents during the 100 year +40 %. We would ask for an exceedance plan to be provided along with a description of how this water will be dealt with on site
3. We appreciate the soakaway design calculations provided, however for completeness, we require to see the full infiltration test results to be provided to show the location and depth of testing undertaken.

We would request for a holding objection until further information is provided to respond to the comments above.

Further Comments 11 October 2023:

Kent County Council as Lead Local Flood Authority have reviewed the Hydraulic calculations dated September 2023 and the Proposed Drainage Layout drawing number: 539121-100, dated 27.07.23 and have the following comments:

Our points from our previous response have not been addressed. Therefore, we have no further comment to make on this proposal and would refer you to our previous response dated 10th August 2023.

Further Comments 7 November 2023:

Kent County Council as Lead Local Flood Authority have reviewed the Proposed Drainage Layout drawing number: 539121-100, dated 27.07.23, the Hydraulic calculation dated September 2023 and the Soakaway design dated 03.07.23 and have the following comments:

1. We appreciate the information provided however would ask for clarification regarding the hydraulic calculations as to why all the nodes/pipes are not represented. For example, the hydraulic calculations only show pipe numbers 1.000, 2.000 and 1.001. Pipe numbers 1002, 1.003 and 1.004 do not appear in the calculations and as such we cannot be confident that the hydraulic analysis provided reflects the design proposed, we ask for the final full network analysis to be provided.
2. With regards to the climate change allowances, in this location the allowance for the 2050s epoch is higher than that for the 2070s epoch for the 100 (1%) year storm scenario. We would expect that for a development that has a lifetime beyond 2061, the higher of the two allowances is to be used. In this location the climate change allowance to apply to the design is 45% for the 100 year (1% AEP) rainfall event, rather than the 40% currently applied within the calculations dated September 2023.
3. We are still unable to locate the results of the infiltration testing as previously requested, although the soakaway design sheet utilising the final infiltration rates has been submitted. Some confusion may have been caused by our request for the results of infiltration testing, to clarify we require for the ground investigation report, which we assume includes the full results of the infiltration testing, undertaken on site to be provided. In order to demonstrate compliance with the requirements of BRE365 we would expect for the report to include a location plan confirming the location at which testing was undertaken and for it to demonstrate the depths at which the testing was also undertaken.

Upon review of the soakaway design report submitted there is some confusion with regards to the information supplied which we would appreciate clarified:

The report supplied references a soakaway/infiltration trench 9098mm deep and that the depth of the trial pit used was 400mm. On reviewing drawing number 539121-100, dated 27.07.23 and the Hydraulic calculations dated September 2023 the depth of the soakaway feature is given as 1.6m. We would expect for the depths of soakaway and the trial pit utilised within the soakaway design report to be reflective of the final feature proposed.

Until this matter has been clarified we cannot be certain that the results supplied are reflective of the final proposed depths and location of the infiltration feature, that the infiltration testing undertaken and the soakaway design complies with BRE365 and that therefore the proposed design operates effectively.

We would request for a holding objection until further information is provided to respond to the comments above.

Further Comments 12 September 2024

Whilst accepting of the addressing points within the letter dated 9th August 2024 prepared by VKHP Consulting, we would expect for the updated causeway flow calculations to be provided. In addition updated layout drawings should be provided to show the latest extents of the soakaway. Lastly we would request the test results from the infiltration testing undertaken.

We would request for a holding objection until further information is provided to respond to the comments above.

Further Comments 14 October 2024:

We note from the email from the director of MKA dated 24 September 2024 included within your email chain below provided the following:

“As previously mentioned, the infiltration test were carried out close to the proposed location of the tank. These were hand dug and to a depth that was appropriate for a hand dug test pit.”

Does MKA have any test sheets to illustrate the testing undertaken and the rates obtained from the hand dug test?

If there are no supporting test sheets present and no further testing planned before commencement of works on site to evidence the rate used within the design, we will have to rely on the soakaway design sheet containing the infiltration rate specified. Typically, we would always obtain full infiltration test sheets and any ground supporting information as part of the detailed design submission. On the basis of no supporting documentation being provided, we will take the rate used within the design as being the rate obtained.

If we are to proceed along the lines suggested above, we would expect to see further testing to be undertaken during construction of the soakaway to demonstrate appropriate infiltration rates. Should rates be identified to be substantially less than the value used within the design we would expect revisions to the scheme to be undertaken, either through Section 73 application or evidence within the Verification Condition (Condition 9).

Officer's Analysis

Condition 5 (Sustainable surface water drainage scheme)

Condition 5 states as follows:

Prior to the commencement of any above ground works, a detailed sustainable surface water drainage scheme for the site shall be submitted to and approved in writing by the Local Planning Authority. The detailed drainage scheme shall be based upon the Drainage Strategy Report prepared by vkhp Consulting dated 22 February 2022 and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no

pollution risk to receiving waters.

- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

Reason: To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding. These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development and in accordance with Policy CS12 of the Gravesham Local Plan Core Strategy 2014.

The following (final) submitted drawings set out the details required under this condition:

Drawing no. 539121-100 Rev. F (Proposed Drainage Layout)
Storm Network (V10.8, September 2023)
Soakaway Design Rev. 1 (03/07/2023)

There have been various submissions and comments between the agent's consultants and KCC Flood and Water Management (see above consultee comments). Whilst KCC's latest comments ideally required further supporting information with regards to infiltration test sheets and testing, they have confirmed they will take the rate used within the soakaway design as being the rate obtained, and on this basis would expect to see further testing to be undertaken during the construction of the soakaway to demonstrate appropriate infiltration rates. Should rates be identified to be substantially less than the value used within the design they would expect revisions to the scheme to be undertaken, either through a Section 73 application or evidence within the Verification Condition (Condition 9). An informative can be included to this effect.

On this basis, the submitted details are considered to be satisfactory in terms of the surface water disposal arrangements and risk of flooding in accordance with the reason for condition 5. The details are therefore considered to be acceptable and condition 5 can be discharged.

Condition 6 (Details of materials)

Condition 6 states as follows:

Prior to the commencement of any above ground works, details and/or samples of all external facing materials to be used on the development hereby permitted shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.

Reason: In order to ensure an acceptable standard of development upon completion, in accordance with Policy CS19 of the Gravesham Local Plan Core Strategy 2014.

The document *Materials for Planning Condition No. 6 – Rev. A (dated Jan 23)* sets out the details required under this condition, and includes the following:

- Ibstock Capital Brown Multi Stock bricks with Grey flush pointing in common and some stack bond areas (for majority of external new wings)
- Grey zinc cladding
- White render to small areas of the courtyards
- Redland Duoplain roof tiles in Rustic Brown
- Lead Grey finishes to flat roofs
- A mixture of Marble Oak, Ceramic Oak , Caramel Oak and Rhinestone Oak Rockpanel Woods planks to

roof soffits and some cheeks.

The proposed materials are in line with the details set out in the original planning application. They incorporate some modern detailing and overall will correspond with the mixed materials found in the surrounding area. The submitted details are considered to be satisfactory in terms of the external facing materials and ensuring an acceptable standard of development in accordance with the reason for condition 6. The details are therefore considered to be acceptable and condition 6 can be discharged.

Condition 7 (Details of plant, machinery, chimneys, ducting, filters or extraction vents)

Condition 7 states as follows:

Prior to the commencement of any above ground works, a scheme detailing all plant, machinery, chimneys, ducting, filters or extraction vents to be used in connection with the use shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented prior to the first use of the development and retained thereafter.

Reason: To maintain the character and appearance of the building and to ensure a satisfactory visual relationship between the existing and new development in accordance with adopted Policy CS19 of the Gravesham Local Plan Core Strategy 2014.

The following drawings set out the details required under this condition:

Drawing no. MBS 2022/1 Rev. T3 (Proposed Domestic and Drainage Services Layout)
Drawing no. MBS 2022/2 Rev. T3 (Proposed Domestic and Drainage Services Layout)
Drawing no. MBS 2022/3 Rev. T2 (Proposed Heating and Ventilation Services Layouts)
Drawing no. MBS 2022/4 Rev. T2 (Proposed Heating and Ventilation Layouts)
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The submitted details are considered to be satisfactory in terms of the character and appearance of the building in accordance with the reason for condition 7. The details are therefore considered to be acceptable and condition 7 can be discharged.

Conclusion

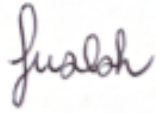
The Local Planning Authority is satisfied with the condition details submitted in relation to permission 20211215 for single storey 'wing' extensions to north, east, south and west elevations to provide 21 new ground floor ensuite bedrooms.

Recommendation

Fully discharge conditions 5, 6 and 7.

(See draft Decision)

Case Officer:	Mrs Katherine Parkin	Team Leader:	Mrs Faye Walsh
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Signed:	<i>K. Parkin</i>	Signed:	
Dated:	5 December 2024	Dated:	05 December 2024