



Rebecca Harrison
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Flood and Water Management
Invicta House
Maidstone
Kent
ME14 1XX

Website: www.kent.gov.uk/flooding
Email: suds@kent.gov.uk
Tel: 03000 41 41 41
Our Ref: GBC/2023/094909
Date: 27 April 2023

Application No: 20230228

Location: Ascot Arms , Central Avenue, Gravesend, Kent DA12 5AW

Proposal: Application for the approval of condition 8 attached to planning permission reference number 20220207 relating to a detailed sustainable surface water drainage scheme for the site has been submitted and approved.

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

Kent County Council as Lead Local Flood Authority have reviewed the Summary Drainage Report dated 8th March 2023 prepared by Arc Engineers and have the following comments:

It is understood from the report that the use of a shallow infiltration feature has been discounted due to infiltration rates being lower than expected and instead the surface water will be managed through using 4 deep bore soakaways.

1. We note that the last calculations provided date back to 04/04/2022 and feature only shallow infiltration devices. The latest design as shown on the Drainage General Arrangement (22026 - ARC - XX - XX - DR - D - 0501 - T4, dated 08/03/2023) shows the use of deep bore soakaways. We would request for updated modelling to be provided to satisfy condition 8.
2. Further to this, as of the 10th of May 2022, the Environment Agency's climate change allowances have been updated. 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>.

In this location the allowance for the 2050s epoch is higher than that for the 2070s epoch. We would expect that for a development that has a lifetime beyond 2061, the higher of the two allowances is to be used.

3. The report highlights that an Environmental permit will be required from the Environment Agency to allow the discharge of the surface water into the ground via a deep bore soakaway. We would advise for the Environment Agency to also be consulted with regards to these proposals and that confirmation of their acceptance for this condition or for the environmental permit to be provided.

We would therefore recommend a holding objection 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

Graduate Flood Risk Officer
Flood and Water Management