



Genna Henry
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/2022/092456
Date: 14 November 2022

Application No: 20220870

Location: Elizabeth Huggins Cottages, Cross Lane West, Gravesend, Kent

Proposal: Application for approval of conditions 3,9,18 and 20 attached to planning permission reference number 20210672 relating to (3) Hard and soft landscaping scheme, (9) Refuse storage details, (18) External lighting details and (20) Surface water drainage.

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

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

Unfortunately, there is presently insufficient information submitted to recommend the discharge of condition 20 related to the provision of a sustainable drainage scheme. We would therefore recommend the application is not determined until further details have been provided for review.

As a minimum, a discharge of conditions application for the submission of a sustainable drainage scheme must comprise:

- A summary statement or covering letter giving an overview of the proposed sustainable drainage system.
- '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))
- 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 +20% and 100 year +40% storm intensities.
- 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.

In this instance the application is only accompanied by drainage layout drawings.

Additionally, the discharge of condition 20 requires the submission of the maintenance details of the proposed sustainable drainage scheme. We recommend submission of an operation and maintenance manual that comprises:

- An approximate timetable for the implementation of the drainage system during construction of development.
- A description of the SuDS components associated with the proposed drainage system and the key features that affects their operational performance if not properly maintained. This should be accompanied with a drawing which shows the drainage arrangement.
- Details of the operation and maintenance activities associated with each of the SuDS. This should consider the frequency of inspections and the types of maintenance activities required on a regular, periodic or remedial basis.
- Details of who will undertake inspections and maintenance activities. This should include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage system throughout its lifetime.

In this instance no information has been submitted with respect to the proposed maintenance of the drainage system.

We would highlight the importance of submitting sufficient detail to fully address the requirements of the conditions being discharged.

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