

Our Ref: 20/010/GM/24/018

Your Ref:

Gravesham Borough Council
Planning Department
Civic Centre
Gravesend
DA12 1AU

For the attention of Mr E Bonthron



18 July 2025

6 Forbes Business Centre
Kempson Way
Bury St Edmunds
Suffolk
IP32 7AR

t: 01284 764 085

w: pdeconsulting.co.uk

Dear Ethan,

Non-Material Amendment to planning permission reference 20220733 to enable the alteration of the proposed site drainage approved in accordance with Condition 4

Please find attached a Non-Material Amendment (NMA) which we are submitting on behalf of our client FM Conway Limited in respect of operations at Imperial Wharf, Clifton Marine Parade, Gravesend, Kent, DA11 0DY.

This NMA seeks to amend details which were approved by Gravesham Borough Council in accordance with Condition 4 attached to planning permission reference 20220733 on 16 October 2024. This NMA comprises of the following documents:

- Causeway drainage calculations dated 26 June 2025;
- Drawing Number CIV100 Revision P6 (Surface Water Drainage Design);
- Drawing Number CIV101 Revision P3 (Surface Water Drainage Design (Sheet 2 of 2));
- Drawing Number CIV105 Revision P0 (Bitumen Culvert Standard Details(Sheet 1 of 3));
- Drawing Number CIV106 Revision P0 (Bitumen Culvert Standard Details (Sheets 2 of 3));
- Drawing Number CIV120 Revision P0 (Proposed Site Levels (Sheet 1 of 2)); and
- Drawing Number CIV121 Revision P0 (Proposed Site Levels (Sheet 2 of 2)).

Following approval of details under Condition 4 Conway have been working with contractors and designers on various aspects of the project build and have identified some conflicts with the previously approved drainage scheme. The conflicts relate to land to the west of the White House and Conway have been working with Meridian Civil Engineering Consultancy Limited (Meridian) who produced the approved scheme to devise an appropriate solution.

In light of further Site investigations, the drainage design has therefore been altered in the following ways:

1. The location of the proposed outlet into the River Thames has changed from a previous design location east of the jetty to a position west of the jetty.



The reason for this is that investigations on Site have revealed that the previously proposed outlet into the River Thames to the east of the jetty cannot be used. However, the investigations have revealed an existing 150 mm outlet west of the jetty with an invert approximately 4.050 mAOD (or 1.55 m below ground at outlet location).

2. The use of a single outlet in the previous design has changed to two outlets – one 150 mm existing outlet (referenced above) utilised for the gravity outfall and a new separate 280 mm outlet for the proposed rising main.

The reason for this addition is that the existing 150 mm outlet is not of sufficient capacity to allow the outflow from the Site at a rate that does not lead to flooding without the need for excessive attenuation to be provided on Site. Such excessive attenuation is deemed unnecessary as the outfall is to the tidal River Thames.

3. The location of proposed petrol interceptor and pump station has been changed from east of the jetty to west of the jetty and further away from the flood wall.

The reason for this is the proposed outfalls from the Site are now to the west of the jetty. Major drainage elements that require significant excavations are now sited at least 16 m away from the flood wall.

4. The previous design proposed a pump peak flow of 245 l/s. The new proposals are for a pump peak flow of 141 l/s. The pump rate of 141 l/s keeps runoff in the network for all events up to and including the 30-year event. During the 100-year+45%CC event, calculations demonstrate that there is flooding of 10.2 m³ at Node 2 of the network (this is the outlet of the main ACO S300 channel drain running through the middle of the Site). The flooding of 10.2 m³ is proposed to be retained in an above ground depression formed by manipulation of the finished ground levels, which is demonstrated in drawings CIV120 and CIV121.

The rationale for the changes is that the pump rate of 245 l/s requires excessive size of the pumping station and larger rising main diameter. The proposed peak pump rate of 141 l/s allows a drainage arrangement for which the network model shows no flooding for the 30-year event and an amount of flooding that can be safely stored on Site for 100-year+CC event.

5. Drainage for incidental runoff under the weighbridge is provided via a sump pump.

This is to drain away low points that could collect incidental runoff.

To summarise, the proposed alterations relate only to the land to the west of the White House. No changes are proposed to the drainage network in the proposed new car park or in the area around the new bitumen tanks.

The updated drainage layout still seeks to drain the same areas as previously approved and maintains the previously accepted principles of the outfall to the River Thames with sufficient capacity to accommodate the 1 in 100 year + 45% climate change event. The changes are effectively just in respect of the layout of the drainage network and alterations to the sizing of certain aspects.

I trust that the enclosed is sufficient for your needs, however should you have any questions, please do not hesitate to contact me.

Yours sincerely,

G. Massingham

George Massingham BSc (Hons) AssocRTPI
SENIOR CONSULTANT