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Flood and Water Management

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Our Ref: GBC/2021/086547
Date: 4 August 2022

Application No: 20211092

Location: Milton Mount Hall, Old Road East, Gravesend, Kent DA12 1NQ

Proposal: Demolition of existing hall and outbuildings, erection of a 3 storey building containing 9 x 2 bed flats towards the front of the site, a terrace of 4 no. 3 bedroom houses over 2 full floors and within the roofspace towards the rear of the site, and with parking for 19 cars.

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

Kent County Council as the Lead Local Flood Authority have reviewed the Drainage Strategy Report Prepared by Hodel Consulting Engineers dated 11th May 2022 and have the following comments:

It is understood from the report that It is proposed that the surface water for the site will be managed through infiltration using permeable paving systems and two geo-cellular soakaways.

The LLFA raise no objections to these proposals at this stage.

In addition to the report the accompanying Geo environmental investigation prepared by Ground and Environmental Services Ltd highlights that the rates obtained from soils had a moderate soakage potential and that it is recommended that full scale soakage tests be carried out.

Therefore, as part of the detailed design stage, we would seek for additional ground investigations to be undertaken that would include both infiltration testing (adhering to BRE:365 guidance) and further analysis for within the areas proposed for infiltration. It is also advised that a geotechnical specialist confirms the required separation distance between the infiltrating feature and any foundations.

We also note that the area is in groundwater Source Protection Zone 1. Consultation with the Environment Agency early in the planning process is recommended to identify any constraints or specific requirements in this area that may impact the proposed SuDs methods.

Should the Local Planning Authority be minded to grant planning permission for this development, the LLFA would advise the following conditions are attached:

Condition:

Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been 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 Hodel Consulting Engineers dated 11th May 2022. The submission shall also 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 within the curtilage of the site 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.

Condition:

No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason:

To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 165 of the National Planning Policy Framework.

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