



Ethan Bonthron
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/2025/104386
Date: 25 March 2025

Application No: 20250167

Location: Milton Place Car Park, Gravesend, Kent,

Proposal: Construction of 76 dwellings and associated infrastructure.

Thank you for your consultation on the above referenced planning application. Kent County Council as Lead Local Flood Authority has reviewed the Flood Risk Assessment and Drainage Strategy (Revision P01) prepared in support of the application and have the following comments to provide:

The LLFA understands from the report that surface water runoff from the development will be directed to an infiltration basin. The design of the basin has been based upon an infiltration rate of $2.82 \times 10^{-4} \text{m/s}$ (1.01 m/hr) from testing close to the proposed location of the basin. We would advise that further testing is undertaken at the location of the basin itself to obtain an accurate reflection of the underlying chalk. To facilitate the undertaking of further testing, we would advise for the attachment of a detailed design condition for surface water drainage. The wording to this condition can be found at the end of the response.

In addition to the infiltration testing, we would seek an urban creep factor to be applied on the residential homes only. This is build redundancy in the drainage design in the event of increasing impermeable areas such as extensions. Lastly, we request that the summer and winter CV values within the Causeway Flow Simulation Settings are uplifted to a value of 1 as opposed to the default values of 0.75 and 0.84.

Should the Local Planning Authority be minded to grant planning permission to the development, the LLFA would request for the following conditions to be applied:

Condition:

No development other than necessary enabling works shall begin 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 submitted scheme shall demonstrate compliance with the required technical standards at the time of submission 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 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 182 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,

Daniel Hoare

Senior Flood Risk Officer
Flood and Water Management