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Our Ref: GBC/2023/096933
Date: 11 September 2023

Application No: 20230740

Location: Metropolitan Police Specialist Training Centre , Mark Lane, Gravesend, Kent DA12 2HN

Proposal: Application for approval of conditions 8 attached to planning permission reference number 20211541 relating to a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person.

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 8 related to the provision of a sustainable drainage Verification Report. We would therefore recommend the application is not determined until further details have been provided for review.

We note that as a result of the construction works that a crated attenuation system has been included within the drainage network. Whilst understanding that a statement has been provided confirming that this provides equivalent volumes of storage when compared to the approved design, where all attenuation was provided within the car parking sub base, no hydraulic calculations have been provided to confirm the suitable operation of the network (as per the condition).

As such we would ask that 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 are provided.

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.

Currently, the approved design demonstrated a volume of exceedance for the 1 in 100 year + 40% CC event of 20.6m³ and the current as built drawing shows an attenuation tank accommodating 10m³. In line with the point above, please submit calculations to demonstrate the exceedance volume and flows are managed within the red line boundary.

We also note that an oil separator has been included on the surface water network again this was not detailed within the approved design and required evidence of it's installation to be submitted and for this to include the relevant information to demonstrate compliance with CIRIA approved test protocols.

We would also ask for the attached asset record sheet to be completed for the hydrobrake and attenuation tank.

Additionally, the discharge of condition 8 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,

Lucy Elcoat-Dean

Flood Risk Officer

Flood and Water Management