



Peter Price
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/2021/086980
Date: 2 November 2021

Application No: 20211251

Location: Former Fleet Leisure, Nelson Road, Northfleet, Gravesend Kent

Proposal: Application for approval of conditions 8, 9, 20, 21 and 32 attached to planning permission reference number 20200001 relating to drainage strategy, materials, boundary treatment and Section 278 Agreement - Access/Highway Works.

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

This application is supported by a Drainage Strategy Report produced by SDS Consulting (dated 15th September 2021). The sports pitches are proposed to discharge to soakaways which discharge to the ground at a proposed rate of 0.026m/hr.

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

1. Whilst it is appreciated that calculations have been provided, at the detailed design stage, we would expect to see the drainage system modelled using FeH rainfall data in any appropriate modelling or simulation software. Where FeH data is not available, 26.25mm should be manually input for the M5-60 value, as per the requirements of our latest drainage and planning policy statement (November 2019); the FSR dataset should not be used:

http://www.kent.gov.uk/__data/assets/pdf_file/0003/49665/Drainage-and-Planning-policy-statement.pdf

2. The soakage tests that are located in the close proximity of the proposed infiltration devices are not currently compliant with BRE Digest 365, however, it is necessary that tests are completed to BRE Digest 365 at all locations where infiltration devices are proposed.

3. Specifications are required for the drainage proposals for the proposed all-weather pitches as all-weather sports pitches may be substantial in size and create large drained areas. This means that less rainfall is absorbed into the ground compared to natural undeveloped land/greenfield pitches. This can lead to an increase in the rate and volume of surface water generated by the site compared to an undrained natural turf pitch and result in drainage collection with a concentrated outfall.

In cases where there is no suitable infiltration or receiving drainage system the development impact can be significant given the size of the playing fields.

We would recommend that further information is provided to respond to the comments above before the condition is approved.

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,

Thomas Hawes

Flood Risk Project Officer
Flood and Water Management