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Flood and Water Management

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Our Ref: GBC/2021/085795
Date: 31 October 2022

Application No: 20210757

Location: Custom House, The Terrace, Gravesend, Kent DA12 2BW

Proposal: Redevelopment of the site and conversion of the existing building to provide 27 residential units (6 x 1 bed, 12 x 2 bed and 9 x 3 bed) with associated landscaping, parking and vehicular access.

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

Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk Assessment and Drainage Strategy dated 7th October 2022 prepared by Herrington Consulting Ltd and have the following comments:

The proposals seek to manage the surface water for the site through utilising water butts and a piped network to a series of geocellular storage crates prior to uncontrolled discharge into the River Thames with a tidal flap valve at the outfall. In addition to this, surface water runoff accumulated at the lowest point of the site, against the flood defence, will be collected via the existing french drains or a new linear slot drain, and connected into the network. The LLFA raise no objections to this proposal at this stage.

We note that there are incidents of surcharging in the hydraulic analysis identified for the 2 year rainfall event scenario. We would expect for this to be designed out of the above works as part of the detailed design stage and if not, reasons provided as to why this is not possible.

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 Flood Risk Assessment and Drainage Strategy dated 7th October 2022 prepared by Herrington Consulting Ltd 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 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