



Lucy Hankin
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/2023/095114
Date: 16 August 2023

Application No: 20230367

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

Proposal: Application for the approval of conditions 3, 7, 8, 10, 11, 14 and 15 attached to planning permission reference number 20211092. (3) Construction Management Plan, (7) Archaeological WSI, (8) Drainage, Sustainable Surface Water Scheme Drainage Design Report (10) Levels and Retaining Works Site Layout and Ground Floors, (11) Materials, External Facings Site Layout and Roof Plan, (14) Boundary Treatments Site Layout and Roof Plan and (15) Detailed Energy and Sustainability Measures specification notes.

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

Kent County Council as Lead Local Flood Authority have reviewed the Drainage Strategy Report including Management and Maintenance Requirements prepared by Hodel Consulting Engineers dated 24th July 2023 and have the following comments:

1. We appreciate that the Engineering layout (drawing number 21-080_C01, revision H, dated 24.07.23) has been updated as well as the hydraulic calculations provided within the report to reflect the infiltration rates obtained within the soakaway locations. However we note that there are discrepancies between the invert levels for the Geocellular Soakaways, now not matching those within the hydraulic calculations. We would seek for the invert levels on the drawing to be identical to those within the model.
2. Further to this we note that the half drain time has not been calculated as the structure is too full. Whilst not a requirement for those in association with the 1:100 year event to achieve half drained within 24 hours, KCC would expect for the time to be as close to this as possible. If it is not possible to achieve a half drain time of under 24 hours, KCC requests a further 10 year event to be run consecutively to the 1:100 in order to demonstrate the operational functionality of the features and possible issues of exceedance.
3. With regards to the infiltration testing we seek to confirm that this was undertaken within the locations of the soakaways SA1 and SA2 and is compliant with BRE:365 requiring for three tests to be undertaken within each pit and the lowest result obtained used within the design.

We would request for a holding objection until further information is provided to respond to the comment above.

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