GRAVESHAM LOCAL PLAN CORE STRATEGY
RESUMED HEARING STATEMENT

Issue 2

Prepared by Boyer Planning on behalf of Bovis Homes & Persimmon Homes

March 2014
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Appendix 1 – Local Highway Implications

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1. INTRODUCTION

1.1 This representation is submitted to the Inspector in relation to the resumed hearings in the Gravesham Local Plan Core Strategy.

1.2 The Inspector has asked two questions that form the key matters to be addressed in Session 2. These are:

i. Are the policy and the proposals for growth and change in this area appropriate and justified, including in relation to the NPPF, and in terms of environmental, economic and social impact; including regarding flood risks and transport impacts?

ii. Are they clear and deliverable over the plan period, including in respect of the associated transport and other infrastructure requirements?

1.3 We address each of these matters below.

1.4 This representation address the proposed allocation of housing land located to the north of Coldharbour Road and not the proposed employment allocation to the south of Coldharbour Road. In addition, it concentrates on the southern part of the housing site (land being promoted by Bovis Homes and Persimmon Homes) whilst recognising that the northern part of the site (i.e. land controlled by Kent County Council) forms part of the overall allocation and is likely to come forward for development within the Plan period.
2. APPROPRIATNESS OF COLDHARBOUR ROAD

2.1 Policy CS21 seeks to allocate land north of Coldharbour Road for housing development. The site has got a long history of being a suitable housing site, including a previous allocation in the Local Plan. The site continues to be an attractive location for housing development being located within the urban area, close to local facilities and with connections to various modes of transport.

2.2 The NPPF sets out that the planning system has three roles: environmental; economic; and social. We contend that the site meets all these roles and that development of this site would have a positive impact on future growth in Gravesham.

2.3 Paragraph 14 of the NPPF sets out the definition of sustainable development when considering local plans:

For plan-making this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;

- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
  
  — any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

  — specific policies in this Framework indicate development should be restricted.

2.4 The site is not located in an area where the NPPF restricts development.

Environmental impact

2.5 The NPPF sets out that the environmental role is:
an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

2.6 The site is not in an area where development is restricted by any policy in the NPPF. Whilst some of the wider site is located within Flood Zone 3, no residential development is proposed in this area.

2.7 The site has no national or local landscape or ecological designations.

2.8 The development of the site will ensure that the surface water run-off is no greater than the existing greenfield run-off rate, thus complying with the guidance in the NPPF.

2.9 In addition, common ground has been agreed with the highway authorities that would ensure that the development would not have an adverse impact on the local or strategic highway network.

2.10 In terms of the benefits of development of this site, these include:

- Enhanced biodiversity as part of managed park and hedgerows as well as additional tree planting;
- Site located within walking distance of facilities such as supermarket;
- Site located in close proximity to school (which may expand); and
- Development includes play space for existing and new residents.

Economic role

2.11 The NPPF sets out that the economic role of planning is:

an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.
2.12 Development at Coldharbour Road would provide much needed family houses and affordable housing in a sustainable location to continue to support Gravesham’s economic growth. Housing delivery in Gravesham has stagnated and the reliance on urban brownfield sites for housing delivery limits the opportunities to meet the housing needs of the Borough. The site is located adjacent to a further site that is proposed to be developed for business uses (although we note that representations have been made that potentially would limit the quantum of business development) as well as other existing and proposed employment sites (for example, a service area).

2.13 Development at Coldharbour Road would provide the required on-site infrastructure to meet the needs of the growing population and would provide contributions towards off-site enhancements to infrastructure (such as highway improvements).

Social role

2.14 The NPPF sets out that the social role of planning is:

- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being.

2.15 Development at Coldharbour Road would meet all of the criteria set out:

- It would deliver much needed market and affordable housing;
- The development of the site would result in a high-quality form of development with significant open space and linkages to the surrounding area; and
- It is located in very close proximity (within walking distance) to local facilities.

Flood risk

2.16 The area of site to be developed for housing is located in Flood Zone 1 (i.e. low risk of flooding), however, it is located adjacent to land that is located within
Flood Zone 3 (high risk of flooding). It is noted that even with the recent rainfall levels that have been judged to be the worst seen in this country for some time, the site did not flood (including the area at highest risk of flooding). Indeed, the current tenant of the land confirmed that to the best of his knowledge the site has not flooded. This indicates that the site drains particularly well.

2.17 The proposed development of the site will include a Sustainable Drainage System (SDS) and will ensure that the water run-off levels are no greater than the current site, thus according with the guidance in the NPPF and NPPG.

**Transport impacts**

2.18 The development of the site at Coldharbour Road is unlikely to have any significant adverse impacts on either the strategic or local highway networks. This is confirmed in the Statement of Common Ground with Kent County Council.

2.19 In addition, a Transport Assessment considering both the impacts on the local highway network, public transport connections as well as connections to the pedestrian and cycle networks will be submitted as part of the application package.

2.20 The proposal for development at Coldharbour Road seeks to utilise and enhance sustainable transport methods and reduces reliance on the car. It is envisaged that once the entire site is developed (including KCC land), a bus would be routed through the site, thus enhancing the sustainability credentials of the site.

2.21 The conclusion in relation to the potential of the site is that development would not lead to significant adverse impacts.

**Conclusion**

2.22 In relation to the allocation of land north of Coldharbour Road and west of Wrotham Road, it is clear that this would have significant social, economic and environmental benefits. The allocation of the land would not lead to significant adverse impacts in terms of either flooding or transport. The benefits that the
allocation of the land would bring, significantly and demonstrably outweigh any impact.

2.23 As such, the bringing this site forward for development will contribute to the achievement of sustainable development and accords with the policies set out in Paragraph 14 of the NPPF.
3. COLDHARBOUR ROAD – DELIVERY

3.1 The proposed allocation of land at Coldharbour Road, as set out in Policy CS21 has three separate elements to it (although two of these are linked).

3.2 Land south of Coldharbour Road is proposed to be allocated for employment uses (although representations have been submitted that a more mixed-use development may be appropriate for this site).

3.3 Land north of Coldharbour Road is proposed to be allocated for around 550 new homes. This allocation includes both the land promoted by Bovis Homes and Persimmon Homes and land owned by Kent County Council.

3.4 Our representations considered that whilst there is very strong evidence that the site should be allocated for housing and that it can deliver housing within the first five years of the Plan (post adoption), the evidence points to a slightly lower number of units on the site.

3.5 We are aware of several representations which seek to make a case for an increase of units on this site (for example, the CPRE), however, there are several reasons why the site cannot accommodate the number of new homes sought by either the Council or other respondents.

3.6 The principal reason relates to the character of the site, which is edge-of-urban, and the impact that a higher level of development may have on the views and landscape. Whilst the NPPF advises against slavishly following existing design patterns, there has to be regard to the design principles established in the area and the impact that the development may have on existing residential occupiers.

3.7 To that effect, the nature of the site leads itself to a greater proportion of houses rather than flats and in order to create a balanced community, various types and sizes of units should be accommodated.

3.8 A further constraint to the quantum of development to be accommodated is the requirement to accommodate surface water drainage within the site as well as providing open space and play space.
3.9 Therefore, we consider that the capacity of the site to accommodate housing is constrained, although, not to the level that the site cannot contribute a significant amount of much needed housing.

3.10 The current proposal is to deliver housing development on the site in two phases with the Bovis Homes and Persimmon Homes site commencing delivery in 2015/16, whilst development of the KCC land would follow.

3.11 One of the key issues that the Inspector has to consider is whether Gravesham can demonstrate a five year supply of housing land. It is clear that given the significant delays to the delivery of brownfield sites within Gravesham, that this site is essential in order for Gravesham to demonstrate that there is a five year supply of housing land.

3.12 In our response to Issue 1 (Question v) we have already highlighted that there are concerns about the ability of Gravesham to identify a five year supply of housing land. We have set out that the five year supply (if the overall housing figure and the phasing are accepted) is approximately 1,700 new homes.

3.13 The table below provides, what we believe is a clear and deliverable supply of housing land. The key aspects of this are:

- Land at Coldharbour Road delivers circa 370 new homes;
- Land at Gravesend Riverside commences delivery of new homes in 2016/17;
- The Heritage Quarter delivers housing development; and
- Some additional sites come forward within the urban and rural areas (windfalls).

<table>
<thead>
<tr>
<th>Table 9 - Gravesham Five Year Housing Land Supply</th>
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<tbody>
<tr>
<td>---------------</td>
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<tr>
<td>Small windfalls assumption (sites of 4 or less)</td>
</tr>
<tr>
<td>Gravesend Riverside</td>
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<tr>
<td>Swanscombe Peninsula</td>
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<tr>
<td>Town Centre</td>
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<tr>
<td>Balkerland</td>
</tr>
<tr>
<td>Rest of Borough</td>
</tr>
<tr>
<td>Coldharbour Road</td>
</tr>
<tr>
<td>Total supply for year</td>
</tr>
<tr>
<td>Annual target</td>
</tr>
<tr>
<td>Cumulative Supply</td>
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<tr>
<td>Cumulative Target</td>
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<td>Cumulative Supply v Cumulative Target</td>
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3.14 We consider that this is an optimistic, but realistic reading of the current position. However, it is clear that this level of development will only come forward if infrastructure requirements are identified and delivered in order to allow the development to come forward in a timely manner.

**Infrastructure requirements at Coldharbour Road**

3.15 The key off-site infrastructure requirements associated with the delivery of new homes at Coldharbour Road are identified as:

- Strategic highway network;
- Water and drainage; and
- Education.

*Strategic highway network*

3.16 A Statement of Common Ground has been agreed with KCC and HA that has identified the potential impacts that development of this site could have on the strategic highway network; the infrastructure improvements required; and the methodology for funding and carrying out these improvements.

3.17 Therefore, there are no strategic highway issues that would affect the delivery of new homes on the site.

*Water and drainage*

3.18 Southern Water has noted that it does not have an objection to the allocation of the site for new homes, but it requires a minor change to Policy CS21 to include a requirement to connect the to the sewerage and water distribution systems at the nearest point of adequate capacity.

3.19 Whilst we appreciate Southern Water’s position, it is clear that developers have a right to connect to the water and sewerage systems, even though there is no capacity within these. Whilst this may lead to a less than optimal situation, this position has been accepted by the courts.
3.20 Southern Water’s representation seems to confuse the situation where there is a proposed allocation of a site rather than a planning application (as evidenced by their reference to planning conditions). We consider that the inclusion of the wording suggested by Southern Water is not necessary and exceeds the statutory requirements.

3.21 However, in order to address this issue, we have carried out a full assessment of the likely required infrastructure for water and sewerage and the costs of the improvements. This is included as Appendix 2.

3.22 The assessment concludes that there are restrictions in terms of water and sewerage connections and that the required upgrades to the infrastructure can be accommodated and funded.

**Education**

3.23 The site is located immediately south of St George’s CoE secondary school, which caters for pupils (boys and girls) from year 7 through to sixth form. The school admits 180 new pupils each year.

3.24 The nearest primary school is Shears Green Junior School which is located within walking distance of the site.

3.25 St George’s School have noted in their representations that they would like to expand their site to include a primary school. This would take place on land currently utilised by the School.

3.26 In addition, it is important to note that the KCC land was purchased by KCC in order to accommodate another primary school in this area, and this is still a possibility (as identified in the Policy).

3.27 The proposals for the site do identify additional and improved linkages to the existing school site and are compatible with any development proposals that may come forward.

3.28 The development of new housing on the site will lead to additional pressure on both primary and secondary school places. There is no objection from the local
education authority to the development, and various options exist in order to accommodate the additional pupils.

**Pre-application**

3.29 Bovis Homes and Persimmon Homes have commenced on a pre-application process with Gravesham Borough Council and Kent County Council. Three meetings have already taken place and significant progress has been made on key matters of principle.

3.30 A Statement of Common Ground with the Council will be submitted that will identify key matters agreed. In addition, a Planning Performance Agreement (PPA) has been agreed (although it has not yet been signed).

**Conclusions**

3.31 The allocation of land at Coldharbour Road for new homes will assist in meeting local housing needs. Significant work has been undertaken by the promoters of the site to identify any infrastructure constraints and work with the relevant authorities to ensure that there are no constraints to the delivery of these new homes.

3.32 The promoters are working closely with GBC and KCC to ensure that an early application can be pursued and that new homes can start to be delivered in 2015/16.
PERSIMMON HOMES AND BOVIS HOMES
LAND AT COLDHARBOUR ROAD GRAVESEND

GRAVESHAM BOROUGH LOCAL PLAN CORE STRATEGY EXAMINATION - SUMMARY OF POSITION IN RELATION TO HIGHWAY IMPACTS ON THE LOCAL HIGHWAY NETWORK

MARCH 2014
PERSIMMON HOMES AND BOVIS HOMES
LAND AT COLDHARBOUR ROAD
GRAVESEND

GRAVESHAM BOROUGH LOCAL PLAN CORE STRATEGY EXAMINATION - SUMMARY OF POSITION IN RELATION TO HIGHWAY IMPACTS ON THE LOCAL HIGHWAY NETWORK

MARCH 2014

Project Code: PHGRAVESEND.1
Prepared by: RH
Approved by: IM
Issue Date: March 2014
Status: FINAL
Persimmon Homes and Bovis Homes
Land at Coldharbour Road
Gravesend
Gravesham Borough Local Plan Core Strategy Examination - Summary of
Position in relation to Highway Impacts on the Local Highway Network

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1 Introduction

1.1 This Hearing Statement has been prepared by Mayer Brown, on behalf of Bovis Homes and Persimmon Homes in respect of the Gravesham Borough Local Plan Core Strategy Examination, in particular, New Policy CS21 - Land at Coldharbour Road, Gravesend.

1.2 The following note summarises the position in relation to the Highway Impacts on the Local Highway Network. This is set out in Section 2.
2 Highway Impacts on the Local Highway Network

Traffic Impacts

2.1 Details of vehicle trip rates and the distribution of traffic has been submitted to Kent County Council, the Local Highway Authority.

2.2 A Trip Assessment and Distribution exercise was undertaken to understand where residents living at the Land at Coldharbour Road development would travel to. This was based on a methodology that was agreed with Kent County Council (KCC) and the Highways Agency (HA).

2.3 The methodology involved:
   - Determine initial trip rates
   - Disaggregate vehicle trip rates by journey purpose using data from the National Travel Survey to provide data for journey purpose, i.e. Work, Leisure, Shopping, School and Other
   - Disaggregate vehicle trip rates by journey purpose using data from the National Travel Survey to give trip rates by mode of travel for each journey purpose
   - Calculate the distribution of trips by journey purpose
   - Final testing of surveys with growth and distributed development

2.4 A spreadsheet model was prepared using the above methodology, to test the impacts of the proposed development together with land controlled by Kent County Council coming forward.

2.5 Subsequently, capacity assessments have been undertaken at the following junctions in the vicinity of the site, which include:
   - The proposed site access on Coldharbour Road
   - The Wrotham Road/Coldharbour Road junction
   - The Wrotham Road/A2 eastbound junction
   - The Wrotham Road/A2 westbound junction

2.6 The latter 3 junctions have also been tested using the PARAMICS model developed by Gravesham Borough Council. Discussions with the Highway Authority did not indicate that any other junctions would require analysis.
Mitigation Measures

2.7 The relevant test in relation to impact on the Local Highway Network is contained in NPPF Para 32, namely whether severe harm would occur.

2.8 The capacity assessments have demonstrated that development at Land at Coldharbour Road would not result in severe harm to the Local Highway Network.

2.9 In relation to the Wrotham Road/A2 Interchange, congestion at the junction by the end of the Plan period, is shown to occur in the modelling work, primarily as a result of significant growth being tested just under 20%. It would be expected that demand restraint measures/peak spreading would mitigate against the majority of that growth occurring in the peak periods, but notwithstanding this it is proposed to make a fair and proportional contribution towards improvements to mitigate the junction being developed with KCC and the HA.

2.10 In terms of bus service provision, discussions with Arriva Southern Counties, have demonstrated their willingness to divert the 308 bus service, which runs from Bluewater to Sevenoaks along the Wrotham Road corridor. The Master Plan for the site includes for a spine route through the site, suitable for use by buses, connecting to the remainder of the allocation and then onto the adjacent highway network. Arriva envisage that a diverted route could involve, traveling from the town centre down Wrotham Road, and would turn left onto New House Lane (instead of continuing south) and then left into Haynes Road, and again onto Westcott Avenue, and enter the site to the north of the development, and continue through the proposed development at Coldharbour Road, and exit via the proposed site access and continue to Morrison’s. The route would then follow the existing route from Morrison’s as it does at present. This is illustrated in Figure 2.1
2.11 In the initial phases of development, existing bus stops would be used, with the Residential Travel Plan including for the provision of timetable information and initial free travel for all residents.
3 Conclusions

3.1 Discussions have taken place with Kent County Council and the Highway Agency in relation to the Transport Impacts of the Proposed Development.

3.2 It is not anticipated that any highways works will be required excepting a proportional contribution towards improvements at the A2/Wrotham Road Junction, for which the primary requirement for improvements is a result of predicted growth within the planned period for which a combination of peak spreading and demand management measures are likely to mitigate against a significant proportion of growth coming forward.

3.3 The proposed development does provide the opportunity to divert the existing 308 bus service through the site, improving the viability of that service.

3.4 It is clear therefore that the proposals to support an allocation at New Policy CS21 - Land at Coldharbour Road, Gravesend are all deliverable without the requirement for major public monies or Statutory Procedures, thus ensuring they can be in place in the early part of the plan period.
PERSIMMON HOMES AND BOVIS HOMES
LAND AT COLDHARBOUR ROAD GRAVESEND

GRAVESEND BOROUGH LOCAL PLAN
CORE STRATEGY EXAMINATION - SUMMARY OF POSITION IN RELATION TO FOUL DRAINAGE INFRASTRUCTURE

MARCH 2014
PERSIMMON HOMES AND BOVIS HOMES
LAND AT COLDHARBOUR ROAD
GRAVESEND

GRAVESEND BOROUGH LOCAL PLAN
CORE STRATEGY EXAMINATION -
SUMMARY OF POSITION IN RELATION
TO FOUL DRAINAGE INFRASTRUCTURE

MARCH 2014

Project Code: PHGRAVESEND.1
Prepared by: RH
Approved by: IM
Issue Date: March 2014
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Persimmon Homes and Bovis Homes
Land at Coldharbour Road
Gravesend
Gravesham Borough Local Plan Core Strategy Examination - Summary of Position in Relation to Foul Drainage Infrastructure

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APPENDIX A: Southern Water Level 2 Capacity Check
1 Introduction

1.1 This Hearing Statement has been prepared by Mayer Brown, on behalf of Bovis Homes and Persimmon Homes in respect of the Gravesham Borough Local Plan Core Strategy Examination, in particular, New Policy CS21 - Land at Coldharbour Road, Gravesend.

1.2 The following note summarises the position in relation to Foul Water Drainage and Infrastructure Proposals.
2 Foul Water

2.1 Level 1 capacity checks were requested by Mayer Brown, which were undertaken by Southern Water.

2.2 As part of the check, Southern Water advised that there is currently inadequate capacity within the foul sewerage network, to accommodate the proposed development. Southern Water advised that a Level 2 check would be required.

2.3 The Level 2 check was undertaken, which identified that off-site improvements would be required. The Level 2 check sets out 2 options available for this development, both of which include increasing the diameter of the existing sewers. The Level 2 Capacity Check is contained in Appendix A with the available options summarised below.

**Option 1**

2.4 This Option involves upgrade of 3 pipes, located at:

- Wrotham Road, from 300mm to 375mm
- New House Lane, from 600mm/900mm (egg) to 975mm (circular)
- Pelham Road, from 675mm/1053mm (egg) to 1125mm (circular)

2.5 Figures 2.1 - 2.3 show the locations of the proposed upgrades.

![Figure 2.1: Section of Wrotham Road Proposed Upgrade](image)
Figure 2.2: Section of New House Lane Proposed Upgrade

Figure 2.3: Section of Pelham Road Lane Proposed Upgrade
Option 2

2.6 For Option 2, Southern Water are indicating that the upgrade to the sewer on Wrotham Road, from 300mm to 375mm may not be required and therefore propose;

- New House Lane, from 600mm/900mm (egg) to 975mm (circular)
- Pelham Road, from 675mm/1053mm (egg) to 1125mm (circular)

2.7 These are show in Figures 2.2 and 2.3.
3 Conclusions

3.1 It can be concluded that whilst there are capacity constraints on the existing foul sewerage network, Southern Water have identified clear and affordable solutions for providing the additional capacity required.

3.2 It is clear therefore that in terms of Foul Drainage provision the proposals to support an allocation at New Policy CS21 - Land at Coldharbour Road, Gravesend are all deliverable.
APPENDIX A: Southern Water Level 2 Capacity Check
STUDY INTO THE OPTIONS FOR
FOUL DRAINAGE PROVISION AT
LAND AT 551
WROTHAM ROAD
GRAVESEND
KENT
DA11 7PE.

17 February 2014

REQUESTED:
MAYER BROWN LIMITED
I. Development Details:

The proposal is to discharge 19.7 l/s of foul flow to the local foul sewerage systems at manhole references TQ64712801 or TQ64722004 which are located along Wrotham Road.

**Figure 1 - Proposed Development**

II. Results and Conclusions:

**Foul Water:**

There is currently inadequate capacity within the local foul sewerage network to accommodate a flow of 19.7 l/s at manhole references TQ64712801 or TQ64722004. The proposed development would increase flows to the local network and as a result existing properties and land may be subject to a greater risk of flooding.

Additional off-site sewers or improvements to existing sewers will be required to provide sufficient capacity to service the proposed development as indicated in Option 1 (Figure 2, 3 & 4 and Table 1) and Option 2 (Figure 5 & 6 and Table 2).

Alternatively, the nearest point where capacity is currently available is at Northfleet WTW located approximately 2300 metres north west of the proposed development site. Section 98 of the Water Industry Act 1991 provides a legal mechanism through which the appropriate infrastructure can be requested (by the developer) and provided to drain a specific location.
Alternatively, the developer can discharge foul flow no greater than existing levels if proven to be connected and it is ensured that there is no overall increase in flows into the foul system. You will be required to provide a topographical site survey and/or a CCTV survey with the connection application showing the existing connection points, pipe sizes, gradients and calculations confirming the proposed foul flow will be no greater than the existing contributing flows.

**Option 1**

**Figure 2- Proposed Improvements – Foul system**
Study into the Options for Foul Water Drainage Provision along Wrotham Road, Gravesend

Table 1 - Proposed Improvements Schedule

<table>
<thead>
<tr>
<th>U/S Manhole</th>
<th>D/S Manhole</th>
<th>Sewer Diameter (mm)</th>
<th>Avg. Depth (m)</th>
<th>Length (m)</th>
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<tbody>
<tr>
<td>TQ64712801</td>
<td>TQ64722101</td>
<td>Existing: 300</td>
<td>Proposed: 375</td>
<td>1.7</td>
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<tr>
<td>TQ64723705</td>
<td>TQ64723801</td>
<td>Existing: 600/900 (Egg)</td>
<td>Proposed: 975 (Circular)</td>
<td>4.7</td>
</tr>
<tr>
<td>TQ63739303</td>
<td>TQ63739405</td>
<td>Existing: 675/1053 (Egg)</td>
<td>Proposed: 1125 (Circular)</td>
<td>8.1</td>
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</tbody>
</table>

Option -2

Figure 5- Proposed Improvements – Foul system
Figure 6- Proposed Improvements – Foul system

Table 2 - Proposed Improvements Schedule

<table>
<thead>
<tr>
<th>U/S Manhole</th>
<th>D/S Manhole</th>
<th>Sewer Diameter (mm)</th>
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<td>1125 (Circular)</td>
<td>8.1</td>
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</tbody>
</table>

Before any connections are made, an application form needs to be completed and approved by Southern Water Services.

Please note: - The information provided above does not grant approval for any designs /drawings submitted for the capacity analysis. The results quoted above are only valid for 12 months from the date of issue of this letter.