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Our Ref: GBC/2023/094275
Date: 28 April 2023

Application No: 20230140

Location: Site Of Former Police Station, 133 Windmill Street, Gravesend, Kent

Proposal: Application for approval of condition 8 attached to planning permission reference no. 20220432 relating to the sustainable surface water drainage scheme

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

Kent County Council as Lead Local Flood Authority have reviewed the Technical Note V1.0 dated 12 April 2023 prepared by The Civil Engineering Practice and have the following comments:

We appreciate the updated information provided, however as part of the hydraulic analysis we would also seek for the latest Environment Agency climate change analysis to be used (10th May 2022). As part of this update, revisions have been made to the 'Peak Rainfall Intensity Allowances' that are used in applying climate change percentages to new drainage schemes. The LLFA would now seek the 'upper end' allowance is designed for both the 30 (3.3%) and 100 (1%) year storm scenarios. The latest information on the allowances and map can be found at the following link: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

This analysis must determine if the impacts of the greater allowance are significant and exacerbate any flood risk. The design may need to be minimally modified but may also need additional mitigation allowances, for example attenuation features or provision of exceedance routes. This will tie into existing designing for exceedance principles.

Further to this we would also request that a copy of the Agreement with Southern Water for the connection to the existing sewer network is also provided.

We would request for a holding objection until further information is provided to respond to the comments 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