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Flood and Water Management
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Our Ref: GBC/2025/103713
Date: 11 March 2025

Application No: 20241011

Location: Land And Buildings At Seacon Site, Tower Wharf, Lower Road, Northfleet
Gravesend

Proposal: Extension of existing storage warehouse to provide a bagging and packaging facility for aggregates and cementitious products, incorporating extensions to both sides, a new warehouse section to the south and silos to the side.

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 prepared by Leimen LTD (Feb 2025) and have the following comments:

- It can be noted that the development intends to discharge to an existing surface water sewer. This may be accepted as infiltration will not be possible due to the presence of groundwater several metres above permeable geologies. We do note that Southern Water have been consulted and have requested that Thames Water be contacted. Kent County Council would require evidence of correspondence with Thames Water prior to any progression of this application.
- Kent County Council 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. Additionally, given that only the impermeable areas have been considered within the hydraulic analysis we would expect for the Cv values for both Winter and Summer simulations to be set to a value of 1.0.
- As of the 10th of May 2022, the Environment Agency's climate change allowances have been updated. 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>. Can the applicant provide amended hydraulic calculations for the 1 in 30+CC year return period?

Unless the applicant provides additional information responding to the above comments, Kent County Council as Lead Local Flood Authority would not recommend this application be progressed at present.

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,

Euan Allen

Graduate Flood Risk Officer
Flood and Water Management