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Our Ref: GBC/2026/110816
Date: 15 July 2026

Application No: 20260153

Location: Dene Holm House, Dene Holm Road, Northfleet, Gravesend Kent

Proposal: Demolition and replacement of a care home with a new build C2 use care facility development comprising of 60 ensuite residential bedrooms and erection of a building to provide 6 rehabilitation apartments with associated amenity spaces, inside and outside the building footprint.

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

Kent County Council as Lead Local Flood Authority have the following comments:

1. The proposed drainage strategy does not detail any measures for water reuse. This is the first discharge destination in the hierarchy listed in the National Standards for Sustainable Drainage Systems. As a minimum, we would expect to see rainwater harvesting incorporated for landscape and grounds maintenance. Where there is sufficient demand for a non-potable water supply, consideration should be given to more extensive rainwater reuse measures.
2. The drainage strategy proposes the use of infiltration features. Although no ground investigation has been undertaken, it is generally accepted that infiltration is likely to be viable within this area. Ideally, given that this is a full planning application, ground investigations should have been undertaken prior to the preparation of the drainage strategy. As a minimum, relevant nearby desk study information could be used to justify the selected infiltration rate, where such information is available, in preference to the assumed rates utilised.
3. The factor of safety of 2 applied to the infiltration rate used is insufficient when assessed against the current National Standards for Sustainable Drainage Systems (Paragraph 3.17). We would request that this is reviewed. In most instances we would expect the 'minor inconvenience' factors of safety to be utilised for the development unless there would be a significant risk arising from failure of the drainage system.
4. The current calculations are undertaken for the 1 in 100 year event only and utilise FSR rainfall data, a Cv value of 0.95, and a climate change allowance of 40%. We request that these are updated to use FEH 2022 rainfall data, a Cv value of 1.0, and a 45% climate change allowance for the 1 in 100-year rainfall

event, in accordance with the Medway Management Catchment peak rainfall allowances. It should be noted that, in some locations, the allowance for the 2050s epoch exceeds that for the 2070s epoch. Where this occurs, and where the development has a design life extending beyond 2061, the higher allowance should be applied. It is essential that appropriate modelling is undertaken in accordance with current best practice and adopts a sufficiently conservative approach, particularly in the absence of ground investigation data.

5. Whilst we do not object to the principle of utilising permeable paving and soakaways, we note that the proposed surface water drainage system is predominantly a hard-engineered solution and currently does not incorporate any green or blue infrastructure features. The National Standards promote a 'SuDS approach', whereby runoff is managed as close to its source as possible through the prioritisation of above-ground features that incorporate vegetation. Consequently, the biodiversity and amenity benefits of the proposed drainage system are currently limited.
6. The drainage strategy includes a layout plan showing how the proposed drainage measures are integrated within the development. Given the limited space available, it is important that the design is robust. It may be beneficial to revise the shape of the north-eastern soakaway to provide greater separation from the site boundary, although this could be explored further as part of the detailed design stage.
7. A maintenance plan has been provided and adequately sets out the requirements for maintaining the proposed drainage features. Should additional features be incorporated into the design, the maintenance plan should be updated accordingly.

As this is a full planning application, we request that the above matters are given due consideration prior to determination. This will help ensure that the proposals are sufficiently robust and can be accommodated within the proposed layout. This is particularly important given that ground investigation data is not yet available and that the available space within the development is limited. The proposals should also demonstrate compliance with the latest [National Standards for Sustainable Drainage Systems](#).

On this basis, we request a holding objection pending the submission of further information to address the comments outlined 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,

Alex Brauninger
Senior Flood Risk Officer
Flood and Water Management