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Our Ref: GBC/2025/106496
Date: 26 May 2026

Application No: 20250763

Location: Land At Dalefield Way (East), Gravesend, Kent, DA12 2FL

Proposal: Change of use of the land for open storage (B8 use) primarily for equipment and operations related to Dalefield Way Industrial Park (B8 use) with associated installation of hardstanding/surface treatment, security fencing/gates, access, a soft landscaping mound, and erection of temporary office cabins.

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

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

A revised Flood Risk Assessment and Preliminary Drainage Strategy (Rev 03, December 2025) has been submitted to address the comments raised in our previous letter dated 19 November 2025.

The surface water drainage strategy is now based on the use of permeable tarmac with a 400 mm thick permeable sub-base across the extent of the storage area. The area of surfacing has been reduced to allow an 8 m buffer from the watercourse. Previous correspondence from the Environment Agency indicates that this represents a minimum offset. However, this would still encroach upon the 10 m landscape buffer from the watercourse secured under previous applications for the wider development. We therefore recommend that the Local Planning Authority (LPA) considers whether the proposed 8 m offset is sufficient in this context.

The use of the permeable surface, together with a revised surface water discharge rate, would address the previous reasons for objection from the Lead Local Flood Authority (LLFA). This is because the proposed lower discharge rate of 2.1 l/s is considered acceptable, and the permeable tarmac hardstanding would provide interception and treatment of surface water runoff prior to discharge to the watercourse.

It should be noted that there is an inconsistency between the text and calculations (which propose a 2.1 l/s outflow from the site) and the drawing in Appendix E (which indicates a 3.75 l/s outflow). The permissible discharge rate shall be 2.1 l/s, based on the limiting value of 3 l/s/ha outlined in the national standards.

Should the Authority be minded to grant permission for the development, we recommend that conditions be attached to secure the detailed surface water drainage

arrangements, ensure post-construction verification that the drainage proposals are implemented in accordance with the approved details, and confirm that appropriate maintenance arrangements are in place, as set out below:

Condition:

Development shall not begin until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the Flood Risk Assessment and Preliminary Drainage Strategy (Rev 03, December 2025). The submitted scheme shall demonstrate compliance with the National Standards for SuDS at the time of submission and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of at a rate not exceeding 2.1 litres per second and without increase to flood risk on or off-site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered.

The drainage scheme shall be implemented in accordance with the approved details.

Reason:

To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding, pursuant to Paragraph 182 of the National Planning Policy Framework and the National standards for sustainable drainage systems (SuDS). These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development.

Condition:

The development hereby permitted shall not be brought into use until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason:

To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 182 of the National Planning Policy Framework.

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 Brauning

Senior Flood Risk Officer

Flood and Water Management