



Katherine Parkin
Gravesham Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

Flood and Water Management
Invicta House
Maidstone
Kent
ME14 1XX

Website: www.kent.gov.uk/flooding
Email: suds@kent.gov.uk
Tel: 03000 41 41 41
Our Ref: GBC/2025/106496
Date: 22 August 2025

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 reviewed the Flood Risk Assessment Note and Preliminary Drainage Strategy prepared O'Halloran and O'Brien Ltd.

The surface water management strategy proposes to connect into the existing drainage regime, implemented as part of the previous industrial development within the blue line boundary. The existing drainage network comprises a number of open channels which inter-connect with a wider network of watercourse drains and flood levee corridors, ultimately discharging to the north into the "Shorne and Higham Marshes" watercourse via culverts beneath the railway line and disused canal.

The drainage proposals as part of the previous applications included 'flood levees' with a storage provided of 1905m³ (for the residential scheme to the south of Dalefield Way) and 1500m³ (for the industrial scheme) together with watercourse improvements and flood compensation areas.

A series of reports are appended to the Flood Risk Assessment, setting out proposals from the previous planning applications in the area. One of the key matters therefore is to consider whether the previous drainage strategies made allowance for the impermeable areas / run-off generated by the proposals now being considered. We would note that:

1. The planning application area occupies a 10m landscape buffer from the watercourse and green space proposed with planning reference 20100436, and reserved matters application 20150873. Maintaining adequate offset from watercourses is essential for maintenance access and ecological reasons.

2. No information, such as impermeable area or discharge rate allowances, is provided for this site. It appears that the area for this application did not comprise of any significant impermeable areas contributing to the drainage system within the original development proposals under 20100436.
3. The proposals involve direct discharge to the watercourse, and it is not proposed to drain via flood levees that provide attenuation storage.

In terms of the drainage proposals on the site itself, we would make the following additional comments:

4. The report notes permeable hardstanding would be provided, but this is inconsistent with other drawings which suggest the hardstanding would be in concrete.
5. The on-site drainage provision is limited channel drains and fuel/oil interceptor. No assessment is made that this would provide sufficient treatment of run-off prior to discharge to the watercourse.
6. No calculations have been submitted for the proposed drainage system to demonstrate the operational performance of the on-site network.

With the lack of evidence to the contrary, we consider that the impermeable area generated by this development are unlikely to have been considered within the strategic drainage provision.

No on-site SuDS are proposed to control flow rates and reduce volumes of runoff, and provide multifunctional benefits including ensuring water quality downstream would not be adversely affected by the proposed site use.

Due to the above, we would object to the proposals. The reason for this is that information currently submitted does not demonstrate that flood risk is not increased elsewhere (contrary to paragraph 181 of the National Planning Policy Framework), and that insufficient consideration has been given to the incorporation of on-site SuDS (contrary to paragraph 181 (part c) and 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