



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

Flood and Water Management
Sessions House
County Hall
Maidstone, Kent
ME14 1XQ

Website: www.kent.gov.uk/flooding
Email: suds@kent.gov.uk
Tel: 03000 41 41 41
Our Ref: GBC/2025/106302
Date: 25 November 2025

Application No: 20250596

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

Proposal: Use of the land for open storage of construction related equipment and operations related to Dalefield Way Industrial Park (B8 use) with associated installation of hardstanding/surface treatment

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 & Preliminary Drainage Strategy prepared by Manhire Associates Consulting Engineers (dated October 2025) and have the following comments:

It is proposed to manage surface water via a combination of permeable paving, a high-capacity channel drain and an oil separator to manage pollution with a HydroBrake to restrict discharge rate 8.75l/s into an existing network of watercourse drains and flood levee corridors at the East of the site.

We would recommend a holding objection until the below points have been addressed:

1. As set out in the National Standards for SuDS, the peak allowable discharge rate from the development to surface waters for the 50% AEP event shall be limited to the equivalent 50% AEP greenfield runoff rate, or 3 l/s/ha, whichever is the greater.
2. As the development has a 50-year lifespan (up to 2075), the 2070 epoch should be applied, and the upper-end allowance used for both the 3.3% and 1% events, in line with Environment Agency's guidance. The design should then be adjusted accordingly to accommodate the additional volumes.
3. We request that CV values be set to 1 for both summer and winter scenarios.
4. We expect developments to apply the Simple Index Approach (SIA) as set out in Chapter 26 of the CIRIA SuDS Manual (C753) to demonstrate that adequate pollution control measures are incorporated in line with national SuDS standards. The SIA assigns pollution hazard indices to different land uses and compares them against the mitigation indices provided by selected SuDS components for sediment, metals, and hydrocarbons.

5. In line with Standard 2 of Defra's Technical Standards for SuDS, the drainage design should apply a 'SuDS approach' to capture and retain the first 5mm of rainfall through interception.

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,

Ahaura Keighley

Graduate Flood Risk Officer
Flood and Water Management