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**Our Ref:** GBC/2024/100887  
**Date:** 3 September 2024

**Application No:** 20240521

**Location:** FM Conway, Imperial Wharf, Clifton Marine Parade, Gravesend Kent

**Proposal:** Application for the approval of conditions 4, 7 and 13 attached to planning permission reference number 20220733 relating to Condition (4) - Surface Water Drainage Strategy, Condition (7) Hard Landscaping Scheme and Condition (13) Biodiversity Enhancement.

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

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

Having reviewed the latest information supplied we can confirm that we are accepting of the majority of the explanations provided in reply to those concerns raised in our response dated xxxxxx. We will expect for the items detailed in MCEC's response dated 29th July to be supplied as part of the verification report required to discharge condition 5:

- further CCTV survey.
- permitting evidence for the re-use of the outfall into the River Thames.

Further to the above items and the specific requirements of condition 5 we will also expect for the verification report to demonstrate agreement with Southern Water as to the various proposed connections to their network.

However there is one matter we still require to be addressed prior to being able to recommend the discharge of condition 4 - a 40% climate change allowance has been applied to the 1% AEP critical rainfall event, however the Environment Agency advises that:

"In some locations the allowance for the 2050s epoch is higher than that for the 2070s epoch. If so, and development has a lifetime beyond 2061, use the higher of the two allowances."

This being the case for the Medway Management Catchment we would expect for an allowance of 45% to be applied to the 1% AEP critical rainfall event and would ask that the hydraulic calculations be rerun to demonstrate compliance with the requirements as stipulated by the Environment Agency. Until we can confirm acceptance of the resultant

analysis we would advise for the holding objection to remain.

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,

**Neil Clarke**

Sustainable Drainage Team Leader  
Flood and Water Management