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Our Ref: GBC/2025/106302
Date: 7 August 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 and Preliminary Drainage Strategy prepared O'Halloran and O'Brien Ltd.

We have several key points relating to this drainage strategy, which we would request are addressed:

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 comprise of multiple systems; online attenuation is provided through flood levees, offering a storage volume of 1,905m³. Surface water from roads will pass through full retention fuel/oil separators prior to discharge into the watercourse drains.

While we thank the applicant for providing such a detailed history of the previous applications, we kindly request that future submissions include a report that clearly outlines the current surface water drainage proposal in a more focused document with a 'draw down' table of previously approved areas and subsequent discharge rates to demonstrate that capacity still exists within the wider network and that this additional rate can be accommodated. This helps to ensure clarity and efficiency in our review process.

1. As part of the submission, we request that modelling and drainage drawing is provided demonstrating the drainage system for the site as a whole (to include

the new proposed areas and the existing). This is necessary to confirm that the new system does not adversely affect performance of the existing drainage and to determine the impact of the additional catchment.

2. We advise that the Environment Agency be consulted regarding the safety of development, particularly in light of findings that tidal flood defences around Gravesend were at a lower level than previously expected. While it is noted that the EA previously did not object to the proposal in 2016, given the time that elapsed and changes in planning standards we suggest further consultation.
3. As the outfall, of this wider network is located outside the red line boundary and discharges into the adjacent watercourse named "Shorne and Higham Marshes" via culverts, we require confirmation of sufficient capacity of the receiving network for these proposals. That said this site location falls under the remit of the North Kent Marsh Internal Drainage Board (set up in August 2016). They will also need to be contacted regarding connection into the ditch network and subsequent outfall into ordinary watercourse. Contact: enquires@lmidb.co.uk.
4. For the offsite connection to be made confirmation of ownership or 3rd party land consent will be required to install drainage through the adjacent land. This is essential to ensure a drainage outfall can be secured.
5. We note that a drainage drawing (dated May 2025) has been included in Appendix G. Please provide a key to confirm the features shown. Additionally, a detailed drainage drawing for the full drainage network that this site will connect into is required.
6. We note that an impermeable area plan has been included within Phase 3A Flood Risk Assessment - January 2007 in Appendix D (drawing reference B140-019). Please confirm whether this layout and impermeable areas remains unchanged. Please supply an updated impermeable area plan if necessary. An impermeable areas plan should be provided to assist in reviewing the calculations.

We require updated hydraulic calculations to be supplied:

7. As part of the hydraulic calculations, we note that the seasonal default Cv values have been used. Given the drained area is impermeable we require this to be set at 1. We would seek for this to be updated and be provided moving forward.
8. As of the 10th of May 2022, the Environment Agency's climate change allowances have been updated. As part of this update, revisions have been made to the 'Peak Rainfall Intensity Allowances' that are used in applying climate change percentages to new drainage schemes.

The LLFA would now seek the 'upper end' allowance is designed for both the 30 (3.3%) and 100 (1%) year storm scenarios. The latest information on the allowances and map can be found at the following link:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

This analysis must determine if the impacts of the greater allowance are significant and exacerbate any flood risk. The design may need to be minimally modified but may also need additional mitigation allowances, for example attenuation features or provision of exceedance routes. This will tie into existing designing for exceedance principles.

9. Please confirm the area used in the calculations. The area used in the greenfield calculations should be consistent with that used in the hydraulic modelling.
10. We request greenfield runoff calculations to be supplied. We cannot accept proposed discharge rate until further details about the overall network are supplied.

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