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Our Ref: GBC/2026/109026
Date: 3 March 2026

Application No: 20260131

Location: Site Of Former Police Station, 133 Windmill Street, Gravesend, Kent DA12 1DB

Proposal: Erection of 67 Retirement Living Apartments for older people (comprising 67no. 1 bedrooms) including communal facilities, access, car parking and landscaping

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

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

We note the proposals for the use of a combination of permeable paving and below-ground attenuation for surface water management, with a final outfall to the surface water sewer. Given the site constraints and ground conditions, we consider this may appropriate in this instance, although opportunities for infiltration are noted to require further investigation in the report.

We note that there would be a reduction in impermeable area and the introduction of surface water flow controls that would help to ensure surface water flood risk is managed, but the proposals as submitted do not reference or meet all the requirements of the National Standards for Sustainable Drainage Systems.

We highlight that there is a need to consider opportunities for rainwater harvesting as the priority for water collection and re-use (Standard 1), prior to discharge as close as possible to greenfield run-off rates (Standard 3), and the inclusion of SuDS features which provide interception of the first 5 mm of rainfall (Standard 2). At present, the design relies on engineered features which do not provide interception for the roof area run-off and have no benefit in terms of providing amenity and biodiversity value, or better incorporation into the landscaping strategy.

We also highlight that hydraulic modelling should utilise a Cv value of 1 when modelling only impermeable area contributions to the drainage system, to ensure that the drainage system is appropriately modelled.

We currently request a holding objection and recommend that the proposals are reviewed against the latest national standards to ensure that they align with the requirements set out within.

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