



Ethan Bonthron
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/2024/099158
Date: 21 February 2024

Application No: 20240013

Location: Former St Josephs Convent Preparatory School , 46 Old Road East, Gravesend, Kent DA12 1NR

Proposal: Conversion of existing Victorian building into 6 flats. Demolition of existing outbuildings. Erection of a 3 storey medical centre. Erection of a building containing 7 no flats. Erection of 41 no houses. Associated works to include; access, public open space 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 have reviewed submitted information and understand it is proposed to discharge via infiltration through permeable paving, infiltration blankets and a basin.

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.

We would expect to see hydraulic calculations for the 2 year, 30 year +35% and 100 year +45% events modelled as a worst case scenario.

Given the site is located within Zone 1 Groundwater Source Protection Zone. We would recommend consultation is undertaken with the Environment Agency's groundwater

protection team regarding the use of infiltration on this site, and their comments included within the submission.

We also recommend using the worst case infiltration rate (0.11×10^{-5} m/s) found for all drainage features, unless justification can be provided for using the faster rate, for all drainage features on site until further testing provides location specific rates per drainage feature for detailed design.

The Environment Agency mapping shows there is an area of high risk of surface water flooding to the west of the site. Please confirm that this risk has been mitigated and depths have been assessed.

Until the above comments have been addressed, we recommend that a holding objection is in place.

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,

Lucy Senior

Flood Risk Officer

Flood and Water Management