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**Our Ref:** GBC/2025/106496  
**Date:** 19 November 2025

**Application No:** 20250763

**Location:** Land At Dalefield Way (East), Gravesend, Kent, DA12 2FL

**Proposal:** Change of use of the land for open storage (B8 use) primarily for equipment and operations related to Dalefield Way Industrial Park (B8 use) with associated installation of hardstanding/surface treatment, security fencing/gates, access, a soft landscaping mound, and erection of temporary office cabins.

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

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

A revised flood risk assessment dated October 2025 has been submitted. The main alteration in the document, in terms of surface water management, is the proposal to provide attenuation for surface water within the site boundary. This follows the concerns we raised previously that the strategic development provision was not sized for this new impermeable area.

The proposals involve a conventional drainage system with channel drains, below-ground storage, a petrol interceptor, and flow control prior to discharge to the watercourse alongside the site boundary. We have the following comments regarding the revised details:

- 3 As highlighted in our letter dated 22nd August 2025, the proposed drainage system is conventional in nature and includes no SuDS features to control the volume of run-off. In the revised proposal, only control of outflow rate is considered. The discharge rate selected appears to be based on previous strategies in the area for the existing development (7 l/s/ha); however, this does not reflect current guidance. The National Standards for Sustainable Drainage Systems (referred to hereafter as the national standards) include the following requirements:

*3.18 The peak allowable discharge rate from the development to surface waters or sewers for the 50% AEP event shall be limited to the equivalent 50% AEP greenfield runoff rate, or 3 l/s/ha, whichever is greater.*

*3.19 Where the volume of runoff discharged from the development to surface waters or sewers for the 1% AEP, 6-hour rainfall event is greater than the volume of greenfield runoff for the same rainfall event, the peak allowable*

*discharge rate from the development for the 1% AEP event shall be limited to the 50% AEP greenfield runoff rate or 3 l/s/ha, whichever is greater.*

The greenfield rates for the site have not been calculated; therefore, we are unable to determine whether the proposed 6.5 l/s discharge rate is appropriate. No features are proposed which provide interception of the first 5 mm of rainfall. As such, we consider that, as submitted, this proposal does not meet the requirements of standards 2 and 3 of the national standards.

- 4 Limited pollution control is provided, and no assessment has been made to demonstrate that the pollution interceptor is appropriate for the treatment of run-off from the site use and nature of materials stored, as highlighted in our letter dated 22nd August 2025. The proposals as submitted therefore are not considered to meet the requirements of Standard 4 of the national standards.
- 5 We highlighted in our previous letter dated 22nd August 2025 that the planning application area occupies a 10 m landscape buffer from the watercourse and green space proposed under planning reference 20100436 and reserved matters application 20150873. Maintaining adequate offset from watercourses is essential for maintenance access and ecological reasons. We note the Environment Agency has objected to the proposals, highlighting insufficient offset from the adjacent watercourse, which is designated a 'main river'. There does not appear to be any consideration of this within the flood risk assessment.

Whilst revised details have been provided, for the reasons above we remain of the view that the information currently submitted does not demonstrate that flood risk is not increased elsewhere (contrary to paragraph 181 of the National Planning Policy Framework), and that insufficient consideration has been given to the incorporation of on-site SuDS (contrary to paragraph 181(c) and 182 of the National Planning Policy Framework). We would therefore maintain an objection to the development as currently proposed.

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