



Lisa Fisher
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/2024/100305
Date: 18 June 2024

Application No: 20240378

Location: Site Of Battle Of Britain, Coldharbour Road, Northfleet, Gravesend Kent

Proposal: Application for the approval of conditions 3, 4 and 5 attached to planning permission reference number 20231182 relating to Code of Construction Practice/Construction Management Plan; Sustainable Surface Water Drainage Scheme and Infiltration; Tree Protection and Tree Works/Removal.

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

Kent County Council as Lead Local Flood Authority understand that email correspondence from Gillings Planning (24/06/2024) has been received by the LPA. This has been passed on to the LLFA. The contents of the email relates to two items, the first of these is regarding the climate change allowances to design the drainage system on. The LLFA welcomes that the higher rate of 45% has been tested within the supporting drainage calculations. The 40% as stated within our Drainage and Planning Policy Statement (2019) is outdated and we defer back to the current Environment Agency's published guidance on peak rainfall allowances. The LLFA would request that the updated drainage calculations are provided for review.

The second items relates to the potential for groundwater contamination and pollution prevention measures employed on site. It is understood that these comments follow consultation responses from the Environment Agency.

Lastly, our previous consultation response sought the results of the ground investigation and infiltration testing to be provided. This was to support the drainage design and, most importantly, the rate used in the design of the soakaways. This appears to still be outstanding; therefore, we would request that this is also provided.

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,
Daniel Hoare
Senior Flood Risk Officer
Flood and Water Management