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Our Ref: GBC/2025/106427
Date: 01 September 2025

Application No: 20250750

Location: British Gas Property Division, Gas Holder, Canal Road, Gravesend Kent

Proposal: Application for variation of condition 2 attached to planning permission reference number 20240960 for change of use to open storage (Use Class B8) with associated works, cycle and car parking; to allow replacement of Flood Risk Assessment & SuDS Strategy Report (FRA20197.1) and Drawing No. AR-XX-XX-XX-DR-0001-003 Rev. D - Proposed Site Plan with revised documents/plans.

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

Kent County Council as Lead Local Flood Authority have reviewed the FRA and SuDS Strategy Report prepared by PES dated 11.07.2025 and have the following comments:

It is proposed to manage the surface water for the site through the use of permeable paving prior to a restricted discharge into the watercourse/ ditch on the eastern boundary of the site.

Whilst we were not consulted on application 20240960, we have no objection to the variation of Condition 2. Should the Local Planning Authority be minded to grant permission we would recommend that the following advisories and conditions be attached to any future applications to ensure appropriate consideration to the surface water drainage for the site has been given.

Advisories:

1. The area falls within the jurisdiction of the North Kent Marshes Internal Drainage Board therefore we would advise that they are consulted with regards to the proposed watercourse connection also.
2. Within the hydraulic calculations, the rainfall details use Rainfall model FSR with rainfall depth M5-60 of 20.00mm rather than the 26.25mm suggested in the Kent County Council Drainage and Planning Policy. At the detailed design stage, we would expect to see the drainage system modelled using 2022 FeH rainfall data in any appropriate modelling or simulation software. Where 2022 FeH data is not available, 26.25mm should be manually input for the M5-60 value.
3. We expect the hydraulic calculations to demonstrate a CV value of 1.0 for both summer and winter simulations.

4. 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.

5. As part of the detailed design stage, details should be provided to demonstrate that an effective outfall for surface water is provided for the development layout. This information may include details of surveys of watercourses and culverts between the development and receiving network and / or details of any works that may be necessary to deliver an effective outfall for surface water.

Conditions:

Condition:

Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the FRA and SuDS Strategy Report prepared by PES dated 11.07.2025. The submitted scheme shall demonstrate compliance with the required technical standards at the time of submission and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site.

The detailed drainage scheme will also be required to demonstrate that any existing surface water flow paths can be accommodated and disposed of without increase to flood risk on or off site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

Reason:

To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding. These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development.

Condition:

No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason:

To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 182 of the National Planning Policy Framework.

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,

Emily Neale

Flood Risk Officer
Flood and Water Management