



**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](http://www.kent.gov.uk/flooding)  
**Email:** [suds@kent.gov.uk](mailto:suds@kent.gov.uk)  
**Tel:** 03000 41 41 41  
**Our Ref:** GBC/2024/099263  
**Date:** 12 March 2024

**Application No:** 20240036

**Location:** Land At The Rear Of Bridge Bar And Club, 24 Stone Street, Gravesend, Kent DA11 0NP

**Proposal:** Application for the approval of conditions 7, 8, 9, 18 and 21 attached to planning permission reference number 20211196 relating to a detailed sustainable surface water drainage scheme for the site (7), a detailed highway scheme (to accord substantially with Drawing No.D1.10 Rev E contained (8), details of surface finishes for roads and footpaths (9), full details of the open space, the design and landscaping of all un-built areas of any part of the development (18) and details of the proposed means of foul and surface water sewerage disposal (21).

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

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

Although we do not appear to have been consulted on the full application, we have reviewed submitted information for the surface water drainage of the site and understand it is proposed to attenuate flows in an attenuation tank before pumping via rising main to discharge to the existing combined sewer network.

FEH:

At the detailed design stage, we would expect to see the drainage system modelled using FeH rainfall data in any appropriate modelling or simulation software. Where FeH data is not available, 26.25mm should be manually input for the M5-60 value, as per the requirements of our latest drainage and planning policy statement (November 2019); the FSR dataset should not be used.

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.

It is recommended that until the above comments are addressed, 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