

Comments on Drainage Proposals associated with the Examination into Tenterden and Rural Sites DPD June 2010

1. I have been asked to review the proposals under consideration at the above Examination with regard to the drainage aspects and consequences of the proposals associated with the principal site (TENT1).
2. To prepare the comments I have reviewed a series of documents forwarded to me, in particular the Proposal Policy and the Response to Issue 5 – Ashford Borough Council and responses to previous submissions, and would make the following comments.
3. The proposed densities for dwellings are high by traditional standards and with the associated roads and communal facilities will greatly increase the areas of hard surfaces from which drainage will flow via piped systems. In addition there are proposals to provide an area of public car parking which will further increase the extent of hard surface areas. The impact of these factors will be discussed further below.
4. In paragraph 60 of Ashford Borough Council's Response to Issue 5, it is stated that the proposed site (TENT1) is underlain by Wadhurst Clay, which in itself is relatively impervious. However, this stratum is overlaid by superficial deposits, which will have some capacity to absorb rainfall. The proposed development will change this significantly.
5. In recent years there has been a tendency to rainfall events of higher intensity and duration, quite often locally. This has resulted in much higher instantaneous flows and volumes being delivered via piped systems to the associated drainage facilities such as streams and rivers.
6. The presented documentation is somewhat site specific and has not addressed the wider impacts which could result. At present downstream of TENT1 there are extensive areas which pond to provide flood retention relief with consequential detriment to agricultural operations while the ground is either inundated or saturated. The proposals without adequate drainage design will exacerbate these problems due to the higher flow rates, which will be discharged via the Tilder Gill.
7. It is noted that the proposals include for a wetland margin to provide habitat and a boundary feature. This will involve a certain area of land.
8. In paragraph 60 of Ashford Borough Councils Response to Issue 5 it is also stated " *...and therefore it is likely that the best SUDS strategy will be those not reliant on high filtration rates, such as ponds, swales, balancing ponds and wetland. The scale location and type of systems required will need to be addressed through the Masterplan process. However, it is considered that there is suitable land on site TENT1 and opportunities to enhance existing drainage systems in this area, so as to achieve a range of mitigation measured.*"

The effectiveness of such ponds relies on evaporation or progressive discharge to lower levels. The potential difficulty relates to the actual rainfall events experienced and their duration compared to the design basis. Recent rainfall patterns have produced high intensity rainfall events and some drainage designs will be inadequate to cope with the flow rates experienced with consequential effects on landowners downstream.

The provisions proposed to 'mitigate' the effects of increased drainage and flow rates are abdicated to the Master plan process and would be better founded on some proper prior assessment to estimate the area of land which would be required to provide a properly designed drainage system which enhanced the development, was safe for future inhabitants and more particularly their children and eliminated the risks of more extensive flooding to land owners downstream.

9. In paragraph 61 of Ashfords Response to Issue 5, it states that "*the development of TENT1 is unlikely (Italics added) to generate additional harm to Ashenden Gill LWS, as has been*

suggested." It is reasonable to question why the term 'additional' harm has been used. This seems to suggest that some harm is tolerable. It also ignores any harm to landowners further downstream. In addition, the use of the term 'unlikely' is an expression of opinion, which appears to have little basis in terms of prior analysis or evaluation. There is no practical problem with designing and constructing a suitable drainage system for this site, but it will involve a sufficient area of land which should be included in the provision made for TENT1.

- 10 The overall appearance of the proposals is that the area for TENT1 has been decided and that all other needs and considerations, some of which should reasonably have been the subject of prior investigation can somehow be accommodated in a 'tardis-like' exercise called the Masterplan.

These requirements include high density housing, communal facilities, highways, car parking, a wetland margin and various ponds, swales, balancing ponds and wetlands.

Tenterden is an beautiful rural town in the heart of the Kent Countryside and it is submitted that to ensure that the proposed development can be integrated into the existing built environment to create a pleasant, safe and environmentally sympathetic development which also provides for wildlife and bio-diversity, without impacting others, particularly downstream, the proposals for TENT1 should prudently provide for additional land on which and to ensure that a suitable development can be constructed.

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