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Our Ref: ABC/2021/084537
Date: 8 June 2021

Application No: 21/00790/AS

Location: Land between Woodchurch Road and, Appledore Road, Tenterden, Kent

Proposal: a) Outline application for the development of up to 145 residential dwellings (50% affordable) including the creation of access points from Appledore Road (1 x all modes and 1 x emergency, pedestrian and cycle only), and Woodchurch Road (pedestrian and cycle only), and creation of a network of roads, footways, and cycleways through the site. Provision of open space including children's play areas, community orchards, sustainable urban drainage systems, landscape buffers and green links all on 12.35 ha of the site. (Save for access, matters of appearance, landscaping, layout & scale reserved for consideration') b) Full planning permission for the change of land use from agricultural land to land to be used as a country park (8.66 ha), and land to be used as formal sports pitches (3.33 ha), together with pavilion to serve the proposal and the surrounding area. Including accesses, ancillary parking, pathways, sustainable urban drainage systems and associated landscaping.

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

The application is supported by A Flood Risk Assessment and Drainage Strategy prepared by RSK (April 2021). The report includes reference to ground investigation which found groundwater at 2.10m and 2.61m below ground level and that the site did not have favourable infiltration given the underlying ground conditions. The drainage strategy is based upon an estimate impermeable site coverage of 3.1 ha within a site area of 23.3 ha.

It is proposed to manage surface water from the residential area through attenuation with controlled discharge to the existing ordinary watercourses which cross the site and discharge to the public sewer in Appledore Road. Attenuation is provided within swales, pond and some limited extents of below ground crated systems.

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

- a) The pre-application discussions highlighted the capacity issues in the public sewers in Appledore Road. It has been agreed with the applicant that these

sewers would be re-instated to an acceptable condition as part of the development works.

- b) We would note that the first pages of the Microdrainage calculations in Appendix I do not contain any information. It is assumed that it is the modelled results for Network 1. We would appreciate if the applicant could provide a new copy of these calculations.
- c) Greenfield runoff rates have been calculated on developable areas as contributing to the proposed drainage system at three outfall locations. We did want to confirm the calculations against the estimated impermeable areas but could not find the estimated areas. These calculations do not appear to be included within Appendix J but it may have been overlooked given the fragmentation of the report. We would appreciate if the applicant could provide a summary of the impermeable areas per outfall and the greenfield runoff rate calculation sheet.
- d) The drainage strategy includes extents of permeable pavement within private driveways as well as highway areas. We would recommend that at detailed design that areas within curtilage of residences is considered carefully as there is no control over the ongoing provision of the pavement area. The recommendation would be to avoid private driveways of impermeable pavement which are necessary for the attenuation volume.
- e) Information to be noted is in relation to the Southern Water position, which states that no new surface water flows will be accepted, however existing connections can be maintained. The drainage strategy utilises the existing ordinary watercourses to accept surface water flows from the proposed development. We do not disagree with this approach given the topography and the existing direction of surface water from the development site.
- f) The ordinary watercourses have been incorporated into the drainage strategy where possible. We would recommend that with detailed design an appropriate maintenance easement is provided. Our Drainage and Planning Policy (SuDS Policy 6) states that a minimum setback of 5m to 8m should be provided, which is dependent upon the location.
- g) Any works within the ordinary watercourses will be required to be consented by Kent County Council.
- h) A maintenance program has been included within the current submission for the proposed drainage features.

We agree with the principles incorporated into the drainage strategy for this proposed development; however, we have not been able to complete our review because of errors with the reproduction of the report.

We would therefore recommend a holding objection until the additional information requested above is 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,

Bronwyn Buntine

Sustainable Drainage Team Leader
Flood and Water Management