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**Our Ref:** ABC/2020/077160  
**Date:** 5 February 2020

**Application No:** 19/01788/AS

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

**Proposal:** a) Outline application for the development of up to 250 residential dwellings (40% affordable) including the creation of access points from Appledore Road (all modes) 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. (Matters for approval: Access) 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 planning application is supported by Flood Risk Assessment and Surface Water Drainage Strategy and a Sustainable Drainage System Management Strategy prepared by RSK (December 2019). Information has been presented which supports that the overall approach to surface water management will be dependent upon attenuation with controlled discharge to the existing drainage network/watercourses.

The site area is stated as 24.5ha and it is assumed that a total developable area of 6.6 ha across three outfall catchments, with 8.2ha comprising a country park. Proposed surface water peak flow discharge rates are tabulated on Drawing 133187-RSK-C-ALL-01-03-01 (23 August 2019) of the FRA.

The site does receive flows from off-site which traverse the site through the existing ditch system. These are noted but have not been quantitatively assessed.

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

- a) The FRA includes a drawing Existing Overland Flow Routes and Catchment Area (Drawing 133187 C ALL 01 03 01) which states the developable area per catchment area with the proposed discharge rate and outfall location. This

demonstrates that the discharge rates are compliant with Ashford Borough Council discharge requirements based upon the developable areas stated.

- b) The development plan has taken consideration of the existing ditch and watercourse system which cross the site. The drawing which shows the drainage features (Drawing no 133187-C-ALL001-02-01\_02) indicates that open space and setbacks appear to be provided appropriately for the watercourses; however these setbacks must be fully assessed at reserved matters when the layout is fully set.
- c) The drainage network will receive surface water flows from the adopted public system to the north of the site. This will need to be directed through the site. At later stages of design these flows will need to be accounted for within the channel design for the existing ditch system as well as development contribution.
- d) The report assesses the existing capacity and condition of the sewers in Appledore Road and that surface water sewers are impacted by root ingress. The FRA has proposed that the developer would carry out the necessary repair and pipe clearance works (page 21 of FRA).
- e) A detailed SuDS Management Strategy has been submitted which indicates that maintenance has been considered. The applicant has proposed to undertake works in Appledore Road to address the locations of root ingress. We appreciate that this addresses the existing issues which were identified by residents.
- f) We appreciate the detail assessment provided by the applicant with respect to the existing drainage networks and the integration of the development network into the existing watercourses. This approach has provided for a blue-green network which delivers multi-benefits beyond drainage provision alone.
- g) Given the strategic level of the information submitted at this stage of planning, it would be beneficial if greater detailed is provided for drainage matters when reserved matters for layout and landscape are considered. The layout arrangement proposed must enable easy access for maintenance purposes for any drainage measure, above or below ground. This can only be confirmed when greater details are available and needs to confirmed when the layout is reviewed. Similarly, it is important that landscape provisions are reviewed in the context of the drainage proposal.
- h) With many works proposed to integrate with the existing ordinary watercourses it is important to ensure that any culverts which may be required for access or highway cross-overs are compliant with Kent County Council requirements. We would refer the applicant to Kent County Council's published Land Drainage Policy which can be found on Kent County Council's web pages.
- i) The Flood Risk Assessment includes calculations for the three networks proposed. No drainage schematics have been submitted for the drainage networks and calculations have only been provided for the 1 in 100 year plus

climate change event. Detailed design will be required to demonstrate that the network operates appropriately for smaller rainfall events. We would refer the applicant to Kent County Council's published Drainage and Planning Policy which can be found on Kent County Council's web pages and describes operational requirements. We would also emphasize the importance of provision of a network schematic to accompany any calculations.

We would note that the recent flooding in Appledore Road may be reduced by implementation of the development. Construction of a development with a positive drainage system, attenuation and controlled discharge will provide a positive control on surface water flows from the greenfield site which contribute to accumulation of surface water in Appledore Road. The applicant has also proposed maintenance works on the sewer in Appledore Road which will also improve the capacity of the existing system.

If your authority is minded to approve this application, we would recommend the inclusion of the following conditions on any planning approval for this proposed development:

Condition 1:

No development shall take place until the details considered with respect to reserved matters condition for layout and landscape, shall demonstrate (and be approved in writing) that necessary surface water management infrastructure for the proposed development, is consistent with Flood Risk Assessment and Surface Water Drainage Strategy (RSK, December 2019) and which:

- a) can be accommodated within the proposed residential layout;
- b) provides appropriate spatial arrangements with integration of the drainage system to the existing ordinary watercourses and sufficient access for maintenance;
- c) identifies strategic drainage system measures or networks and phased delivery of any strategic drainage elements; and,
- d) promotes multi-function sustainable drainage measures.

Reason:

To ensure the development is served by satisfactory arrangements for the disposal of surface water and that they are incorporated into the proposed layouts.

Condition 2:

Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the phase has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the Flood Risk Assessment and Surface Water drainage Strategy (RSK, December 2019) 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 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.

### **Section 106**

Drainage infrastructure provided to alleviate the risk of flooding on-site and off-site will be agreed as part of detailed matters submitted through the planning application process as discussed above. However, establishment and implementation of the drainage measures can be critical to ensuring that surface water can be managed through the phases of development for both conveyance through the site and discharge from the site. In addition to the conditions recommended above, we would therefore recommend that S106 terms be included to ensure that the drainage measures inherent in the landscape provision are established and maintained in accordance with agreed standards till such time as they are fully established or are transferred for adoption to the designated adopting authority.

Kent County Council would specifically recommend that consideration should be given to the following being secured through the Section 106 agreement:

- (a) Implementation of the Surface Water Strategy approved under the appropriate condition of planning permission;
- (b) Responsibilities of the management body (or authority), including keeping a maintenance record;
- (c) Repairing obligations;
- (d) Control over any future alterations to the drainage system; and,
- (e) Monitoring arrangements including payment of a monitoring sum to the LLFA for a limited time during construction and establishment.

The conditions and S106 terms recommended provide a means to ensure the adequacy of detailed design which will be confirmed with a fully developed housing layout, that implementation is undertaken as approved and to ensure that the system is established appropriately with an ongoing maintenance program.

Please note:

Any feature capable of conveying water can be considered to fall under the definition of an 'ordinary watercourse' and we would urge the applicant to contact us prior to undertaking any works that may affect any watercourse/ditch/stream or any other feature which has a drainage or water conveyance function. Any works that have the potential to affect the watercourse or ditch's ability to convey water will require our formal flood defence consent (including culvert removal, access culverts and outfall structures). Please contact [flood@kent.gov.uk](mailto:flood@kent.gov.uk) for further information.

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