



**Mark Davies**  
**Ashford Borough Council**  
Civic Centre  
Tannery Lane  
Ashford  
Kent  
TN23 1PL

**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:** ABC/2021/084537  
**Date:** 24 September 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.

We were consulted by the applicant on further information submitted for this application on 3 September 2021. Unfortunately, we were not able to provide a detailed response prior to the planning committee meeting on 15 September 2021 given the short time to provide a review.

Though the Committee Report has been published, we thought it important to provide the results of our review for future consideration given the notification of a possible future appeal and to record our assessment of the drainage proposal which was submitted.

The applicant has provided a response to our consultation letter of 23 July 2021 to Ashford Borough Council prepared by RSK (2 September 2021).

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

## 1. Surface drainage network

The main concerns raised regarding the original submission related to the contributions of surface flows from off-site and how the drainage system was integrated with the existing watercourses which crossed the site and discharged to downstream drainage systems. The new drainage layouts are shown in Proposed Surface Water General Arrangement (Sheets 1 and 2, page 10 of 20 pdf).

When compared to the earlier drainage proposal, the network is now separated from the ditch network.

## 2. Off-site surface water contributions

The applicant has provided photographic evidence and by site inspection confirmed the presence or absence of contributions from outside of the site (Appendix D, RSK 2 September 2021). We agree that highways contributions do not occur to the ditch system in the northeast corner, in proximity of Willow Cottage.

It remains uncertain as to the purpose of the 225 mm diameter pipe that is seen to discharge onto the site from the rear of the Old Coach House.

This pipe is not shown on infrastructure plans and would not appear to be connected to a public sewer or highway drainage system. Should a connection to the highway system exist, it would be installed below buildings within the curtilage of the Old Coach House. It is therefore assumed that this pipe is solely related to drainage of the Old Coach House itself.

The approach within the drainage design is to separate the off-site flows and existing watercourses from the drainage network required for the proposed development. This method would see that any surface water flows are conveyed through the site, without any impact from development and continue conveyance through the existing features without any detriment. As stated within the applicant's response, "all drainage ditches are being maintained in their current form." Any required crossing for highways will be provided in oversized pipes.

This approach means that the drainage network proposed for the development can be assessed without consideration of contributions from elsewhere as they contribute to the existing and separate drainage networks. It should be noted that development of the remaining areas will be removed from contributing to the existing network and would be anticipated to reduce pressure for the conveyance systems at No 13 Appledore Road. Reductions will also occur at the other discharge locations given the attenuation within the proposed development.

## 3. Surface water network provision

We had previously commented upon the lack of information in relation to impermeable areas and the drainage network representation. An impermeable area plan has been provided and Microdrainage results for the new networks have been submitted. An

allowance has been made for possible contributions from undeveloped green space which may contribute to the drainage network.

Microdrainage results have been submitted for all three surface water drainage networks, for all rainfall events including the 1 in 100 year plus 40% climate change event:

- Network 1 – minor flooding is shown for a limited number of locations 1.004, 1.011 and 1.012 controlled outflow to 4.6 l/s. These will need to be addressed through an exceedance plan however, given the magnitude of the volumes are expected to be managed locally. This is a detailed design matter and will be addressed during later design stages.
- Network 2 – operates appropriately with controlled outflow of 8.5 l/s
- Network 3 – operates appropriately with controlled outflow of 6.8 l/s

These results demonstrate that the estimated attenuation volumes are sufficient to manage surface water drainage from the impermeable areas stated. The total off-site surface water flow from the proposed developed impermeable areas totals 20 l/s.

#### 4. Revised drawings

The Critical Hydrological Drainage Features drawing has been amended as has the layout to accommodate appropriate buffer zones. It is now clear where existing features will be retained, and the proposed surface water drainage features will be situated.

#### 5. Proximity to drainage features

RSK have provided a response based upon their knowledge and experience. We would agree that the underlying geology should suggest that there would be little impact.

From this review, the issues which were identified have been addressed but any planning approval would require specific conditions to ensure the surface water drainage strategy is delivered as stated.

We will provide a further response when Ashford is in receipt of a new planning action in relation to this development proposal.

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