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Flood and Water Management

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Our Ref: ABC/2022/089850
Date: 16 May 2022

Application No: 22/00571/AS

Location: Land north of Possingham Farmhouse, Ashford Road, Great Chart, Kent (TN26 1JR)

Proposal: Outline application for the development of up to 655 residential dwellings (including 30% affordable dwellings) to consider access, layout and scale with all other matters reserved.

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

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

Having reviewed the information submitted we are generally accepting of the principles proposed for dealing with surface water, namely a system which attenuates the water in 2 basins each with a restricted discharge to the surrounding ditch network at a combined rate equating to 4l/s/Ha.

However we do have some concerns which we would like clarified/enacted prior to recommending approval:

- The site is split into 2 catchments with quoted corresponding developable areas of 7.277Ha and 9.19Ha and it is these areas that have been used to calculate the greenfield run off rates.

However on checking the microdrainage results supplied the above areas do not correspond with the areas utilised in the calculations these being 4.587Ha and 5.4Ha

Given the impermeable nature of the site we would ask for clarification to be provided as to why this area has decreased as we would expect for the majority of surface water to convey to the drainage network. Conversely if it can be demonstrated that the surface water from the non developed areas does not enter the positively drained system we would expect for this area to be reflected in the green field run off calculations

Ultimately we wish to make sure that the surface drainage system is designed such that the volume of water entering the system does not exceed it's designed capacity or that the discharge rate from the developed site is not excessive.

- As of 19 February 2016, the Environment Agency published new guidance on how to use climate change allowances in flood risk assessments. The guidance can be found at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

The new allowances for peak rainfall intensities have implications for drainage design and should be included within any drainage strategy prepared to accompany a planning application.

As LLFA, KCC will require that the design accommodates the 1 in 100 year storm with a 20% allowance for climate change and an additional analysis undertaken to understand the flooding implication for a greater climate change allowance of 40%.

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.

Until the above items above have been dealt with to our satisfaction we would ask that a holding objection be put 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,

Neil Clarke

Sustainable Drainage Team Leader
Flood and Water Management