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**Our Ref:** SBC/2022/093131  
**Date:** 5 January 2023

**Application No:** 22/503654/EIOUT

**Location:** Land To The West Of Bobbing Sittingbourne Kent ME9 8QL

**Proposal:** Outline application (all matters reserved except for access) for a mixed used development comprising up to 2,500 dwellings, a 4.99ha commercial employment zone including doctors surgery, a 4.2ha sports hub, primary school, community facilities, local retail provision, public open space, children's play areas and associated parking, servicing, utilities, footpath and cycle links, drainage, ground and other infrastructure.

Thank you for your consultation on the above referenced planning application. Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk Assessment (17/06/2022- Revision 6) prepared by GTA Civils and have the following the comments to provide:

The report informs the LLFA that the current proposals to manage surface water runoff from the development would be for a combination of swales and attenuation ponds that have a restricted discharge into two existing watercourses, prior to flowing into the Iwade Stream.

Highlighted within the report and our pre-application guidance (appended to the report) was the passage of surface water from the existing ditches into the Iwade Stream, which passes through the village. The watercourse (designated main river upon entering Iwade) has been a cause of flooding to the village in the past, most recently being 2018. It is essential that any development is sympathetic to the wider network and does not increase risk to the downstream community.

Statement 5.1 details that discharge into the Iwade Stream will be restricted to the calculated greenfield Qbar rate of 4.1 l/s per hectare for all return periods. With the proposal only at outline stage, multiple discharge points into the streams are proposed and as such a total discharge rate into the Iwade Stream would be 137.35 l/s (Based upon 33.5 ha of impermeable area).

Whilst the LLFA would typically accept the application of Qbar as a restriction for surface water discharge, there is concern/ uncertainty in regards to the capacity within the stream, particularly the section passing through Iwade itself. As part of the S19 Flood Investigation report for Iwade Flood of 2018, it was found that the culvert section passing under Sheerstone Road had to be overpumped due to the volume limitations of

the culvert. This followed a previous large scale flood event back in 2002 that was caused as a result of a blockage within the watercourse.

With the creation of large scale impermeable areas, the overall volume of surface water leaving the site area is expected to increase substantially compared to the existing scenario. The LLFA accepts that managing increasing volumes of runoff is complex and as such would seek to explore options of reducing the discharge rate further to mitigate any possible impacts of volume downstream.

One option for mitigating runoff is the inclusion of longer term storage for the large portion of the developable area discharging to the central watercourse. This could be through the creation of a dedicated wetland area within the northern area between phases 10 and 11. It is understood from the Open Space Strategy drawing (August 2022) that this area is to remain natural in setting and may provide options for the inclusion of a large scale feature such as this. We view that a wetland feature will reduce the reliance of providing smaller scale SuDS features throughout the development and deliver enhanced biodiversity benefits.

Further to the item raised above, we would recommend consideration of the following:

1. If the application of Qbar is to remain in place, there is a further question in regards to the contributing areas to the watercourse under current conditions. Digital Elevation Modelling suggests that the eastern side of the southernmost field (above railway line) would actually fall eastwards towards Sheppey Way and not northward. Should areas not already contributing to the watercourse be connected, those areas respective run off rates shall not be included within the permissible discharge rate.
2. The positioning of attenuation features through the central part of the site under current proposals would be separated by the delivery of phasing, as shown on the Residential Phasing Strategy drawing (December 2020 - Revision H). It is important that cascading surface water features are constructed at the onset of development. Ideally these features would be encapsulated within the primary infrastructure/ spine road phase.

The LLFA are open to discussions on the proposals should the applicant want to further discuss these points raised within our consultation response.

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,

**Daniel Hoare**

Flood Risk Project Officer  
Flood and Water Management