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Our Ref: TMBC/2024/099897
Date: 17 April 2024

Application No: 24/00372/PA

Location: Development site land east of Kiln Barn Road and west of Hermitage Lane, Aylesford.

Proposal: Outline planning application with all matters reserved (except for access) for development of land to west of Hermitage Lane and East of Kiln Barn Road comprised of: a residential-led development including affordable housing; a new village centre including a primary school; ancillary commercial, community and employment floorspace; strategic open space, parkland, child play provision and sustainable drainage infrastructure; new access points and associated transport infrastructure. Application supported by an Environmental Statement

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 (March 2024) prepared by Charles and Associates and are able to provide the following comments:

1. The LLFA understand from the report that the current situation of the land can be considered as greenfield and no existing drainage arrangements are present. The proposed redevelopment of the site will change this situation and as such a surface water drainage strategy has been outlined.

The proposal presented within the report will be to utilise infiltration through a combination of attenuation basins and deep bore hole soakaways. Preliminary testing has been undertaken and has indicated that both options (shallow and deep) would be adequate to manage runoff.

As rightfully raised within the FRA and supporting RSK Geosciences report, there is a risk of gull features within the Hythe Formation on site. From the investigations undertaken, there were areas identified on site that may contain such features. Therefore, as part of any future reserved matters application, we would request that dynamic probing is undertaken across the areas allotted for drainage features. This is to ensure that these features are not activated by the inundation/concentration of water.

In addition to the request of dynamic probing, we would support the recommendation within the RSK Geosciences report (Section 11.7) of locating any infiltrating feature

at least 10m away from any foundations. This is to reduce the risks associated with the gulls (sinkholes) further.

2. The LLFA would raise the request of considering for redundancy within each of the drainage networks, to ensure they are resilient in the future. The preliminary design doesn't currently consider the potential of urban creep or the factor of safety value applied within the Microdrainage Modelling. These are items that would need to be applied as part of the Reserved Matters applications, when the layout and density of housing are confirmed.
3. It is acknowledged that the outline proposal for the surface water drainage scheme is divided into five separate networks. A phasing plan will be required as part of the Reserved Matters that clearly shows that each phase of development is served by its own independent network or that the drainage elements will be constructed as part of the enabling works. This is to ensure that the drainage is functioning as the development is being occupied.
4. Future consideration of pollution treatment per individual drainage network/catchment area. This is to ensure that there is sufficient levels of treatment for each network. This should ideally be in accordance to the CIRIA SuDS Manual (2015)

The LLFA would advise that the following conditions are applied to the application should consent be granted:

Condition:

No development shall take place until the details required by Condition 1 (assumed to be reserved matters condition for layout) shall demonstrate that requirements for surface water drainage for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm can be accommodated within the proposed development layout.

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:

Where infiltration is to be used to manage the surface water from the development hereby permitted, it will only be allowed within those parts of the site where information is submitted to demonstrate to the Local Planning Authority's satisfaction that there is no resultant unacceptable risk to controlled waters and/or ground stability. The development shall only then be carried out in accordance with the approved details.

Reason:

To protect vulnerable groundwater resources and ensure compliance with the National Planning Policy Framework.

Condition:

Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the principles contained within the Flood Risk Assessment prepared by Charles and

Associates (Revision A- March 2024). The submission shall also 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 within the curtilage of the site 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.

Condition:

No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason:

To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 175 of the National Planning Policy Framework.

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
Senior Flood Risk Officer
Flood and Water Management