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Our Ref: CCC/2023/095115
Date: 24 August 2023

Application No: CA/23/00484

Location: Land At The Hill, Bekesbourne Lane, East Of Bekesbourne Hill, Bekesbourne, Canterbury, CT4 5EA

Proposal: Outline planning application for up to 300 residential dwellings (including affordable housing and older person accommodation), a new community hub, introduction of structural planting and landscaping, informal public open space and children's play area and surface water flood mitigation and attenuation. All matters reserved except for access.

Thank you for your consultation on the above referenced planning application. Kent County Council as Lead Local Flood Authority understand that an updated version to the Flood Risk Assessment (June 2023- Issue 2) has been uploaded to the planning portal since our previous consultation response on the 2nd of May 2023. The LLFA have subsequently reviewed this report and have the additional comments to add:

- The LLFA understand from the latest FRA that a CCTV investigation has been undertaken into the the condition and pathway of the 225mm culvert. From the outputs contained within Appendix B, there would appear to be fractures and cracks noted for the a long section of the culvert, between MH1 and MH3. Further to this, the last part of the culvert survey was unable to be carried out due to high water level within the pipe. It is unknown if this was as a result recent rainfall as recorded during the investigation or a wider issue at that particular section of pipe.

The imagery provided does appear to show that water is flowing through the culvert and into the Little Stour. Whilst the pipe is currently functioning the LLFA have concerns as to its continued ability to convey flows into the future. With the additional reliance of a housing development (including treatment works), discharging into this feature, we would view the potential impacts if this pipe fails to be much greater. The fractures and cracks shown in the supporting imagery indicate to us that this pipe is will need to be replaced. We would view that this needs to be considered as part of this outline stage as this outfall/ culvert is essential to the feasibility of the scheme.

If the pipe is to be replaced, we would advise consideration on whether this would need to be enlarged to take account of the increased frequency, intensity and durations of storm events as a result of climate change.

- As raised within our previous consultation response, the LLFA had concerns around the allowable discharge rate for the site. It is understood that the rate has been derived using the loH124 method and applying a 0.4 soil value. It is understood that the soil rate of 0.4 is based upon infiltration testing undertaken at the site. The application of this rate would suggest that the superficial layer of soil at this site is relatively impermeable in nature and more in line with clay geology. It is noted that the that the infiltration test sheet referenced within the report has not been included and as such we would request this is provided for completeness. This is to support the rate used.
- The LLFA are aware that the intention is for a Waste Water Treatment Plant to be constructed on site to treat foul flows. The treated water is understood to then be discharged into the existing 225mm culvert, located at the north eastern corner of the site. Final agreement of this approach is required with the Environment Agency however, with this additional flow, we have concern that the greenfield runoff rate will be exceeded. In line with other developments proposals utilising similar treatment systems, we request that the surface water discharge rate is lowered to compensate for these additional treated flows.

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