



Planning CCC <planning@canterbury.gov.uk>

CA/23/00484 - Outline planning application for up to 300 residential dwellings - Land At The Hill Bekesbourne Lane East Of Bekesbourne Hill Bekesbourne Canterbury CT4 5EA

1 message

24 August 2023 at 15:39

Good afternoon Mr Gambrill.

Although we haven't been formally consulted on the above referenced planning application, we would like the following comments recorded against this proposal.

Whilst this site is located outside of the River Stour (Kent) IDB's district, the plans submitted show that there is an intent to dispose of the surface water generated by the development towards our Drainage District. The proposal therefore has the potential to affect IDB interests (downstream flood risk in particular).

As with all development proposals, efforts should be made to replicate 'greenfield' surface water discharge conditions, with regard given to drainage routes, flow rates and discharge volumes. Disposal of water via infiltration should be used wherever conditions permit, with all surface water managed as close to source as possible.

The Flood Risk Assessment/surface water management scheme submitted to accompany planning application proposes a post-development runoff rate of 20.5l/s, with all of the runoff being discharged to an existing culvert beneath the adjacent highway and onwards into our Drainage District.

The partial CCTV survey within the FRA shows that this culvert is in a poor condition with numerous cracks and defects. It is at times impassable owing to the presence of roots. Beyond the highway it is unclear what the rest of the receiving network consists of or what condition it is in. It is important to ensure that any downstream receiving network is contiguous and capable of receiving formal runoff, with all culverts and similar potential obstructions to flow appropriately assessed. We consider that it would be premature to approve this application as it may not be possible to discharge any surface water management related condition at a later date if this receiving network proves unsuitable. We would expect to see some form of formal commitment from the applicant to fully survey and remediate any identified defects, with future maintenance appropriately considered and funded, especially since this network will be expected to convey the pumped water from the southern catchment that would presently be discharged elsewhere.

We are concerned that the southern attenuation pond is intended to be a pumped system, and consider that this is an unsuitable and unsustainable drainage solution at this location with the maintenance a particular concern. We are also aware that there is an intent to provide a private WWTW for this site within its boundary, and that the impacts from the permanent effluent discharge from this have not been incorporated into the FRA recommendations.

We would therefore request that an **objection** be registered against this application, pending submission of additional information. It must be also ensured that KCC (as LLFA) are consulted and are satisfied with any drainage design prior to approval.

If, at a later date, it can be adequately demonstrated that water can be effectively conveyed from the point of discharge to a wider receiving network, the applicant will need Land Drainage Consent from Kent County Council for

any works that has the potential to affect flow in any ditch or watercourse on the site. Land Drainage Consent will also be required from ourselves under our Byelaw 3, specifically with regard to seeking a Surface Water Development Contribution for any increase in **rates/volumes** of discharge that may be directed into our District.

Byelaw 3 states:

“3. Control of Introduction of Water and Increase in Flow or Volume of Water

No person shall as a result of development (within the meaning of section 55 of the Town and Country Planning Act 1990 as amended (“the 1990 Act”)) (whether or not such development is authorised by the 1990 Act or any regulation or order whatsoever or none of them) for any purpose by means of any channel, siphon, pipeline or sluice or by any other means whatsoever introduce any water into any watercourse in the District so as to directly or indirectly increase the flow or volume of water in any watercourse in the District (without the previous consent of the Board).”

Any such contribution will be a one-off payment, and will serve to facilitate the management of the increased flows resulting from the development into our District.

Please refer to the following website for further information on the SWDC, policies and byelaws:

<https://rsidb.org.uk/consents-byelaws/>

We would be grateful if the applicant can be advised to contact us at their earliest convenience.

Kind regards,

Joe Williamson

