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Our Ref: CCC/2023/095115
Date: 24 May 2024

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. Since our last consultation response on the 7th of November 2023, Kent County Council as Lead Local Flood Authority, has undertaken pre-application discussions with the applicant. These discussions have resulted in updates being made to the Flood Risk Assessment and Outline Surface Water Drainage Strategy report (09/04/2024-Issue 4). The LLFA has reviewed the further documentation and has the latest comments to provide the LPA:

- In our previous consultation responses, we raised concern regarding the discharge rates from the development. This was in relation to the potential addition of flow from the on-site waste water treatment plant and the application of a higher Standard Percentage Runoff value of 0.4 (SPR). It is our understanding that since the last round of consultations, the requirement for an on site treatment plant is no longer needed, and foul water will instead now be discharged to the sewer. This subsequently removes the requirement to consider this additional input as part of the overall discharge rate.

The earlier FRA report (29/06/23-Issue 2) calculated greenfield rates by utilising a SPR value of 0.4. This value was changed from the HOST Map Classes, which showed a value of just 0.3. In discussion, it was agreed that the value would be reduced back to the default map value (0.3). This reduction subsequently lowers the calculated greenfield runoff rates, with a Qbar (2.3 year return storm) scenario down to 11.0 l/s (21.4 l/s proposed previously). With this revision in discharge rates, the LLFA considers this point addressed.

- The discharge outfall for surface water from the site would be into an existing culvert that traverses through Littlebourne before flowing into the Little Stour. The LLFA

raised concern as to its passage and subsequent condition of the Kent County Council owned structure.

An initial CCTV survey was undertaken, with the results contained within Appendix B of the FRA. The outcome of these initial investigations identified a particular section of the culvert (between manholes SWMH1 and SWMH3) to show fractures and cracks. Further to this, there was uncertainty about sections of the culvert past SWMH4 due to the camera being underwater. Following pre-application discussions, an additional survey of the remaining sections of culvert has been undertaken (26/04/2024, standalone document).

With the development discharging surface water to the culvert, the LLFA views that there is a substantial emphasis placed on the importance of this culvert into the future. Therefore, efforts should be made to ensure this continues to function without increasing flood risk. As such, contributions whether financial, or undertaking repairs are strongly advised.

With the LLFA being a statutory consultee in the planning process, we do not possess mechanisms to request funding or put in place arrangements or agreements to undertake works. Despite this, however, the LLFA is aware that the developer would be entering into the Community Infrastructure Levy Charge (CIL) with Canterbury City Council. This may present opportunities to agree on funding through this process, or a separate 106 agreement may be required. The Local Planning Authority is advised to consider this moving forward.

On the basis of the above points and the information submitted to date, the LLFA removes our earlier objection. While we are lifting our objection, we would request a number of planning conditions be attached to any permissions given. Further design works would be required as part of any Reserved Matters application that provides a detailed layout of the site and how surface water drainage is incorporated. The wording for these recommended conditions can be found below:

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:

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 and Outline Surface Water Drainage Strategy report (Issue 4-09/04/2024) and shall 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 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