

Good afternoon, Andrew.

I have reviewed the revised documentation, and we still have concerns over the condition and capacity of the KCC owned culvert, and whether or not KCC Highways have been directly consulted over this surface water disposal route. Is there a way KCC/LLFA's recommendations can be dealt with through the Planning system? The highway drain will most likely need work to make it/keep it operational for the lifetime of this development, and it is not clear whether there is a mechanism for developer contributions to be ringfenced for this purpose. Is there a way to attach a Condition for remedial works to be undertaken on a third-party asset that lies outside of the red-line boundary prior to the commencement of construction on the rest of the site?

We would also still question the sustainability of a pumped surface water system, which somewhat removes the 'sustainable' from SuDS. This in itself may not be sufficient reason for refusal, but all options to avoid this element should be explored.

We are pleased to note there is no longer an on-site WWTW proposed and that a connection to an existing main available. I can't see a response from SW to confirm that capacity is available in their network though. We would recommend that confirmation is sought.

Finally, we would reiterate the requirement for Land Drainage Consent for any increase in rate and/or volume of water being discharged directly or indirectly to our Drainage District. We would appreciate it if a note was added to the Decision Notice if you are minded to approve the application.

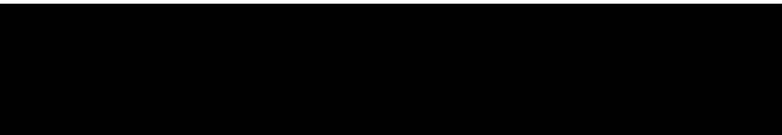
All the best,

Joe Williamson

Joseph Williamson

Technical Officer

[The River Stour \(Kent\) IDB](#)



Subject: Re: 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

Hello Joe

Hope you're well.

I'm going through all of the comments received on this application and noted that a few extra details have been submitted since your last comments.

I've attached the latest flood/drainage assessment, as well as KCCs comments on the latest submissions.

Please could you let me know if you wish to make any updated comments on the proposal following receipt of this information?

Kind regards

Andy



Subject: 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

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

Joseph Williamson

Technical Officer

[The River Stour \(Kent\) IDB](#)

Andrew Gambrill

Deputy Planning Manager (Development Management)
Planning and Health



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