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Our Ref: SBC/2023/093697
Date: 24 August 2023

Application No: 22/505852/SUB

Location: Land Off Staple Street Hernhill Kent ME13 9HY

Proposal: Submission of Details Pursuant to condition 14 (Surface Water Drainage Scheme) of Application 20/503666/FULL.

Thank you for your consultation on the above referenced planning application. Kent County Council as Lead Local Flood Authority have reviewed the latest correspondence from Sweco (2 August 2023) and have the additional comments below:

1. Whilst not raised within our previous consultation responses, we are note from Statement 2.4 of the Flood Risk Assessment provided as part of the full application (20/503666/FULL), that the outlet for the northern pond/watercourse passes under Staple Street and connects into the wider field ditch network. A subsequent review indicates that this connection to the wider network would likely be through the existence of a land drain and not an open watercourse feature as alluded to within the FRA. With the entrance of the site and pond being the low point, there have been resident comments highlighting this as a problematic area for flooding of the highway. In view of this, we have concerns as to the current condition/operation of this land drain.

In light of these concerns, we would request that a CCTV investigation is undertaken of the network downstream of the pond to ascertain its current condition. A failure/blockage of the land drain could be responsible for this periodic flooding to the junction and pond raised by resident comments. With the additional volume of surface water from the new development and on going discussions around the runoff rates from, there is therefore a rightful concern that this flooding could be increased if there is an existing problem with this drain.

2. The latest letter from Sweco (2nd August 2023) states that flow path directions have been added from the soft landscaped areas. Whilst this is welcomed, our previous points around the allowed rate of discharge from the site still stands. The addition of flows from the reconstructed access road, as stated within the previous Sweco note (24/05/2023), infers that the greenfield rates have been abided to. The LLFA would disagree as the calculation of the greenfield rate is based upon the entire site area (4.1 ha, including greenspace areas) and not just the contributing impermeable areas as previously requested.

It is therefore our concern that the greenfield rate will be surpassed if the road runoff rates are not reduced to be in line with the greenfield rate for its own respective catchment area.

3. From residents comments and supporting photographs, we are aware that an additional pipe connection has been made to the existing pond next to the access road (near to headwall serving swale outfall). The LLFA envisage that this pipe extends under the road junction to Staple Street however, we would request further clarification as to its purpose and route.

We would therefore recommend a holding objection until the above points have been addressed.

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,

Gideon Miller

Graduate Flood Risk Officer
Flood and Water Management