

# LAND OFF SHEPPEY WAY, IWADE

# **RESPONSE TO LLFA COMMENTS**

### 1. Introduction

- 1.1. Kent County Council (KCC) in its role as the Lead Local Flood Authority (LLFA) has provided a consultation response in relation to a planning application for the erection of 14 bungalows and chalet bungalows, which will provide age-restricted general market accommodation for those over the age of 55, together with 21 communal car park spaces and amenity space (planning application reference: 19/505215/FULL).
- 1.2. This contains several points which are discussed and addressed in **Table A** below.

### Table A: Response to LLFA Comments

Whilst we are generally satisfied with the principles proposed, namely a connection restricted to a rate of 2l/s to an existing sewer, we do not feel it has been demonstrated this is completely feasible which may possibly leave the site without a drainage mechanism.

It is welcomed that KCC are generally satisfied with the principles proposed outlined in the Surface Water Management Statement (Document reference: P912-DOC01-Issue 2, September 2019).

Additional clarification is set out in the sections below to demonstrate the proposed solution is feasible.

The strategy submitted states that the system to the north has been designed to receive a base flow of 5 l/s from an area that contains the applicant's site. No evidence has been submitted to confirm this or that the network constructed complied with the approved design and that therefore sufficient capacity exists.

Furthermore this connection exists outside of the red line boundary. No information has been submitted that demonstrates that the off-site surface water drainage works can be appropriately secured and protected.

The site's red line planning application boundary extends along the proposed access road which serves the proposed Care Home development (Ref: 19/501160/REM) to the east of the application site to Sheppey Way. A copy of the proposed development site's red line planning application boundary is attached as **Appendix 1**. The drainage information contained on Drawing No. P912/02 (including the connection into the Care Home development drainage) is entirely within the planning application red line boundary.

The proposed surface water drainage system proposes to connect to the Care Home development's drainage system within the access road (and therefore within the site's red line planning application boundary). The proposed Care Home development's drainage system connects into the Southern Water public sewer network to the north.

The proposed Care Home development to the east of the site was granted outline planning consent on 7 December 2017 (planning application reference: 16/505299/OUT) and the reserved matters application was granted consent on 22 July 2019 (planning application reference: 19/501160/REM). Furthermore, planning conditions 10 and 11 of the outline planning consent relate to surface water drainage and were discharged on 13 December 2019 (planning application reference: 19/504264/SUB) on the basis of the information contained in a 'Technical Note for Flood Water and Surface Water Drainage' (December 2019)' prepared by SLR (document reference: 402.06594.00006 - TN02 v01).

The 'Technical Note for Flood Water and Surface Water Drainage' reaffirms that 'an allowance for a connection from the adjacent development has been accommodated within the development.' and on SLR Drawing No. 002 Rev 0 'Drainage Plan'.

We note that KCC in its role as the LLFA had no objection to this proposed Care Home's drainage arrangements (reference: SBC/2019/075248, 20 September 2019). Furthermore, Southern Water stated in an email dated 06/12/19 that 'we have not objected to discharge of condition on the grounds of insufficient capacity'.

On this basis the principle of a drainage connection from both the Care Home (consented under 19/501160/REM) and the proposed development into the surface water drainage network to the north is established, secured and protected under the Care Home planning permission.

The development proposals are consistent with the allowance made by the Care Home development and our client states '*Frontier estates who are developing the Care Home site are under and obligation to provide a surface water sewer to the boundary of our site for drainage purposes*'.

In addition the proposed Care Home development restrict runoff to 1.4 l/s and together with the proposed runoff from the proposed development site of 2.0 l/s this would result in a peak runoff rate of 3.4 l/s which is less than the 5 l/s runoff rate allowed for in the design of the sewer system to the north of the site (as described in paragraph 4.20 of the SWMS).

As the proposed drainage is within the application red line boundary and the principle of connection into the Care Home drainage is established it is considered that this addresses KCC comments above.

We note that the microdrainage model provided utilises a FSR M5-60 value of 19.6mm. KCC policy is that that we would expect to see the drainage system modelled using FeH rainfall data. Where FeH data is not available, 26.25mm should be manually input for the M5-60 value, the FSR dataset should not be used:

http://www.kent.gov.uk/\_\_data/assets/pdf\_file/0003/49665/Drainage-and-Planning-policystatement.pdf"

FEH rainfall data has been used to simulate the 1:30 and 1:100 storm events (including an allowance for climate change). This is evident on pages 41, 42, 44 and 46 of the SWMS PDF.

FSR rainfall data was used to model the 1:1 storm event (page 40 of the SWMS PDF). However, this is an appropriate use of this dataset as FEH rainfall data is not calibrated to return periods lower than 1:2 storm event.

As the larger magnitude events are simulated with FEH data we therefore comply with the KCC requirement to use FEH rainfall data in the MicroDrainage hydraulic model. The information contained in the SWMS therefore complies with KCC requirements.

### **Response to Iwade Parish Council**

1.3. Iwade Parish Council also provided a consultation response to the planning application. Although supportive of the planning application concerns are raised over flooding of the Iwade Stream and *'ask that alternative methods of drainage be looked at to deal with surface water'.* 

- 1.4. Regarding alternative methods of drainage, the disposal of surface water runoff into the ground via infiltration has been discounted due to impermeable ground conditions on the site. The ground conditions would prevent the water from being disposed of by infiltration to a satisfactory standard.
- 1.5. The site falls within the natural catchment of the Iwade Stream and the local surface water sewer network drains into this watercourse. The only appropriate outfall location for the proposed development would be the surface water sewer system to the north of the site which drains into the Iwade Stream.
- 1.6. To ensure the proposed development does not increase flood risk elsewhere the discharge rate from the site is restricted to below greenfield 'pre-development' runoff rates. The runoff is temporarily stored onsite in oversized pipes and permeable paving areas before being discharged at a controlled rate into the sewer network. The proposed onsite attenuation and flow control measures ensure that flood risk from the Iwade Stream will not increase as a result of the proposed development.
- 1.7. These measures are in keeping with industry best practice and planning policy and guidance.
- 1.8. These measures are set out in more detail in the Surface Water Management Statement which supported the planning application.

### Summary

1.9. The clarifications provided in this File Note are considered sufficient to address the points raised by KCC and is consistent with the adjacent Care Home development drainage proposals and can be secured by a planning condition requiring further details of the above arrangements, in accordance with the principles set out in the SWMS, to be submitted and approved by the Local Planning Authority prior to the commencement of development.

### Appendices

Appendix 1 Location Plan – CDP Architecture Ltd – Drawing No. 766 P01

# Appendices

# Appendix 1



1:1250 scale bar



CDP original printed to scale. Prints from PDF's could distort.



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Hume Planning

Job Title Proposed Retirement Cottages, Iwade Drawing Title Location Plan

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