

From:Martin Kempshall
Sent:Thu, 30 Nov 2017 15:52:11 +0000
To:Claire Marchant
Cc:Planning Help
Subject:17/01610/AS - Plough Inn, Lees Road, Brabourne, Ashford, Kent, TN25 6QB

Dear Claire,

Thank-you for the consultation, please find below comments in relation to the following application;

Case Reference: 17/01610/AS

Address: Plough Inn, Lees Road, Brabourne, Ashford, Kent, TN25 6QB

Proposal: Erection of 4 detached bungalows (3 bed); new vehicular access / junction works; hard and soft landscaping and associated works

A surface water drainage strategy has been produced for the above application and the principles of this is considered in accordance with requirements detailed in both NPPF and Ashford Borough Council's Sustainable Drainage SPD. Therefore, there is no objection to the application, subject to the recommended condition below.

The current site usage is classified as undeveloped greenfield, despite being 'North of the M20' the site is outside the 'growth area' identified within the Ashford Borough Council Sustainable Drainage SPD and therefore the following policy criteria is considered prevalent;

'Encouraged to achieve 4l/s/ha as far as possible, but must avoid any runoff rate in excess of existing greenfield rate for the site (Where this can be established) or 6l/s/ha (Where the existing greenfield rate cannot be established).'

The assumed infiltration rate used within the design strategy should be confirmed at the earliest opportunity to confirm whether an adequate 'half drain time' can be achieved (as this is currently not the case in the soakaway calculations provided at the given assumed rate). Notwithstanding this, given the space available and surrounding site features (including land drainage features in close proximity to the site) it is considered likely that a viable surface water solution is available.

To align with current national policy at detailed design stage the scheme it would be deemed acceptable for the surface water drainage system to be designed to either the 20% (NPPF) or 30% (ABC SPD) allowance, however it is requested that the system is also tested for the 1:100+40% CC allowance as identified within the latest NPPF guidance.

In addition to the above it is now an expectation for new surface water drainage system modelled using FeH rainfall data in any appropriate modelling or simulation software. Where FeH data is not available, 26.25mm should be manually input for the M5-60 value, as per the requirements of KCC's latest drainage and planning policy statement (June 2017); the FSR dataset should not be used:
http://www.kent.gov.uk/_data/assets/pdf_file/0003/49665/Drainage-and-Planning-policy-statement.pdf

Should the application be granted permission it is recommended that the following condition is attached;

Small Condition

- No development shall commence until plans and particulars of a sustainable drainage system (including the details below) for the disposal of the site's surface water has been submitted and accepted by Ashford Borough Council. These should be based upon the principles proposed within the Surface Water Drainage Statement by RGP Design – October 2017. It must be demonstrated that the surface water generated by this development can be accommodated and disposed of without an increase in on, or off-site flood risk (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm).
- Prior to the commencement of the development details of surface water drainage works shall be submitted to and approved in writing by the Local Planning Authority and the works shall be carried out and maintained in accordance with the accepted details. This should include a management and maintenance plan for the lifetime of the development which shall include the

arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage system throughout its lifetime.

- Where infiltration methods are to be proposed, test results should be provided and undertaken in accordance with requirements from BRE Digest 365, with test locations identified.
- No drainage systems for the infiltration of surface water drainage into the ground should occur without the express written consent of Ashford Borough Council. It must be demonstrated that there is no resultant unacceptable risk to controlled waters, groundwater, or ground stability. The development shall only then be carried out in accordance with the approved details.
- The submitted details shall include identification of the proposed discharge points from the system, a timetable for provision of the system and arrangements for future maintenance (in particular the type and frequency of maintenance and responsibility for maintenance). The approved system shall be maintained in accordance with the approved details and shall be retained in working order until such time as the development ceases to be in use.

Reason

- In order to reduce the impact of the development on flooding, manage run-off flow rates, protect water quality and improve biodiversity and the appearance of the development pursuant to Core Strategy Policy CS20 Sustainable Drainage

Kind regards,

Martin

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