



Marion Geary
Maidstone Borough Council
Maidstone Planning Department
King Street
Maidstone
Kent
ME15 6JQ

Flood and Water Management
Invicta House
Maidstone
Kent
ME14 1XX
Website: www.kent.gov.uk/flooding
Email: suds@kent.gov.uk
Tel: 03000 41 41 41
Our Ref: MBC/2023/097666
Date: 8 November 2023

Application No: 23/504471/OUT

Location: Land At Moat Road Headcorn Maidstone TN27 9NT

Proposal: Outline application (with all matters reserved except access) for the development of up to 120no. dwellings (Use Class C3) including demolition of existing buildings, new means of access into the site from Moat Road (not internal roads), associated highway works, provision of public open space, emergency/pedestrian access to Millbank, and associated infrastructure including surface water drainage (with related off site s278 highway works to Moat Road).

Thank you for your consultation on the above referenced planning application. Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk Assessment and Surface Water Drainage Strategy report (September 2023) and are able to provide the LPA with the following comments:

- The LLFA understand from the report that most of the site is currently undeveloped except for several agricultural outbuildings on the south east corner of the site. A 150mm outfall is understood to be present and receives surface water runoff from the agricultural buildings. The current residential proposal would see a vast increase in impermeable areas on site and as such a drainage strategy has been set out. The surface water strategy currently proposed would see waters being captured through a combination of swales, permeable paving systems and gullies, prior to entering a series of large attenuation ponds with a restricted off site discharge.

The LLFA welcome that discussions have taken place with the Upper Medway Internal Drainage Board regarding the potentially agreeable discharge rates from the site. It is understood that a maximum allowable rate of 8.2 l/s for all return periods has been proposed. From the greenfield runoff estimations provided within the report (Appendix H), a rate of 8.2 l/s for all return periods would appear to be below both the 1 year and Qbar (2.2 year return) scenarios.

- As mentioned within the report, the current outfall from the agricultural buildings passes under Moat Road through a 150mm culvert into the roadside ditch on the opposite side. This ditch is understood to then have a connection into the Hoggs Stream. We note that this stream has been a source of flooding to Moat Road and the surrounding area and as such we would expect the site outfall being surcharged during high levels within the stream. In view of this, we would request a preliminary

analysis into what impact a surcharged outfall would have on the required levels of storage needed on site.

- Further to the surcharged outfall, the current Microdrainage Source Control analysis of the attenuation volumes utilises FSR Rainfall dataset. The LLFA would request that either FEH (Flood Estimation Handbook) 2013 or 2022 is now used instead. If FSR is continued to be used, the M5-60 value should be uplifted to 26.25mm. This is to be in line with our requirements contained within the Drainage and Planning Policy Statement (2019).
- Section 7.2 within the report highlights that areas of public open space and gardens will infiltrate into the underlying geology. This statement would appear to contradict the later section 7.3.1 that highlights that infiltration is unlikely to the suitable due to the underlying weald clay formation that has low permeability and shallowness of groundwater. With the relative fall of land from north to south and the locating of open spaces within the western and middle portions of the site, we have concern that flows from these areas could enter into the positively drained system. Consideration for this additional volume within the drainage system is required.

In view of the above points, the LLFA would currently object to the proposals.

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