



**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](http://www.kent.gov.uk/flooding)  
**Email:** [suds@kent.gov.uk](mailto:suds@kent.gov.uk)  
**Tel:** 03000 41 41 41  
**Our Ref:** MBC/2023/097666  
**Date:** 25 January 2024

**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. Since our previous consultation response, Kent County Council as Lead Local Flood Authority understand that further documentation has been provided relating to a letter prepared by the Associate Director of RSK LDE (19/12/2023) and an amended Flood Risk Assessment (December 2023- Issue R1-5). The LLFA have reviewed these documents and have the following further comments:

1. The Letter from RSK LDE has been prepared to address comments raised within our previous response. The first discussion point within this letter is related to the consideration of a surcharged outfall from the site during elevated water levels within the receiving watercourse. It is acknowledged that the proposal has been modified to raise basin 3 and the flow control above the 1 in 100 year fluvial event level (>19.65m). However, it is our understanding that the headwall from the site will be constructed within the bank of the ditch with a recorded level from the Topographic Survey drawing between 18.93-18.88m. It is accepted that raising the flow control outlet invert above the 100 year flood year event level would reduce the impacts from surcharging but we would want confirmation through supporting modelling.

Further to the above, the letter makes reference of considering the coinciding of a fluvial flood event and large scale rainfall event. Whilst the timing of two large events such as the 100 year fluvial and a 100 year (+45% climate change) rainfall event occurring at the same time has a low probability, we would still view that a 30 year rainfall event taking place during varying fluvial events (up to 100 year) is realistic. We would therefore urge that this is considered.

2. The second item of discussion within the letter was the potential of runoff from the open spaces on site (greenspaces). The LLFA accept that soil percolation will take

place and be aided with vegetation, however, it is still our view that runoff from these could still occur because of the relatively poor draining soils and site slope. As such, we would still advise that the two large open spaces are included as potential additions to the drainage system.

3. Whilst not directly attributed to surface water flooding and outside of our statutory role, we understand that the fluvial flood zones extend on to the southern portion of the site. Statement 5.4 within the report details that flood compensation measures are not required due to no additional building or land raising is proposed within the areas highlighted to be at risk. Whilst this is acknowledged, we are of the view that opportunities from the current layout could allow for additional flood storage on site. This could include the re-profiling of the area of land on site closest to the School Stream (south eastern corner). We would therefore recommend that this explored further but accept that any agreements for land level changes would need to be agreed with the Environment Agency.

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