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**Our Ref:** MBC/2023/097666  
**Date:** 18 March 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. Kent County Council as Lead Local Flood Authority have reviewed the latest correspondence from LDE (15th February 2024) in response to our last consultation response (26th January 2024) and have the follow up comments below:

1. The LLFA acknowledge that the current layout and drainage design is indicative to support the premise of the outline planning application. Any detailed modelling on the drainage system that includes consideration of surcharging at the outfall is proposed to be undertaken as part of any future reserved matters application. The LLFA accept the provision of this at the next stage of planning, as we view that attenuation of surface water could be expanded on site to offset any further reductions in off site flows that may be experienced from surcharging.
2. With the underlying soils in this area being relatively impermeable in nature, surface water runoff from open-space areas may occur. Under the outline layout/ drainage proposals, swales have been proposed at the boundary of the western open space. It is accepted that the swales could be "modified" or extended as part of the detailed design stage to cater for any runoff expected. The LLFA accept this can be managed as part of a future Reserved Matters application.
3. The last point of discussion surrounded the potential of providing flood storage compensation on site (south-eastern corner) to benefit the local catchment. It is accepted that this is outside of our responsibility as a statutory consultee for surface water drainage; however, we would view this development as an opportunity to improve upon known fluvial flood risks. We would urge the applicant to consider this moving forward.

In view of the documentation provided to date, the LLFA remove our objection to this application. Further details of the drainage arrangements are needed but it is viewed that these can form part of the reserved matters application. Therefore, should the local planning authority be minded to grant planning permission, the LLFA would request the following conditions are attached:

**Condition:**

No development shall take place until the details required by Condition 1 (assumed to be reserved matters condition for layout) shall demonstrate that requirements for surface water drainage for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm can be accommodated within the proposed development layout. The submission shall also adequately consider the potential of a surcharged outfall from the site.

**Reason:**

To ensure the development is served by satisfactory arrangements for the disposal of surface water and that they are incorporated into the proposed layouts.

**Condition:**

Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the principles contained within the Flood Risk Assessment (04/12/2023) and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- appropriate consideration of the potential for a surcharged outfall from site. This would include analysis into the coinciding of fluvial and rainfall events.
- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

**Reason:**

To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding. These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development.

**Condition:**

No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason:

To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 175 of the National Planning Policy Framework.

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