

# NEXT PHASE

THE TOWN PLANNING EXPERTS

## Addendum Submission

For the part retrospective retention of completed lakes Bridges and Puma, the retention and completion of part completed raised reservoirs Lakes 1, 2 and 3 (all for angling purposes) along with the clubhouse and detailed landscaping scheme at  
Monk Lakes, Staplehurst Road, Marden, Maidstone, TN12 9BS

On behalf of Taytime Limited

October 2019



0183/01  
Addendum Submission – Monk Lakes

# AMENDED



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## 1.0 INTRODUCTION

- 1.1 NextPhase Development Limited have prepared this addendum supplementary statement to the Environmental Statement of February 2009 on behalf of the applicants Taytime Limited, to address updated matters of detail in relation to a part retrospective planning application relating to the retention of completed lakes Bridges and Puma, the retention and completion of part completed raised reservoirs Lakes 1, 2 and 3 (all for angling purposes) along with the clubhouse and the detailed landscaping scheme at Monk Lakes, Staplehurst Road, Marden, Maidstone, TN12 9BS.
- 1.2 Maidstone Borough Council commissioned its own survey of the Monk Lakes site area around Lakes 1 to 3 in August 2019. The survey results identified differences on site from the proposed plans for Lakes 2 and 3 including some areas where land is currently higher than proposed together with some areas where land is lower. With this in mind, the addendum has been prepared to provide updated plans that account for the differences; provide commentary on the impact of the differences in the context of the conclusions raised in the Environmental Statement of February 2019 and to provide updated technical information to account for these differences where required.
- 1.3 This addendum confirms that with regard to the detail of the planning application, Lakes 2 and 3 are complete and as such the updates have accounted for the differences identified within the survey. Whilst there are differences between the proposed plans and what is on site on the western and southern banks of Lake 1, the works associated with Lake 1 are only part completed.

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1.4 Following the council's survey of August 2019, prepared by Aworth Survey Consultants, the following plans, found within Appendix 2 have been updated and should supersede those found on file:

- Site Layout Plan 0183 04 02
- C Clubhouse and Car Park Area 0183 04 04
- Landscape and Plan 0183 04 03
- Revised Floor Plans and Elevations for Clubhouse 0183 04 05

1.5 As part of the works undertaken to satisfy the Environment Agency and remove the holding objection, it has been agreed to raise the land surrounding the clubhouse building by nearly two metres for flood risk mitigation; the increase in land levels have been accounted for in the accompanying clubhouse carpark layout plan together with updated floor plans and elevations in relation to the clubhouse building itself. Given the increase in land levels it was considered reasonable and appropriate to reduce the ridge height associated with the clubhouse building floor plans and elevations so as to mitigate for any landscape impact created by an increase in the height afforded to the massing of the clubhouse itself on the wider area. It is considered that the mitigation proposed in the significant reduction of the ridge height of the clubhouse building has sufficiently addressed any issues in this regard.

1.6 Hydrological Matters

The differences found following the council's survey in relation to Lakes 2 and 3 have had the potential to provide impact in relation to hydrological conclusions raised within the Environmental Statement. With this in mind an assessment of the impacts of the differences from a hydrological perspective has been undertaken by Hafren Water; with their addendum and commentary on the matter found within Appendix 1 of this submission.

- 1.7 With regards to other matters associated with the Environmental Statement of February 2019 it is considered that the differences do not fundamentally alter the conclusions raised in the individual Environmental Statement Chapters, the technical reporting informing these technical chapters and as such the overall conclusions raised within the Environmental Statement other than where identified in Appendix 1 by Hafren Water.
- 1.8 Other Matters  
Third party representation raised in May 2019 identified that the Environmental Statement has not provided consideration to the fact that the application site is located within a Kent County Council Mineral Safeguarding Area and as such Policy DM7, “*Safeguarding Mineral Resources*”, of the Kent County Council Mineral and Waste Plan applies.
- 1.9 Policy DM7 identifies that *“planning permission will only be granted for non-mineral development that is incompatible with mineral safeguarding, where it is demonstrated that either:*
2. *That extraction of the mineral would not be viable or practicable;*
- 1.10 It is the applicant’s position in regards to the policy that the site does not allow for viable or practicable extraction of mineral given environmental and heritage designations that occur within the immediate context of the site. The site is located immediately adjacent to the River Beult SSSI; any mineral extraction taking place immediately adjacent to the SSSI would need to satisfactorily demonstrate that the works associated with mineral extraction will not offer any significant harm from an environmental impact perspective. It is the applicant’s position that given the technical conclusions raised as part of the EIA process in relation to this application before the council, that the sensitivity of the site in relation to flood risk and surface

water drainage would as a singular factor provide practical difficulties when seeking to extract mineral immediately adjacent to the water course of the SSSI.

- 1.11 The works in relation to mineral extraction will take place over a considerable period of time; given the site's surrounding boundaries provide residential dwellings, including two Grade II Listed Buildings to the site's immediate western boundary; it is considered that the impacts of mineral extraction with regard to noise, vibration and air quality in particular will be difficult to mitigate against with regard to raising detrimental impacts upon surrounding residential receptors and as such the impact upon Grade II Listed Buildings could be considered to be significantly detrimental.
  
- 1.12 Therefore with regard to Part 2 of Policy DM7 it is considered that with regards to the physical and policy characteristics and designations of the land and its surrounding area respectively, the implementation of any mineral extraction within the application site would not be considered practical or viable as the development, with reference to Policy CSM1 of the Kent County Council Mineral and Waste Plan, would not be considered to be sustainable development.

## 2.0 CONCLUSIONS

- 2.1 The Environmental Statement submitted on behalf of the applicants in February 2019 identified that the proposal was considered to provide positive effects that outweighed those of a negative effect once mitigation was applied.
- 2.2 The differences as identified by the Council's own land survey in relation to Lakes 1 to 3 have been reviewed in the context of the information prepared within the original Environmental Statement and updated information where it can be applied has been incorporated into the submission.
- 2.3 Other than that commentary identified in Appendix 1 from Hafren Water in relation to hydrological updates, the differences identified have not fundamentally changed the conclusions raised within the Environmental Statement of 2019; the proposed restoration will still generate the positive effects and the provision of a number of enhancement measures as identified within that submission consisting of:
- Providing an attractive wider landscape for recreational angling
  - Socioeconomic benefits for the employment of local people
  - Increased access to leisure and recreational activities for local communities
  - Creating a world class sporting facility for the tourism benefit for the area
  - Providing the opportunity for biodiversity and habitat enhancement in accordance with local and national policy
  - Providing development that offers minimal identified impacts to surrounding receptors. Where impacts have been identified, mitigation is proposed to reduce this impact
- 2.4 The impacts of the differences have been considered against the technical information prepared to inform the Environmental Statement of February 2019 and

the assessment of impacts identified and raised within the conclusions of the assessment. It is considered that whilst the differences identified have required an update to some of the plans informing the Environmental Statement, the overarching impact of the differences are negligible in the context of the planning permission that is sought in relation to the proposal.

## APPENDIX

- 1 Hydrological Addendum – Hafren Water October 2019
- 2 Updated Application Plans
  - I Site Layout Plan 0183 04 02
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  - III Proposed Club House and Car Park Layout 0183 04 04
  - IV Clubhouse Proposed Floor Plans and Elevations 0183 04 05

1      Hydrological Addendum – Hafren Water October 2019

Mr Richard Timms  
Principal Planning Officer  
Maidstone Borough Council  
Maidstone House  
King Street  
Maidstone  
Kent  
ME15 6JO

4<sup>th</sup> October 2019

Dear Mr Timms

**Response to Maidstone Borough Council Email Dated 5<sup>th</sup> September 2019 regarding Monk Lakes**

**Background**

Further to your email dated 5<sup>th</sup> September 2019 (11/1948 Monk Lakes), the following assessment investigates the potential flood related issues emanating from a comparison of the Council's new topographic survey of Lake 3, and its representation of the 'as built' situation, with the proposed design of Lake 3 shown on Drawing D118024-101-1001 P2.

The potential flood related issue concerning the construction of Lake 3, which was raised by the Environment Agency on 26<sup>th</sup> June 2019, concerns the loss of flood storage due to the lake's encroachment into flood zone 3.

**Assessment**

The previous estimate of flood storage loss through construction of Lake 3 was proposed by a Flood Risk Assessment (N Reilly, February 2012 (2012 FRA report)) which gave a volume of 30,200 m<sup>3</sup> (see attached Figure 2A, Section 7.3 and Appendix B of the 2012 FRA report). The 2012 FRA report does not include a detailed description of the method of calculation other than to say it represents a storage loss "between the levels of 15.4m and 16.3m AOD". The elevation of 15.4m AOD is assumed to represent pre-development ground levels and an elevation of 16.3m AOD relates to the 100-year plus climate change flood level established in 2011. Figure 2A of the report shows the location of the 2011 flood outline, which runs east – west along the southern side of Lake 3 (blue line in Attachment B). Appendix B of the 2012 FRA report appears to suggest the estimation of storage loss was determined from approximate values of the depth, width and length of Lake 3 that occupies the floodplain.

A revised estimate of flood storage loss through construction of Lake 3 has now been made which gives a volume of 3,662 m<sup>3</sup>. This has been determined using computer-aided design (CAD) software. The volume was arrived at by prismoidal calculations between two TINs (Triangular Irregular Networks). The two surfaces represent pre-development ground levels sourced from a 2002 LiDAR survey (cyan line in Attachment B) and the 'as built' Lake 3 ground levels sourced from a survey drawing (Reference Aworts 5881) created in September 2019 (green line in Attachment B). The areal extent of the volume calculation has been confined to the east, west, north and south by the western edge of Puma Lake, a ditch along the west edge of Lake 3, the southern bank of River Beult and the 2011 Flood Line from Figure 2A in the 2012 FRA report, respectively.

With reference to Attachment B, the flood loss volume is represented by areas where 'as built' ground levels (cyan line) exceed the pre-development ground levels (green line)

and where this area lies below the 2011 Flood Line (blue line). This storage loss is limited to part of the northern embankment, with most of Lake 3 being constructed at or above the 2011 flood level.

### **Conclusion**

A comparison of the flood storage loss volume obtained from design calculations in the 2012 FRA report ( $30,200 \text{ m}^3$ ) with that obtained from the 'as-built' survey in 2019 ( $3,662 \text{ m}^3$ ), shows a substantial decrease in the actual flood storage loss caused by construction of Lake 3. Ground level profiles suggest that flood storage loss is restricted to a small part of the northern embankment and that much of the lake has been constructed at or above the 2011 flood level.

The analysis has been based on the 2011 flood outline as shown on Figure 2A in the 2012 FRA report. It is understood that this flood condition was the basis of the accepted Lake 3 design and the subsequent determination of flood compensation storage.

The discrepancy in estimates of flood storage loss is most likely due to differences in the methods used. The original calculation in 2012 makes no reference to the use of CAD or surveyed ground surfaces and therefore may have been limited to a simple arithmetic calculation involving an assumed depth, width and length of the Lake 3 embankment within the floodplain. A revised estimate in 2019 has been based on a more detailed calculation carried out in CAD using surveyed ground surfaces.

The revised calculations show that the effect of constructing Lake 3 on flood storage loss are less than previously envisaged. This will have a beneficial impact on flood risk management.

Yours faithfully



Peter Dunn BSc MSc  
Senior Hydrologist

#### Attachments:

- A. Extracts from in 2012 Flood Risk Assessment Report, Kent. N Reilly, February 2012.  
Section 7.3, Figure 2A and Appendix B.
- B. Drawing showing plan and profile views of Lake 3 from 2019 CAD analysis.

## Attachment A

Extracts from in 2012 Flood Risk Assessment Report, Kent. N Reilly, February 2012.

- 7.3 As noted above, the made ground for Lake 3 extends into the natural flood plain and there will therefore be a loss of flood plain storage as well as a loss of flow cross section. The amount of this storage loss has been assessed at 30,200 m<sup>3</sup> (see figure 2A) between the levels of 15.4 m and 16.3 mAOD. This is based on water level information and the indicative flood plain maps provided by the Environment Agency. It is proposed that this loss be compensated for by excavation of the car park area down to a level of 15.4 mAOD by Bridges Lake, rising to 16.3 mAOD on the approach road. This results in a fall of 1 in 226 across the car park area to provide for drainage. The volume of this up to the level of 16.3 mAOD is 15,600 m<sup>3</sup>. There is thus a small deficiency which is discussed further in section 7.5 below.
- 7.4 The loss of flow cross sectional area on the left bank in the 100 year return period climate change case due to the presence of the Lake 3 embankment is



Figure 2A



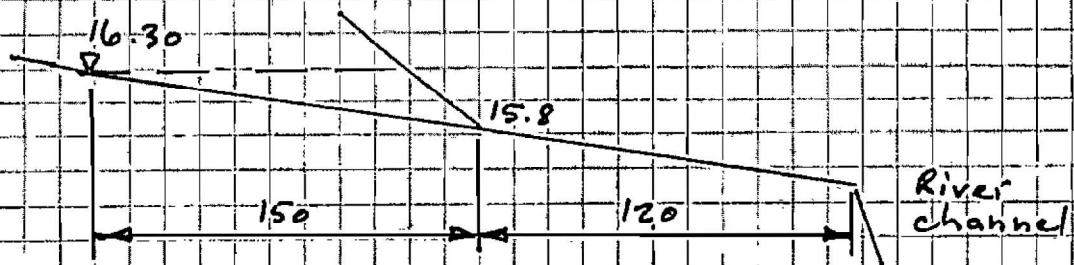
Calculations for

LOSS OF FLOW CROSS SECTION.ADDITIONAL LOSS OF  
FLOOD PLAIN STORAGE

Calculated by MR Date 29/11/11

Sheet nr 7 of 17  
Rev AFLOW CROSS SECTION

Lake 3 encroaches into the flood plain by 150m and thereby reduces the flow cross section



$$\text{Flow cross section lost} = \frac{150 \times 0.5}{2} = 37 \text{ m}^2$$

Replace by excavating ground between the embankment and the river channel

$$\text{Depth required} = \frac{37}{120} = 0.3 \text{ m}$$

$$\text{Excavation volume} = 120 \times 200 \times 0.3 = 7,200 \text{ m}^3$$

LOSS OF FLOOD PLAIN STORAGE

As a result of increasing the 100 year CC flow level from 16.13 to 16.3 m AOD there is an additional loss of floodplain storage

$$\text{Additional volume} = 140 \times 290 \times (16.30 - 16.13) \\ = 6,900 \text{ m}^3$$

$$\begin{aligned} \text{Volume to } 16.13 \text{ m AOD (original volume)} &= 23,300 \\ \text{Additional} &= 6,900 \end{aligned}$$

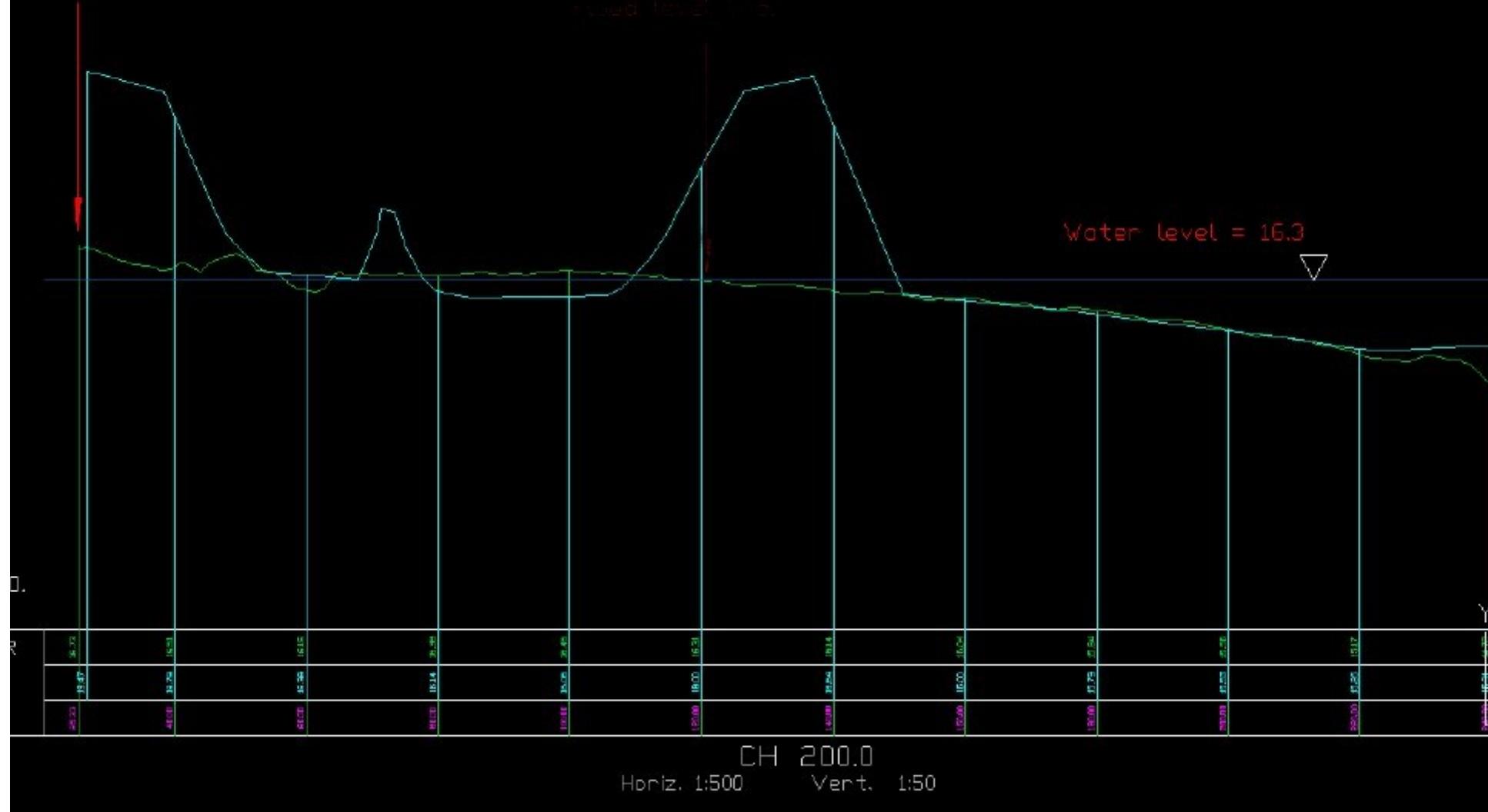
$$\text{Total} \quad 30,200 \text{ m}^3$$

Attachment B

2019 CAD analysis

n of given 16.3  
level line. Used as the  
n boundary of model.

Water level = 16.3 contour  
fixed level 16.3



2 Updated Application Plans

I Site Layout Plan 0183 04 02



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**B** CARPARK LEVELS AMENDED RL 04/10/19

**A** CLUBHOUSE ORIENTATION AND POSITIONED CHANGED RL 04/10/19

REV: DESCRIPTION: BY: DATE:

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[www.nextphasedevelopment.co.uk](http://www.nextphasedevelopment.co.uk)

**PROJECT:** Monk Lakes **SUPERSEDED**

**CLIENT:** Taytime Ltd.

**TITLE:** Proposed Site Layout

**SCALE AT AD:** 1:1000 **DATE:** 27/09/19 **DRAWN BY:** RL **CHECKED BY:** CW

**PROJECT NUMBER:** 0183-04 **DRAWING NUMBER:** 0183-04/02 **REVISION:** B

Chartered Planning & Development Surveyors



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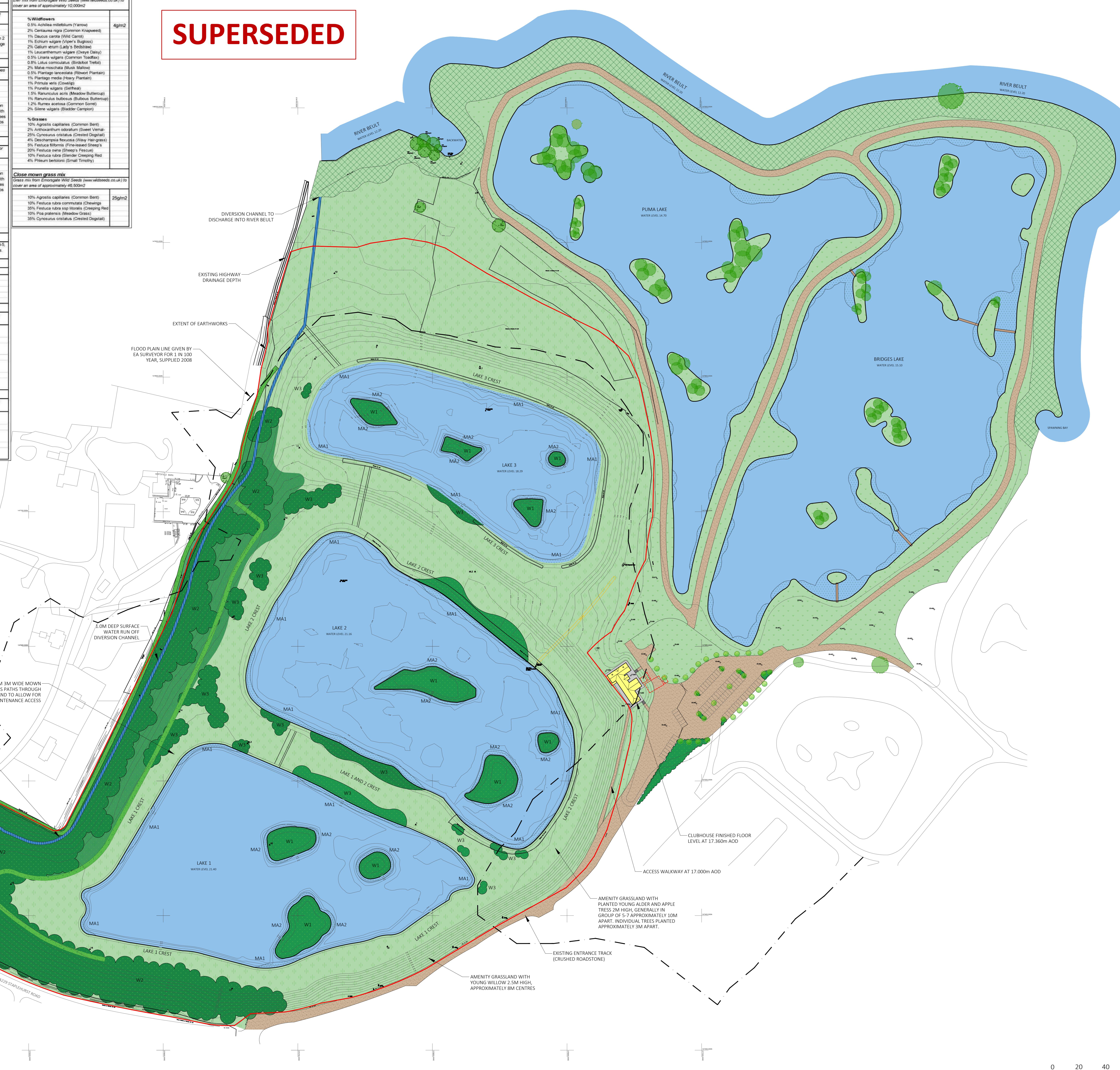
2 Updated Application Plans

II Landscaping Plan 0183 04 03

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KEY:	
—	APPLICATION BOUNDARY
- - -	1 IN 100 YEAR FLOOD PLAIN LINE
- - -	EXISTING BUILDINGS TO BE DEMOLISHED
■	WILDFLOWER MEADOW MIX
■	EXISTING MOWN GRASS
■	PROPOSED NEW NATIVE SHRUB / TREE PLANTING TO SPECIFICATION
■	MARGINAL AQUATIC MIX
■	EXISTING MARGINAL VEGETATION
■	PAVING SLABS
■	PROPOSED NEW HEDGE
■	SURFACE WATER DIVERSION CHANNEL
■	COMPACTED MOT TYPE 1
■	GANGWAY
●	EXISTING SHRUBS/TREES
●	PROPOSED NEW NATIVE SPECIES TREES 18-20CM GIRTH CONTAINERISED STOCK

# SUPERSEDED

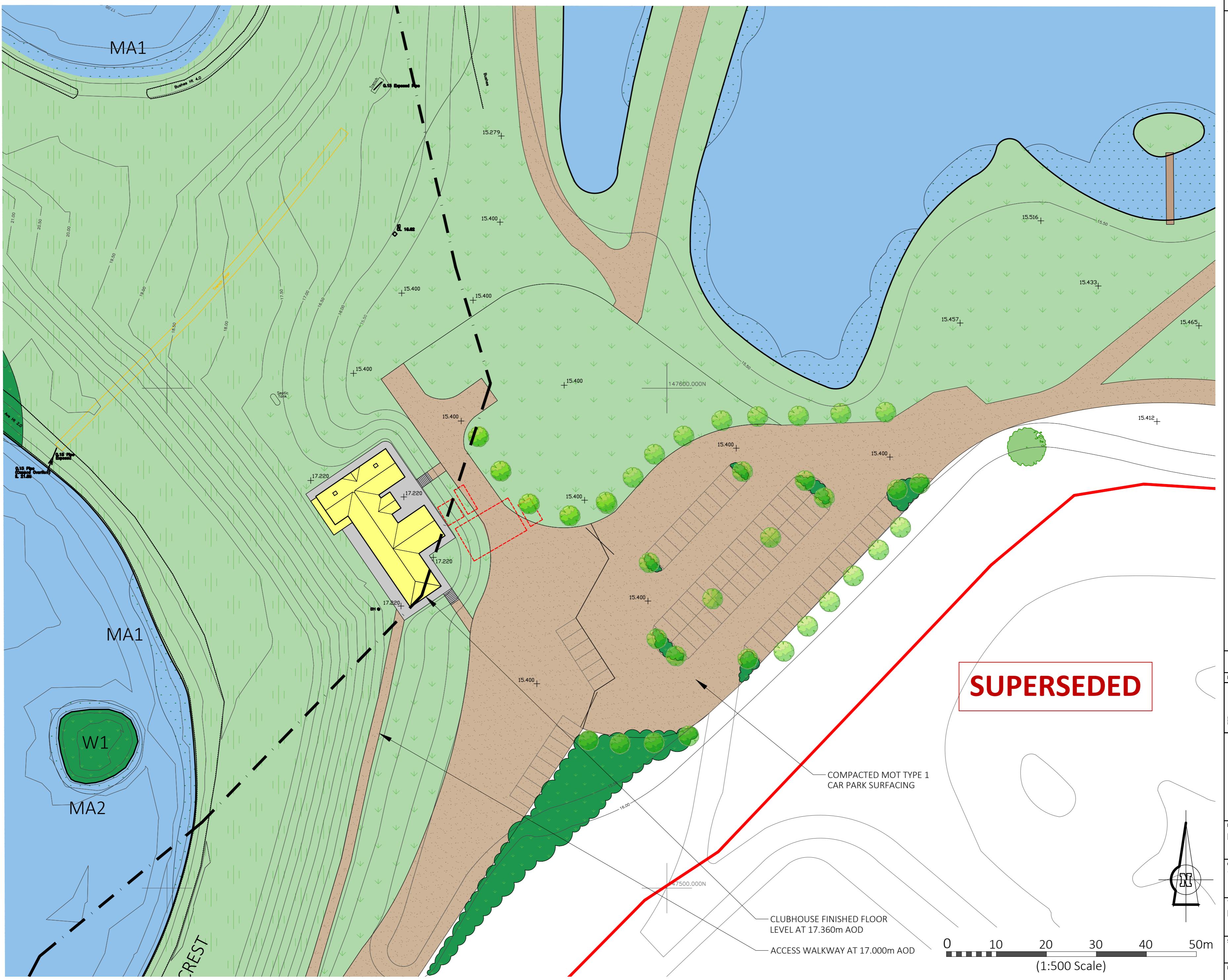


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A CLUBHOUSE POSITION AND ORIENTATION, CARARK LEVELS ARRANGED	RL 04/10/19
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PROJECT: Monk Lakes	
CLIENT: Tynte Ltd.	
TITLE: Proposed Landscaping Plan	
SCALE AT A: 1:1000   DATE: 27/09/19   DRAWN BY: CW   CHECKED BY:	
PROJECT NUMBER: 0183-04   DRAWING NUMBER: 0183-04/03   REVISION: A	

2 Updated Application Plans

III Proposed Club House and Car Park Layout 0183 04 04



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1

- |   | APPLICATION BOUNDARY  |
|---|---|
| — — — — —   | 1 IN 100 YEAR FLOOD PLAIN LINE  |
| — — — — —   | EXISTING BUILDINGS TO BE DEMOLISHED                                   |
|    | WILDFLOWER MEADOW MIX   |
|    | EXISTING MOWN GRASS   |
|    | PROPOSED NEW NATIVE SHRUB / TREE PLANTING TO SPECIFICATION            |
|   | MARGINAL AQUATIC MIX  |
|  | EXISTING MARGINAL VEGETATION  |
|  | PAVING SLABS  |
|  | PROPOSED NEW NATIVE HEDGE   |
|  | SURFACE WATER DIVERSION CHANNEL                                       |
|  | COMPACTED MOT TYPE 1  |
|  | GANGWAY   |
|  | EXISTING SHRUBS/TREES   |
|  | PROPOSED NEW NATIVE SPECIES TREE<br>18-20CM GIRTH CONTAINERISED STOCK |

	CLUBHOUSE POSITION AND ORIENTATION, CARPARK LEVELS AMENDED	RL	04/10/19
	DESCRIPTION:	BY:	DATE:



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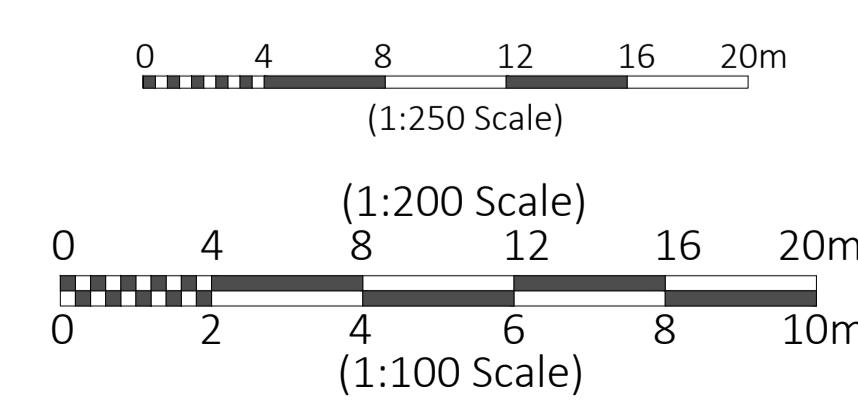
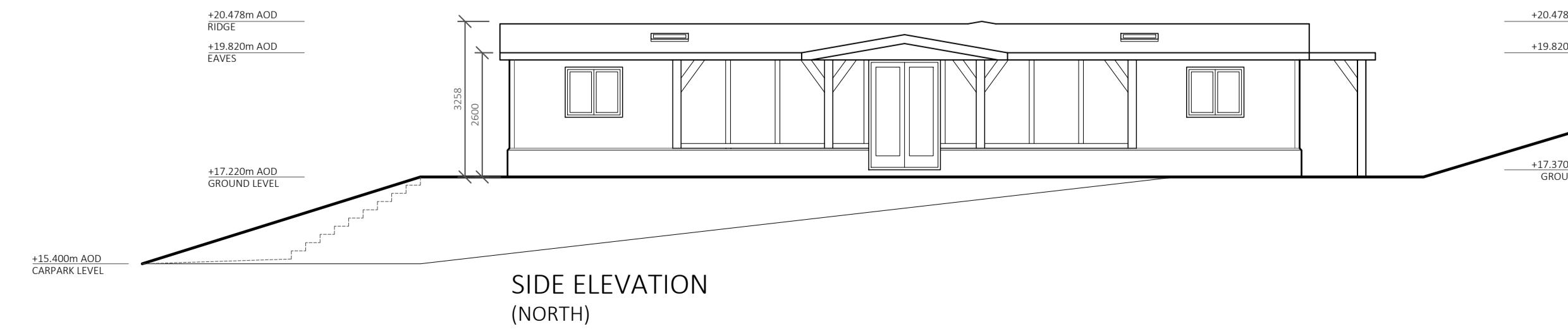
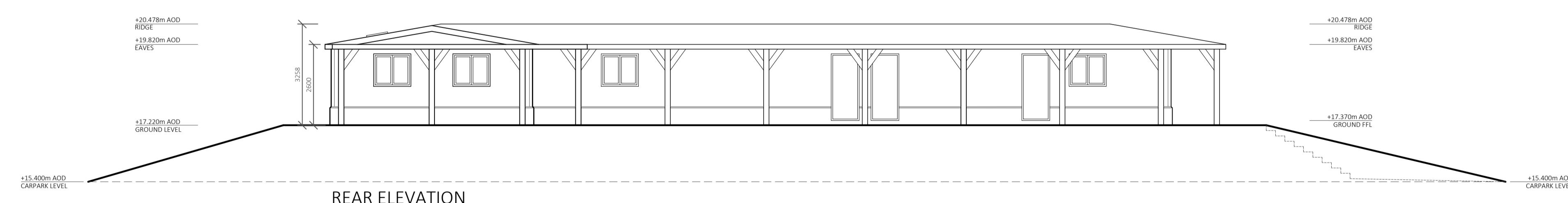
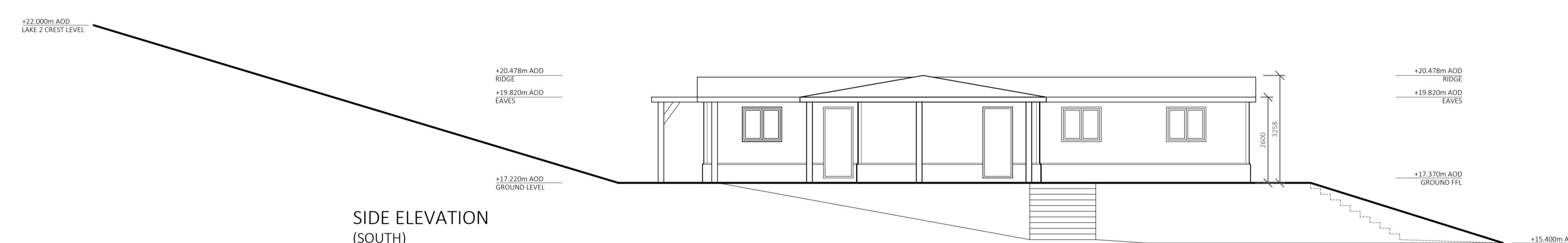
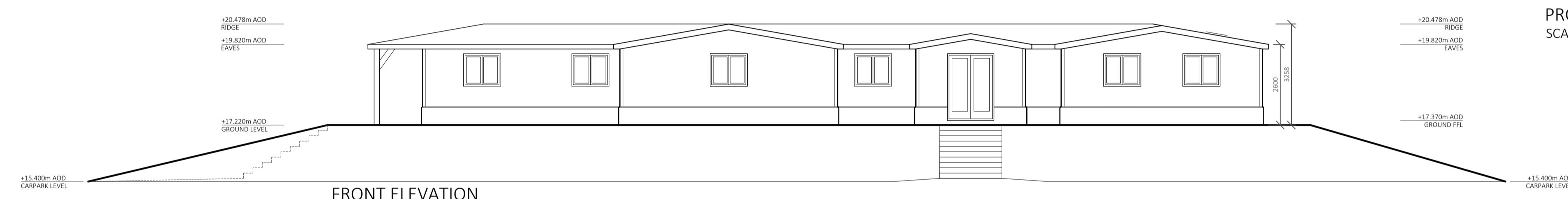
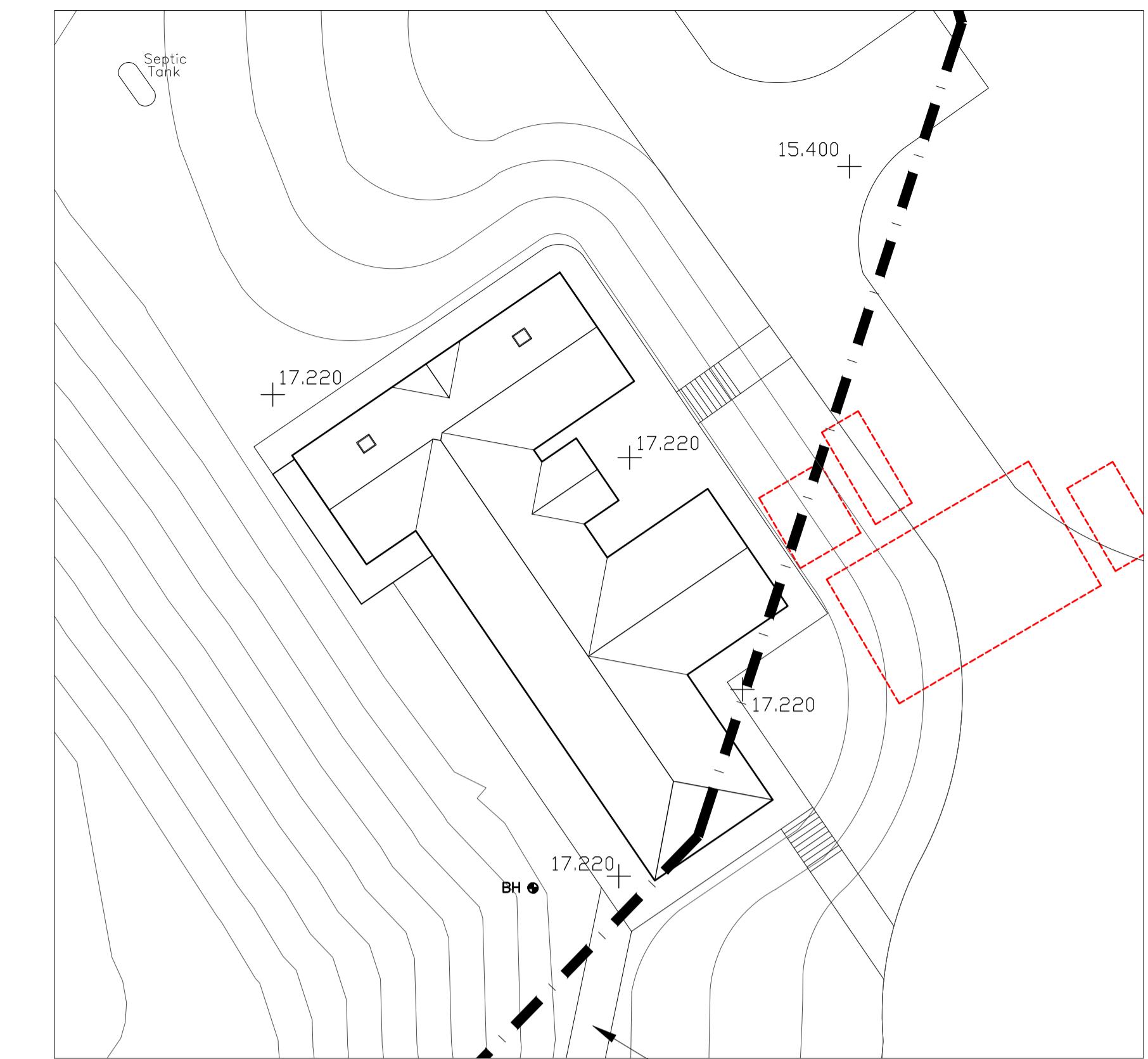
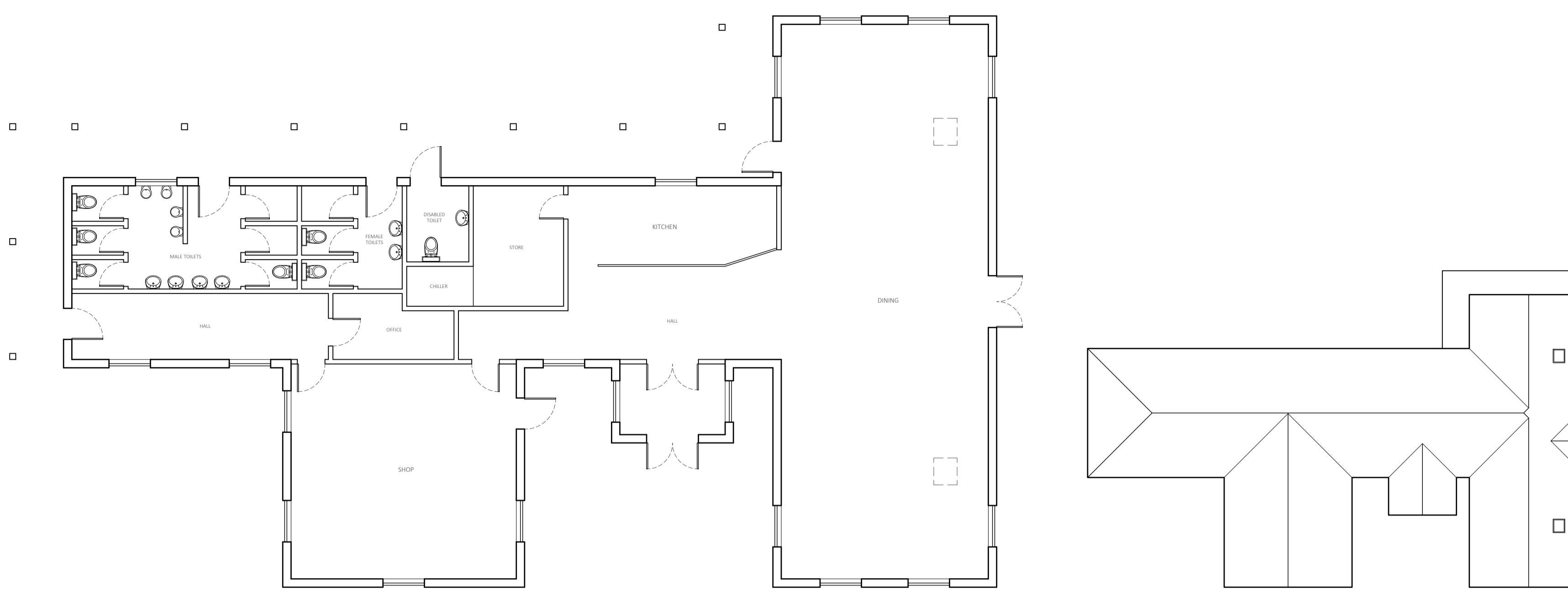
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0183-04	0183-04/04	A	

2 Updated Application Plans

IV Clubhouse Proposed Floor Plans and Elevations 0183 04 05

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A	LEVELS AND ORIENTATION AMENDED	RL	04/10/19
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PROJECT: Monk Lakes			
CLIENT: Taytime Ltd.			
TITLE: Clubhouse - Proposed Floor Plans and Elevations			
SCALE @ A:	DATE: AS SHOWN	DRAWN BY: RL	CHECKED BY: CW
PROJECT NUMBER: 0183-04	DRAWING NUMBER: 0183-04/05	REVISION: B	Chartered Surveyors & Development Planning

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