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Our Ref: FHDC/2019/072582
Date: 4 April 2019

Application No: Y19/0302/FH

Location: Land rear plot 15, Collins Road, New Romney, Kent

Proposal: Formation of new vehicular access to serve the future employment site at Mountfield Road, New Romney, on land located to the west of Mountfield Road, south of Collins road and the north of Church Lane - Mountfield Road phase 4

Thank you for your consultation on the above referenced planning application.

Kent County Council as Lead Local Flood Authority have the following comments:

Desk-based BGS information shows that the site is underlain by Hastings Beds of the Sandstone Formation and Tidal Flat Deposits. Groundwater is assumed to be less than 3 metres below the surface and there are overall significant constraints to infiltration indicated. We are aware ground investigation has not been completed and an infiltration rate of 3×10^{-5} has been derived from soakage testing at Church Road over 100m west of the site.

As the proposal is for full planning permission, we would request that site specific ground investigations are undertaken prior to commencement to assess the depth to groundwater and infiltration potential on site. It is important that infiltration is as shallow as possible in order to maintain a suitable unsaturated zone as there must be no direct discharge to groundwater. Soakage tests should be compliant with BRE 365, notably the requirement to fill the test pit several times. Should infiltration not be viable, an alternative outfall for surface water would need to be sought.

We would also recommend that the side slopes of any drainage basin normally be no steeper than 1:3 to allow for vegetative stabilisation and for public safety reasons. Cross sections should be provided to demonstrate the side slopes and ensure sufficient separation distance can be achieved between the access road and infiltration basin.

As further information is required, we recommend pre-commencement condition is applied to any grant of planning permission. If the applicant was not minded to agree to the pre-commencement condition then we would recommend the application is refused in the absence of site specific infiltration testing.

Should your authority be minded to grant permission for the above development, we recommend the following conditions are attached:

Condition:

Development shall not begin 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 Surface Water Management Strategy (RMB Consultants Ltd, February 2019) 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):

- 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 part of the development (or within an agreed implementation schedule) hereby permitted shall be brought into use until a Verification Report pertaining to the surface water drainage system, carried out by a suitably qualified professional, has been submitted to the Local Planning Authority which demonstrates the suitable modelled operation of the drainage system such that flood risk is appropriately managed, as approved by the Lead Local Flood Authority. The Report shall contain information and evidence (including photographs) of earthworks; details and locations of inlets, outlets and control structures; extent of planting; details of materials utilised in construction including subsoil, topsoil, aggregate and membrane liners; full as built drawings; topographical survey of 'as constructed' features; and 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 165 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,

Sophia-Harri Nicholaou
Flood Risk Project Officer
Flood and Water Management