

Folkestone Hythe District Council
Development Control
Civic Centre Castle Hill Avenue
Folkestone
Kent
CT20 2QY

Our ref: KT/2018/125053/01-L01
Your ref: Y18/1428/FH
Date: 17 December 2018

Dear Sir/Madam

Erection of 30 dwellings

Hope All Saints Garden Centre, Ashford Road, New Romney, Kent TN28 8TH

Thank you for consulting us on the above. We have no objection to this proposal however we do have the following comments to make.

Flood Risk

Whilst this site lies within Flood Zone 3a (an area considered to be at 'high risk' from tidal flooding), we are satisfied with the conclusions of the applicant's Flood Risk Assessment.

Notwithstanding the above, the Council should initially be satisfied that the Sequential Test has been applied, as per the requirements of the National Planning Policy Framework (NPPF) and its associated Technical Guidance. The Sequential Test is applied to ensure the most vulnerable forms of development are preferentially located in the areas at lowest risk of flooding.

If the Sequential Test can be demonstrated to have been passed, the second part of the Exception Test requires that any new development is 'safe' from the effects of flooding.

The submitted Flood Risk Assessment (FRA) interrogates the Local Planning Authority's Strategic Flood Risk Assessment (SFRA) and associated flood risk hazard modelling. This modelling shows that the site is appropriately defended from flooding and shows that the development should be safe from flooding in the event of a breach in the defences towards the end of the assumed lifetime of the development (taken to be around 100 years for residential development).

Provided the minimum floor levels recommended in the FRA are adhered to at the detailed design stage, we would have no objection to this development.

If you are satisfied that the Sequential Test has been appropriately applied and passed, we would recommend that the following Condition included in any permission granted:

Condition: The development shall be carried out in accordance with the submitted

flood risk assessment (Tridax 2018) and the following mitigation measures detailed within:

- Finished floor levels shall be set no lower than 2.9maODN and 3.2maDN for living/sleeping accommodation respectively.

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements.

Reason: To reduce the risk of flooding to the proposed development and future occupants.

You should also ensure that the local IDB and KCC (as LLFA) are consulted and are content with the proposed drainage strategy.

All appropriate flood resilience measures should also be incorporated into the finished properties, and the future residents should be encouraged to sign up with our Flood Warning Service

We record the outcome of planning decisions and request the decision notice is emailed to kslplanning@environment-agency.gov.uk

Yours faithfully

Ms Jennifer Wilson
Planning Specialist

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