

Stacey, Jane

From: [REDACTED]
Sent: 27 March 2024 17:01
To: Planning
Cc: [REDACTED]; SUDS@kent.gov.uk; [REDACTED]@gladman.co.uk
Subject: 20/0604/FH - Land to the South of Ashford Road, Sellindge - 55 Dwellings

[REDACTED]
Good afternoon.

Whilst we haven't been formally consulted on the above-referenced development proposal, we would request the following comments are recorded against this proposal.

Although this site lies just outside of our IDB Drainage District, we note KCC's (as LLFA) comments regarding the SuDS strategy and their opposition to a discharge to the highway drainage network. We echo these concerns, not least because it is likely that the Highway drainage outfalls to watercourse that flows into our Drainage District. The point of discharge does not appear to have been considered. If this or an alternative strategy is pursued that results in a new point of discharge to any on/off-site ditch or watercourse, there could be flood risk and drainage implications for the areas downstream. We therefore request that a holding objection is registered, and that the following comments are noted:

If it can be initially confirmed that full infiltration is not feasible at this location and that water can be demonstrably & effectively conveyed from the point of discharge to a wider receiving network that leads to an appropriately sized watercourse, the applicant will require KCC's Consent (as LLFA) for any new outfall to an internal/boundary ditch; they will also need our Land Drainage Consent for under our **Byelaw 3**, specifically with regard to the payment of a Surface Water Development Contribution, for any increase in **rates/volumes** of discharge that may be directed into our District (directly/indirectly). Should an alternative drainage arrangement be sought, we would like to be reconsulted to ensure the interests of our Board are fully considered.

For ease of reference, our Byelaw 3 states:

"3. Control of Introduction of Water and Increase in Flow or Volume of Water

No person shall as a result of development (within the meaning of section 55 of the Town and Country Planning Act 1990 as amended ("the 1990 Act")) (whether or not such development is authorised by the 1990 Act or any regulation or order whatsoever or none of them) for any purpose by means of any channel, siphon, pipeline or sluice or by any other means whatsoever introduce any water into any watercourse in the District so as to directly or indirectly increase the flow or volume of water in any watercourse in the District (without the previous consent of the Board)."

Any such contribution will be a one-off payment, and will serve to facilitate the management of the increased flows resulting from the development into our District.

Please refer to the following website for further information on the SWDC, policies and byelaws:
<https://rsidb.org.uk/consents-byelaws/>

We would be grateful if the applicant/their consultant can be advised to contact us at their earliest convenience to discuss the drainage arrangements.

Kind regards,

Joe Williamson

Joseph Williamson

Technical Officer

[The River Stour \(Kent\) IDB](#)