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Our Ref: SBC/2023/093697
Date: 21 July 2023

Application No: 22/505852/SUB

Location: Land Off Staple Street Hernhill Kent ME13 9HY

Proposal: Submission of Details Pursuant to condition 14 (Surface Water Drainage Scheme) of Application 20/503666/FULL.

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

Kent County Council as Lead Local Flood Authority have reviewed the additional information in relation to the discharge of condition 14 and have the following comments:

1. Whilst we acknowledge that the discharge rates do not exceed greenfield rates for the whole site, we would not expect the full site area to be included with the greenfield rate calculations. The CIRIA SuDS Manual (2015) states: "The runoff area used in any of the runoff estimation methods should be consistent; for example, if the whole site area is used in the greenfield runoff calculations, the whole site should also be represented in the runoff calculations for the proposed development. If there is a landscaped area in the developed scenario that discharges directly to receiving waters and does not contribute to the drainage system (so is excluded from the calculations) then this area should also be excluded from the greenfield calculations."

We note that the areas used within the greenfield calculation and microdrainage modelling differ, with greenfield calculation using the whole site area whereas the modelling uses only the developable positively drained area. As such we would request clarification to be provided as to why these areas differ or for the calculations be adjusted accordingly. The areas utilised to calculate the Greenfield run off rate should be used within the hydraulic analysis. If evidence can be provided that none of the surface water from the various 'green areas' will enter the positively drained network, then this would be acceptable but would still expect for this area to be removed from the greenfield run off calculations.

2. Multiple occurrences of flooding appear within the 30 yr rainfall event. We would not normally expect to see any flooding at this event and would expect for the network to be optimised to ensure no flooding for this storm event.

We would therefore recommend a holding objection until the above points have been addressed.

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,

Gideon Miller

Graduate Flood Risk Officer
Flood and Water Management