



**James Wilson**  
**Swale Borough Council**  
Swale House  
East Street  
Sittingbourne  
Kent  
ME10 3HT

**Flood and Water Management**  
Invicta House  
Maidstone  
Kent  
ME14 1XX  
**Website:** [www.kent.gov.uk/flooding](http://www.kent.gov.uk/flooding)  
**Email:** [suds@kent.gov.uk](mailto:suds@kent.gov.uk)  
**Tel:** 03000 41 41 41  
**Our Ref:** SBC/2023/093697  
**Date:** 30 January 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 information provided pertaining to the discharge of condition 14 and have the following comments:

1. We note that the discharge rate previously approved on the 15th December 2020 was 2 l/s from the site. Drainage Layout Sheets 1 and 2 (65204882-SWE-ZZ-XX-DR-C-0100 and 65204882-SWE-ZZ-XX-DR-C-0101) now provided, appear to show three further points of unrestricted discharge into the ditch. We would expect discharge from the whole site to be restricted to 2 l/s as previously approved unless it can be shown that discharge rates from the site are not exceeding greenfield rates for their respective storm events or QBAR.
2. In addition to point one above, it is noted a package treatment plant is provided onsite to treat foul water prior to discharge into the watercourse. With this addition of flow there is concern that the rates entering the ditch is now above greenfield rates and as such could result in increase flood risk downstream.
3. Full network modelling of the drainage system should also be provided. This should demonstrate the drainage system's operation and performance for the critical duration 1/2 year, 30 year and 100 year storm intensities, with relevant climate change allowances for the 100 and 30 year event. No surcharging of the network should be experienced for the 1/2 year events, unless where unavoidable at features such as flow controls.
4. Additionally, the discharge of condition 14 requires the submission of the maintenance details of the proposed sustainable drainage scheme. We recommend submission of an operation and maintenance manual that comprises:
  - An approximate timetable for the implementation of the drainage system during construction of development.

- A description of the SuDS components associated with the proposed drainage system and the key features that affects their operational performance if not properly maintained. This should be accompanied with a drawing which shows the drainage arrangement.
- Details of the operation and maintenance activities associated with each of the SuDS. This should consider the frequency of inspections and the types of maintenance activities required on a regular, periodic or remedial basis.
- Details of who will undertake inspections and maintenance activities. This should include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage system throughout its lifetime.

In this instance no information has been submitted with respect to the proposed maintenance of the drainage system.

We would therefore request a holding objection on the discharge of condition 14 until the above points have been adressed.

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