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

**Our ref:** KT/2017/123369/05-L01
**Your ref:** Y17/1042/SH

**Date:** 15 October 2018

Dear Sir/Madam

**Surface water management system addendum- Hybrid planning application for the development of land at Princes Parade. An application for outline planning permission (with all matters reserved) for up to 150 residential dwellings (use class c3), up to 1,270sqm of commercial uses including hotel use (use class c1), retail uses (use class a1) and / or restaurant/cafe uses (use class a3); hard and soft landscaped open spaces, including children's play facilities, surface parking for vehicles and bicycles, alterations to existing vehicular and pedestrian access and highway layout within and around the site, site levelling and groundworks, and all necessary supporting infrastructure and services. full application comprising a 2,961sqm leisure centre (use class d2), including associated parking, open spaces and children's play facility**

**Princes Parade Promenade, Princes Parade, Hythe, Kent**

Thank you for consulting us on the Technical Addendum to the previously submitted Flood Risk Assessment and Drainage Strategy for this development.

Although we appreciate the efforts that have been put into seeking an alternative method of disposal and discharge location for the surface water generated by this development, we are still unfortunately unable to consider that the proposed discharge into the Royal Military Canal (RMC) presents a satisfactory solution. We are therefore **unable to remove our objection** to the surface water system presented with its discharge to the RMC.

The analysis undertaken seeks to demonstrate that under existing conditions, a proportion of the runoff from the site will already discharge into the RMC, and that the surface water management system proposed will mimic the response from the undeveloped site.

While we are aware that the geology/fill of this former landfill site will result in a response to rainfall that would be somewhat different from a ‘natural’ site, the runoff analysis undertaken assumes that the underlying ground is reasonably freely draining (thus providing a lower greenfield rate for calculations than may actually be the case). Given the sensitivity of the receiving watercourse, we are satisfied with this conservative approach.

Our primary concern with the proposed scheme is with its apparent inability to cope with relatively minor successive rainfall events. The half-drain time of each individual part of the system appears to be far in excess of the recommended 24hr time-frame; this means that the attenuation features could already be near maximum capacity having received the runoff from any preceding rainfall event when any subsequent storm system arrives.

Once the maximum capacity of the system is exceeded, surface water flooding is likely to occur, and this would lead to a likely unrestricted overland discharge from the site to the RMC.

This sequence of events will be of particular concern during periods of prolonged wet weather, as would be expected during the winter months of any given year. With the predicted effects of climate change, this risk is likely to be further exacerbated. According to recent guidance, we are likely to experience warmer, wetter winters and more intense and frequent summer downpours as the effects become more pronounced.

The aim of the addendum is to demonstrate that there is a viable and practical alternative to discharging the surface water runoff from this development towards the sea. With the scheme as currently presented, we consider that the flood risk to the area will be exacerbated during conditions that would be expected to occur relatively frequently.

Additional attenuation could be provided to accommodate successive rainfall events, but it is likely that the additional cost and land-take involved would prove prohibitive. Increasing the rate of runoff from the attenuation features would result in more water entering the RMC at a higher rate than at present; this would not be acceptable owing to the known flood risk from this system and the NPPF's requirement for flood risk management (i.e. new development must not exacerbate any existing risk).

We have liaised with Kent County Council's Flood and Water Management team (in their capacity as Statutory Consultee on surface water management matters within major development), and they share the above concerns and would similarly oppose any system with the characteristics of that outlined.

If the applicant would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our cost recovery service.

If they wish to request a meeting, or document review, please contact our team email address at KSLPlanning@environment-agency.gov.uk

Further information on our charged planning advice service is available at:
https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions

Yours faithfully

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