

Session 1 –Legal & Procedural; Housing Needs (1).

No.	Issue.	Timescale.	Response.
1.1	MBC should consider how to appropriately reference the intended review of the plan, perhaps through a policy	20/10/16	The Council agrees there is a need for clarity. As part of the response to the Inspector's question 7.4 (Hearing Session 7) alternative wording is proposed to the text in the submitted plan (PC/84)
1.2	Any addendums to Sustainability Appraisal should be included alongside any consultation on main modifications if no previous consultation has been carried out.	Subject to date of consultation	The Council agrees and will consult on the addendums with any main modifications resulting from the Inspector's conclusions at the end of the examination hearings.
1.3	MBC to prepare a response to Ms. Shotter's representation on Lenham sewerage and drainage matters for Session 7	20/10/16	Please see text below table.
1.4	Subject to consideration of the soundness of the Lenham Broad Location at later sessions a change to the Key Diagram would be consulted upon alongside any main modifications to include a single symbol showing a broad location at Lenham.	Subject to date of consultation	The Council agrees and will consult on an amended Key Diagram with any main modifications resulting from the Inspector's conclusions at the end of the examination hearings, subject to the outcomes of the Inspector's consideration of the broad location at Lenham in later hearing sessions.
1.5	Programme Officer Invite Coordinating Team to Session 5A on 12/10/16 where windfall supply is on the agenda	ASAP	This is a matter for the Programme Officer, not MBC.
1.6	MBC: Putting note together updating information on Page 108 HOU002 to reflect 2011 census	20/10/16	This information has been provided to the Programme Officer, and was added to the Council's website as an Examination Document (ED020) on 13 October 2016.

Response to Ms Shotter representation on Lenham in relation to sewerage and drainage:

Ms Shotter raises a number of issues in her representation; here the Council responds only in relation to sewerage and drainage as directed by the Inspector. The information reflects that contained in the Council's response to the Inspector's question 7.14.

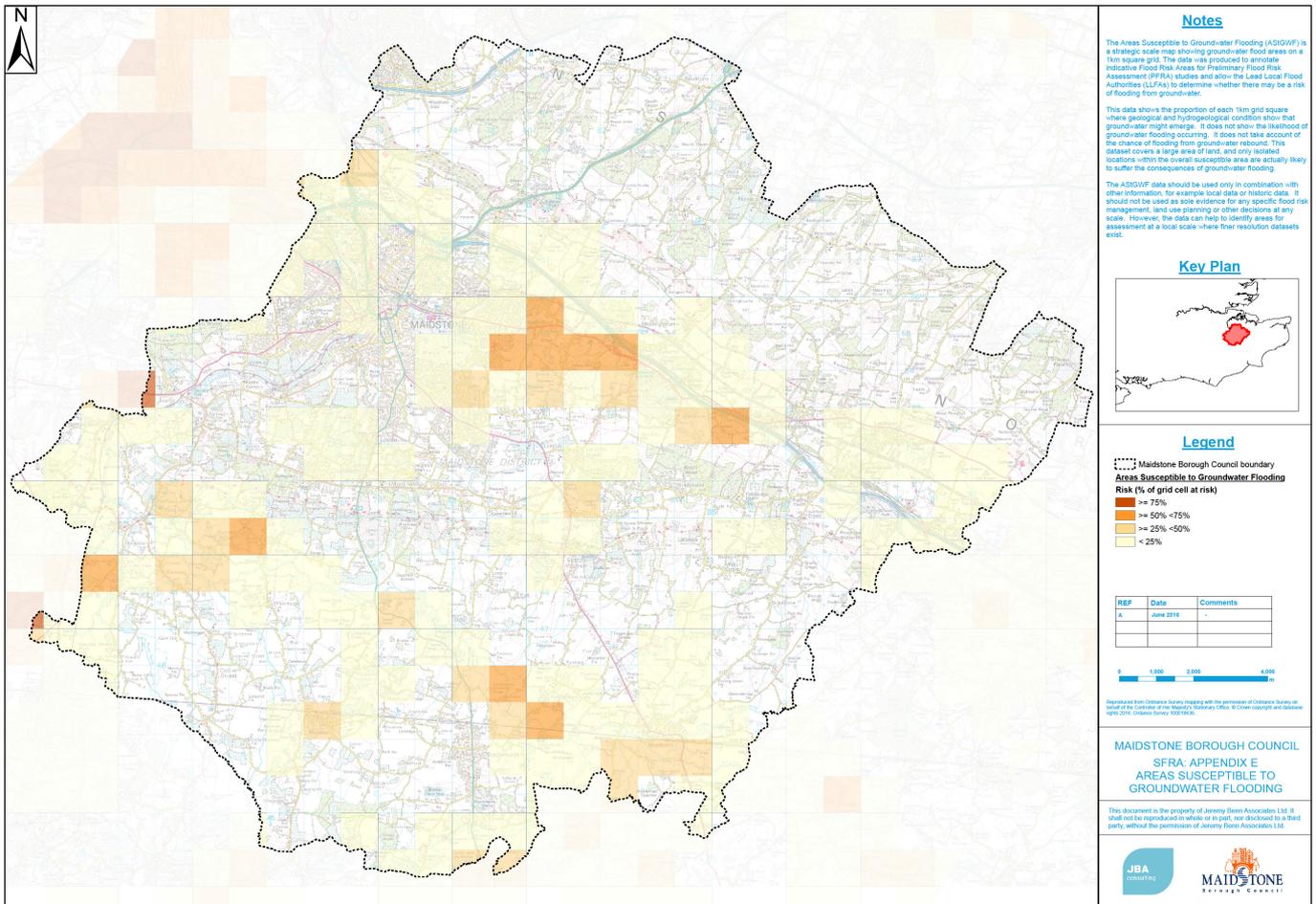
Ground Water Drainage

In assessing the availability of sufficient suitable sites at Lenham to comprise a broad location, an appraisal of flood risk was undertaken in consultation with the Environment Agency.

The SHEDLAA (HOU 007) indicates no objection to the large sites which are able to contribute to residential development at Lenham. For example, to the west, site HO3-202 - Land off Old Ham Lane, Lenham the EA commented that they had no objection to residential development but that the authority should be aware the site and Ham Lane suffered prolonged waterlogging following heavy rainfall during the winter of 2013/14. Similarly, to the east site HO3-264 - Land South of Ashford Road, Tanyard Farm, Lenham the EA commented that they had no objection to residential development but that the authority should be aware that the site is bisected by a watercourse which has given rise to localised flooding in the past. Development would have to achieve highly sustainable design that avoids the springs and streams at the headwaters of the River Stour. Significant areas of greenspace would be required to safeguard, and buffer these features to prevent deterioration and deliver mitigation measures and ecological gains.

The Council has now commissioned an update in the form of an addendum to the 2008 SFRA carried out by Mott MacDonald. The SFRA Addendum 2016 (CC 005) assesses the ground water drainage conditions around Lenham.

As part of the SFRA Addendum, mapping of the whole borough has been provided showing the Areas Susceptible to Groundwater Flooding (AStGWF). The AStGWF is a strategic-scale map showing groundwater flood areas on a 1km square grid. The data was produced to annotate indicative Flood Risk Areas for Preliminary Flood Risk Assessment (PFRA) studies and allow the Lead Local Flood Authorities (LLFAs) to determine whether they may be at risk of flooding from groundwater. A copy of the map is included below.



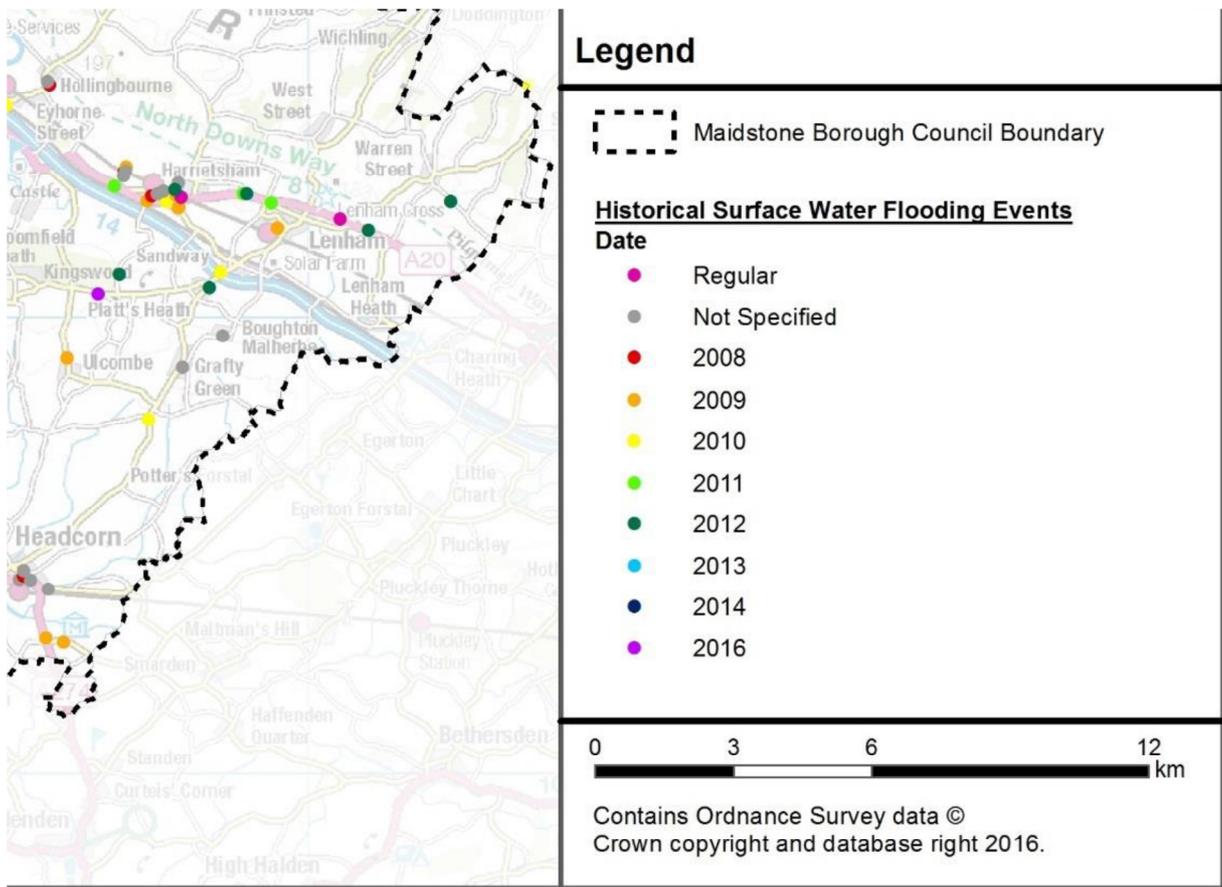
The data shows the proportion of each 1km grid square, where geological and hydrogeological conditions indicate that groundwater might emerge.

The information indicates that the areas susceptible to groundwater flooding are primarily located in the central and southern sections of the borough. For the most part, susceptibility to groundwater flooding is considered to be low as less than 25% of the area within the 1km grid squares that are considered to be susceptible to groundwater flooding. The SFRA indicates that this dataset covers a large area of land and only isolated locations within the overall susceptible area are actually likely to suffer the consequences of groundwater flooding.

The ASGWFF data should be used only in combination with other information, for example local or historical data. It should not be used as sole evidence for any specific flood risk management, land use planning or other decisions at any scale.

Historical records for Lenham show regular flooding in one location on the A20 to the east of the village and limited other isolated incidents. The SFRA Addendum 2016 states that it can be difficult to ascertain if a source of flooding is from groundwater. This is because the flood

risk may be the result of a combination of sources, or a culverted watercourse that may have been mistaken for a spring or an underground stream.



Indeed, the following incidents at Lenham depicted on the map above demonstrate the individual nature of the sources:

Pink record – Ashford Road

- o **Source:** SWMP data. The original source is Maidstone Borough Council.
- o **Date:** 'Regular' specified within the data supplied. No further information regarding date was provided.
- o **Type:** Surface water flooding
- o **Other information provided:** Insufficient soakaways in a verge caused flooding on the A20. The historic record does not specify property flooding.

Green record 1 – Ashford Road

- o **Source:** Kent County Council Flood History Information.

- o **Date:** 1st January 2012 (Note: the majority of dates provided KCC reference the first of the month. It is considered this may not be reflective of the actual flooding date, which is why information is only presented in years on the figure)
- o **Type:** Surface water flooding with blocked drain/gully
- o **Other information provided:** KCC were requested to remove floodwater, cleanse and jet any gullies as required to prevent further flooding. The historic record does not specify property flooding.

Green record 2 – Waterditch Lane

- o **Source:** Kent County Council Flood History Information.
- o **Date:** 1st January 2012. (Note: the majority of dates provided KCC reference the first of the month. It is considered this may not be reflective of the actual flooding date, which is why information is only presented in years on the figure)
- o **Type:** Surface water flooding with blocked drain/gully
- o **Other information provided:** KCC were requested to clear floodwater and cleanse gullies at this location.

Despite the low risk of groundwater flooding the SFRA advises that developers planning to build within groundwater emergence zones should still investigate whether groundwater flooding is likely to be a problem locally. The SFRA notes that although an area may be designated as susceptible to groundwater flooding, this does not mean that groundwater flooding will definitely be a problem within these areas, rather it provides an indication of the risk. Nonetheless, developers planning to build within groundwater emergence zones should still investigate whether groundwater flooding is likely to be a problem locally.

The SFRA Addendum also promotes the use of SuDs to prevent changes to surface water run-off.

The Local Plan states that the Water Cycle Study (CC 002; CC 003) indicates that a number of the rural service centre catchment areas have at least some known problems with surface water flooding and recognises that it is therefore important that surface water run-off from new development does not make this problem worse. The Plan emphasises that future developments in the rural service centres should include the implementation of sustainable drainage systems (SuDS) that reduce surface water run-off and ensure a detailed flood risk assessment is undertaken prior to any development (Para 5.47).

This statement is supported by Criterion 7 of Policy H2 (3) (Lenham broad location for housing growth) which states specifically:

7. Appropriate surface water and robust flood mitigation measures will be implemented where deemed necessary, subject to a flood risk assessment, incorporating sustainable urban drainage systems.

In conclusion, identification of the Broad Location at Lenham has had sufficient regard to ground water drainage and the Local Plan specifically highlights the need to consider the issue at the detailed planning stage.

Sewage Treatment Works

The Borough Council is well aware that there is limited capacity within the existing sewage treatment works at Lenham and has closely liaised with Southern Water over the need for future upgrades. It is intended that the treatment work improvements could be incorporated into the next Ofwat Review which has commenced and will be completed in 2019. That will provide the framework for Southern Water's investment decisions over the next five years and could specifically identify phased works at Lenham, or provide the basis for a subordinate document to undertake that work.