

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

**Our ref:** KT/2017/123369/06-L01  
**Your ref:** Y17/1042/SH  
**Date:** 15 January 2019

Dear Sir/Madam

**Updated 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 reconsulting us on this revised, and very much 'alternative' drainage proposal for this development site.

Following lengthy discussions with the applicant's consultants, we are satisfied that the secondary scheme now presented represents a 'just-about viable' alternative to a direct discharge to the sea. This is purely on the understanding that (and as stated) any excess flows from surcharged attenuation features are directed towards the beach/sea when the surface water storage features are at or have exceeded capacity.

We reiterate that we are content that there is already a greenfield contribution from the site to the Royal Military Canal (RMC) during prolonged or extreme rainfall events, and that with the controls proposed, the post-development runoff rate/volume should not be increased via 'option B'. However, whilst the Flood Risk assessment (FRA) states that there may be a slight overall improvement, we consider that 'option A' (that of a direct and permanent discharge from the site to the sea via a formal outfall) would present a more significant benefit to the flood risk within the RMC, and we would be unable to consider this sufficient reason in itself for this secondary solution to be justified as the primary option.

We are still of the opinion that the overwhelmingly preferable option for surface water from this site is for a direct and permanent discharge to the sea (with interception and treatment provided for the 'first flush'), and we would need quite a degree of liaison and persuasion from any prospective developer if this alternative 'option B' is pursued.

Environment Agency  
Orchard House (Endeavour Park) London Road, Addington, West Malling, ME19 5SH.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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The costs involved with this secondary, attenuated, solution with its associated maintenance and land regrading to achieve the overland flow routes for excess flows, would require extremely convincing arguments for 'option B' to be pursued.

The 'outside of the redline boundary' argument is unlikely to carry sufficient weight when a second application to cover just the outfall could be submitted at a later date.

To clarify. This secondary solution appears to be viable from a flood risk management and surface water runoff perspective, but should be seen as an emergency fall-back option only, and only if there are extremely good reasons for a direct discharge to the beach not to be pursued. We would need a lot of evidence and convincing to support this approach and discharge any associated condition.

If you any any queries, please do not hesitate to contact me.

Yours faithfully

**Ms Jennifer Wilson**  
**Planning Specialist**

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