

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

Our ref: KT/2017/123369/03-L01
Your ref: Y17/1042/SH
Date: 27 July 2018

Dear Sir/Madam

Additional information - 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 the revised information submitted in support of the above-referenced application.

Flood Risk

We **OBJECT** to the proposed discharge of surface water into the Royal Military Canal (RMC).

We are disappointed that the applicant is now intending to discharge the surface water generated by this proposed development into the RMC. This was an option for surface water management that was originally discussed with the applicant's Flood Risk consultants and discounted owing to the lack of capacity within the receiving watercourse. It was agreed that a direct discharge to the sea was the most sustainable and least problematic solution from a flood-risk management perspective.

Whilst we agree that the surface water management system can largely be dealt with through a detailed design submission at the discharge of conditions stage (as recommended by KCC, the LLFA for the area), we would be unable to withhold an objection to any submission that proposes a discharge of surface water to the RMC.

The cover letter states that the applicant's consultants have undertaken further assessment of the drainage requirements. We would have expected to see any such assessment submitted to support this revision, and we should have ideally been

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involved given the previously agreed approach.

We would also like to take the opportunity to remind the applicant that any works (including the construction of outfalls) within 8m of the RMC will require a Flood Risk Activity Permit from the Environment Agency, and that we are unlikely to grant permission to any works that we deem inappropriate or that may serve to exacerbate the flood risk to the receiving watercourse or surrounding areas.

Fisheries, Biodiversity and Geomorphology

The buffer zone shown in the mitigation strategy document is acceptable. Although the buffer zone tapers towards the eastern end of the site, the green space available at the western end of the site is wide enough to compensate for this narrowing.

Groundwater and Contaminated Land

We have reviewed Appendix 1 Surface water Strategy and Summary of ES Consultation and reiterate our comments provided in KT/2017/123369 dated 16th November 2017.

Adequate assessment of land potentially effected by contamination should be undertaken prior to the positioning of surface water soakage areas and excavations designed to accommodate the infrastructure of the development.

There must be no discharge into land impacted by contamination or land previously identified as being contaminated. There must be no direct discharge to groundwater, a controlled water. There must be no discharge to made ground.

The underlying historic landfill 'Princes Park' accepted putrescible and difficult waste. It is currently unknown if this landfill has the potential to produce landfill gas. It should be demonstrated that proposed drainage methods will not influence or exacerbate conditions in, on or under the site.

If the Council is minded to granted permission against our advice we would ask them to contact us for further discussion.

Yours faithfully

**Ms Jennifer Wilson
Planning Specialist**

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