

Sevenoaks District Council  
Development Control  
Council Offices Argyle Road  
Sevenoaks  
Kent  
TN13 1HG

**Our ref:** KT/2019/126352/01-L01  
**Your ref:** 19/02360/FUL  
**Date:** 27 November 2019

Dear Ray Hill

**CONVERSION OF THE FORMER PUB INTO 1NO. FOUR BED COTTAGE. PARTIAL DEMOLITION OF OUT BUILDINGS LINKING THE OLD STABLES TO THE PUB ALONG WITH A NEW EXTENSION TO STABLES IN ORDER TO CREATE 1NO. TWO BED HOUSE AND 1NO. ONE BED HOUSE. TO THE REAR OF THE SITE AN APARTMENT FOR 1NO. TWO BED, AND A TOWN HOUSE FOR 1NO. THREE BED. LANDSCAPING WORKS.**

**FORMERLY THE STAR INN 130 HIGH STREET EDENBRIDGE KENT TN8 5AY**

Thank you for consulting us on the above application.

We have reviewed the information submitted and have the following comments to make:

Paragraph 2 and 4.2.1. from FRA confirms that all units have permanent sleeping accommodation on the first floor or above. Unit 1, 2 and 3 have living accommodation on the ground floor. Unit 4 and 5 have parking provision (electrical charging space, garage, and bike storage), access lobby and storage space on the ground floor.

Paragraph 2.2 from FRA confirms that at the time of preparing the FRA, no detail regarding Finished Floor Levels (FFLs) had been determined.

Paragraphs 3.4.1 and 4.1 from FRA confirms the potential flood depths during a 1% AEP (1 in 100 years) + 35% event, for each unit, as follows:

- **Unit 1: The Proposed House (The Star Inn Conversion) - the flood depth is approximate at 0.41m** (A flood elevation of 41.23mAOD minus the topographic elevation of 40.82mAOD).
- **Units 2 and 3: The Proposed Houses (existing Stable Conversion) - the**

**flood depth approximates 0.40m** (A flood elevation of 41.34mAOD minus the topographic elevation of 40.94mAOD).

- **Unit 4: The Proposed Flat** (in the central section of the site) - **the flood depth approximates 0.66m** (A flood elevation of 41.38mAOD minus the topographic elevation of 40.72mAOD).
- **Unit 5: The Proposed House** (within the western site section) - **the flood depth approximates of 1.29m** (A flood elevation of 41.41mAOD minus the topographic elevation of 40.12mAOD).

Paragraph 4.2.1 recommends that flood resistance and resilience measures should be incorporated into the buildings of these different units, as follows:

- **Unit 1: to a minimum FFL of 41.23mAOD.**
- **Units 2 and 3: to a minimum FFL of 41.34mAOD**
- **Unit 4: no minimum FFL stated**
- **Unit 5: no minimum FFL stated**

We have no objection to these levels being applied to the development currently proposed but unfortunately, the FRA does not confirm this will be the case. The precise finished floor levels proposed for each unit should be confirmed as part of a formal planning application.

Therefore, we would recommend the **following conditions**:

### **Conditions**

1. Plans and drawings should be submitted detailing the finished flood levels for living and sleeping accommodation for each unit. We would also expect the plant/services located at the ground floor to be suitably protected above 1% AEP (1 in 100 years) + 35% level.
2. Full details of the flood mitigation measures proposed for the development specifically related to how the ground floor will be protected against flood during the design flood event, shall be submitted to and agreed in writing by the local planning authority.
3. We have no objection to car parking provision at the ground level of Unit 4 and 5 but this will significantly increase the risk to the cars parked there during flood conditions. We would recommend the parking area have a safe access/egress route due the fact this could be affected by flooding, so cars are likely to be isolated during a flood event.

### **Reason**

To ensure that the development is appropriately protected during a flood event and sufficiently flood resilient and resistant for an internal flood during a flood event. Also a safe access/egress route plan for car parking area should be agreed by LPA as part of this formal planning application.

Please be aware that this development will not have safe access and egress in a 50 year or greater flood. As such you should be confident that this can be addressed in the applicants their evacuation plan.

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The [planning practice guidance](#) to the National Planning Policy Framework states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a [design flood](#) and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you consult with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with the guiding principles of the Planning Practice Guidance (PPG).

Please don't hesitate to contact us if you need any further information.

Yours faithfully

**Ms Sara Gomes**  
**Planning advisor**

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