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Our Ref: SEDC/2019/076062
Date: 11 November 2019

Application No: 19/05000/HYB

Location: DSTL Fort Halstead Crow Drive Halstead Sevenoaks KENT TN14 7BU

Proposal: Hybrid application comprising, in outline: development of business space (use classes B1a/b/c) of up to 27,659 sq m GEA; works within the X enclave relating to energetic testing operations, including fencing, access, car parking; development of up to 750 residential dwellings; development of a mixed use village centre (use classes A1/A3/A4/A5/B1a/D1/D2); primary school; change of use of Fort Area and bunkers to Historic Interpretation Centre (use class D1) with workshop space and; associated landscaping, works and infrastructure. In detail: demolition of existing buildings; change of use and works including extension and associated alterations to buildings Q13 and Q14 including landscaping and public realm, and primary and secondary accesses to the site

Thank you for your consultation on the above referenced planning application.

Kent County Council as Lead Local Flood Authority have the following comments:

Outline planning phase

We have reviewed the FRA and Drainage Strategy (Hydrock, September 2019) and have noted that the outline drainage design is consistent with that approved under application 15/00628/OUT. We have no objection with the proposed deep-bore soakaways as infiltration testing undertaken and submitted in application 15/00628/OUT indicates that they are feasible.

At detailed design stage, further infiltration testing should be undertaken in the location of the proposed deep bore soakaways. As fissures are indicated to be present, further testing will establish where shallower soakaways (e.g. 10m depth) could be placed.

We would expect to see the drainage system modelled using FeH rainfall data in any appropriate modelling or simulation software. Where FeH data is not available, 26.25mm should be manually input for the M5-60 value, as per the requirements of our latest drainage and planning policy statement (June 2017).

The applicant proposes construction of 13 phases over a duration of 11 years. We would expect a drainage strategy to be submitted for each major phase compliant with

the strategic drainage strategy and so that we can confirm that each catchment operates appropriately.

Should your local authority be minded to grant permission for this development, we would recommend the following conditions:

Condition:

Development shall not begin in any phase until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the FRA and Drainage Strategy (Hydrock, September 2019) and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

Reason:

To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding. These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development.

Condition:

No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be occupied until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate the suitable modelled operation of the drainage system where the system constructed is different to that approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason:

To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 165 of the National Planning Policy Framework.

Full planning phase

Although the change of use and alternations aspects of the proposed development are relatively low risk, no information has been provided in relation to highway access and arrangements. We would recommend that these details are provided, especially in terms of highway drainage details for the roundabout and access roads.

As further information is required, we recommend pre-commencement conditions are applied to any grant of planning permission. Should your local authority be minded to grant permission for this development, we would recommend the following conditions:

Condition:

Development shall not begin until surface water drainage details for the highway and access arrangements has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated without increase to flood risk on or off-site. The drainage scheme shall be implemented in accordance with the approved details.

Reason:

To ensure the development is served by satisfactory arrangements for the disposal of surface water from the highway and to ensure that the development does not exacerbate the risk of on/off site flooding. These details and accompanying calculations are required prior to the commencement of the development as they form an intrinsic part of the proposal, the approval of which cannot be disaggregated from the carrying out of the rest of the development.

This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.

Yours faithfully,

Sophia-Harri Nicholaou

Flood Risk Project Officer
Flood and Water Management