



**Tonbridge & Malling Borough Council**  
Development Control  
Gibson Building  
Gibson Drive  
Kings Hill  
West Malling, Kent  
ME19 4LZ

**Highways and Transportation**  
Ashford Highway Depot  
4 Javelin Way  
Ashford  
TN24 8AD  
Tel: 03000 418181  
Date: 1 September 2017

**Application - TM/17/01793/FL**

**Location - Rosador London Road Wrotham Sevenoaks Kent TN15 7RR**

**Proposal - Demolition of the residential bungalow and the erection of 6x B1/B8 units and a 2 storey office building with new estate road and associated parking**

Paul

Thank you for inviting me to comment on this application. I note that Wrotham Parish Council have employed dha to undertake a technical appraisal of it. I would concur with its findings in that:-

- Clarity is required regarding footway provision proposed
- Submission of an independent Stage 1 Road Safety Audit would be helpful
- Consideration should be given to adding no entry to the northern access where it meets the main access road proposed to minimise conflicts.

I would be grateful if this additional information requested could be sought before completing my response on behalf of this authority. In the meantime if I can be of any further assistance, please do not hesitate to contact me.

Yours faithfully

**Terry Drury**  
Senior Development Planner

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**Highways and Transportation**  
Ashford Highway Depot  
4 Javelin Way  
Ashford  
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**Tel:** 03000 418181  
**Date:** 4 October 2018

**Application - TM/17/01793/FL**  
**Location - Rosador London Road Wrotham Sevenoaks Kent TN15 7RR**  
**Proposal - Demolition of the residential bungalow and the erection of 6x B1/B8 units and a 2 storey office building with new estate road and associated parking**

Paul

Thank you for re-consulting me regarding this application. I note the Parish Council's response; in particular the road safety revue commissioned by them. Of note is Peter Brett's observations that the swept paths necessary for vehicles to negotiate the latest junction design have not been included. It is also noted, probably due to the focused attentions given to the unorthodox arrangements of the service road and access here, that speed data has been overlooked. These items should be measured and demonstrated to ensure that appropriate visibility splays are achievable and to aid safety appraisals.

I note that within the original Transport Statement submitted, injury crash data has been assessed although it may be worthwhile reviewing/updating this. The applicant may wish to consider undertaking a topographical survey which would be required at a detailed design stage. The current design is provided on A3 paper size at a scale of 1:500. A design provided on a topographical survey would enable greater confidence regarding accuracy and detail. It is also considered that a plan which enabled a visual appraisal of the wider context would also be helpful.

I am sorry that this response is continuing the duration and piecemeal/iterative approach of this application but without this information the feasibility for access cannot be fully assessed. It is not considered that these issues can be addressed via planning conditions. If I can be of any further assistance, please do not hesitate to contact me.

Yours faithfully

**Terry Drury**  
Senior Development Planner

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**Highways and Transportation**

Ashford Highway Depot  
4 Javelin Way  
Ashford  
TN24 8AD

**Tel:** 03000 418181  
**Date:** 30 January 2019

**Application - TM/17/01793/FL**

**Location - Rosador London Road Wrotham Sevenoaks Kent TN15 7RR**

**Proposal - Demolition of the residential bungalow and the erection of 6x B1/B8 units and a 2 storey office building with new estate road and associated parking**

Paul

Thank you for re-consulting me regarding this application. I am grateful for the work undertaken by the applicant's consultant following my response of 4<sup>th</sup> October.

The proposal

The proposal is to demolish the property known as Rosador and erect 3 units: -

- Unit A, B1/B2/B8, 300m<sup>2</sup>
- Unit B, B1/B8, 788m<sup>2</sup>
- Unit C, B1, 600m<sup>2</sup>

Where B1 = Office, B2 =General Industrial and B8 = Storage and Distribution

The maximum parking provisions for these units are: -

	Cars	Goods Vehicles/Serviceing
Unit A – 300m <sup>2</sup>	15	1.5
Unit B – 788m <sup>2</sup>	32	3
Unit C – 600m <sup>2</sup>	24	Light/medium goods servicing only considered necessary
Totals – 1688m <sup>2</sup>	71	5

As is common with applications of this type the balance between staff car parking and goods vehicle use varies according to the nature of the businesses of the end users/tenants. The proposed unit sizes are fairly modest however and the site as a whole is considered to be able to adequately accommodate goods vehicle turning for forward egress. As a guide, from measuring roof sizes of the units next door, these four units are estimated to be 545m<sup>2</sup>, 800m<sup>2</sup>, 1445m<sup>2</sup> and 1570m<sup>2</sup> in footprint size (totalling 4360m<sup>2</sup>).

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### Traffic Generation

In the original Transport Statement of June 2017, the applicant's consultant estimated the traffic generation of these units from the TRICS database to be 23 two-way movements in the morning peak period and 20 two-way movements in the evening peak period; 229 two-way movements over a 12-hour weekday period (7am to 7pm). This includes goods vehicle movements. From the TRICS analysis undertaken 11 goods vehicle movements are expected at the proposed site over the 12-hour period.

### Access

As part of the proposals the applicant has remodelled the access to a central location. This is shown on drawing number 0001 of MLM project 619054. Swept path analyses for goods vehicles turning into and out of the site have been demonstrated on drawing 0003 of this project. Tracking analyses for irregular access to the small substation to the north-west and the larger substation to the south-east of the entrance have also been demonstrate. The design work has been undertaken on a topographical survey base of the area. Drawing 0001 shows that a new verge and footway will be created across the old/existing access to the north-west which is a sinuous remnant from works which implemented the M26 motorway.

Speed surveys have been undertaken and visibility analysis for viewing approaching traffic when emerging from the proposed site has been undertaken. This is shown on drawing 0005 of project 619054 and shows that some cutting back of highway vegetation will be required at the outside of the western side of Nepicar Roundabout (Junction 2a). The nose of the north-western A20 splitter island also requires remodelling to accommodate a right turn lane into the site.

### Crash Analysis

A review of historical injury crashes, the last 5 years, has been undertaken. Three crashes, one of which was fatal, involved motorcyclists cornering into or on Nepicar Roundabout with no other vehicles involved. Another was thrown from a motorcycle when a car pulled out of Oakdene Café amid queuing traffic. Four of the crashes, all slight, have involved rear end shunts and another four have involved vehicles pulling out across approaching traffic, one of which was serious as this involved a southbound vehicle at the petrol station swerving to the offside and colliding head on with a northbound vehicle.

These crashes occurred at several locations; the petrol station, Oakdene Café, the M26 eastbound off slip approach to Nepicar roundabout and the A20 southbound approach to Nepicar roundabout. There is not a predominant theme or concentration of crashes at a particular location and regrettably this number of injury crashes involving human error are not considered to be inordinate over this period of time. It is noted that, although relatively recent (in the last three years), no injury crashes occurred at the Nepicar Park access.

### Road Safety

The applicant has submitted a proposal utilising highway land and the site designed in accordance with the Design Manual for Roads and Bridges (DMRB). Reference to paragraph 109 of the July 2018 NPPF is also relevant: -

'109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'

It is not considered that the proposal offers a substandard design or that there is a tangible unacceptable impact on highway safety. The scale of the development and estimated traffic generation are not considered to constitute a severe impact on the road network. On behalf of this authority I write to confirm therefore that I have no objection to the proposals, subject to conditions.

- Submission of a Construction Management Plan before the commencement of any development on site.
- Provision of measures to prevent the discharge of surface water onto the highway.
- Provision and permanent retention of the vehicle parking spaces and/or garages shown on the submitted plans prior to the use of the site commencing.
- Provision and permanent retention of the vehicle loading/unloading and turning facilities shown on the submitted plans prior to the use of the site commencing.
- Provision and permanent retention of secure, covered cycle parking facilities prior to the use of the site commencing in accordance with details to be submitted to and approved by the Local Planning Authority.
- Completion and maintenance of the access shown on the submitted plans prior to use of the site commencing including cutting back of vegetation in accordance with drawing 0005 of project 619054, creation of right turning lane as shown on the general arrangement drawing and closure of the current access to the west and creation of footways.

Planning permission does not convey any approval for construction of the required works within the highway which will need to be undertaken via a S278 agreement with this authority.

**INFORMATIVE:** It is the responsibility of the applicant to ensure, before the development hereby approved is commenced, that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being taken by the Highway Authority.

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the road. This is called 'highway land'. Some of this land is owned by The Kent County Council (KCC) whilst some are owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil. Information about how to clarify the highway boundary can be found at <https://www.kent.gov.uk/roads-and-travel/what-we-look-after/highway-land/highway-boundary-enquiries>

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Yours faithfully

**Terry Drury**  
Senior Development Planner



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**Tel:** 03000 418181  
**Date:** 12 February 2019

**Application - TM/17/01793/FL**  
**Location - Rosador London Road Wrotham Sevenoaks Kent TN15 7RR**  
**Proposal - Demolition of the residential bungalow and the erection of 6x B1/B8 units and a 2 storey office building with new estate road and associated parking**

Paul

Following my response of 30<sup>th</sup> January regarding this application, I have been sent a copy of Wrotham Parish Councils subsequent response uploaded on 8<sup>th</sup> February. This includes work undertaken by Peter Brett Associates commissioned by the Parish. In the face of the applicant's consultant, and my, professionalism being challenged, I consider that further analysis is required to fully address the doubts raised. Namely: -

A Picady analysis of the access. I am confident that this will yield a low RFC, however the result will help give an indication of the level of conflicts that may occur. This (conflicts) as always however is in the context of motorists needing to drive according to the circumstances, including other traffic, before them. I note from the original transport statement submitted with this application in June 2017 that less than 25 vehicle movements are forecast to use the site at peak times. For robustness use of the service road south east of Rosador as discussed by Peter Brett should be estimated and added. It is considered that the turning movement proportions at the neighbouring Nepicar Park would be a good reflection for Picady analysis here.

I note Peter Brett's concerns that the speed measurements undertaken may not be statistically determinate. An ATC count on the A20 north west of the site can provide both speed and traffic flow data for Picady analysis and further confidence regarding traffic speeds. Confirmation of the site's expected opening/operating times is requested. This is requested in the context of the motorcycling activities/meets described.

Peter Brett have suggested that an ATC (for a week +) should also be undertaken to assess the northbound/forward visibility approach speed. I have concerns that an ATC on a non-straight piece of road may yield inaccurate results (and not be resilient) but would appreciate a commentary on this perhaps after speaking to the data collection company. Otherwise commentary regarding the statistical significance of the 116 speed measurements

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recorded is requested. I note that the speed measurements obtained were gathered at a quiet time of day when traffic flows are lower, and this is generally accepted to offer a better situation for measuring typical free flowing traffic speeds.

Finally, I do accept Peter Brett's point that the Road Safety Audit does not accord with the latest scheme plans and that 'it would not be unreasonable to expect a new RSA and Designer's Response to be provided.'

Yours faithfully

**Terry Drury**  
Senior Development Planner

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**Tel:** 03000 418181  
**Date:** 30 May 2019

**Application - TM/17/01793/FL**

**Location - Rosador London Road Wrotham Sevenoaks Kent TN15 7RR**

**Proposal - Demolition of the residential bungalow and the erection of 6x B1/B8 units and a 2 storey office building with new estate road and associated parking**

Paul

Thank you for re-consulting me regarding this application. I am grateful for the further work undertaken by the applicant's consultant, Technical Note dated April 2019.

Having regard to paragraph 109 of the NPPF it is not considered that the proposal represents an unacceptable impact on highway safety, or that the impacts on the road network would be severe. On behalf of this authority I write to confirm therefore that I have no objection to the proposals, subject to the following conditions.

- Submission of a Construction Management Plan before the commencement of any development on site.
- Provision of measures to prevent the discharge of surface water onto the highway.
- Provision and permanent retention of the vehicle parking spaces and/or garages shown on the submitted plans prior to the use of the site commencing.
- Provision and permanent retention of the vehicle loading/unloading and turning facilities shown on the submitted plans prior to the use of the site commencing.
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Planning permission does not convey any approval for construction of the required works within the highway which will need to be undertaken via a S278 agreement with this authority.

INFORMATIVE: It is the responsibility of the applicant to ensure , before the development hereby approved is commenced, that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being taken by the Highway Authority.

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the road. This is called 'highway land'. Some of this land is owned by The Kent County Council (KCC) whilst some are owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil. Information about how to clarify the highway boundary can be found at <https://www.kent.gov.uk/roads-and-travel/what-we-look-after/highway-land/highway-boundary-enquiries>

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Yours faithfully

**Terry Drury**  
Senior Development Planner

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**Paul Batchelor**  
Tonbridge & Malling Borough Council  
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**Flood and Water Management**

Invicta House  
Maidstone  
Kent  
ME14 1XX

**Website:** [www.kent.gov.uk/flooding](http://www.kent.gov.uk/flooding)  
**Email:** [suds@kent.gov.uk](mailto:suds@kent.gov.uk)  
**Tel:** 03000 41 41 41  
**Our Ref:** TMBC/2017/062037/2  
**Date:** 9 March 2018

**Application No:** 17/01793/FL

**Location:** Rosador London Road Wrotham Sevenoaks Kent TN15 7RR

**Proposal:** Demolition of the residential bungalow and the erection of 6x B1/B8 units and a 2 storey office building with new estate road and associated parking

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

The applicant has resubmitted a Design & Access Statement (January, 2018) which shows additional landscaping on the extended land to the north east. This proposal will restore this land to its original form of pasture land. This will enhance the variety of biodiversity in this area.

The site is underlain by impermeable Gault Clay, and infiltration techniques will not therefore be viable for disposal of surface water from the development. The proposed scheme to install a new attenuation feature, which will gather surface water and discharge at controlled rates into existing ditches is acceptable in principle, but unfortunately only limited information has been provided for the surface water drainage strategy, and greater clarity on the proposed scheme is required.

Surface water runoff from the site should be discharged at Greenfield runoff rates. Given advances in technology and design of flow controls, it is now possible to achieve control flow rates of 2l/s. This should be considered the minimum rate to be set for small sites, unless agreed by Kent County Council. We assume that the attenuation pond will be located within the redline boundary of the development proposal.


We would ordinarily recommend that any application is not determined until an appropriate surface water drainage strategy has been provided for consultation, but notwithstanding the above, we think that the site could accommodate a workable drainage scheme, and therefore have no objection at this stage.

Should your Authority be minded to grant permission to this application, we would however recommend that the following conditions are attached:

**Condition 1:**

Development shall not begin 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 maximise the use of sustainable drainage techniques to dispose of surface water, and 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 that silt and pollutants resulting from the site use and construction can be adequately managed to ensure there is no pollution risk to receiving waters.

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 2:**

No building hereby permitted shall be occupied until details of the implementation, maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the local planning authority. The scheme shall be implemented and thereafter managed and maintained in accordance with the approved details. Those details shall include:

- a) a timetable for its implementation, and
- b) a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage system throughout its lifetime.

Reason:

To ensure that any measures to mitigate flood risk and protect water quality on/off the site are fully implemented and maintained (both during and after construction), as per the requirements of paragraph 103 of the NPPF and its associated Non-Statutory Technical Standards.

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