

14-9-26

1. Summary Representation

This document covers the water supply for:

- 1.1.** The existing residents of Halstead Parish mainly clustered around the village crossroads and out along 5 country lanes (750 dwellings).
- 1.2.** In the draft Local Plan Reg.19 two further sites ST2-34 are included in the centre of the village (16 dwellings).
- 1.3.** Fort Halstead existing residents in Fort Road, Armstrong Close and Beckman Close and the residents who live off Crow Drive and the eastern end of Otford Lane (approx. 100 houses).
- 1.4.** The Fort Halstead proposed allocation of sites ST3-7, ST3-8, and ST3-9 in the SDC Local Plan (total of 93 dwellings)
- 1.5.** The Broke Hill Golf Course proposed allocation, site ST5-1 (810 dwellings).
- 1.6.** This gives a total of 1,769 dwellings planned between now and 2042. This area is covered totally by Thames Water.

The following comments apply equally to both existing residents and developments planned across the district between now and 2042.

2. KCC Planning Portfolio

- 2.1. KCC Nigel Williams, Planning Portfolio Holder July 2026:** “The Sevenoaks District Local Plan includes a new and robust utilities policy (Policy UD1). This strengthens the Council’s position significantly by requiring all development to demonstrate that sufficient utilities capacity exists, or can be delivered, to meet the needs of new development. Crucially, Policy UD1 gives the Council a clear and defensible basis to refuse planning permission if it is demonstrated that adequate water supply or wastewater capacity cannot be provided. This ensures that growth is only delivered where the necessary infrastructure is in place, and that our communities are not exposed to unacceptable impacts on the utilities network”.

3. Key reasons for objecting to both ST5-1 and developments across the north of the District.

- 3.1.** Planning application for ST5-1: Thames Water 28th April 2026 “Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal”

- 3.2. SoCG between Thames Water & SDC: Thames Water's current WRMP24 does not fully reflect the scale of growth proposed in the Sevenoaks District Local Plan. WRMP24 is based on 2022 population forecasts and similar discrepancies are being experienced across the wider region due to recent changes in national housing requirements.
- 3.3. South East Water's current WRMP24 does not fully reflect the scale of growth proposed in Sevenoaks District Council's Local Plan. WRMP24 is based on 2022 populations forecasts, and similar discrepancies are being experienced across the wider region due to recent change in national housing requirements.
- 3.4. The SoCG between Sevenoaks District Council and Thames Water, and the SoCG between Sevenoaks District Council and South East Water, read exactly the same. Neither water companies are prepared for extensive development, and require time to assess the situation. Neither statement is dated nor signed.
- 3.5. Policy UD1 clearly states that there should be no development until water and wastewater can be provided.
- 3.6. Within the Sevenoaks District Council (SDC) Regulation 19 Local Plan the number of 1,769 new dwellings introduces specific infrastructure challenges across these co-located or clustered sites which compounds the broader issues affecting the Halstead's and Sevenoaks's water networks.

4. Concerns, Conflicts, & Challenges

The explicit water concerns, infrastructure challenges, and planning application objections surrounding Site ST5-1 intersect with specific framework strategies:

- 4.1. **The Localised Water & Drainage Network Crisis:** There is a continuous problem of poor water pressure or no water on existing properties around Fort Halstead. There has also been recent lack of water supply to Kemsing, Tonbridge, and Tunbridge Wells.
 - 4.1.1. **Cumulative Infrastructure Strain.** The primary infrastructural concern raised by residents and Halstead Parish Council is the "double-whammy" impact. SDC's allocation of 810 homes at Broke Hill (ST5-1) combined with the 635 homes at Fort Halstead (ST2-57) and 4 further sites plus existing homes totals 1,769 properties. The existing local mains network, currently facing persistent private supply issues and major pipeline incompatibility, cannot safely absorb this scale of demand without extensive reinforcing works.
 - 4.1.2. **South East Water & Thames Water Jurisdiction:** Site ST5-1 sits at a complex boundary for water supply covering Sevenoaks District as well as the London Borough of Bromley. Local water resource management planning from regional suppliers explicitly warns that regional supplies are severely constrained. The planning application for ST5-1 faces warnings that drinking water distribution and waste water treatment facilities lack the current structural capacity to meet

government housing targets without catastrophic pressure drops or systemic failure.

The impact on local water supplies is governed by the following constraints, policy frameworks, and provider positions:

4.2. Stress on Local Network Capacity and Flow Rates:

4.2.1. **Wastewater and Network Stress:** According to the official SDC and Thames Water Statement of Common Ground (2026), local developments are being routed into regional networks where specific network or treatment upgrades are required. Thames Water notes that localized modelling must confirm whether the existing pipe infrastructure can handle the flows from these specific allocations without risking overflows or pressure loss.

4.2.2. **Cumulative Infrastructure Strain on Water Supply & Wastewater Networks** (Sites ST3-7, ST3-8, ST3-9, ST2-57, and ST5-1, ST2-34). HPC is writing formally to object to the allocation of the above sites and the progression of sites ST3-7, ST3-8, and ST3-9.

While the addition of the first tranche of 93 homes at Fort Halstead may appear manageable in isolation, the Council has failed to assess adequately the cumulative, compounding strain these allocations place on the local water network when combined. In total, this introduces 1,769 residential units into a highly localized, historically vulnerable network. The current infrastructure is entirely unfit to absorb this rapid scale of demand.

4.3. Conflict with National Planning Policy Framework (NPPF). Proceeding with these allocations without guaranteed, pre-funded network reinforcements violates core principles of the NPPF:

4.3.1. **NPPF Chapters 14 & 15:** The framework explicitly mandates that new development must not contribute to, or be put at unacceptable risk from, water pollution or systemic infrastructure failure.

4.3.2. **Infrastructure Alignment:** The NPPF dictates that housing delivery must not outpace critical utility infrastructure. Approving these sites before physical upgrades are completed creates an unacceptable risk of severe pressure drops, supply failures, and network vulnerabilities for existing residents.

4.4. Conflict with SDC Local Plan Policies & Emerging Strategy. These allocations directly conflict with Sevenoaks District Council's own spatial policies and the safeguards detailed in the SDC and Thames Water's 'Statement of Common Ground' (2026):

4.4.1. **Policy EN1 & Policy SP2:** These policies dictate that development must be sustainable and actively paired with proven infrastructure capacity. Localized modelling from Thames Water has already flagged network and treatment concerns in the wider area.

4.4.2. **Failure to Secure Phasing:** Under Policy UD1, infrastructure must lead development. There is currently no evidence or transparent timeline proving that the distribution network can handle the additional clean water demand and foul drainage output generated by these mega-developments.

4.5. Severe Local Environmental & Physical Risks

4.5.1. **Water Pressure & Supply Outages:** The Halstead/Fort Halstead area has faced persistent, well-documented private supply vulnerabilities, pipe diameter incompatibilities, and network outages. Pushing further allocations onto this unstable grid risks worsening pressure loss for existing properties.

4.5.2. **Wastewater & Surface Water Infiltration:** The increase in impermeable surfaces across these combined sites risks overwhelming local drainage ditches and wastewater systems, increasing the risk of local flooding and putting nearby chalk aquifers at risk of contamination.

4.6. **Current Status of Fort Halstead Water Supply:** The water situation at Fort Halstead involves ongoing frustrations regarding infrastructure failures, private water supply issues, and delayed connections to the Thames Water mains system. Local residents have experienced intermittent but severe outages, leaving them reliant on emergency bottled water and bowsers.

4.7. The core issues impacting the community:

4.7.1. **Private Supply Vulnerabilities:** The existing Fort Halstead residential estate currently operates on a private water supply managed by property firm CBRE. Because it is a private network, residents often report feeling vulnerable with a distinct lack of regulatory oversight and poor communication when major faults occur. The houses off Crow Drive & the eastern end of Otford Lane experience the same frustrations but are not linked to CBRE's supply because of the age of their properties.

4.7.2. **Theft and Infrastructure Failures:** In early 2026, a major loss of supply occurred after cables were stolen from the local pumping station. During this and subsequent incidents, emergency provisions of bottled water were heavily criticized by residents and local MP Laura Trott as slow and "wholly inadequate".

4.7.3. **Mains Connection Delays:** Although Thames Water originally promised to transition the households onto the public mains system back in late 2023, the final integration has faced continuous delays. Contractors like the M Group have been laying kilometres of brand-new, higher-capacity pipework to fully decommission the old military supply, with work extending deep into 2026.

4.7.4. **Pipe Incompatibility:** According to Halstead Parish Council minutes, infrastructure updates are further complicated because residents are still receiving water via old, narrow private pipes that do not effectively join the new, wider mains distribution pipes.

5. Long-Term Capacity & Environmental Concerns:

- 5.1.** Beyond immediate pipe bursts and infrastructure transitions, wider concerns exist regarding how the local network will cope with future demand. The overarching redevelopment of the former MoD weapons research site is set to add 635 new homes to the village. The Halstead Parish Council has consistently raised alarms that local water supplies and drainage infrastructure are insufficient to support this rapid scale of expansion. Historically, there have also been community anxieties regarding potential soil and runoff contamination stemming from the site's previous military use.
- 5.2.** Residents currently experience water pressure issues on a daily basis. The ongoing water infrastructure issues at Fort Halstead intersect directly with national planning guidelines, local council frameworks, and rigorous conditions placed on the site's massive mixed-use redevelopment.

6. Key Policies

The legal and planning framework governing the water situation breaks down into the following key policies and official infrastructure comments:

6.1. National Planning Policy Framework (NPPF) Alignment

The issues surrounding private utility transitions and capacity constraints trigger several core chapters of the NPPF:

- 6.1.1. NPPF Chapter 14** (Meeting the Challenge of Climate Change, Flooding, and Coastal Change): This policy requires that local development does not contribute to or face an unacceptable risk from water pollution. Because Fort Halstead is a former MoD weapons research site, the NPPF mandates strict controls over surface water infiltration to prevent the mobilization of historical underground contaminants into local aquifers.
- 6.1.2. NPPF Chapter 15** (Conserving and Enhancing the Natural Environment): Local planning authorities must ensure that developments are appropriately remediated so they cannot be classified as "contaminated land". It also demands that infrastructure matches the delicate scale of the surrounding Kent Downs Area of Outstanding Natural Beauty (AONB).
- 6.1.3. NPPF Infrastructure Delivery Mandates:** Planning policies dictate that new housing cannot outpace critical infrastructure. Developers must demonstrate proactive coordination with water and sewerage providers before substantial development occurs.

6.2. Sevenoaks District Council Local Plan & Core Strategy Policies: Under the emerging Sevenoaks District Council Local Plan (Regulation 19 stage) and existing spatial policies, Site ST2-57 (Fort Halstead) is bound by strict criteria:

6.2.1. **Policy EN1** (Allocations and Development Plan): SDC uses this policy to enforce strict structural safeguards on water infrastructure. It establishes that without guaranteed utilities capacity, developers can be legally blocked from moving forward.

6.2.2. **Policy SP1 & SP2** (Core Strategy): These govern sustainable development, drainage management, and environmental controls.

7. Statutory Infrastructure & Developer Obligations

Official feedback and conditions attached to the hybrid planning applications (19/05000/HYB) detail the practical steps mandatory for the site:

7.1. Thames Water Property Observations: During initial macro-consultations, Thames Water indicated that while broad clean water capacity exists at a network level, localized distribution requires a complete decoupling from the legacy military system.

7.2. M Group & KCC Infrastructure Delivery: As of 2026, contractors like the M Group are executing the delivery of a higher-capacity, metered public water main designed to fully replace the private military supply.

7.3. Foul Drainage Strategy: Specific planning conditions mandate a site-wide foul drainage scheme to handle the high density of the planned 635 residential dwellings and village centre.

7.4. The Star Hill Access and Infrastructure Integration: Local representations to the Council emphasize that all pipe routing, fibre lines, and utilities infrastructure must be safely integrated underground to mitigate structural disruption to the nearby rural villages of Halstead and Knockholt.

8. Conclusion & Requested Action

The Council cannot legally or safely evaluate any of the proposed sites in a vacuum. HPC requests that the planning inspector or Council committee defer or restrict these allocations until a comprehensive, area-wide Cumulative Water Impact Assessment is published by Thames Water.

The Statement of Common Ground with Thames Water is not signed or dated. Thames water is already under considerable strain and there is no guarantee the listed problems can be resolved within a meaningful time frame. SDC must return to Government and request an extension to the Local Plan time-frame.