

From: [REDACTED]
To: [Local Plan \(TWBC\)](#)
Subject: Responding to the Public consultation on the new local plan STR/SS1
Date: 26 February 2024 23:39:43

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My main concern is around flooding and the lack of engagement with Southern Water or any reassurance that developers will contribute to the alleviation of surface water flooding, adequate drainage and an adequate waste water and sewerage system.

The Strategy for Paddock Wood East Capel policy STR/SS1

Flooding and Flood risk

Examination of TWBC local plan initial findings-Planning Inspector

Paragraph 161 of the framework requires all plans to apply a sequential risk based approach to the location of development:

Paragraph 47- I disagree with the statement, 'where a large parcel of land contains different flood zones such as land west of Paddock Wood, it does not automatically follow that the entire parcel should be discounted because one part is subject to flooding'

Comment: The west parcel of land has completely flooded across the whole field in previous years. The difference in the height of the terrain is minimal and would be flattened to barely any difference in perceptible height once heavy plant equipment ploughs it up.

Revised Policy STR/SS1 The Strategy for Paddock Wood, including land East of Capel- Appendix D

1. Development principles-map 4 to be facilitated through release of green belt land to the west of Paddock Wood.

Point 8. States, surface water run off from the development will not exacerbate and so far as possible and practicable, improve flooding elsewhere.

Where is else where? Is this referring to existing homes along the boundary of the west parcel?

Looking at Map 4, attenuation measures are immediately adjacent to existing residential areas instead of away from them, in what is already classed as a flood zone 3 by the Environment agency. Why are the existing residents being put at risk of flooding above the risk to new developments?

Revised map 28- Paddock Wood and East Capel Structure Plan:

There is no discussion with Network Rail about the efficacy or maintenance of the drainage culverts or any proposals to add more culverts to drain surface water run off away from the existing or new developments to the north west parcel. Who will be responsible for managing these attenuation features?

Point 9.Mineral deposits extraction- will there be a quarry in the west parcel prior to housing development? How will existing housing be protected from the noise and disruption?

Point 13. The Garden Settlement principle is not evident on map 4, as due to the increased flood risk, the development will be piecemeal, which according to TWBC framework master plan, doesn't conform, therefore should not be permitted. If the land floods, part of the new development would be like an island.

Comment: call for sites. Land owners will only be too pleased to sell sites prone to flooding due to being less economically viable, but this is not acceptable to build homes on instead without a much more serious and robust risk assessment and the infrastructure to

support the increased risk of flooding. The revised local plan is still using out of date data and should be re- drafted using the most recent Environment Agency data, not data from 2018.

Mrs Sheila Craft
Worried resident