

**1) Please confirm which document this representation relates to.**

Schedule of Proposed Main Modifications

**2) Please confirm which part of the document this representation relates to? (If your representation relates to multiple sections and/or documents, please add separate comment(s) to the relevant section on this event page)**

**If Main Modification (please quote number e.g. MM1):**

MM80 (and MM81)

**Chapter and (if applicable) subheading:**

**Policy/ Paragraph number:**

Policy STR/SS 1/paragraph 13

**3) Do you consider the Main Modification/ document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038):**

Yes No

**Legally Compliant**

Sound

\*

**4) Please give details of why you consider the Main Modification/ document not to be legally compliant or sound. Please be as precise as possible and provide evidence to support this. Or if you wish to support the legal compliance or soundness of a main Modification/ document, please also use this box to set out your comments.**

Paragraph 13 is deleted from the Local Plan by MM80 (and not replaced by MM81). Paragraph 13 read - Ensure a drainage strategy is in place, in consultation with the Local Planning Authority, Kent County Council as the Drainage Authority, **and Southern Water prior to the grant of planning permission** for any substantial development on the site, unless exceptional circumstances arise. This should demonstrate that there is adequate capacity in the foul sewage network, and that development will not exacerbate flooding elsewhere. The drainage strategy should be implemented through the development to deliver the levels of storage, attenuation, and mitigation measures to reduce the incidence of flooding to adjacent residential areas in Paddock Wood;

Southern Water is a key consultee for drainage strategy and masterplans for this location in particular given nearby assets and infrastructure (but water companies are not statutory consultees at planning stage). Given the removal of paragraph 13, and without comprehensive wording sufficient to ensure we are consulted on the master planning for such a strategic site, we request that wording is added to ensure that Southern Water is consulted on Masterplans for this site, and at planning application consultation stage, with reference to drainage strategy in particular but also to ensure planning for each parcel of the development accounts for any odour modelling and layout needs that may be relevant, as well as easements for public sewerage infrastructure.

**5) If you do not agree with the proposed Main Modification/ document please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified in question 4 (above) where this relates to legal compliance or soundness. Please be as precise as possible.**

We would request one (or all) of the following changes please:

- MM81 paragraph 8 could include mention of Southern Water as a key stakeholder.
- MM81 paragraph 13 could also include Southern Water as a key stakeholder (and/or the reference to 'other relevant statutory consultees' be amended to read 'other relevant statutory or other key consultees

**7) Please tick this box if you wish to be kept informed about the Inspector's Report and/ or adoption of the Local Plan.**

Yes, please keep me informed