

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):

MM207

Chapter and (if applicable) subheading:

387 Section 6 Development & Flood Risk

Policy/ Paragraph number:

6.277 & 6.278

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.

I do not consider the MM to be sound as I do not believe enough has been done to reduce future flooding for Paddock Wood. 'Betterment where possible' does not give detail, or have any back up to substantiate this.

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.

I do not agree that this plan is compliant, due to the lack of backed up information on how, where or when these measures will take place. Will they be before, during, or after the completion of the development? What will the measures actually be, and can you quantify for certain that they will be adequate for the long term. Having monitored water levels at the end of my garden (adjacent to the railway line, and close to where you want to put a large attenuation pond) for 15 years when there has been heavy rain fall, and watched the level increase over time, which can either be due to climate change or the large increase of housing in the last 10 years, I have huge concerns that not enough research and discussions with Southern Water,

the Environment Agency etc has taken place. Whether it be climate change or increase in housing, any further housing increase will cause massive flooding problems, and I'd like to know what you propose to do for any resident that suffers future flooding as a direct result of new housing. Will you reimburse us all financial losses, will you put in further drainage improvements etc. I am also very concerned as to the safety of having an attenuation pond right beside a railway line. Waterlogged ground/erosion mixed with the excessive vibrations from the trains (of which I'm well aware of when radiators rattle, and drinks in glasses ripple) surely is not a wise mix. It may be prudent to resurrect considering Cinder Hill Woods as an attenuation pond, and slow down the floodwater before it reaches Paddock Wood, thus allowing the railway culverts to work more efficiently, and reduce the flooding

6) Please use this box for any other comments you wish to make.

Where is the Supplementary Planning Document for Paddock Wood and Capel, as mentioned on page 25? Also there is a Master planning process, where a range of significant infrastructure is required to mitigate the impact of development in particular areas, the delivery if this will be agreed through it. Is this something else that we can't see. It is unacceptable to expect residents to accept your proposals and plans, when we cannot add local vital input.

With regard to a follow-on study in October '23 by David Locke Associates (page 73 para 5.177) it states in terms of site constraints and flood and highways modelling the viability of the scheme has been tested. Was this actual testing, or computer modelling? When exactly was it done? Did the model include all new land levels, where sites are being raised, including all future developments? Why are there no figures/models to prove what has been done. Just from visual inspection, the area of land beside Stewards Transport, where 1 roadway will exit the site on to Maidstone Road, is far more often ponded after heavy rainfall than it used to be 10 years ago. It used to seem remarkable if it were under water, now it is quite normal.

Page 81. This policy talks about reducing flood risk elsewhere. Where exactly is elsewhere? Please explain this and how exactly you are going to reduce flooding in Paddock Wood from rivers and fluvial means. Where is the detailed copy of the Flood Risk Strategy? How can anyone possibly comment on such a major piece of infrastructure requirement, and give their views, when there's no evidence? The policy does not give clear guidelines and it does not follow with EN25.

Page 89 (H). Ensure that surface water run-off from development will not exacerbate and in so far as possible and practicable improve flooding. This is not acceptable, you should be actually improving flooding elsewhere. As residents, we've had enough of gardens, homes and roads being flooded around Paddock Wood.

Page 90 (7). All residential developments will be in flood zone 1. So why are two of the areas mostly in flood zone 2 & 3? All development will be in flood zone 1, yet parcel A (North Western) and parcel B (Western) of which you have allocated 1290 dwellings, has most of its land in Flood Zone 2 & 3. How is this possible. Please explain.

It is so difficult for residents to put their views and concerns forward, when not all of the necessary documentation is made available to us. Or is it that the documentation doesn't exist?

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