



**Tunbridge Wells
Borough Local Plan (2020 – 2038)**

**New Evidence Base Documents
Consultation Representation Form**

**Please use a separate sheet for each
representation**

Ref: (For official use only)
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Box 1: Name of the Local Plan Evidence Base Document to which this representation relates:	PS_095 Revised Policy Wording for Policy STRSS 1 – Paddock Wood and Land at East Capel (September 2024).pdf
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Completed forms must be received at our offices by **midnight on Wednesday 23rd October 2024.**

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: LocalPlan@TunbridgeWells.gov.uk or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

PART A – CONTACT DETAILS

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
Title	Mrs	
First Name	Eleri	
Last Name	Randall	
Job title (where relevant)	Planning Specialist	
Organisation (where relevant)	ENVIRONMENT AGENCY	
Address Line 1	Orchard House	
Address Line 2	Endeavour Park	

Address Line 3	Addington	
Address Line 4	West Malling, Kent	
Postcode	ME19 5SH	
Telephone number	██████████	
Email address (where relevant)	████████████████████ ██████████	

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	Environment Agency
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3.	To which part of the document listed in Box 1 above does this representation relate to?	
Chapter and (if applicable) sub heading	Development Principles	
Paragraph number or appendix	3(h)	

4.	Do you consider the Evidence Base document on which you are commenting, makes the Borough Local Plan Submission Version (2020 – 2038) (please tick or cross as appropriate):				
4.1	Legally Compliant	Yes	x	No	
4.2	Sound	Yes	x	No	

5.	<p>Please give details of why you consider the Borough Local Plan Submission Version (2020 – 2038) is not legally compliant or unsound. Please be as precise as possible.</p> <p>If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.</p> <p>The text box will automatically expand if necessary.</p>
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We recommend replacing *“ensure that surface water runoff from the development will not exacerbate and so far, as possible and practicable improve flooding elsewhere;”*

With

“shall use sustainable drainage techniques to ensure surface water drainage will not increase flood risk either on site or elsewhere and should be designed to demonstrate a reduction in flood risk overall”.

The reason is the current wording of *“improving flooding elsewhere”* does not suggest a potential reduction in flood risk.

As for all development parcels, we reiterate our previous comments in regard to ensuring all allocations for residential development around Paddock Wood to be within Flood Zone 1 and all employment development to be within Flood Zone 1 or 2. We note in para 3.15 of PS_098 Action Note that all residential development associated with Policy STR/SS1 is to be located within Flood Zone 1.

6.	<p>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 at Section 5 (above) where this relates to legal compliance or soundness.</p> <p>You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p> <p>The text box will automatically expand if necessary.</p>
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Our comments are as above.

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With

“shall use sustainable drainage techniques to ensure surface water drainage will not increase flood risk either on site or elsewhere and should be designed to demonstrate a reduction in flood risk overall”.

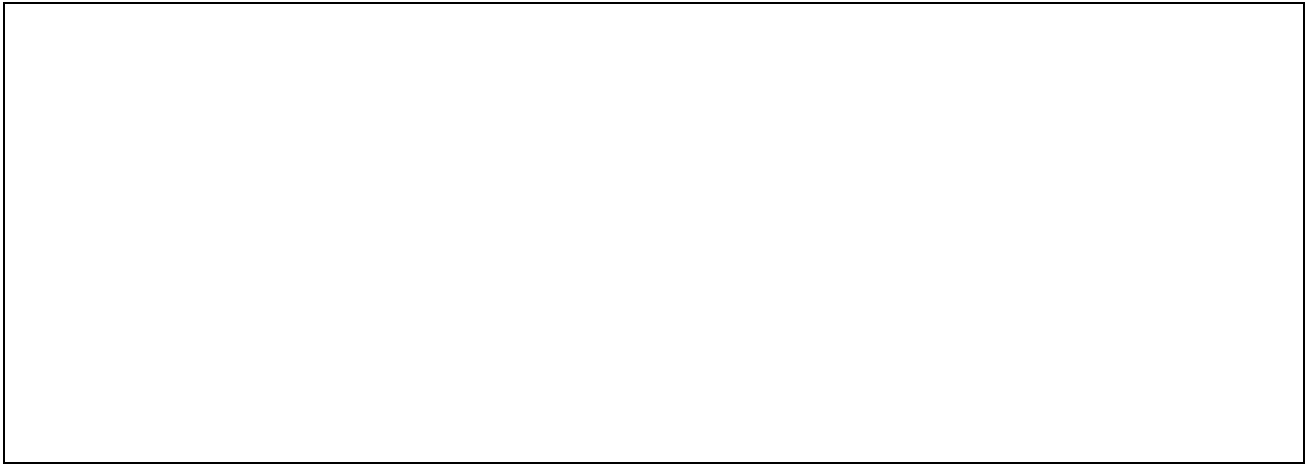
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7.	<p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</p>
	<p>No further comments – we would be happy to discuss by phone/email if any queries regarding our response.</p>

8.	<p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearing session when it takes place? (please tick or cross as appropriate)</p>	
	No , I do not wish to participate at the examination hearing session	x
	Yes , I wish to participate at the examination hearing session	

9.	<p>If you wish to participate at the examination hearing when it takes place, please outline why you consider this to be necessary:</p>
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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearing session.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature	Eleri Randall	Date	22/10/2024
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