

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):**

Mm26

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

Water

**Policy/ Paragraph number:**

Page 26

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.

Water, you make a lot of statements on flooding but nothing to back this up. ie A range of significant flood mitigation measures at Paddock Wood/Capel

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 on the grounds of lack of true information on how, where and when these measures are to take place, ie before, during or after the development is completed and what the measures will intake. Have my grave concerns about flooding been taken seriously, ie (Matfield, Cinder Hill Woods) are you going to reignite the discussions with southern water, environment agency and upper Medway internal drainage board and any others about using Cinder Hill Woods as a attenuation holding site, which could slow the floodwater rate down allowing for the railway culverts to work more efficiently and helping to reduce flooding.

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

Page 73 para 5.177 David Lock Associates follow-on Study October 2023 it states in terms of site constraints and flood and highways modelling the viability of the scheme has been tested? When was this tested- was the test done on computer ie desktop based and was a new topography done first with the new sequential test as all land being developed has been raised and the new Capel development wishes to raise the development land by up to a metre, so was this celebrated into the computer together the correct outcome needed.

you state on page 25 Paddock Wood and Capel will take form of a Supplementary planning document. But this has not been produced yet so again how can anyone agree to a half baked scheme without knowing about the total scheme. There will be no input from residents or others to address any issues they may find so no local input but we have to expect a plan with many holes in it.

STR5 A range of significant infrastructure (is) required to mitigate the impact of development to particular areas, the delivery of this will be agreed through a masterplanning process. Again we have to expect something that we cannot see.

page 89 (H) Ensure that surface water runoff from development will not exacerbate and in so far as possible and practicable improve flooding. Sorry these words are meek to all residents of Paddock Wood. This should read ensure that surface water runoff from the development will not exacerbate but improve flooding elsewhere.

Page 90 (7) all residential development will be in flood zone 1 Yet two of the areas are mostly in flood zone two and three. On page 19/20 Major transformation expansion of Paddock Wood including land at east Capel, following garden settlement principles and providing Flood Risk Solutions. (it does not say this is just Paddock Wood and Capel and it is not clear about these) (Flood Risk Solutions) ie like site specific Flood Risk Assessment and it does not Clarify What they maybe. You go on to mention a supplementary planning document, so where is this document as it is making any objection nor agreement acceptable when documents are missing or moved to another place. You also say all development will be in Flood Zone 1 yet parcel A (north western) and B (western) which you have allocated 1290 dwellings, has most of its land in Flood Zone 2 and 3 so how can this be possible.

On page 90 (8) All development proposals in relation to the Eastern and Western parcels shall be in accordance with an Approved Masterplan relating to each parcel that will respect the requirements of Paragraph 2 and 7. Yet again there is no way of scrutinising this nor anyway of objecting or raising comments on. Again when, where and when is this likely to happen ie before-during or after building development and will we be able to make comments on which may jeopardise this development.

page 81 Flood Risk. This policy does not give clear guidelines and it does not follow with policy EN25 as it refers to surface water flooding but disregards the River Medway Flooding, has this been forgotten totally. This policy talks about reducing Flood Risk elsewhere. Please explain where elsewhere is and how you are going to reduce the Risk of Flooding in Paddock Wood from River and Fluvial means. We have not had a detailed copy of the Flood Risk Strategy so how can anyone possibly comment on this which is a Major piece of infrastructure requirement which no one can give any views on so how can we be confident when there is no evidence to say otherwise.

policy STR/SS1 (B) Southwestern parcel. The flood water Attenuation area is right by the railway embankment, so Network rail will not expect this area to be used as a Flood Attenuation area,

as concerns will be raised on Railway embankment erosion. It is also unclear whether or not this attenuation area is to take Tudeley Brook Steams water and the Graverly Way stream Water or is it just for the development area and nothing to do with these streams. This in it self is a big issue, as this area Floods from both streams and Floods part of Paddock Wood when the streams cannot take such high volumes of water from Pembury and Matfield.

Page 302 Section 6 Development and Flood Risk. It is Essential that new development across the Borough does not Increase Flood Risk,, either on site or elsewhere and provides adequate drainage provision so that Flood Risk is managed Effectively, any new development proposed in areas that are vulnerable to flood risk Should ( Build in) additional local capacity in terms of flood mitigation and provide ( betterment) where possible. It should state proposed areas that are vulnerable to flood risk (**Will** build in additional local capacity in terms of flood mitigation and **Will** provide betterment.)

Where land for development that is in a vulnerable area of risk of flooding **Then this area should be removed from any development.)**

**page 27 policy STR5** A range of significant infrastructure (**is**) **required to mitigate the impact through a master planning process. How** can we respond to this when there is nothing on the plan.

Highway improvement only mention Badsell road in Paddock Wood and nothing about Mascalls court road where there is to be some 1400 houses built. The road network in Paddock Wood is a total shambles and here we go again. This road Mascalls court road is a small country road with some very sharp bends in it, yet nothing in this plan to overcome the bad road. We have very large lorries using this road six days a week with other traffic and to date there has been no major incident with traffic, which is a miracle but now a major development is due to start there will be Chaos. Heavy Traffic will refuse to use this road and instead will use Warrington road as they have before, Warrington road is a housing estate and as such should not have major traffic travelling down it, but it will if there is nothing on the a road improvement to Mascalls Court road first, with widening in some areas and straightening out of bends or as the very least widening the bends.

Colts hill bypass is mentioned again but only a shortened road which is not acceptable as it only moves the problem further along and is totally unacceptable as it wastes money and give no one any real relief. It must be a completed route of a bypass not some hashed up scheme that makes no sense

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