

Planning Policy Team
Tunbridge Wells Borough Council
Town Hall Mount Pleasant Road
Tunbridge Wells
Kent
TN1 1RS

Our ref: KT/2006/000284/OR-
29/PO2-L01

Your ref:

Date: 14 July 2025

Dear Sir/Madam

**Notice of the submission of the Southborough and High Brooms
Neighbourhood Development Plan – Regulation 16**

Thank you for your email on the 11 June 2025 inviting representations on the Southborough and High Brooms Neighborhood Development Plan (SHBNDP).

We are very pleased to see that our previous comments on addressing flood risk in the plan have been noted and note that certain areas in the north-eastern part of the parish fall within Flood Zones 2 and 3. The SHBNDP appropriately acknowledges these areas and incorporates a range of flood risk mitigation measures that developers are either expected or encouraged to implement in order to enhance flood resilience and climate adaptation. These measures are embedded within Policies SHB1 (Location of Development) and SHB4 (Energy Efficiency and Design), which set out expectations for developers to avoid high-risk areas and implement appropriate design responses.

We welcome the Plan's clear commitment to steering development away from areas of high flood risk and its proactive inclusion of flood mitigation strategies. These provisions are essential to ensuring that flood risk is managed sustainably and not exacerbated by future development.

Based on the information provided, we consider the flood risk policies and supporting evidence within the SHBNDP 2025 to be acceptable from a flood risk management perspective.

We would like to re-iterate our Groundwater Protection comments from our previous response and also attach our advice note for further information.

It may be beneficial to create a Foul Water Drainage Policy which identifies the drainage hierarchy and identifies that for any large development, it would be unlikely for these developments to be permitted to discharge via a non-mains drainage system given the potential risk to the environment. Any development proposing to discharge to a package treatment plant, should identify if their proposed drainage strategy is compliant with the [General Binding Rules](#). Developments which do not meet the General Binding Rules may require a permit and should consult with the

Environment Agency. Should a permit be required it cannot be guaranteed that a permit would be granted and as such we would recommend that any permit applications be run concurrently with any planning applications.

Major developments must provide provision to attach to mains sewer as part of the development to prevent discharge of large volumes of treated effluent to the environment. This should be agreed through liaison with the Local Water Undertaker.

Reference should be made to the [Environment Agency's approach to groundwater protection](#), to enable developers to appropriately understand the required expectations from the Agency for any proposed developments.

The below is an extract from a similar Neighbourhood Plan:

Private, non-mains foul drainage systems are not environmentally acceptable within publicly sewered areas. Planning applications must demonstrate that connection to the public sewer is feasible and any mitigating measures necessary to enable a connection must be identified and agreed between the applicant and the sewerage undertaker.

If a non-mains drainage solution is proposed, an applicant must demonstrate that it is not practicable to connect to the public sewer. Sufficient information to understand the potential implications for the water environment of non-mains drainage must be submitted, including the Environment Agency's Foul drainage assessment form (FDA1). The hierarchy of non-mains alternative solutions must be followed:

- a. package sewage treatment plants (which may be offered to the sewerage undertaker for adoption) where effluent goes through a wetland prior to discharge into the watercourse/ground as that will improve water quality; then
- b. septic tanks; then
- c. in the last instance, a cesspool if no other solution is possible.

Yours faithfully

Eleri Randall

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