EAST PECKHAM NEIGHBOURHOOD DEVELOPMENT PLAN

TOPIC PAPER 2

NATURAL ENVIRONMENT

Version: ~~2nd~~ 3rd Draft for Committee Review **Date:** ~~30 June~~1 October 2026

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SUMMARY

East Peckham parish covers approximately **1,289 hectares (4.98 square miles)**. Two constraints dominate the natural environment evidence base: **Green Belt designation and flood risk**.

East Peckham's natural environment cannot be understood separately from its hydrology. The parish's rivers, floodplain, agricultural landscape and ecological networks are closely interconnected, with flooding both shaping and sustaining many of its important habitats.

The parish is predominantly Grade 2 “best and most versatile” agricultural land.

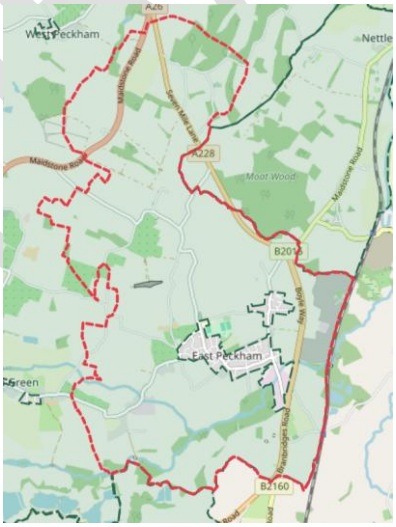
Ancient woodland is present but modest in extent (46.6 ha, 3.6% of the parish), concentrated in a small number of named woods.

1,289 ha PARISH AREA (4.98 SQ MILES)	**57%** OF PARISH LAND IN FLOOD ZONE 3	**22/27** LAA SITES PARTLY/WHOLLY IN GREEN BELT	**46.6 ha** CONFIRMED ANCIENT WOODLAND (3.6%)

1. GREEN BELT, GREEN SPACE AND WATERCOURSES

1.1 Green Belt

1.1.1 East Peckham’s undeveloped land is overwhelmingly within the Green Belt. ~95% of the parish is within the Metropolitan Green Belt - roughly 1,224 ha of the parish's 1,289 ha total area.



1.1.2 The remaining ~65 ha (5%) sits within the existing built-up-area boundaries of Hale Street and East Peckham. Essentially the whole parish outside the village core is Green Belt.

1.2 Rivers and Watercourses

1.2.1 The parish is shaped by two watercourses: the **River Medway**, which forms part of the southern/eastern parish boundary, and the **River Bourne**, which runs along the south-western edge near Snoll Hatch.

1.2.2 The parish is also defined by the Coult Stream. The Environment Agency (EA) classifies the Coult Stream as a "main river" — placing it in the same regulatory category as the River Medway and River Bourne, and confirming it as one of three major rivers in the Borough. The Coult Stream flows through the centre of the village, before joining the River Medway near Stoneham Lock. A further minor watercourse, the Boroughs Oak Stream, flows through the Hale Street area and is a documented source of flooding to properties along that road.

1.2.3 East Peckham is situated at the confluence of all three rivers: the River Medway, the Coult Stream and the River Bourne meeting in the extensive flat floodplain that forms the lower-lying parts of the parish. This topographic position — at a three-river meeting point on a low-lying floodplain — is the root cause of the parish's exceptional flood risk profile, documented in detail in Section 5. The flat, low-lying fields in this confluence zone act as natural flood storage, attenuating peak flows across all three river systems. At periods of flood this natural storage capacity directly reduces flood depths downstream through East Peckham and the adjoining Yalding floodplain.

1.2.4 The impact of this on roads and transport during high-rainfall and flooding events is documented in *Topic Paper 6.*

1.2.5 Flood defence infrastructure: The Leigh Flood Storage Reservoir, located near Tonbridge, provides flood protection to Tonbridge and Hildenborough from River Medway events. It does not protect East Peckham.

1.2.6 East Peckham has no comprehensive flood barrier or reservoir scheme protecting the village, with no future plans for new flood defence infrastructure, other than the minor protection offered by the Coult Flood Storage Area (FSA). East Peckham is therefore reliant on land-based natural flood management and development restriction to manage existing flood risk levels.

Evidence: Rivers and Watercourses

Sources confirming the content of this section:

• Kent's most flood-prone area assessment: Kent County Council county-level strategic flood risk evidence, cited in East Peckham Parish Council (EPPC) Reg 18 Response.

• Leigh Barrier scope: publicly available EA/Tonbridge & Malling Borough Council (TMBC) infrastructure evidence.

1.3 Green Space Provision

1.3.1 Public green space in the village itself — playing fields, children's play areas, outdoor exercise equipment and allotments — is catalogued in *Topic Paper 5 (Amenities and Services)*, which also reports that green spaces are used weekly or more often by 89% of survey respondents, the second most-used amenity in the parish after shops. This paper focuses on the wider countryside and designated natural assets surrounding the built-up area, rather than duplicating that inventory.

Name	Usage	Area (ha)	Approx Location	% within parish
Hop Farm Country Park	Public Park or Garden	66.21	TN12 6PZ	87.70%
East Peckham Playing Field	Playing Field	6.36	TN12 5BS	100%

Holy Trinity Church	Religious Grounds	0.74	TN12 5LH	100%
St Michael's Church	Religious Grounds	0.54	TN12 5NG	100%
East Peckham Community Garden	Allotments or Community Growing Spaces	0.48	TN12 5BS	100%
East Peckham Playing Field	Play Space	0.32	TN12 5BS	100%
East Peckham Playing Field	Tennis Court	0.07	TN12 5BS	100%
East Peckham Playground	Play Space	0.04	TN12 5BS	100%
East Peckham Basketball Court	Other Sports Facility	0.04	TN12 5BS	100%
Hop Bine Close Play Area	Play Space	0.03	TN12 5JN	100%

2. LANDSCAPE CHARACTER

2.1 The Landscape of East Peckham includes an important mixture of natural habitats:

- broad floodplain
- orchards
- wooded ridges
- rivers
- hedgerows
- agricultural mosaic

2.2 These are central to East Peckham's natural and historic character, which make up the connected landscape character that is special to EP:

- Coult Stream corridor
- River Medway corridor
- River Bourne
- hedgerow network
- orchards
- floodplain meadows
- scrub
- woodland patches

2.3 There is an important link between the Green Infrastructure network and Natural Environment in the following areas:

- public green spaces
- LGS
- community gardens
- playing fields
- PROWs
- woodland
- orchards

2.4 The orchards within the Parish are important in terms of the natural and historic landscape and character, but are also influential and beneficial for biodiversity and pollinators.

3. ECOSYSTEMS

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The countryside and green spaces of the Parish of East Peckham play an important role in the provision of:

- flood storage
- carbon storage
- biodiversity
- water quality
- food production
- health and wellbeing
- recreation
- cooling

4. EXISTING ENVIRONMENTAL DESIGNATIONS

4.1 Sites of Special Scientific Interest (SSSI)

4.1.1 Natural England's SSSI dataset includes two sites in the extended area around East Peckham, one of which is the River Medway corridor SSSI. Whilst East Peckham parish itself contains no SSSI, any development proposals near the parish edge bordering the Medway should still consider proximity effects and Natural England consultation requirements where relevant.

4.2 Local Wildlife Sites

4.2.1 Confirmed Local Wildlife Sites within and adjacent to East Peckham parish: The Kent & Medway Biological Records Centre (KMBRC) Protected Species Survey (Report ENQ/25/553, November 2025) and the EPPC Local Green Space Submission confirm the following Local Wildlife Sites (LWS) associated with the parish study area:

4.2.2 MA18 — Hale Street Ponds and Pasture: A designated LWS in the Maidstone borough administrative area, located in the western part of the parish near Hale Street. Comprises wetland habitats including ponds, ditches and associated grassland pasture. Rare plant records include Bogbean (International Union for Conservation of Nature (IUCN) Vulnerable; KRDB3; S41 listed) recorded 2008, and True Fox-sedge (IUCN Vulnerable; Nationally Rare; S41 listed), one of very few Kent sites for this species.

4.2.3 TM19 — East Peckham Ponds: The Local Wildlife Site identified in the TMBC Land Availability Assessment, constraining site 68377 (Arnold Business Park). Located in the Tonbridge and Malling administrative area, comprising the ornamental and wildlife ponds west of Branbridges Road. Also cited as a constraint on adjacent land parcels.

4.2.4 TM20 — East Tonbridge Copses and Dykes and River Medway: A LWS covering the floodplain woodland, dyke network and river corridor habitat along the River Medway at the eastern/southern parish boundary. This designation recognises the ecological importance of the Medway corridor and the associated low-lying woodland and wetland mosaic.

4.2.5 MA53 — Stoneham and The Lees, Yalding: A LWS covering floodplain meadow and wetland habitat in the Stoneham/Lees area near the parish boundary with Yalding. This site forms part of the wider Medway floodplain ecological network extending through East Peckham.

4.2.6 T&M1 — Hale Street Quarry (Regionally Important Geological Site (RIGS)): A geological RIGS designation at Hale Street Quarry, also referenced as a Local Wildlife Site in the KMBRC survey. Provides geological and geomorphological interest alongside any biological nature conservation value.

4.2.7 The above is not a complete inventory of all designated sites. The KMBRC and Natural England hold the definitive LWS register for the borough; a formal confirmation request should be submitted before the final version of this paper is published.

4.3 SSSI Impact Risk Zones

4.3.1 Three SSSI Impact Risk Zone (IRZ) polygons intersect the East Peckham parish study area, according to the KMBRC Protected Species Survey (ENQ/25/553, November 2025). Natural England issues IRZs around Sites of Special Scientific Interest (SSSIs) to identify the geographic areas within which proposed

developments must be screened for potential adverse effects on the SSSI's notified features, before a planning determination is made.

4.3.2 SSSI IRZ polygon IDs 51830, 87868 and 87967 all intersect the parish study area. Any planning application within the buffered extent of these polygons must notify Natural England and may require an appropriate assessment of impacts on the interest features of the relevant SSSI(s). The Medway floodplain SSSIs in the wider sub-region include Medway Valley SSSIs, and the East Peckham LWS corridor connects ecologically to these nationally designated sites.

4.4 Candidate Local Wildlife Site — Site 58751 (Henham/Coult Stream Parcel)

4.4.1 East Peckham Parish Council is actively pursuing the registration of Site 58751 — a 4.85-hectare parcel locally known as "Henham Woods" or "The Scrub", adjacent to the Coult Stream — as a candidate Local Wildlife Site as part of TMBC draft Local Plan. It occupies a particularly significant ecological position at the interface between the Coult Stream riparian corridor, the East Peckham settlement edge and the open floodplain. This application is based on a formal Kent Wildlife Trust (KWT) site assessment carried out by LWS Officer Dave Shenton in December 2025.

4.4.2 The KWT assessment concluded that the site contains an interesting mosaic of habitats including secondary woodland (Oak, Field Maple, Sycamore, Wild Cherry naturally regenerating on formerly open ground), dense scrub (Bramble, Blackthorn, Elm, Hazel), rough grassland and tall herb communities; floodplain meadow, and a riparian corridor along the Coult Stream itself, including marshy grassland, rush pasture and marginal aquatic vegetation. The site was assessed as meeting the criteria for LWS designation on the basis of its habitats and confirmed species assemblage. KWT formally recommended that the site be registered as a candidate LWS and submitted to KMBRC for inclusion in the borough-wide register. It also identified the following surveys as warranted before any development proposal is determined: Water Vole, Hazel Dormouse, amphibians (including Great Crested Newt), breeding birds and moths.

4.4.3 The parish supports an unusually rich assemblage of protected and priority species because of the close interaction between rivers, floodplain habitats, woodland, scrub, orchards and agricultural land. The full species evidence for Site 58751 is set out in the Appendix below (Coult Stream Corridor). Of particular note, the site supports confirmed records of Nightingale (Red List; S41) and Turtle Dove (Red List; S41) — two of the most rapidly declining birds in the UK — as well as Water Vole (KRDB2 Vulnerable; Wildlife & Countryside Act (WCA) (1981) Schedule 5; S41) along the Coult Stream corridor. The KWT assessment also noted habitat features indicative of H91E0 Alder Woodland on Floodplains, a priority habitat listed under Habitats Directive Annex I.

4.5 Conservation Areas

4.5.1 Tonbridge and Malling Borough Council has designated four distinct Conservation Areas within East Peckham Parish. Collectively, they protect the historical narrative of the area's development, moving from the elite hilltop manorial core down through individual valleys and specialist agricultural hamlets.

4.5.2 Summary of conservation areas:

- ROYDON: Hilltop manor houses, Tudor brickwork, St. Michael's Church; Old Church Lane.
- LITTLE MILL: River Bourne frontage and crossing, industrial water milling, small winding lane.
- SNOLL HATCH: Vernacular (structures built using local materials, traditional methods, and native styles, without the intervention of professional architects) medieval timber-frames, organic farm clusters.
- BULLEN CORNER: Vernacular timber-framed cottages and historic agricultural buildings.

4.5.3 These are considered in detail in *Topic Paper 4: Heritage and Conservation.*

5. KEY HABITATS AND BIODIVERSITY

5.1 Ancient Woodland

5.1.1 A geometric intersection of the Natural England Ancient Woodland Inventory against the confirmed parish boundary found **46.6 hectares of ancient woodland within East Peckham (3.6% of the parish area)**, made up of several distinct woods, some only partly within the parish:

Wood	Type	Area within parish (ha)
Peckham Fields Wood	Ancient & Semi-Natural Woodland / PAWS	26.5
Killing Grove Wood	Ancient & Semi-Natural Woodland / PAWS	4.5
Alder Shaw	Ancient & Semi-Natural Woodland	2.8
Courtlodge Wood	Ancient & Semi-Natural Woodland	2.3
Hazel Wood	Ancient & Semi-Natural Woodland	0.2
Moat / Hale Park Wood	Ancient & Semi-Natural Woodland	0.1
Unnamed parcels (10 polygons)		**~9.7**

5.1.2 Ancient woodland is irreplaceable habitat under National Planning Policy Framework, ~~2024~~ 2026 (NPPF) Decision-making policy N6 2. The NPPF states that "irreplaceable habitats are habitats with characteristic ecological features and processes which cannot successfully be created, or would take a very long time to establish and function normally." ~~(NPPF) paragraph 180(c):~~ Oonce lost, it cannot be recreated, and development affecting it must demonstrate "wholly exceptional" reasons.

5.1.3 Ancient woodland is an irreplaceable habitat that has developed continuously over centuries and supports species assemblages that cannot readily be recreated.

5.2 Priority Habitat and Other Biodiversity Considerations

5.2.1 Beyond ancient woodland, the Land Availability Assessments prepared as part of the Tonbridge and Malling Borough Council draft Local Plan, mention "priority habitat" (a broader category including deciduous woodland, wildflower grassland and similar) at **7 of the 27 sites (26%)**, most often along site boundaries (hedgerows, shelter belts, watercourse margins). Tree Preservation Orders (TPOs) are mentioned as a constraint at a small number of sites, suggesting most TPO-protected trees in the parish sit within the existing built-up area rather than on the assessed development land.

5.2.2 Need for a Strategic Environmental Assessment and a Habitats Regulations Assessment is anticipated and planned as part of the preparation of the Neighbourhood Development Plan. The Kent and Medway Local Nature Recovery Strategy will also be reviewed as part of the process.

5.3 Protected Species — KMBRC Evidence

5.3.1 The Kent and Medway Biological Records Centre (KMBRC) prepared a Protected Species Survey Report (Reference ENQ/25/553, dated 3 November 2025) covering a search area within approximately 1 km of the centre of East Peckham (grid reference TQ670489). The report identified 190 records of protected or priority species within this search radius. This figure represents one of the richest protected species assemblages of any rural parish in the sub-region and reflects East Peckham's position at the confluence of three river systems with a diverse mosaic of riparian, woodland, orchard and wetland habitats. The full KMBRC dataset is appended to the EPPC Local Green Space Submission (December 2025) and the EPPC Response to TMBC Reg 18 Consultation (December 2025). Detail is included in the Appendix.

6. QUALITY OF AGRICULTURAL LAND

6.1 Provisional Agricultural Land Classification (ALC)

6.1.1 Natural England's provisional 1:250,000 ALC dataset covers East Peckham with only two large national-scale polygons (Grade 2 and Grade 3), each barely clipping the parish boundary. This dataset is explicitly published for screening purposes only — it is not sub-divided into Grade 3a/3b at this scale and is not a substitute for a site-level survey. It is included here for completeness but should not be relied upon alone.

6.2 Agricultural land

6.2.1 East Peckham sits on high-quality agricultural land by national standards, which NPPF- Plan-making policy N1 c. ~~paragraph 174(b)~~ requires to be taken into account when considering the availability of agricultural land used for food production. Plan making should avoid "*the use of higher quality agricultural land where land of poorer quality is available.*"

7. FLOOD RISK

7.1 Extent of Flood Risk

5.1.1 The Environment Agency Flood Map for Planning data, intersected against 3,292 land parcels across the parish, shows flood risk at a scale that few rural parishes face:

Measure	Value
Parcels with any flood zone overlap (FZ2 or FZ3)	**99.9% (3,289 of 3,292)**
Parcels at least 50% within Flood Zone 3	56.1% (1,846 of 3,292)
Parcels entirely (100%) within Flood Zone 3	44.0% (1,449 of 3,292)
Total parish land area within Flood Zone 3	**57.1% (1,650.5 ha of 2,892 ha assessed)**
Total parish land area touched by Flood Zone 2 (measured independently — see note below)	9.8% (284.3 ha)

7.2 Strategic Flood Risk Context

7.2.1 East Peckham already has approximately 612 dwellings at risk of flooding — the highest figure of any settlement in the Borough. With the current housing stock in East Peckham estimated at approximately 1,286 dwellings (2021 Census), 612 at-risk properties represents approximately 48% of existing housing already in flood-risk zones.

7.2.2 KCC's county-level strategic flood risk assessment explicitly identified East Peckham and Yalding as Kent's most flood-prone area. This designation reflects not just the absolute extent of flood zones but the frequency of flood events, the depth and duration of flooding, and the limited mitigation options available given the topography of the three-river confluence.

7.3 Major Flood Events

7.3.1 Three major flood events caused significant property damage and community disruption in East Peckham:

7.3.2 2000 Floods: Major River Medway flooding during autumn 2000 inundated properties in East Peckham, Yalding and Wateringbury. This event prompted a national review of flood policy and investment in flood defences; however, the Leigh Flood Storage Reservoir (the primary mitigation measure) protects only Tonbridge and Hildenborough, not East Peckham.

7.3.3 2013–14 Winter Floods: Prolonged winter flooding (December 2013 – February 2014) caused widespread property inundation in East Peckham. The event was recorded as one of the most damaging floods in the Medway valley within living memory and resulted in months-long displacement of residents and significant infrastructure damage.

7.3.4 2019–20 Floods: A further major flooding event in winter 2019–20 again inundated East Peckham.

7.3.5 The frequency of these events is consistent with the Flood Zone 3 classification of the majority of the parish floodplain, which corresponds to a 1-in-100-year or greater annual probability of flooding. Climate change projections (*Section 5.6*) indicate this frequency will increase.

7.3.6 These flood events caused ongoing road closures, damage to property, infrastructure impacts and community disruption. There is additional detail in *Topic Paper 6* regarding the impact on roads and travel. Flood risk translates to real risk to people's safety, health and well-being, homes and livelihoods.

7.4 Source of Flooding

7.4.1 East Peckham floods primarily from the River Medway. This affects the South, East and West of the village with flooding depths of over a metre deep. There is no route for pedestrian or vehicular access through the village during these flooding events. The River Bourne and Coult flood the North, East and West side of the village. The Bourne is unprotected and causes many flash floods affecting the Little Mill, Addlestead and Snoll Hatch areas.
7.4.2 The Coult Stream floods areas around Church Lane. Downstream of these three sites the Coult Stream causes significant flooding in Hale Street, Smithers Lane, farmland and the tarmac plant, then beyond into Yalding.
7.4.3 The Boroughs Oak Stream floods the Hale Street site and the road adjacent to it. The River Bourne joins the River Medway 400m south west of Snoll Hatch, The Coult Stream passes through the centre of the village and joins the River Medway at Stoneham Lock. Any development upstream that discharges into these watercourses will increase flood depths in both East Peckham and Yalding.
7.4.4 More water being discharged into the Coult and Bourne rivers faster during rainfall event, instead of slowly infiltrating, will increase the peak heights and flow rates of those rivers through the village.
7.4.5 Whilst compensatory flood storage/attenuation storage might delay run off, that runoff will spill out during prolonged storms once that storage is full and exacerbate flooding.

7.5 Risk of other flooding sources

7.5.1 Reservoir flood risk
7.5.2 The flood storage area on the Coult Stream approximately 600m upstream of the village (the Coult Flood Storage Area (FSA) referred to elsewhere in this Topic Paper) is itself an online storage reservoir, regulated under the Reservoirs Act 1975 (now the Flood and Water Management Act 2010), with a capacity of approximately 90,000m³. The Environment Agency's Risk of Flooding from Reservoirs dataset — which also maps the risk from Weirwood, Bough Beech and the Leigh Flood Storage Area further upstream in the wider Medway catchment (TMBC SFRA, Table 8-2) — applies in principle to this local structure too.
7.5.3 The EA's reservoir mapping shows two illustrative scenarios rather than a probability of failure: a "dry day" scenario (failure releasing water held at normal/spillway level) and a "wet day" scenario (failure coinciding with an existing 1-in-1,000-year fluvial flood event). Both are described by the Environment Agency as a "worst credible case," not a likelihood.
7.5.4 Developers would be expected to explicitly consider reservoir flooding.

7.5.5 Sources used (all checked directly, not assumed):

- 5.5.6 Environment Agency Flood Map for Planning Service — current FZ2/FZ3 data (already in your local database; confirmed 100% river-attributed for the parish).

- 5.5.7 Reservoir Flood Maps: when and how to use them — GOV.UK guidance, wet day/dry day definitions.
- 5.5.8 Flood Map for Planning – Flood Zones plus Climate Change dataset — data.gov.uk, August 2025 update.
- 5.5.9 Tonbridge and Malling Level 1 Strategic Flood Risk Assessment (2024) — already in your evidence base at Regulation 18 Evidence Base (EPPC)\TMBC Documents\General Evidence Base\Strategic Flood Risk Assessment\Level_1_Strategic_Flood_Risk_Assessment.pdf, Sections 7.7/8.8 (reservoirs), Table 8-2, and Section 4.1 (tidal limit at Allington).

7.6 Climate Change Projections

7.6.1 National climate projections for south-east England indicate a significant increase in winter precipitation over the plan period. The UK Climate Projections 2018 (UKCP18) for Kent project a 10–20% increase in peak winter rainfall by 2040 (within the Local Plan and NDP plan period). The Kent and Medway Climate Change Risk and Impact Assessment (KM CCRIA, June 2020) projects a further increase of 20–30% by 2080 under a medium-emissions scenario, and potentially higher under a high-emissions scenario.

7.6.2 ~~7.6.2~~ These projections have direct implications for East Peckham. An increase in peak winter rainfall of even 10% would translate to materially higher flood flows in the River Medway, the Coult Stream and the River Bourne, producing flood depths greater than those modelled in the current Flood Map for Planning. NPPF- Plan-making policy F2 1 ~~paragraph 167~~ requires development plans to "*take a risk-based approach when identifying suitable locations for development, taking into account all sources of flood risk and the current and future impacts of climate change.*" ~~Fdevelopment proposals to take account of the impact of climate change over the lifetime of the development, which f~~or residential properties this could be 60–100 years.

7.6.3 The UK Climate Change Committee (October 2025 Progress Report) confirmed that adaptation planning should now assume global average temperature will reach at least 2°C above pre-industrial levels by 2050, with 4°C by end of century not being ruled out under high-emissions scenarios. These commitments have direct implications for the design standards required for any flood-risk development in East Peckham.

7.6.4 Climate change and the Exception Test: Any development in Flood Zone 2 that relies on the Exception Test (NPPF ~~Chapter 14~~Decision-making policy F6 1b) must demonstrate that it ~~"~~will be "*safe for its anticipated lifetime* ~~safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere.~~" and "not increase flood risk elsewhere and, where possible, reduce flood risk overall." Given that climate change projections show significant increases in rainfall intensity and flood frequency within the plan period, Exception Test assessments for East Peckham sites must incorporate UKCP18 climate change allowances appropriate for the site's design life. A standard residential development with a 75–100 year lifespan would need to account for the 2080 scenario (20–30% increase in winter rainfall), not merely the 2040 scenario.

7.6.5 The Flood Zone 2 and 3 boundaries represent modelled extents for events of a defined annual probability — 1% (1-in-100) for rivers, 0.5% (1-in-200) for the sea — assessed without climate change allowances. In August 2025, the Environment Agency added a new "Flood Zones plus Climate Change" layer to the Flood Map for Planning service, showing how the combined extent of Flood Zones 2 and 3 is projected to expand over the present century. The layer applies a "central" (50th percentile) peak river flow allowance for the 2080s epoch (2070–2125) and an "upper end" (95th percentile) sea level allowance accounting for cumulative sea level rise to 2125 — and, significantly, excludes the benefit of any existing flood defences. This last point matters specifically for East Peckham. Because the village has no comprehensive flood defence infrastructure protecting it (*Section 1.2*), the EA's "no defences" climate change layer is not the hypothetical worst case for East Peckham that it might be for a defended town — it is a close approximation of the village's actual future exposure. Combined with the existing evidence that 612 dwellings (approximately 48% of the housing stock) already sit within mapped flood risk under today's climate, the clear implication is that a flood event at or beyond the 1-in-100-year design standard — rather than the more frequent events recorded in 2000, 2013–14 and 2019–20 — would represent a materially

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more severe outcome than anything yet experienced in the village, in both depth and extent. Any Sequential or Exception Test assessment for East Peckham should be tested against this climate-adjusted extent, not solely against the current, undefended Flood Zone 3 boundary.

7.6.6 East Peckham Parish Council declared a Climate and Wildlife Emergency on 15 February 2021.

7.7 SuDS Constraints

7.7.1 Surface water drainage is a material constraint on development, arising from the combination of a high groundwater table and low-permeability soils throughout the Medway/Coult Stream floodplain.

7.7.2 The planning application for a Site on Church Lane (TM/23/03353/FL, refused September 2024) included Soakaway-based SuDS (Sustainable Drainage Systems)/a drainage strategy that was found to be unviable: infiltration testing demonstrated that the groundwater table was too high to permit soakaway drainage, and the proposed scheme was unable to demonstrate that surface water runoff could be disposed of without increasing flood risk to neighbouring properties or the Coult Stream.

7.7.3 Given that the Coult Stream already operates at or near capacity during flood events, the cumulative addition of surface water runoff from new development sites — even if attenuated on-site — has the potential to increase downstream flood levels. Any development proposals must demonstrate, via detailed hydrological modelling, that cumulative upstream development will not increase flood risk to existing properties in East Peckham or Yalding.

7.7.4 Deep piled foundations are likely to be required across the flood-risk sites due to high groundwater. Piling has implications for groundwater connectivity, contamination risk during construction, and construction programme. Reference: https://www.gov.uk/government/publications/piling-in-layered-ground-risks-to-groundwater-and-archaeology.
These factors increase the delivery risk for the flood-risk sites relative to sites on drier, better-drained land.

7.8 Implications for Development

7.8.1 NPPF- Decision-making policy F4 and F5 ~~flood risk policy~~ requires a Sequential Test ~~for any development in Flood Zone 2 or 3,~~ and an Exception Test for highly vulnerable uses (including most housing) in Flood Zone 3. Given that well over half of the parish's land area is in Flood Zone 3, the practical effect is that **the pool of land that could pass the Sequential and Exception Tests is far smaller than the parish's total undeveloped area suggests** — (see *Topic Paper 3*, for the housing-capacity implications).

7.9 Sequential Test: Strategic Implications

7.9.1 The National Planning Policy Framework (NPPF~~, Chapter 14~~Decision-making policy F4 and F5) requires that development be steered away from areas of flood risk wherever possible, through a Sequential Test. The test operates at two distinct scales, both of which are directly relevant to East Peckham.

7.9.2 Scale 1 — Site level (within East Peckham): Individual sites proposed for development must demonstrate they occupy the lowest flood risk land reasonably available within the settlement. Sites in Flood Zone 2 additionally require an Exception Test demonstrating that wider sustainability benefits outweigh the flood risk, and that the development will be safe for its lifetime without increasing risk elsewhere.

7.9.3 Scale 2 — Strategic/plan level (across the borough): When TMBC allocates housing to a settlement in its Local Plan, it must also demonstrate — and defend at examination — that the allocation to that settlement is sequentially preferable to allocating the same housing to lower flood risk locations elsewhere in the borough. This is the strategic Sequential Test. It requires the Local Planning Authority to consider whether reasonably available alternative sites in Flood Zone 1 exist across the whole plan area, and to prefer those sites before committing growth to more flood-prone settlements.

7.9.4 This second scale of testing is the most significant for East Peckham. The flood data in Section 5.1 shows that 57.1% of the total parish land area falls within Flood Zone 3, and 99.9% of land parcels across

the parish have some flood zone overlap. Only a very narrow band of Flood Zone 1 land exists within the settlement envelope itself.

7.9.5 The Green Belt constraint compounds this tension rather than resolves it. Green Belt removes undeveloped land on the periphery of East Peckham from consideration — but it does not change the flood risk category of that land. The effect is that the Sequential Test cannot be satisfied by citing Green Belt restrictions: a site that is both Green Belt and Flood Zone 3 fails both tests independently. Using Green Belt constraints as a reason why flood-risk land must be accepted for development would directly contradict national policy, which treats flood risk as a material constraint in its own right, separate from land designation.

7.9.6 The practical consequence is that the pool of land in East Peckham that could potentially satisfy the Sequential Test — Flood Zone 1 land within or immediately adjacent to the settlement boundary, not in the Green Belt — is small.

6. SUMMARY: CONSTRAINTS, CHALLENGES AND OPPORTUNITIES

6.1 The natural environment evidence points to a parish where land-use options are tightly constrained by overlapping designations. The table below summarises the key evidence and its planning implications:

Issue	Evidence	Planning consideration
Green Belt covers most undeveloped land		Any site release must be justified against Green Belt purposes per the Stage 2 Green Belt Assessment; exceptional circumstances test applies
Extensive flood risk	57.1% of parish land area in FZ3; 99.9% of parcels have some overlap	Sequential and Exception Tests will rule out much of the Parish
Best and Most Versatile agricultural land		NPPF Plan-making policy N1 c ~~para 174(b)~~ requires the loss of BMV land to be weighed in any allocation decision
Ancient woodland present but limited	46.6 ha (3.6% of parish); highest legal protection tier	Any proposal affecting named woods (Peckham Fields Wood, Killing Grove Wood, etc.) needs early ecological input and a strong presumption against loss
No SSSI within the parish		Proximity to the Medway corridor SSSI should still be considered for boundary-adjacent sites
Local Wildlife Sites identified One pending decision		Protect from encroachment; investigate whether further LWS designations exist via KMBRC
BNG		NDP policy to dictate 20% uplift, as research indicates that 10% will not sufficiently mitigate the impact of development and address the biodiversity crisis

Topic Paper 2 NDP policy notes:

SSSI Impact Risk Zones

The NDP should confirm that planning applications within the SSSI IRZ polygons will be expected to notify Natural England and include an ecological impact assessment~~, consistent with NPPF paragraph 180~~. The NDP may wish to include a policy requirement that Habitats Regulations Assessments and SSSI impact screening are undertaken as a condition of permission for major development proposals within or adjacent to the IRZ areas.

Source: KMBRC Protected Species Survey Report ENQ/25/553 (November 2025).

NDP policy note — SuDS and surface water drainage

The NDP should include a policy requirement that any planning application for residential development in East Peckham must be accompanied by a site-specific drainage strategy demonstrating: (a) that infiltration-based SuDS have been assessed and are viable, or that alternative disposal routes are available; (b) that post-development surface water runoff rates do not exceed pre-development rates for the 1-in-100-year event plus a 30% climate change allowance; and (c) that cumulative upstream development will not increase flood risk to existing properties downstream.

Source: EPPC Response to TMBC Reg 18 Consultation (December 2025); TMBC Reg 18 application assessment ref TM/23/03353/FL

NDP Policy Implications: Sequential Test

The NDP should:

1. Require, as a policy statement, that any planning application for residential development must demonstrate it passes the Sequential Test individually, and — where in Flood Zone 2 or 3 — the Exception Test. This is consistent with, and reinforces, national policy.

2. Note on record that East Peckham's flood risk profile means no further housing development beyond the five LAA-identified FZ1 sites should be supported, unless a future site can independently demonstrate FZ1 status or pass the Exception Test with robust evidence.

Cross-reference: Topic Paper 3 (Housing), Section 3.1 for the interaction between sequential testing and the 586-home allocation figure.

6.0.2 Boundary and designations: East Peckham parish boundary (TMBC/OS via mapit.mysociety.org); Natural England Ancient Woodland Inventory, SSSI, and provisional Agricultural Land Classification (OGL v3); geometric intersection performed for this paper using the confirmed parish boundary, not raw national-extract counts.

6.0.3 Flood risk: Environment Agency Flood Map for Planning (FZ2/FZ3), 16,565 features filtered to East Peckham bounding box, intersected against 3,292 parish land parcels (HM Land Registry INSPIRE Index Polygons).

6.0.4 Land Availability Assessment: Tonbridge & Malling Borough Council Local Plan evidence base — 27 East Peckham sites, manually matched to INSPIRE parcels (TMBC does not publish LAA GIS boundaries).

6.0.5 This is a first-pass draft. Sections marked "EVIDENCE GAP" identify specific further work needed before a final version is produced — see Section summaries above.

6.0.6 Source: Office for National Statistics / Natural England / Environment Agency / HM Land Registry, licensed under the Open Government Licence v3.0. Contains National Statistics and Ordnance Survey data © Crown copyright and database right 2026.

Appendix

Mammals — key records:

Water Vole (Arvicola amphibius): KRDB2 Vulnerable; Wildlife and Countryside Act 1981 Schedule 5; Section 41 NERC Act 2006 priority species. Community survey records confirm Water Vole burrows and feeding stations along the Coult Stream corridor (2022). Water Voles are highly sensitive to bank disturbance, vegetation clearance and mink predation; the Coult Stream provides one of the few remaining stretches of suitable habitat for this species in the sub-region.

Otter (Lutra lutra): KRDB1 Endangered; Habitats Directive Annex II and IV; WCA Schedule 5; BAP priority species. Camera trap records on the River Medway adjacent to East Peckham confirm Otter activity in the area. Otter territory encompasses wide stretches of river corridor and the species is sensitive to riverside development and water quality degradation.

Great Crested Newt (Triturus cristatus): Habitats Directive Annex II and IV; WCA Schedule 5; S41 priority species. Recorded at Beltring in 2021 (approximately 1.2 km from the main development sites). Great Crested Newts require ponds for breeding and terrestrial habitat within approximately 500 m for overwintering; their presence in the area means pond and hedgerow impact assessments are required for any development proposals.

Bats (Order Chiroptera): Ten bat species have been recorded within a 5-km search area by the Kent Bat Group (544 total records). Species confirmed include: Common Pipistrelle (138 roost records; nearest roost TQ668487, within approximately 200 m of Site 58751); Soprano Pipistrelle (91 roost records; S41 priority species); Brown Long-eared Bat (83 roost records; S41 priority species; KRDB2 Vulnerable); Daubenton's Bat; Noctule Bat; Serotine Bat; Whiskered Bat; Natterer's Bat; Leisler's Bat; and Brandt's Bat. The Coult Stream corridor is a confirmed bat foraging habitat, and all five proposed development sites are within established commuting routes. Development lighting plans must account for light-sensitive bat species using riparian corridors.

Other notable mammals confirmed in the 1-km search area include: Brown Hare (S41 priority species; KRDB2 Vulnerable); Hedgehog (IUCN Vulnerable; S41); Badger (confirmed via camera trap on Coult Stream corridor 2023); and Harvest Mouse (S41; recorded Hale Street 1990).

Aquatic species — key records:

Bullhead (Cottus gobio): Habitats Directive Annex II; WCA Schedule 5. Recorded on East Peckham Stream in 2010. An Annex II indicator species for river quality, Bullhead is sensitive to sedimentation, water quality degradation and physical modification of riverbeds. Its presence in the Coult Stream/East Peckham Stream system is a material consideration for any development that could affect surface water runoff quality or channel morphology.

Depressed River Mussel (Pseudanodonta complanata): IUCN Vulnerable; S41 priority species. Recorded in 2004. This species is a bioindicator of good river water quality and stable substrate conditions; it is amongst the most threatened freshwater invertebrates in the UK and has been lost from large parts of its former range. Its presence in the East Peckham watercourse system is a material planning constraint on any development affecting river flows or water quality.

European Eel (Anguilla anguilla): IUCN Critically Endangered; S41 priority species. Recorded in the East Peckham stream system. Requires unobstructed river passage from sea to freshwater breeding grounds; any culverting, weir construction or impoundment requires eel passage assessment.

Brown Trout and Sea Trout (Salmo trutta): S41 priority species; recorded 2002. Indicator of good river water quality in the River Medway system at East Peckham.

Bird records — overview:

A total of 139 bird species have been recorded within the 5-km study area (KMBRC data, cited in EPPC LGS Submission, December 2025). The breakdown of notable records is set out in Section 3.4 (Coult Stream Corridor), which documents the species of greatest planning significance in the context of the proposed development sites. Key Red List species confirmed as current or recent breeders in the 5-km area include

Skylark, Lapwing, Yellowhammer, Linnet, Starling, House Sparrow, Mistle Thrush, Lesser Spotted Woodpecker, Spotted Flycatcher and Grasshopper Warbler, in addition to Nightingale and Turtle Dove documented for Site 58751 specifically.

Notable invertebrates and plants:

Variable Damselfly (Coenagrion pulchellum; KRDB3), Downy Emerald dragonfly (Cordulia aenea; KRDB3; confirmed River Medway at East Peckham 2024), Grizzled Skipper butterfly (Pyrgus malvae; IUCN Vulnerable; S41 priority species), Jersey Tiger moth (Euplagia quadripunctaria; Habitats Directive Annex II; recorded East Peckham 2021), and Kentish Snake Millipede (Tachypodoiulus niger; IUCN Endangered; Nationally Rare; S41; recorded East Peckham 1986 and 2011) are among the notable invertebrate records.

Notable plant records include Bluebell (WCA Schedule 8; widespread in local woodland), Bogbean (KRDB3; East Peckham Ponds area 2008) and True Fox-sedge (IUCN Vulnerable; Nationally Rare; S41; Hale Street — one of very few Kent locations for this species).

Evidence attribution

Primary source: KMBRC Protected Species Survey Report ENQ/25/553 (3 November 2025), commissioned by EPPC; full dataset appended to the EPPC Local Green Space Submission (December 2025).

Secondary sources: EPPC Response to TMBC Local Plan Reg 18 Consultation (December 2025), natural environment evidence section; Kent Bat Group roost data; BTO Birdtrack community records.

Note: species status designations follow KMBRC / JNCC conventions current at 2025. KRDB = Kent Rare and Declining Biodiversity list; S41 = Section 41 NERC Act 2006 priority species; IUCN = global threat category.

Bird records — Site 58751 and immediate area:

Nightingale (Luscinia megarhynchos): UK Red List; S41 NERC Act 2006 priority species. Nightingale has declined by approximately 90% in the UK since the 1960s and is now largely confined to south-east England. Audio records at and adjacent to Site 58751 confirmed singing males in April–May 2024 (multiple observers; Merlin app identification; BTO Birdtrack records). Nightingale is a strong indicator of mature scrub habitat quality; its presence at this specific site is material planning evidence.

Turtle Dove (Streptopelia turtur): UK Red List (Vulnerable); S41 NERC Act 2006 priority species; Birds of Conservation Concern. Turtle Dove has declined by 98% in the UK since 1967 and is the UK's most rapidly declining bird species. BTO Birdtrack records and community observations confirm Turtle Dove records at and around Site 58751 from 2021 to 2024, including two individuals recorded simultaneously in July 2022 (confirming breeding activity). A total of 42 Turtle Dove records exist within the 5-km study area (KMBRC/EPPC LGS Submission).

Cuckoo (Cuculus canorus): UK Red List; S41 priority species. Regular spring records around Site 58751 and the Coult Stream corridor. Cuckoo populations in south-east England have declined sharply and the species has been lost from large areas of former range.

Kingfisher (Alcedo atthis): WCA Schedule 1 (protection at nest); 54 records within 5-km study area; confirmed breeding on the River Medway at East Peckham. Kingfisher is sensitive to water quality degradation, disturbance at nest sites and vegetation clearance along riverbanks. Its confirmed breeding status on the Medway system adjacent to the Coult Stream is material to any development affecting the watercourse corridor.

Additional notable bird records on or adjacent to Site 58751 and the Coult Stream corridor include: Kestrel (Red List; S41); Tawny Owl; Hobby; Barn Owl (WCA Schedule 1); Little Egret. In total, the KMBRC survey records 139 species within the 5-km study area; 44 of these are Nightingale records and 42 are Turtle Dove

records, confirming the area as one of the nationally most important refugia for these two rapidly declining species.

Priority habitats confirmed on or adjacent to Site 58751:

H91E0 Alder Woodland on Floodplains (Habitats Directive Annex I; UK priority habitat): Confirmed present in the study area, with features indicative of this habitat recorded along the Coult Stream margin within Site 58751 and adjacent flood-risk land. Annex I habitats carry the highest level of protection under UK law, and development affecting them requires Habitats Regulations Assessment.

Additional priority habitats recorded within the Site 58751 area and surrounding flood zone include: Wet Woodland (UK Biodiversity Action Plan habitat); Lowland Hay Meadow (H6510 Habitats Directive Annex I; UK BAP); Coastal and Floodplain Grazing Marsh (UK BAP); Traditional Orchard (S41 priority habitat, confirmed in the wider parish area). The floodplain itself — 78% of Site 58751 in Flood Zone 2 and 15.6% in Flood Zone 3 — functions as active flood storage; its role as natural attenuation for Coult Stream flood flows is directly analogous to that described for the wider floodplain in Section 5.

Evidence attribution

KWT site visit and LWS assessment: Dave Shenton (LWS Officer, Kent Wildlife Trust), December 2025, documented in EPPC Local Green Space Submission (December 2025).

Bird records: BTO Birdtrack community submissions 2021–2024; KMBRC species data (ENQ/25/553, November 2025); Merlin app identifications.

Habitat assessment: KWT December 2025 site visit; EPPC LGS Submission; KMBRC protected species report.

Flood zone data for Site 58751: 78% FZ2 / 15.6% FZ3 — confirmed from Environment Agency Flood Map for Planning data (EPPC LGS Submission, December 2025).

TMBC SA assessment ("negligible") and EPPC challenge to that assessment: EPPC Response to TMBC Reg 18 Consultation (December 2025).