EAST PECKHAM NEIGHBOURHOOD DEVELOPMENT PLAN

TOPIC PAPER 7

Utilities and Infrastructure

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About this paper

This paper sets out what is known about every utility and infrastructure network serving East Peckham parish: drinking water, sewerage, gas, electricity, broadband and mobile, waste and recycling, and access to services. For each one it asks three questions: what exists today, how much spare capacity it has, and what would have to happen for it to support future growth.

It has been rebuilt for this edition around Tonbridge and Malling Borough Council's Regulation 19 draft Local Plan (published August 2026) and was considered at TMBC's Council meeting on 3rd September 2026. Tonbridge and Malling Borough Council decided to pause its progress for a Regulation 19 consultation due to concerns about water supply and wider infrastructure capacity to support the level of growth required. However following direction from the Government to proceed with a Regulation 19 consultation, the consultation runs from 11 September until 25 October 2026.

This Topic paper considers the evidence published with Regulation 19, including new statements from South East Water and national government on water supply. It also explains which version of national planning policy applies to the Neighbourhood Plan, and what a neighbourhood plan can and cannot do about infrastructure.

Appendices A to H hold the detailed figures for each provider, and Appendix I lists every source. No planning or engineering knowledge is assumed.

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SUMMARY

Tonbridge and Malling Borough Council's Regulation 19 draft Local Plan (August 2026) proposes 228 new homes in the parish on two sites: 156 at Land West of Hale Street and North of Church Lane (allocation EP1) and 72 at Land South of Church Lane (allocation EP2). That is well below the 586 homes proposed at the earlier Regulation 18 stage. It would add about 17 per cent to the 1,349 households recorded in the parish at the 2021 Census. The plan has not yet been examined, so this number could still change. In addition 48 new homes are proposed as part of the NDP housing allocation although this figure is not represented in the calculations below at this stage.

Across almost every network the evidence points the same way. Capacity is tight or already used up. Much of the spare capacity that does exist is being taken by growth in neighbouring council areas. The fixes that are planned mostly arrive in the 2030s, after the pressure they are meant to relieve. The four figures below summarise the position.

≈0.00 Ml/d	5.3 Ml/d	Very Significant	100 to 120%
Spare water in the zone supplying the village, 2024/25 to 2030/31	Peak water shortfall forecast for the borough by 2041/42 (South East Water)	Sewer flood and overload risk for East Peckham's own system, 2020 and 2050	Load on one village electricity transformer today; no upgrade scheduled

Water (Section 3)

The village is supplied from South East Water's Cranbrook water resource zone, which has essentially no spare capacity until at least 2030/31. In December 2025 South East Water told the Borough Council it could not supply growth above its existing plan anywhere in Tonbridge and Malling. Its August 2026 statement forecasts a borough-wide shortfall of up to 5.3 megalitres a day at peak by 2041/42. The interim schemes identified provide at most 2.0 megalitres a day, and none of them is in the Cranbrook zone. A hosepipe ban has applied across the Kent region, including the parish, since 3 July 2026.

Wastewater (Section 4)

East Peckham has its own sewerage system and treatment works. Southern Water rates the system "Very Significant" for both sewer flooding and overload, now and in 2050, and has no named scheme, cost or date to fix either. Two comparable neighbouring systems received a full assessment after a partner organisation asked for one. No such request has been made for East Peckham.

Gas (Section 5)

The local gas network is 92 per cent modern plastic pipe, and SGN has confirmed no capacity constraint for the proposed sites. From 24 March 2027 new homes must meet the Future Homes Standard, which requires low-carbon heating. That moves the pressure from the gas network onto the electricity network.

Electricity (Section 6)

One village transformer serving 23 homes is already overloaded, and two more are close to capacity. None has an upgrade scheduled. The Mereworth primary substation that feeds most of the parish is forecast to go into deficit by 2040 in most scenarios. The Borough Council's infrastructure plan did not assess Mereworth. Kings Hill already takes the largest share of Mereworth's customers and is allocated around 1,300 more homes.

Digital connectivity (Section 7)

89 per cent of parish postcodes have superfast broadband and 59 per cent are gigabit-capable. However, 44 per cent of the parish land area has no superfast service at all, and Openreach has no

confirmed full-fibre programme for the East Peckham exchange. Mobile coverage, measured only across the wider constituency, compares well with rural England.

Waste (Section 8)

Kerbside collection and recycling perform well. The disposal side is under pressure: the North Farm transfer station and recycling centre that serve the southern half of the borough, including East Peckham, are forecast to reach capacity within five years. The replacement is not yet sited, costed or funded.

Delivery, cross-boundary position and the Neighbourhood Plan (Sections 10 to 12)

The upgrades these networks need will fall on the same narrow lanes and verges, in the parish with the most homes at flood risk in the borough. The networks are shared with, and in several cases mainly used by, growth in three neighbouring boroughs, with Kent County Council responsible for waste disposal and the highways where the works take place. Section 12 sets out what the Neighbourhood Plan can add without repeating national or borough policy, and which issues are better handled as direct requests to the providers.

1. INTRODUCTION AND PURPOSE

1.1 Purpose of this paper

This paper sets out the current position of every utility and infrastructure network serving East Peckham parish: what exists today, how much spare capacity it has, and what risks and opportunities the evidence shows for the future. It forms part of the evidence base for the East Peckham Neighbourhood Development Plan (NDP).

1.2 Where the evidence comes from

Every figure in this paper comes from the organisation responsible for it. Those organisations are South East Water (drinking water), Southern Water (sewerage), SGN (gas), UK Power Networks (electricity), Ofcom (broadband and mobile), Kent County Council (waste disposal, highways and schools) and the Environment Agency (rivers and flood risk). The Borough Council's Regulation 19 plan and its supporting evidence are also used, together with national government statistics from the Office for National Statistics, the Department for Transport, the Department for Energy Security and Net Zero and the Ministry of Housing, Communities and Local Government.

Where the Parish Council has carried out its own calculations, for example converting a water company's spare capacity into an equivalent number of homes, this is stated in the text and the working is shown in the appendices. Where a figure cannot be confirmed, or a source leaves a question open, the paper says so rather than filling the gap. Appendix I lists every source, its publisher and date, and where to find it.

All figures are a snapshot as at September 2026. Several sources are updated regularly, and the review dates are noted in the appendices.

1.3 The housing numbers: what the Regulation 19 plan proposes

The Borough Council's Regulation 18 consultation (November 2025 to January 2026) proposed 586 homes in the parish. The Regulation 19 draft Local Plan published in August 2026 proposes 228 homes on two sites:

- EP1, Land West of Hale Street and North of Church Lane (site 59782): 156 homes on 5.32 hectares.
- EP2, Land South of Church Lane (site 68376): 72 homes on 3.32 hectares, of which 2.90 hectares is treated as developable.

The plan's allocation tables record all 228 homes against Hale Street rather than East Peckham, although both sites adjoin both settlements.

The Regulation 19 figure is a proposal. It becomes the adopted figure only after independent examination. This paper therefore treats capacity and risk on their own terms and does not depend on any one housing number. Most of the constraints it identifies exist today regardless of new development: a water zone with no spare capacity, a sewerage system with unresolved flood-risk ratings, and an electricity transformer already overloaded by existing homes. Where the paper does relate a finding to the proposed 228 homes, it says so.

Source: *TMBC Regulation 19 Draft Local Plan 2024-2042 (August 2026), Chapter 14 (allocations table) and Annex 6 development criteria (printed page 505); TMBC Land Availability Assessment 2026, East and West Peckham, Mereworth and Wateringbury ward report. Household count: ONS Census 2021, parish best-fit (11 Output Areas).*

1.4 Which national planning policy applies

Two different versions of the National Planning Policy Framework (NPPF) matter here, because the Local Plan and the Neighbourhood Development Plan are on different timetables.

- The Borough Council's Local Plan is being prepared under the arrangements in force before the 2023 planning reforms. The Council has been directed to submit it for examination by December 2026, within the statutory transitional window that runs to 31 December 2026. Under the transitional rules it is prepared and examined against the NPPF published in December 2024.
- The Neighbourhood Development Plan has not yet been submitted. Under Annex A, paragraph 6 of the NPPF published in August 2026, neighbourhood plans not submitted by that date must comply with the August 2026 NPPF. The East Peckham NDP will therefore be examined against the August 2026 NPPF.

Source: *NPPF August 2026, Annex A paragraphs 1 to 8; NPPF December 2024 (February 2025 corrected reprint), Annex 1; the Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Transitional and Saving Provisions) Regulations 2026 (SI 2026/169), Schedule 1; TMBC Local Development Scheme; TMBC report "Consideration of the draft Regulation 19 Local Plan" (Full Council, 3 September 2026), which records that the Local Plan is assessed against the December 2024 NPPF and not the August 2026 version.*

1.5 What a neighbourhood development plan can and cannot do about infrastructure

The August 2026 NPPF sets clear limits on what a neighbourhood development plan can say. These limits shape the recommendations in Section 12.

- Neighbourhood development plans may set policies on "the provision of infrastructure and community facilities" (policy PM5(1)(b)).
- A neighbourhood development plan should not result in less development than other parts of the development plan provide for the same area (PM5(2)).
- Plans should not include policies that "duplicate, substantively restate or are inconsistent with" national decision-making policies, and should avoid unnecessary duplication of other parts of the development plan (PM6(1)(a) and (c)).
- Plans should not set standards for matters already covered by the Building Regulations. The exceptions are accessibility, energy efficiency on a costed basis, and water efficiency: the tighter optional Building Regulations standard where justified, or, exceptionally, a more stringent local standard in areas of serious water stress (PM13(1)(b)).
- At examination the plan must meet the "basic conditions", which include having regard to national policy and guidance (PM17).

In practice, much of what might be asked for is already required elsewhere. Building Regulations require gigabit-ready broadband infrastructure and electric vehicle charge points in new homes, and from March 2027 low-carbon heating. The draft Local Plan (Policy INF1) already requires developers to show that utility capacity exists or will be delivered in time. A neighbourhood plan adds most where it deals with something specific to East Peckham that these rules do not reach. Some of the most useful actions this evidence supports are not planning policies at all. They are direct requests to the providers, and Section 12 separates the two.

Source: *NPPF August 2026, policies PM5, PM6, PM13 and PM17; Building Regulations Approved Document R (2022 edition, in force 26 December 2022); Approved Document S (2021); Future Homes and Buildings Standards, government consultation response (March 2026); TMBC Regulation 19 Draft Local Plan, Policy INF1.*

1.6 How this paper is organised

Section 2 describes the existing housing stock. Sections 3 to 9 take each network in turn. Each ends with a green box summarising what the evidence means for the Neighbourhood development Plan. Where a network depends on decisions outside the Borough Council's area, an amber box names the other authority and explains the link. Section 10 looks at the practical challenge of delivering all of these upgrades in the same streets. Section 11 draws together the cross-boundary picture. Section 12 sets out options for the Neighbourhood development Plan and for direct action.

2. CONTEXT: HOUSING STOCK AND ENERGY

The age and type of the homes already in the parish affect what the networks carry today and what they will need to carry as existing homes are upgraded.

2.1 The existing stock

The parish had 1,349 households at the 2021 Census. Just over half of the recorded housing stock (50.2 per cent) was built before 1967, and only 9.4 per cent in 2012 or later.

Energy Performance Certificates (EPCs) have been lodged for 666 homes on the parish's 141 postcodes. These postcodes were checked individually against the parish boundary, so the figures do not include neighbouring villages that share the TN12 5 postcode district. Of those 666 homes, 63 per cent (421) are rated D or below and 23 per cent (156) are rated E, F or G, the bands linked with the highest heating costs. Not every home has a certificate, so these figures describe the certified homes rather than the whole stock.

2.2 Fuel poverty and energy use

On the government's official measure, about 9.6 per cent of East Peckham households are in fuel poverty. That is higher than the Tonbridge and Malling average of 7.3 per cent and close to the England figure of 9.9 per cent. About 6.5 per cent of households heat with oil only, which usually costs more per unit of energy than mains gas.

Households here also use more energy than average: 4,136 kWh of electricity and 12,243 kWh of gas a year, against England averages of 3,353 kWh and 11,391 kWh.

2.3 Why this matters for infrastructure

Government policy encourages existing homes to switch to heat pumps and electric vehicles. Each switch adds demand to the same local transformers and substations that new homes would connect to. Any assessment of spare capacity that looks only at new homes will therefore understate the pressure on the electricity network in particular.

See Appendix H for the full housing stock and energy data.

3. WATER SUPPLY: SOUTH EAST WATER

Drinking water is the most tightly constrained service in the parish. This section draws on South East Water's statutory Water Resources Management Plan 2024 (WRMP24), the company's letters and statements to the Borough Council, a letter from national government, the Borough Council's Infrastructure Delivery Plan (IDP) and South East Water's draft Drought Plan.

3.1 Two zones, one village

The parish is supplied from two water resource zones. The village and most of the parish, including both proposed allocation sites, sit in the Cranbrook zone (WRZ7, table reference SEWCB7). This zone also supplies Paddock Wood, Staplehurst, Cranbrook and Tenterden. The northern fringe of the parish (Goose Green and Royden) sits in the Maidstone zone (WRZ6, SEWMT6). The zone boundaries were confirmed against the Environment Agency's published zone map, not assumed from the zone names. Southern Water confirmed in August 2026 that East Peckham is not in its water supply area; its role in the parish is sewerage only (Section 4).

3.2 The Cranbrook zone: essentially no spare capacity today

South East Water's own statutory tables show the Cranbrook zone with approximately 0.00 megalitres a day (Ml/d) of spare capacity every year from 2024/25 to 2030/31. One megalitre is about half an Olympic swimming pool. The margin then recovers slowly: +0.04 Ml/d in 2035/36 and +0.44 Ml/d in 2049/50, the best point in the 25-year plan. Using the zone's own water-use figures, that best case would support roughly 975 homes across the whole zone. Section 3.3 shows that neighbouring councils already have larger allocations in the zone.

The zone's water use per person (188 litres a day) is the highest of South East Water's eight zones. The company's own methodology excludes leakage from this figure and attributes it mainly to garden and outdoor use in dry summers. South East Water also reports a 2024/25 shortfall against its target headroom in the Cranbrook and Paddock Wood zone, because actual demand exceeded the previous plan's forecast.

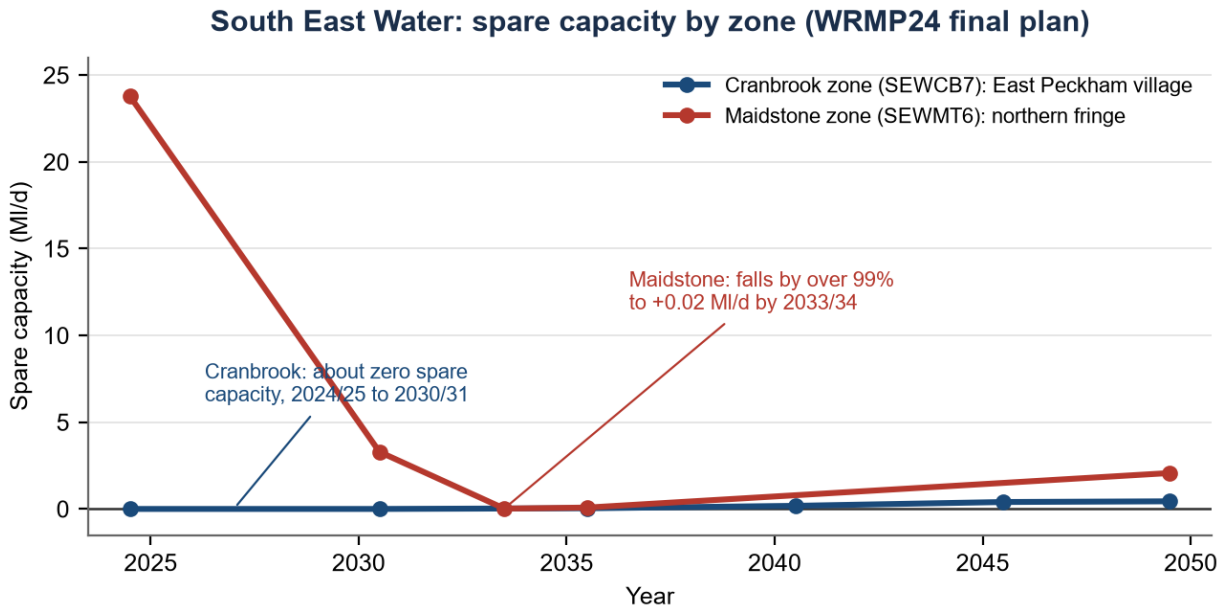


Figure 1: South East Water spare capacity by zone, WRMP24 final plan (Appendix A.1 and A.2).

3.3 Who else draws on the Cranbrook zone

Housing allocations in neighbouring councils already account for a third of the growth South East Water planned for this zone. Summing Tunbridge Wells Borough Council's allocation table at parish level, which avoids counting the same sites twice, gives 4,463 to 4,725 homes:

- Paddock Wood and east Capel: 2,817 to 2,975 homes
- Cranbrook and Sissinghurst: 453 to 467 homes
- Hawkhurst, Horsmonden and smaller villages: 568 to 658 homes
- Tenterden (Ashford Borough): about 625 homes

Together these equal 33 to 35 per cent of South East Water's own 25-year growth assumption for the whole zone (13,500 properties). East Peckham's proposed 228 homes are not included in these figures.

Cross-boundary dependency: Tunbridge Wells Borough Council and Ashford Borough Council

The zone that supplies East Peckham village is shared with Tunbridge Wells Borough's largest growth area (Paddock Wood) and with Tenterden in Ashford Borough. Neither council's growth is within Tonbridge and Malling's control, and South East Water's near-zero margin is the position after that growth has been counted.

3.4 Building is running ahead of the relief scheme

South East Water's plan includes a transfer scheme into this zone (RZ7 Scheme 4, Paddock Wood to Beech), timetabled to start between 2035/36 and 2040/41. Tunbridge Wells Borough Council's own housing trajectory shows its Paddock Wood allocation (2,524 homes) substantially complete by 2036/37, with over 1,000 homes built by 2030/31. Live planning applications suggest delivery may be faster still. A 520-home scheme at Badsell Farm (reference 26/01233/HYBRID) was submitted in 2026, ahead of the trajectory's figure for that point in time, and a further outline application for about 770 homes at Capel and Paddock Wood has been reported as submitted. Most of the demand the relief scheme is meant to meet is likely to be in place before the scheme is confirmed.

Tenterden's 625 homes are often described as already built. Ashford Borough Council and Tenterden Town Council planning records show a more mixed position. About 360 homes are complete. A further 141 homes ("Limes Land") were allowed on appeal in 2022, and details were still being resubmitted in May 2025. Another allocation (Tent 1B) has had no planning application since it was allocated in 2010. The figures published for the individual parts do not add up exactly to 625, so this paper uses the adopted total. Separately, Ashford's draft Local Plan to 2042 (Regulation 18, consultation closed October 2025) proposes up to 500 further homes at Tenterden. If confirmed, the neighbouring share would rise to about 37 to 39 per cent of the zone's planned growth.

A boundary question left open

A 50-home scheme at Biddenden (Ashford Borough, with full permission) may or may not draw on the Cranbrook zone. South East Water's zone documents mention a bulk transfer connected with Biddenden but do not say which zone the village is in, and no other source resolves it. The scheme is excluded from every figure in this paper.

3.5 What South East Water has told the Borough Council

In its response to the Regulation 18 consultation (17 December 2025), South East Water wrote that in the Tonbridge and Malling area, "where we currently lack available headroom in our supplies, we would be unable to accommodate any growth exceeding our WRMP24 forecast assumptions throughout the entire planning period." It named the Tunbridge Wells, Maidstone and Cranbrook zones as under "significant stress". It said new interventions would not be known until its next plan (WRMP29), with a draft due in March 2028.

In August 2026 South East Water published a Planning Position and Options Statement for the Regulation 19 plan. It compares the growth assumed in WRMP24 for the Tonbridge and Malling area (8,157 properties by 2041/42) with the Borough Council's latest housing trajectory (22,896). The gap produces a forecast peak-demand shortfall of 1.92 Ml/d by 2029/30, 4.04 Ml/d by 2034/35 and 5.31 Ml/d by 2041/42, which the company equates to about 15 per cent of current demand in the borough.

The Borough Council's IDP lists the interim schemes set out in that statement: boreholes at Saints Hill and Lilley Farm (0.5 Ml/d each from 2027/28), a transfer from Butler treatment works (1.0 Ml/d from 2028/29 until 2030/31) and a bulk transfer from SES Water (2.0 Ml/d from 2038/39). At no point do these schemes equal the forecast shortfall. From 2031/32 to 2037/38 they provide 1.0 Ml/d against a shortfall of over 4 Ml/d by 2034/35. The IDP records that the schemes "are not in place yet", and South East Water records that their funding depends on a provisional application to Ofwat.

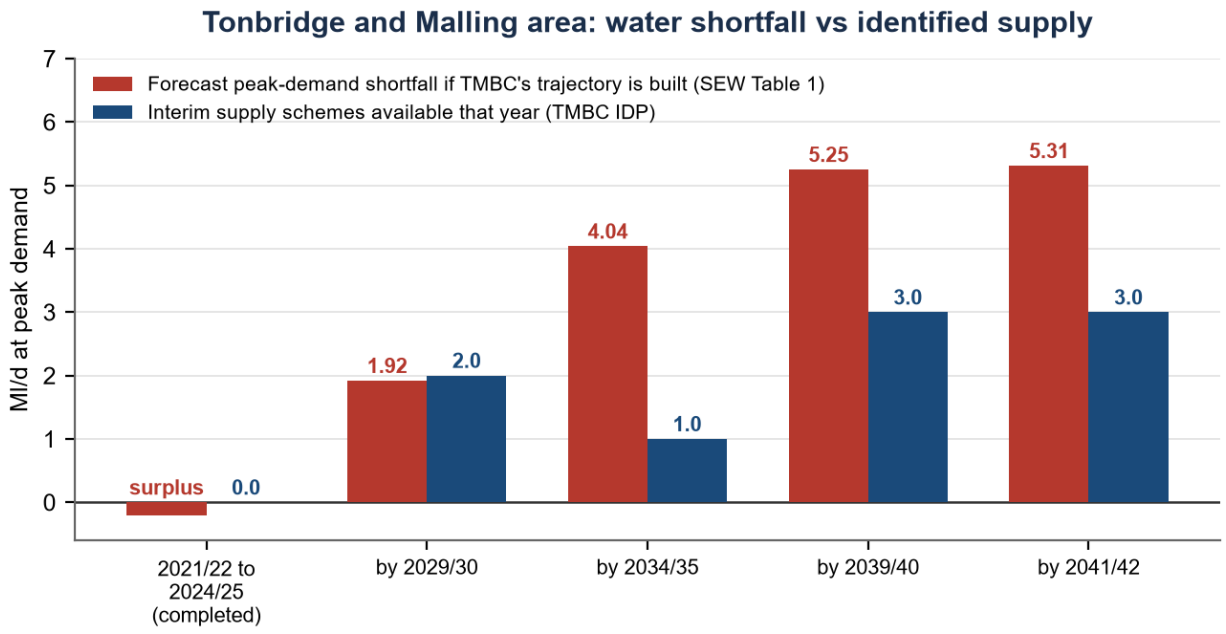


Figure 2: Borough-wide forecast peak-demand shortfall against interim supply schemes (Appendix A.3). These are borough figures, not Cranbrook zone figures.

For East Peckham the key point is where these schemes are located. South East Water's statement describes the borough as lying "predominantly within" the Maidstone zone. Its named options are at Saints Hill, Lilley Farm, Butler treatment works and the SES Water transfer to Riverhill, and none is in the Cranbrook zone. The statement mentions the Cranbrook zone only when listing the zones in the borough. No published document identifies any new supply for the zone that serves the village before the late 2030s.

Cross-boundary dependency: South East Water supply planning across West Kent

South East Water plans water resources by zone, not by council. Its August 2026 statement records an extra 2,303 homes a year across West Kent above the WRMP24 forecast, and says the water for them has "not yet been fully identified or confirmed". East Peckham's supply depends on how the company balances that shortfall across zones and council areas.

3.6 Government reassurance, and its stated limits

A joint letter from Defra and the Ministry of Housing, Communities and Local Government to the Borough Council (received August 2026) states that "there is a credible pathway to water supply for the plan while also recognising the limits of the reassurance that our departments are able to provide". It adds that councils and Inspectors "will need to come to an informed decision based on available information".

The Borough Council's IDP cites a Water Supply Study by AtkinsRealis (August 2026). According to the IDP, the study concludes that "with TMBC's proposed water efficiency policy, forecast supply-demand balance remains in surplus throughout the Local Plan period". The same IDP section also records that "the scale of water supply surplus drops away in the mid-2030s, until the proposed transfer from SES Water becomes operational". The study itself was not among the evidence documents available when the Parish Council downloaded the evidence base in August 2026, so its assumptions could not be checked.

The Borough Council's own report to Full Council (3 September 2026) states that "until further work is undertaken, the exact position on water supply cannot be confirmed". It adds that the position "places significant reliance on the ability of South East Water to scope, fund/bid for and deliver significant infrastructure projects".

3.7 The first site-level test: the application on the EP2 land

The applicant's potable water note for the 64-home application on the EP2 land (TM/26/01252/FL, August 2026) relies on a South East Water pre-development enquiry of 4 June 2026. That enquiry confirms local network capacity of 0.59 litres per second. The note also records South East Water's advice that it could not accommodate further development beyond what it had already planned for. The applicant has offered to meet the Building Regulations optional water efficiency standard of 110 litres per person per day. Local pipe capacity and the zone's overall supply margin are different questions: the enquiry answers the first, not the second.

3.8 Drought and water restrictions

South East Water sets restrictions by drought management area, not by water resource zone. Both of East Peckham's zones sit in its Eastern area with the Ashford zone, and "the most severely affected resource zone" decides the status of the whole area. A hosepipe ban can therefore apply to the whole parish because of conditions in a zone that does not supply it.

The company's stated standard is a temporary use ban (hosepipe ban) no more than once in ten years on average. Its own documents record bans in 2022, 2023, 2025 and 2026. The 2025 ban (July 2025 to February 2026) and the statutory ban effective from 3 July 2026 both covered the Kent region, including East Peckham. Whether the 2022 and 2023 bans reached the parish is not stated in the documents examined. The July 2026 ban was in force "until further notice" when this evidence was compiled.

The draft Drought Plan 2027 to 2032 was consulted on from May to August 2026 and has not yet been finalised. It carries forward, unchanged from 2022, an assessment stating that for the Cranbrook zone "the surplus in the supply-demand balance mitigates any risk". That statement is not consistent with the company's later WRMP24 figures for the same zone. None of the plan's ready-prepared drought permits is in Kent.

3.9 The company's recent performance

This section relies heavily on South East Water's own forecasts, so its recent record is relevant. The Drinking Water Inspectorate found "systemic and repeated failings" after the supply failures of November 2025 to January 2026. In the worst of these, contamination at Pembury treatment works affected up to 24,000 homes. Ofwat opened a licence investigation in January 2026. The Defra and MHCLG letter records that regulators have identified "significant and pervasive failings" and that Ofwat has secured legally binding undertakings, including a £30.5 million remediation package. South East Water's own statement reports 2024/25 leakage of 104.8 Ml/d against its plan target of 81 Ml/d. None of this shows that WRMP24 will fail. It is relevant context when weighing the company's forecasts.

3.10 The Maidstone zone: comfortable today, near zero by 2033/34

The Maidstone zone, which supplies the northern fringe of the parish, has a large margin today (+23.8 Ml/d). South East Water's own forecast shows it falling by over 99 per cent to +0.02 Ml/d in 2033/34. Two factors drive the fall. First, imports from the Ashford zone via Hollingbourne are to be reduced from 12.7 to 4.4 Ml/d so that Ashford can meet environmental flow commitments on the River Stour. Second, Maidstone Borough Council's adopted Local Plan (19,669 homes, 2021 to 2038) equals about 79 per cent of the zone's 25-year growth assumption on its own. The new Butler treatment works adds supply to this zone. The relief schemes are due in 2037, after the lowest point.

Cross-boundary dependency: Maidstone Borough Council and Ashford Borough Council

Most of the pressure on the Maidstone zone comes from Maidstone Borough's adopted housing programme and from the environmental cut to imports from Ashford's zone. The Tonbridge and Malling villages nearest this fringe of the parish have little allocated growth.

3.11 A new water main planned through East Peckham

The only South East Water scheme that names East Peckham is a planned 4 Ml/d transfer main from Blackhurst (Tonbridge area) to Aylesford (Maidstone area), routed via the parish. It is due in use around 2039/40 after a six-year lead-in. This main carries water between two other zones and does not supply the village. It will, however, require construction works through the parish (Section 10).

3.12 What the Regulation 19 plan says

Policy CC7 requires new homes to use no more than 90 litres per person per day on developments of 100 or more homes, and 100 litres on smaller schemes, subject to viability. Each phase must also show that water supply is available before occupation. That requirement "will be applied flexibly where there are confirmed infrastructure delivery programmes". Policy INF1(9) requires applicants to show sufficient water supply and wastewater capacity, and says development that cannot be supported "will be refused planning permission unless impacts can be appropriately mitigated". The development criteria for EP1 and EP2 contain no requirement on water supply.

What this means for the Neighbourhood Development Plan

Water supply is the main deliverability risk in the parish. The zone that serves the village has no confirmed spare capacity before the 2030s. The interim schemes serve other zones. Government's reassurance is expressly limited.

Borough policy already requires capacity to be shown (INF1 and CC7), and the NPPF discourages neighbourhood plans from repeating other policies. The NDP's role is therefore mainly to keep this parish-level evidence in front of decision-makers. It could also consider a locally specific requirement that applications show supply within the Cranbrook zone itself, not just borough-wide. Section 12 sets out options, including direct requests to South East Water.

See Appendix A for the full water data, statements and drought record.

4. WASTEWATER: SOUTHERN WATER

Southern Water is responsible for sewerage and sewage treatment in the parish. It plans its network through a Drainage and Wastewater Management Plan (DWMP). East Peckham has both its own named system in that plan and its own treatment works.

4.1 East Peckham's own system: flagged, but not assessed in detail

Southern Water's plan codes East Peckham's system EPEC. Its population (3,211) is almost exactly the parish population. The company rates the system "Very Significant", its highest risk category, for sewer flooding in a 1-in-50-year storm and for overload of the system, both in 2020 and in 2050. Demand is forecast to grow by 16 per cent by 2035 and 23 per cent by 2050, and the system is assigned an "Improve" strategy.

Only 61 of Southern Water's 381 systems received a detailed ("Level 3") plan with named schemes, costs and dates in this first cycle. East Peckham was not one of them. There is therefore no named scheme, cost or date for fixing either risk. Southern Water says the other systems will be assessed in its second cycle, and gives no date.

4.2 The treatment works, and a private plant on the boundary

East Peckham treatment works on Boyle Way discharges treated effluent to the Coult Stream under Environment Agency permit W00499 (version 8, most recently modified 30 December 2025). The works has never held a permitted storm overflow, so it does not appear in the national storm overflow monitoring data. This means there is no public spill record for it; it is not a guarantee that no discharge could occur. The Hop Farm runs its own privately permitted treatment plant (permit EPRAB3899AD, issued 2015). Its discharge point is inside the parish boundary, although its postal address is in Yalding. It also has no storm overflow on record.

4.3 What neighbouring systems show

Paddock Wood, Tonbridge, Staplehurst and Horsmonden all received full assessments, and each has named, costed schemes. Paddock Wood's works was "assessed to not have adequate capacity to cope with future growth", and the same words were used for Horsmonden. Tonbridge's works has "no other WTWs within a 20km radius" with spare capacity, and its major expansion (£35.9 million) is scheduled for 2040 to 2045. Several storm overflows in these neighbouring systems spill well above the 2024 England average of about 31 spills per site. Examples are Priory Mill, Tonbridge (101 spills), Cannon Lane, Tonbridge (72) and Yalding Old Works (63), 2.8 km from the parish. These sites discharge into the same river system that the parish drains into. They are not part of East Peckham's own network.

4.4 Why two neighbours were assessed and East Peckham was not

Southern Water's screening puts Horsmonden, Staplehurst and East Peckham in the same "Low" concern tier, yet only the first two received full assessment. Southern Water's regional plan says full assessment went to the highest-risk systems "as well as some smaller ones that our partner organisations asked us to include". Its published stakeholder log records a 2021 request for Horsmonden and Staplehurst to be ranked higher, and Southern Water's reply that both were "progressed". A search of the full 88-page log found no mention of East Peckham or its system code.

The Parish Council, directly or through the Borough Council, can therefore ask Southern Water to include East Peckham in the second cycle of detailed assessment, citing that precedent.

4.5 What the Regulation 19 plan and IDP say

The IDP lists East Peckham among Southern Water's treatment works in the borough, but no scheme for it. Schemes are planned at Tonbridge and Ham Hill. The IDP states that expanding treatment capacity is "business-as-usual for Southern Water and not a 'showstopper' to new development". Southern Water has assessed sewer capacity site by site. For EP1 the IDP records an "Essential" wastewater network reinforcement, with cost and timing to be confirmed. It also notes that a critical pressurised sewer rising main crosses the eastern part of the site, which "it is not permissible for a developer to divert or build over". No equivalent row appears for EP2. The EP1 development criteria require critical sewers to be safeguarded.

4.6 The rivers the parish drains to

All three Environment Agency water bodies within the parish fail to reach good ecological status and fail chemical status. The Environment Agency has low confidence that they will reach good status by 2027. The River Bourne is rated Poor; the Mid Medway and Tudeley Brook are rated Moderate. Sewage discharge is among the recorded pressures. The Coult Stream, which runs through the village and receives the treated effluent, is a statutory Main River. Works within 8 metres of its bank need an Environment Agency flood risk activity permit.

Cross-boundary dependency: Tunbridge Wells Borough Council and Maidstone Borough Council

Sewerage systems are separate, but they drain to the same rivers. Storm overflows in the Paddock Wood, Tonbridge and Yalding systems discharge to the Medway tributaries that run through and past the parish.

What this means for the Neighbourhood Development Plan

The parish's own sewerage system carries the highest risk rating and has no plan to fix it. Borough policy (INF1(9)) already requires wastewater capacity to be shown for each application. The most effective single step is outside the planning system: a request to Southern Water for detailed assessment of EPEC, citing the Horsmonden and Staplehurst precedent.

See Appendix B for the full wastewater data.

5. GAS: SGN

For gas, the question is not whether there is capacity for new homes but what role the network will have in future.

5.1 The local network

SGN's published pipe data shows 374 gas pipe segments totalling about 27.7 km inside the parish. 92.4 per cent (25.6 km) is modern polyethylene. The remaining 2.1 km is older metal pipe, including two steel mains laid in 1920 and cast iron mains from 1949 to 1950. Replacing old iron mains is a national safety programme that the Health and Safety Executive requires to be completed by 2032. SGN's business plan says that finishing it in the South East is becoming more expensive, partly because contractors are also in demand for fibre, electricity and water work.

5.2 No growth investment is planned, and none appears needed

SGN's 2025 Long Term Development Statement lists every major reinforcement project by zone. For the South East zone, which includes East Peckham, every category reads "None". The Borough Council's IDP records that SGN has reviewed the proposed site allocations and "confirmed that there are no network capacity restraints".

5.3 New homes and low-carbon heating

The Future Homes and Buildings Standards regulations have now been made. Government's March 2026 response confirms that they and the updated Approved Documents "will come into force on 24 March 2027, subject to transitional provisions", and that new homes will be "future-proofed with low carbon heating". The IDP describes the effect as "effectively banning new residential gas connections". New homes in the parish built under the new rules will therefore draw their heating from the electricity network (Section 6), not from gas.

5.4 Short term and long term

SGN's two main planning documents look at different time periods. Its long-term business plan models national gas customer numbers falling by 12 to 60 per cent by 2041, depending on how quickly homes switch to other heating. Its shorter-term development statement forecasts demand rising 8.6 per cent over the next decade as usage recovers from the 2021 to 2023 fall, and says "the transition is not yet unfolding at the speed or scale assumed". For the parish's existing homes the gas network will remain important for years. For new homes the relevant network is electricity.

What this means for the Neighbourhood Development Plan

Gas is not a constraint on development. National regulations already govern heating in new homes, so there is nothing for the NDP to add on gas. The practical consequence is extra electricity demand, covered in Section 6.

See Appendix C for the full gas data.

6. ELECTRICITY: UK POWER NETWORKS

Two different parts of the electricity network matter here, and they need to be kept separate. The 29 local transformers inside the parish connect directly to streets of homes: their problems are local and present now. The two larger primary substations feed those transformers and also serve a much wider area: their problems are shared and further in the future.

6.1 Local transformers: a problem that exists today

UK Power Networks' data shows one of the 29 village transformers, a 100 kVA pole-mounted unit serving 23 homes, running at 100 to 120 per cent of its rated load. Two more (serving 13 and 65

homes) are at 80 to 100 per cent. None has an upgrade scheduled. Across the whole Mereworth catchment of 127 transformers, East Peckham's overloaded unit is the only one at 100 to 120 per cent. The pressure comes from existing households adding solar panels and electric vehicle chargers, not from new development. Using UK Power Networks' own engineering standard for how chargers are used at the same time, very few additional homes with chargers would push that transformer further over its limit. Residents have also reported voltages of up to 262.5 V on one street with several solar installations, above the 253 V legal maximum.

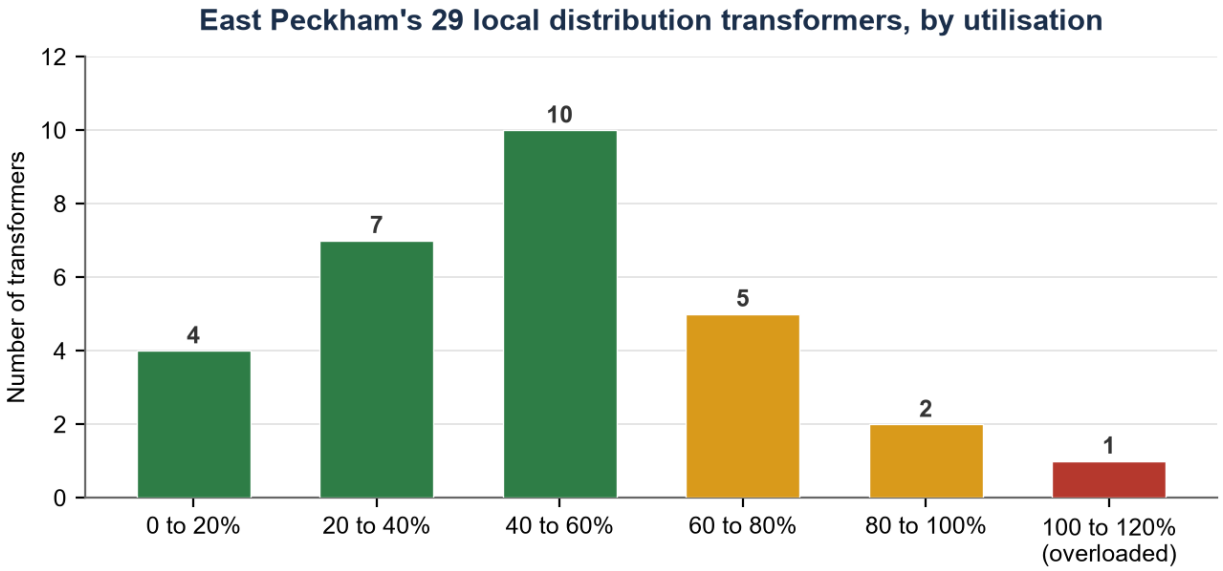


Figure 3: East Peckham's 29 local transformers by utilisation (Appendix D.1).

6.2 Primary substations: a shared, longer-term problem

Mereworth primary substation feeds 28 of the parish's 29 transformers and has about 39 per cent spare capacity today (+6.7 MW). The remaining transformer (11 homes on the eastern fringe) is fed from Paddock Wood primary substation, with 29 per cent spare (+6.4 MW). UK Power Networks' scenario forecasts show Mereworth in deficit by 2040 in three of four scenarios and in all four by 2050. Paddock Wood is in deficit in all four scenarios by 2040. These forecasts cover the whole area each substation serves, not East Peckham alone.

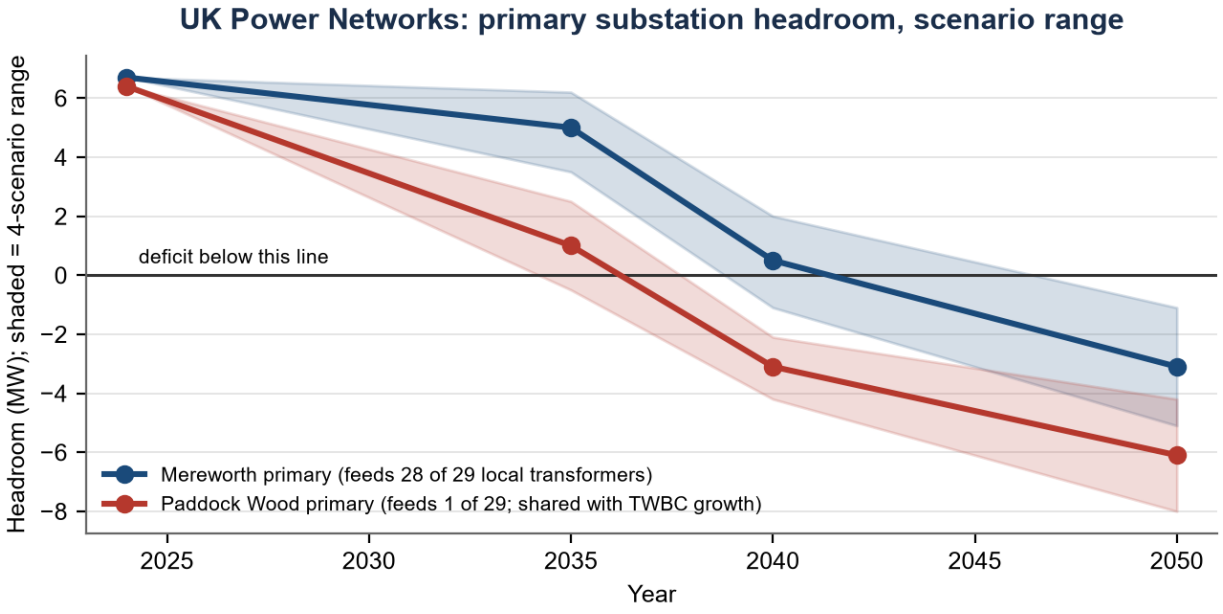


Figure 4: Primary substation headroom, four-scenario range (Appendix D.2 and D.4).

Mereworth serves 7,100 customer connections across 13 parishes. East Peckham accounts for 21.3 per cent of them. The largest single user is Kings Hill, another Tonbridge and Malling settlement, with 43.4 per cent. The Regulation 19 plan allocates around 1,300 new homes at Broadwater Farm, Kings Hill (KH1), plus six smaller Kings Hill sites totalling 338 homes. Whether each of these would connect through Mereworth has not been confirmed.

Cross-boundary dependency: Tunbridge Wells Borough Council

Paddock Wood primary substation also serves Tunbridge Wells Borough's Paddock Wood growth area. Its future deficit is a wide-area question. It does not mean the 11 East Peckham homes connected to it have an unreliable supply today. Any reinforcement will have to be sized and timed for Paddock Wood's growth as well as East Peckham's.

6.3 What the Borough Council's infrastructure plan says

The IDP lists Mereworth among the borough's primary substations. However, it names only five substations as "potentially impacted by the proposed developments in the Local Plan" (Tonbridge East, Townsend Hook, Chatham West, Wrotham Heath and Aylesford), and Mereworth is not among them. The IDP states that "there are no load driven projects that are currently planned for delivery within Tonbridge and Malling borough". It also states that the advice received has not examined the suitability of local circuits, which is exactly where the village's overloaded transformer sits. UK Power Networks is preparing a reinforcement programme for its next price control period (2028 to 2033).

6.4 Heat pumps add a harder kind of demand

The parish's two census areas already have 61 EV charge points, 86 solar installations, 10 heat pumps and 22 battery systems connected. Heat pumps are harder for the network to absorb than chargers. Everyone needs heat on the same cold evening, whereas car charging can be moved overnight. UK Power Networks' own research found heat pumps keep about 43 per cent of their full demand after allowing for this, against 22 per cent for chargers. There is not yet a formal engineering standard for heat pumps, so this figure is indicative. With new homes required to use low-carbon heating from March 2027 (Section 5.3), this matters for any new connection.

6.5 Overhead lines and resilience

16 of the parish's 29 transformers (55 per cent) are pole-mounted and feed overhead lines, including all three that are at or near their limit. Government-commissioned research (Enhancing Resilience in UK Energy Networks, April 2024) found that "the main assets affected by wind are overhead lines through poles being blown over and trees falling on lines". All distribution companies treat targeted undergrounding as a sensible measure in some cases, particularly in "largely forested areas". UK Power Networks has removed over 115 km of overhead line from protected landscapes in the South East since 2006, including more than 25 km in the Kent Downs. That funding is limited to designated landscapes, and the parish sits outside the Kent Downs National Landscape.

What this means for the Neighbourhood Development Plan

New homes already have to include EV charge points (Building Regulations Part S) and, from 2027, low-carbon heating, so the NDP cannot add standards on either. INF1(9) already requires applicants to show they can connect. The NDP can usefully record that the Mereworth substation was not assessed in the IDP, and that the parish's problem is at local transformer level. Two direct requests follow: to UK Power Networks about the overloaded transformer, and about undergrounding exposed rural lines (Section 12).

See Appendix D for the full electricity data.

7. DIGITAL CONNECTIVITY

The figures below use the parish's own list of 141 postcodes, each checked against the parish boundary, and Ofcom's Connected Nations 2025 data (July 2025).

7.1 Fixed broadband

89.2 per cent of parish postcodes have superfast broadband (30 Mbit/s or more) and none falls below the 10 Mbit/s legal minimum. 59.1 per cent are gigabit-capable, but this is split: 57 postcodes have full gigabit coverage and 43 have none. 13 postcodes (about 9 per cent), mostly on the rural fringe, have no superfast broadband at all.

Counted by land area rather than postcode, the gap is wider. 43.9 per cent of the parish has no superfast broadband, 22.7 per cent has superfast only and 33.4 per cent is gigabit-capable. The postcodes without superfast broadband are large and rural, while the gigabit postcodes are small and clustered in the village.

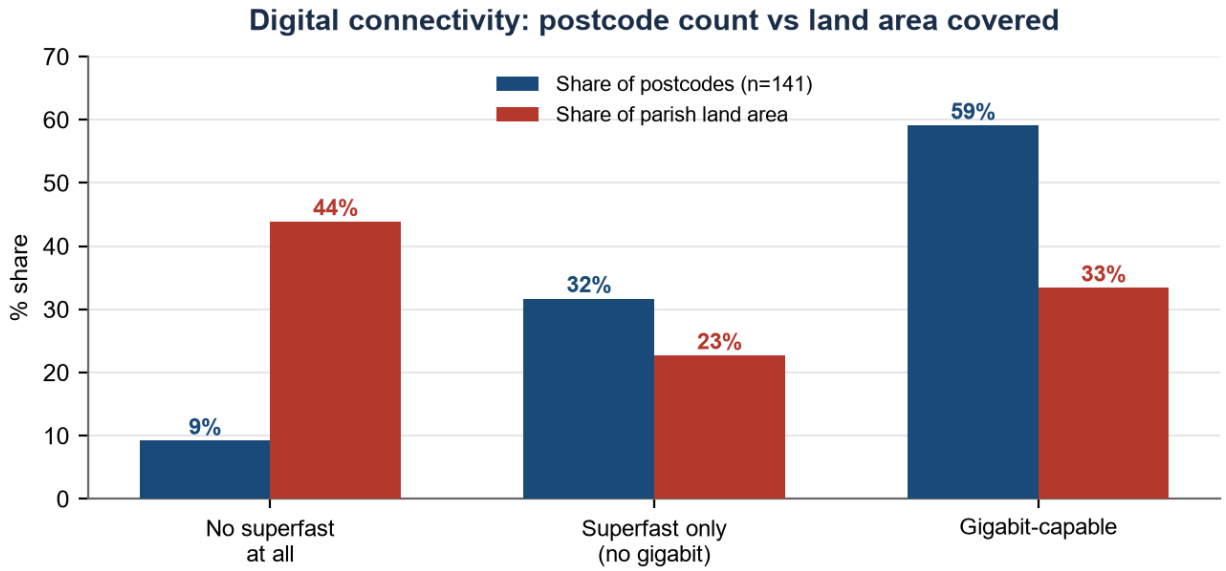


Figure 5: Broadband coverage by postcode count and by land area (Appendix E.1 and E.2).

7.2 Full fibre

"Gigabit-capable" includes upgraded cable networks as well as full fibre to the home, and Ofcom's data does not separate the two. Openreach's own rollout map, checked in June 2026, states it has no confirmed plans to build full fibre on the East Peckham exchange under its major programmes. The most likely source of the parish's gigabit coverage is Trooli, an independent full-fibre company registered at Branbridges Industrial Estate in the parish, whose build in East Peckham was reported under way in 2020. This is an inference from the evidence and has not been confirmed by the company.

7.3 What "superfast" means in practice

Superfast speeds are measured at the street cabinet, not at the home. Speeds fall with distance along the copper line and with internal wiring. For home working, upload speed usually matters more than download speed. In the parish's census areas, lines on the 10 to 30 Mbit/s download band average only 2.1 Mbit/s upload, and superfast lines average 14.9 Mbit/s. A single Microsoft Teams meeting needs about 2.5 Mbit/s upload. 34.7 per cent of employed residents worked mainly from home at the 2021 Census, above the England figure of 31.5 per cent.

7.4 Mobile

Ofcom publishes mobile coverage no more finely than parliamentary constituency. Across Tonbridge constituency, 74.5 per cent of premises are predicted to have indoor 4G from all four operators and 81.2 per cent indoor voice from all four, compared with rural England figures of 57 and 66 per cent. These are modelled predictions for a much larger area, and local experience may differ.

7.5 Overhead lines

As with electricity, many telephone and broadband lines to homes outside the village core are likely to run overhead from poles. Ofcom records that about half of all UK premises were served by overhead cable in 2018. There is no parish-level record of which homes are served this way. Telecoms operators may put up poles and overhead lines without planning permission, after 28 days' notice.

7.6 What national rules and the Regulation 19 plan already require

Since 26 December 2022, Building Regulations Part R has required new homes to have gigabit-ready physical infrastructure up to the network connection point. It also requires a gigabit-capable connection where one can be provided within a £2,000 per home cost cap. Policy INF1(10) of the Regulation 19 plan requires applicants to engage early with broadband and mobile providers and to deliver high-speed broadband, "with full fibre where available". NPPF policy CO1 gives "substantial weight" to proposals that improve network coverage and limits the grounds on which councils may question them. The IDP lists telecommunications in its scope but contains no section on digital infrastructure.

What this means for the Neighbourhood Development Plan

Ducting and connections in new homes are covered by the Building Regulations. Under NPPF policy PM13 the NDP should not set a separate standard. What the NDP can do is record the rural-fringe gap and encourage developers to engage with Trooli as well as Openreach. It can also treat any fibre works in the highway as part of the coordinated programme in Section 10.

See Appendix E for the full digital connectivity data.

8. WASTE AND RECYCLING

8.1 Collection: performing well

Tonbridge and Malling Borough Council collects household waste. Its 2024/25 recycling rate was 48.4 per cent, above England (42.0 per cent) and the South East (45.7 per cent), and residual waste per household has fallen by about a fifth since 2010/11.

8.2 Disposal: a capacity problem within five years

Kent County Council disposes of the waste. The IDP states that kerbside waste from the southern half of the borough, including East Peckham, goes to the county council's transfer station at North Farm, Tunbridge Wells, which "is predicted to be at capacity within the next 5 years". The site cannot be expanded. The North Farm household waste recycling centre used by southern residents is also expected to be at capacity within five years. The IDP lists a new transfer station for the south of the borough, naming East Peckham among the wards it would serve. It is classed "Essential", with phasing of 2030, cost to be confirmed and no site yet identified. Developer contributions of £142.13 per home (transfer station) and £52.00 per home (recycling centre) will be sought.

The IDP states that there is currently no household waste recycling centre within Tonbridge and Malling borough. However, the postcode of the Allington centre (ME16 0LE) falls within Tonbridge and Malling (Aylesford parish) in the national postcode directory. The difference does not affect East Peckham, whose residents use North Farm.

Cross-boundary dependency: Kent County Council and Tunbridge Wells Borough Council

East Peckham's waste goes to facilities in Tunbridge Wells borough, run by the county council and shared with Tunbridge Wells' own growth. The replacement facility may be sited in Tunbridge Wells or in Tonbridge.

What this means for the Neighbourhood Development Plan

Collection is not a constraint. Disposal capacity is, but it is a county-level matter already in the IDP with a contribution mechanism. The NDP has little to add beyond recording the dependency.

See Appendix F for the full waste data.

9. ACCESS TO SERVICES

Transport is covered fully in Topic Paper 6 (Transport and Connections). It is summarised here because it affects how the other constraints should be read.

Two national datasets place the parish among the most isolated neighbourhoods in England for access to services. The Department for Transport's Transport Connectivity Metric 2025 scores the parish's two census areas 44.86 and 36.84 (population-weighted 40.72), against a borough average of 55.35 and an England and Wales average of about 64. Topic Paper 6 uses a single parish-level score of 45.05 from the same dataset. The English Indices of Deprivation 2025 place both areas in the most isolated fifth of neighbourhoods nationally for geographical barriers to services.

Two bus services run year-round. There is no evening or Sunday service. Beltring station, just outside the parish, recorded 14,532 entries and exits in 2024/25 (about 40 a day), has no parking and is unstaffed.

What this means for the Neighbourhood Development Plan

Car dependency is the measured position. Transport assessments for new development should not assume public transport can replace car journeys outside weekday daytime. See Topic Paper 6.

See Appendix G and Topic Paper 6.

10. DELIVERING IT ALL: STREETWORKS, FLOOD RISK, ECOLOGY AND COORDINATION

Sections 3 to 9 look at each network separately. This section asks what it takes, on the ground, to deliver these upgrades together in a small rural parish that also has the most homes at flood risk in the borough.

10.1 Several networks, one set of streets

The planned and needed works are scheduled independently:

- Gas mains replacement due by 2032.
- An overloaded electricity transformer with no fix scheduled, and a reinforcement programme for the next price control (2028 to 2033) whose content for Mereworth is unknown.
- A new water transfer main through the parish in the 2030s.
- A sewerage system awaiting assessment, which could lead to works once it is done.
- Fibre with no confirmed programme.

Each provider publishes its own programme, and none plans around the others.

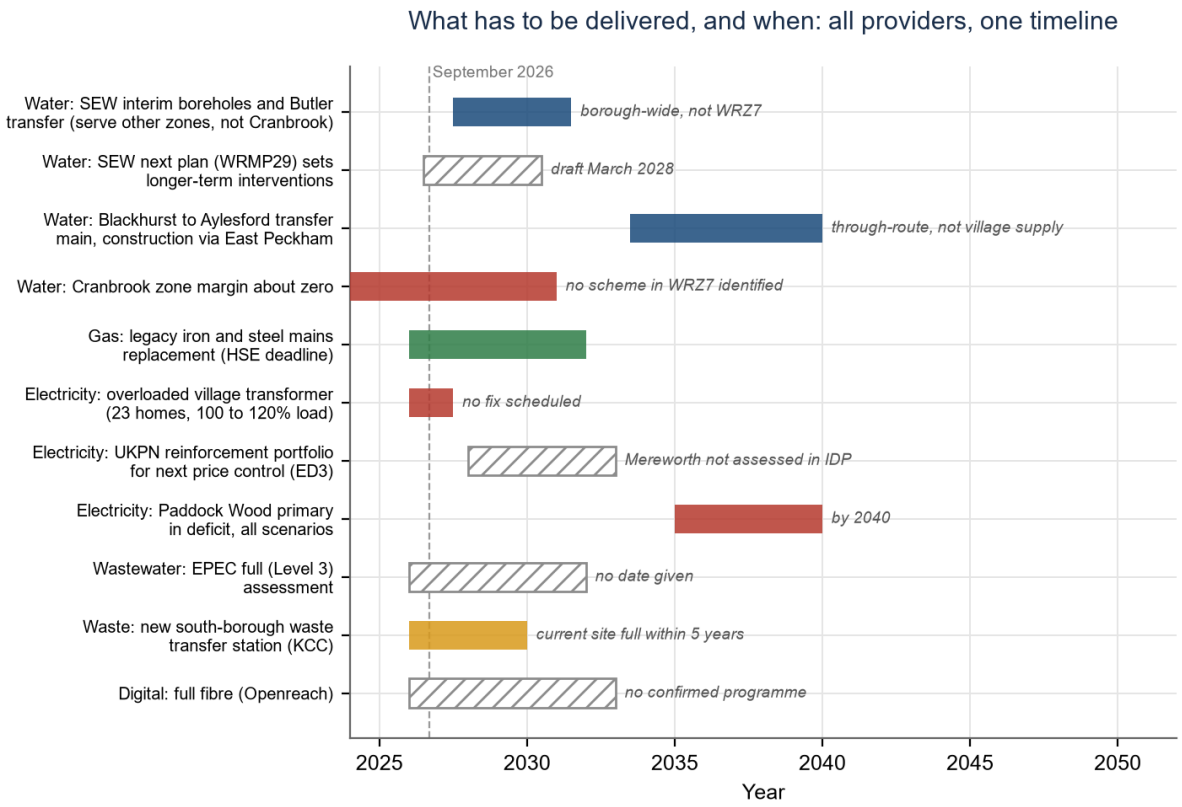


Figure 6: Planned and needed works across all providers (see Sections 3 to 8 for sources).

10.2 Overhead lines: more resilience means more digging

Most of the electricity network outside the village core runs overhead, and many telephone lines probably do too (Sections 6.5 and 7.5). Putting exposed lines underground would improve resilience to storms. It would also add more trenching in the same lanes and verges, so it should be planned alongside the other works, not separately.

10.3 A floodplain parish

The Regulation 19 Sustainability Appraisal records that “East Peckham has 612 dwellings at risk” of flooding from rivers. That is the highest figure it names for any settlement in the borough; Aylesford has 488 and Tonbridge 475. The village lies near the meeting of the River Medway, the River Bourne and the Coult Stream. The Borough Council’s flood risk assessment records two local defences:

- The East Peckham flood storage area on the Coult Stream, built in 2006, which can hold up to 90,000 cubic metres of water.
- Property flood resilience measures, which the Environment Agency installed at 119 properties in East Peckham and Little Mill in 2023.

Digging trenches for pipes, cables and ducts in ground with a high water table often needs pumping out and temporary works. Any work within 8 metres of the Coult Stream, a statutory Main River, also needs an Environment Agency flood risk activity permit. These requirements add time and cost to every buried scheme in the parish, not only the water main.

10.4 Ecology

The parish’s rivers already fail to reach good ecological status (Section 4.6). The Kent and Medway Local Nature Recovery Strategy (2025) sets freshwater priorities including river restoration, cleaner water and buffer strips. Allocation EP1 must avoid harm to three Local Wildlife Sites. One planned excavation along a verge can be designed around hedgerows, root zones and watercourse crossings. Several separate excavations over a decade multiply the disturbance to all of them.

10.5 Constraints inside the allocation sites

The Borough Council's evidence records two utility assets crossing EP1:

- An oil pipeline, with 23.2 per cent of the site inside its 25-metre buffer.
- A critical sewer rising main that cannot be built over or diverted without Southern Water's agreement.

The site criteria require both to be safeguarded. Whether the 156-home figure allows for the land lost to these easements is not stated.

10.6 Coordinating the works: what powers exist

Section 59 of the New Roads and Street Works Act 1991 places a duty on the highway authority, Kent County Council, to "use their best endeavours to co-ordinate" all works in its streets. The county council does this through the Kent Permit Scheme and regular coordination meetings with utility companies. Utility companies must use their best endeavours to cooperate, but they have no absolute duty to coordinate with each other. Policy INF1(15) of the Regulation 19 plan requires coordinated infrastructure delivery within phased developments. It does not deal with coordination between different providers' works in existing streets.

What this means for the Neighbourhood Development Plan

Street works coordination is a county council function, and much of it lies outside planning. The NDP could require major development in the parish to show how its utility connections have been coordinated with other known works in the same streets. The Parish Council could also ask Kent County Council to convene a joint coordination meeting with all the providers named in this paper, citing the flood and ecological constraints above.

11. EAST PECKHAM'S CROSS-BOUNDARY POSITION

Taken together, Sections 3 to 10 show that the capacity East Peckham relies on is shaped, and in several cases mainly used, by decisions outside Tonbridge and Malling. Even within the borough, the parish is often not the largest user of the infrastructure it depends on. This is not a criticism of the Borough Council. It means that a picture drawn from one council's plan alone is incomplete.

11.1 The authorities and providers involved

Organisation	How it affects East Peckham	Network
Tonbridge and Malling Borough Council	Local planning authority; waste collection; Kings Hill (same borough) is the largest user of the Mereworth substation	Planning, waste collection, electricity (indirectly)
Tunbridge Wells Borough Council	Paddock Wood and other allocations take the largest share of the Cranbrook water zone; Paddock Wood substation shared; North Farm waste sites are in the borough	Water, electricity, waste disposal
Maidstone Borough Council	Adopted plan (19,669 homes) accounts for most of the Maidstone water zone's planned growth; Yalding overflows 2.8 km away	Water (northern fringe), rivers
Ashford Borough Council	Tenterden draws on the Cranbrook zone, with up to 500 more homes proposed; Ashford's zone sets restrictions in the same drought area and is cutting its transfer to the Maidstone zone	Water supply and drought restrictions
Kent County Council	Waste disposal authority; highway authority coordinating street works	Waste, highways, street works

Organisation	How it affects East Peckham	Network
Utility providers (South East Water, Southern Water, SGN, UK Power Networks, Openreach and others)	Plan by zone, catchment or substation, not by council area	All networks

11.2 Why this matters

The village's water zone is mainly taken up by Paddock Wood and Tenterden growth. The interim water schemes serve other zones. Drought restrictions can be set by conditions in Ashford's zone. The Mereworth substation's largest user is Kings Hill, and the Paddock Wood substation must also serve Paddock Wood's growth. Waste goes to Tunbridge Wells facilities that will be full within five years. Each of these links is common on its own. Together they mean several of the parish's constraints cannot be resolved by the Borough Council acting alone.

The Regulation 19 plan recognises this principle. Policy INF1(3) requires infrastructure planning to consider developments "located in neighbouring local authorities which are served by the same infrastructure". The same pattern appears in schools and health care: the GP practice most parish residents use is in Paddock Wood, and the default secondary school has more first-preference applications than places. These are covered in Topic Paper 5 (Amenities and Services).

11.3 Summary of cross-boundary dependencies

Service	Provider	Where the pressure comes from	Effect on East Peckham
Water: village	South East Water	TWBC and Tenterden allocations: 33 to 35% of the zone's planned growth (up to 39% with Ashford's draft)	About zero spare to 2030/31; no new supply in the zone identified
Water: northern fringe	South East Water	Maidstone Borough adopted plan; import cut from Ashford zone	Near zero by 2033/34
Drought restrictions	South East Water	Eastern drought area includes Ashford's zone	Whole parish restricted together; ban in force since July 2026
Wastewater	Southern Water	Shared river system with Paddock Wood, Tonbridge and Yalding	Own system unassessed; rivers failing good status
Electricity: Mereworth	UK Power Networks	Kings Hill (TMBC) 43.4% of customers; around 1,300 more homes allocated	Deficit by 2040 in most scenarios; not assessed in IDP
Electricity: Paddock Wood	UK Power Networks	TWBC Paddock Wood growth	Deficit in all scenarios by 2040
Waste disposal	Kent County Council	Shared with Tunbridge Wells growth	Capacity reached within 5 years; replacement not sited

12. WHAT THIS MEANS FOR THE NEIGHBOURHOOD DEVELOPMENT PLAN

This section sets out options. It does not draft policy. For each issue it records what is already required elsewhere and what the NDP could add without repeating national or borough policy. It

also lists actions the Parish Council could take directly. Direct requests can often achieve more than a planning policy, because the providers' own programmes decide when capacity arrives.

12.1 The tests any NDP policy must pass

Under the August 2026 NPPF, an NDP policy must add something necessary and locally specific (PM6), must not restate national decision-making policy (PM6(1)(c)), and must not set standards already covered by the Building Regulations except where PM13 allows it. It must not lead to less development than the development plan provides for (PM5(2)). At examination it must also meet the basic conditions (PM17; Town and Country Planning Act 1990, Schedule 4B, paragraph 8). These include having regard to national policy and general conformity with the strategic policies of the development plan.

12.2 Options by topic

Topic	Already required by	What the NDP could add	Direct action
Water supply	Reg 19 INF1(9) and CC7; Building Regs Part G	Require evidence of supply within the Cranbrook zone specifically, and phasing linked to it	Ask SEW what supply supports the Cranbrook zone before the 2030s; ask the Borough Council to publish the Water Supply Study
Wastewater	Reg 19 INF1(9); EP1 criteria on critical sewers	Require evidence of treatment and network capacity for the EPEC system specifically	Ask Southern Water for Level 3 assessment of EPEC, citing the Horsmonden and Staplehurst precedent
Gas and heating	Future Homes Standard (from 24 March 2027)	Nothing further	None needed
Electricity	Reg 19 INF1(9); Building Regs Part S	Record the local transformer constraint as a parish-specific consideration for connections	Ask UKPN about transformer 1391419 and whether Mereworth is in its next reinforcement programme; ask about undergrounding exposed lines
Digital	Building Regs Part R; Reg 19 INF1(10); NPPF CO1	Encourage engagement with Trooli as well as Openreach; no ducting standard	Monitor the next Ofcom release and Openreach rollout map
Waste	IDP contributions; KCC as disposal authority	Little to add	None beyond monitoring
Street works coordination	NRSWA 1991 s.59 (KCC); Reg 19 INF1(15) within sites only	Require major development to show coordination with other known works in the same streets	Ask KCC to convene a joint coordination meeting with all providers
Flood and rivers	NPPF F-policies; Reg 19 CC8 and CC9; EA permits	Parish-specific evidence on works near the Coult Stream	None beyond existing channels

12.3 Questions this evidence raises for the Borough Council and providers

- Which water resource zone does the Borough Council consider EP1 and EP2 are supplied from, and what supply supports them before the late 2030s?
- When will the AtkinsRealis Water Supply Study be published, and what water savings does it assume from Policy CC7?
- Why is Mereworth primary substation not among the substations assessed in the IDP?

- What treatment and network capacity exists in the EPEC system for 228 more homes, and what is the EP2 sewer capacity assessment result?
- Does the 156-home figure for EP1 allow for the oil pipeline and sewer easements?
- Where will the replacement waste transfer station for the south of the borough be sited, and when?

APPENDIX A: WATER SUPPLY: SOUTH EAST WATER

Units are megalitres per day (Ml/d); 1 Ml/d is one million litres a day. “Homes equivalent” figures are the Parish Council’s own arithmetic using South East Water’s published water use per person and 2.4 people per home. They are not South East Water figures.

A.1 Cranbrook zone (SEWCB7): spare capacity by year

This is the zone that supplies the village and both allocation sites (Section 3.2).

Year	Spare capacity (Ml/d)	Homes equivalent at 188 litres per person per day
2024/25 to 2030/31	≈0.00	0
2035/36	+0.04	about 89
2040/41	+0.18	about 399
2045/46	+0.40	about 887
2049/50 (best point)	+0.44	about 975

Source: *South East Water, WRMP24 final plan statutory tables (October 2024), sheet SEWCB7, rows 36, 41 and 50; water use per person from WRMP24 Baseline Demand Forecast, Table 5.2.*

A.2 Maidstone zone (SEWMT6): spare capacity by year

This zone supplies only the northern fringe of the parish (Section 3.10). It is separate from A.1 and should not be added to it.

Year	Spare capacity (Ml/d)	Homes equivalent at 146 litres per person per day
2024/25	+23.79	about 67,100
2030/31	+3.29	about 9,280
2033/34 (lowest point)	+0.02	about 56
2035/36	+0.08	about 226
2049/50	+2.07	about 5,840

Source: *South East Water, WRMP24 final plan statutory tables, sheet SEWMT6, rows 36, 41 and 50; WRMP24 Sub-zonal Supply-Demand Balance Assessment, Table 5.2 (Hollingbourne import reduced from 12.7 to 4.4 Ml/d).*

A.3 Borough-wide shortfall and interim schemes (Section 3.5)

South East Water’s own comparison of the growth it planned for with the Borough Council’s latest trajectory, for the Tonbridge and Malling planning area as a whole.

Period	WRMP24 growth (properties)	TMBC trajectory (properties)	Effect on supply-demand balance, average (Ml/d)	Effect at peak (Ml/d)
Completions 2021/22 to 2024/25	2,754	2,138	+0.18	+0.21
by 2029/30	4,712	10,025	-1.71	-1.92
by 2034/35	5,992	17,201	-3.59	-4.04
by 2039/40	7,498	22,066	-4.66	-5.25
by 2041/42	8,157	22,896	-4.72	-5.31

Source: *South East Water, Planning Position and Options Statement to inform the Tonbridge and Malling Regulation 19 Local Plan 2024-42 (August 2026), Table 1 (TMBC evidence base document 48).*

Scheme	Zone served	Yield in IDP	Timing
Saints Hill borehole	Tunbridge Wells (WRZ1)	0.5 Ml/d	from 2027/28
Lilley Farm borehole (with Decoy Woods)	Tunbridge Wells (WRZ1)	0.5 Ml/d	from 2027/28
Transfer from Butler treatment works	Maidstone (WRZ6)	1.0 Ml/d	2028/29 to 2030/31
Bulk transfer from SES Water (Bough Beech to Riverhill)	Tunbridge Wells (WRZ1)	2.0 Ml/d	from 2038/39

Source: *TMBC Infrastructure Delivery Plan (August 2026), Utilities: Water Supply; zones from the SEW Position Statement, sections 5.3 to 5.6. South East Water gives larger possible yields for some schemes, noting that borehole yield is uncertain until drilled and tested. Funding depends on a provisional Growth Reopener submission to Ofwat.*

A.4 Housing allocations drawing on the Cranbrook zone (Section 3.3)

TWBC figures are summed at parish level from its allocation table, so that strategic-site lines already included in parish totals are not counted twice. The lower and upper figures reflect the ranges in that table.

Allocation	Authority	Homes	Status
Paddock Wood and east Capel	TWBC	2,817 to 2,975	Local Plan found sound, October 2025
Cranbrook and Sissinghurst	TWBC	453 to 467	As above
Hawkhurst, Horsmonden and smaller villages	TWBC	568 to 658	As above
Tenterden	ABC	about 625	Adopted 2019; delivery phased and incomplete (Section 3.4)
Total		4,463 to 4,725	33 to 35% of SEW's 25-year growth assumption for the zone (13,500 properties)
Tenterden, further draft allocation	ABC	up to 500	Draft Regulation 18, not confirmed; would raise the share to about 37 to 39%
Biddenden (excluded)	ABC	50	Zone not confirmed; excluded from all totals
East Peckham (for reference, not summed)	TMBC	228	Regulation 19 proposal (EP1 156, EP2 72)

Source: *Tunbridge Wells Borough Council Local Plan, Table 4 (Distribution of Housing Allocations) as amended by Main Modifications TWLP/152 (March 2025), and Inspector's Report (October 2025); TWBC Updated Housing Trajectory TWLP/157 (December 2024); Ashford Borough Council and Tenterden Town Council planning records (including appeal decision on application 21/00790/AS); Ashford draft Local Plan 2042, Regulation 18 (August to October 2025); SEW WRMP24 sheet SEWCB7 row 36.*

A.5 The only scheme naming East Peckham: Blackhurst to Aylesford transfer main

This main carries water between the Tonbridge area (WRZ1) and the Maidstone area (WRZ6). Neither is the village's own Cranbrook zone, so it adds nothing to the village's supply. It is listed because its construction would pass through the parish (Section 10).

Scheme	Route	Capacity	Status	First use	Cost
Blackhurst to Aylesford transfer main	WRZ1 to WRZ6, via East Peckham	4 Ml/d	Preferred	2039/40	£32.2m

Scheme	Route	Capacity	Status	First use	Cost
Additional storage at Blackhurst	With the above	5 Ml/d	Preferred	n/a	£3.1m

Source: *South East Water, WRMP24 Options Appraisal Summary and Feasible Options List (October 2024).*

A.6 Water use per person by zone

Zone	Litres per person per day
Cranbrook zone (village)	188.0, the highest of SEW's eight zones
Maidstone zone (northern fringe)	146.0 to 147.7
South East Water average	154.1

South East Water's methodology excludes leakage and business use from these figures. It attributes the Cranbrook figure mainly to garden and outdoor use: the zone's dry-summer peak factor (1.543) is the highest of the eight zones.

Source: *South East Water, WRMP24 Baseline Demand Forecast (October 2024), sections 5.1 to 5.3 and Table 5.2.*

A.7 Drought and water restrictions (Section 3.8)

Item	Detail
Drought area	Eastern drought management area: zones 6, 7 and 8 (Ashford); the most severely affected zone sets the status for the whole area
Stated level of service	Temporary use (hosepipe) ban no more than 1 in 10 years on average
Recorded bans	2022, 2023, 2025 (18 July 2025 to 5 February 2026, Kent region) and from 3 July 2026 (statutory notice, Kent region, until further notice). Coverage of East Peckham confirmed for 2025 and 2026 only
Zone 7 drought vulnerability assessment	Carried over from 2022: "the surplus in the supply-demand balance mitigates any risk"
Pre-prepared drought permits	Ardingly and Arlington (Sussex) only; the one Kent option (Lower Medway groundwater, 1.9 Ml/d) is not application-ready until December 2027
Status	Draft plan consulted 4 May to 6 August 2026; final plan not yet published. Appendices H, I, K, L and M withheld by SEW on security grounds

Source: *South East Water, Draft Drought Plan 2027 to 2032, Main Technical Report (May 2026): section 2.7 and Table 7 (drought areas), Table 2 (vulnerability assessment), Table 3 and Appendix B (level of service), Table 13 and section 4.4.1.1 (permits and options), section 1.8 and Appendix N; SEW statutory temporary use ban notice under Water Industry Act 1991 s.76, effective 3 July 2026.*

A.8 Regulatory and government statements

Document	Key content
SEW response to TMBC Regulation 18 (17 December 2025)	"We would be unable to accommodate any growth exceeding our WRMP24 forecast assumptions throughout the entire planning period"; WRZ1, WRZ6 and WRZ7 under "significant stress"; draft WRMP29 due March 2028
Defra and MHCLG joint letter to TMBC (received August 2026)	"Credible pathway to water supply for the plan while also recognising the limits of the reassurance"; regulators identified "significant and pervasive failings"; Ofwat undertakings include a £30.5 million remediation package
TMBC Full Council report (3 September 2026), paragraph 7.4	"Until further work is undertaken, the exact position on water supply cannot be confirmed"

Document	Key content
TMBC IDP (August 2026)	Water Supply Study conclusion quoted as surplus throughout the plan period; same section records that the surplus "drops away in the mid-2030s"
SEW Position Statement (August 2026)	2024/25 company leakage 104.8 Ml/d against WRMP target of 81 Ml/d
Drinking Water Inspectorate; Ofwat	"Systemic and repeated failings" following the November 2025 to January 2026 supply failures (Pembury, up to 24,000 homes); Ofwat licence investigation opened January 2026

Source: *Annexes 3 and 4 to TMBC report "Consideration of the draft Regulation 19 Local Plan" (3 September 2026); TMBC IDP (August 2026); SEW Position Statement (August 2026), paragraph 4.5; DWI and Ofwat findings as reported by Water Magazine (15 April 2026) and ITV News Meridian (15 January and 10 February 2026).*

APPENDIX B: WASTEWATER: SOUTHERN WATER

B.1 East Peckham system (EPEC): screening results

Measure	2020	2050
Risk of sewer flooding in a 1-in-50-year storm	Very Significant	Very Significant
Risk of flooding from hydraulic overload	Very Significant	Very Significant
Forecast growth in wastewater demand		+16% by 2035; +23% by 2050
Strategy	Improve	Improve
Population served	3,211	

Source: *Southern Water, Drainage and Wastewater Management Plan, Medway catchment (May 2023), Medway Wastewater Systems BRAVA Summary.*

B.2 East Peckham treatment works and the Hop Farm

Item	East Peckham WWTW	The Hop Farm
Operator	Southern Water	Kent Entertainment Ltd (private)
Permit	W00499 (version 8, modified 30 December 2025)	EPRAB3899AD (issued 20 February 2015)
Discharges to	Coult Stream	River Medway
Permitted storm overflow	None on record	None on record
Location note	Boyle Way, inside the parish	Postal address in Yalding; permitted discharge points inside the parish

Source: *Environment Agency, Consented Discharges to Controlled Waters with Conditions (permit register); Environment Agency Event Duration Monitoring, Storm Overflow Annual Return 2024 (name search). "None on record" means there is no public spill record, not that a discharge could never occur.*

B.3 Nearest monitored storm overflows (neighbouring systems, not EPEC)

Site	Distance	2024 spills	Long-term average	Duration 2024
Yalding Old Works (Maidstone)	2.8 km	63	54.2 a year	32 days 15 hours
Tatt Yalding (Maidstone)	3.3 km	37	19.8 a year	23 days 22 hours
Hartlake Road pumping station	3.3 km	11	2.9 a year	1 day 14 hours
Paddock Wood WTW (Tunbridge Wells)	4.3 km	39	24.5 a year	13 days 1 hour
Five Oak Green Road, Tudeley	6.3 km	40	35.2 a year	14 days 6 hours
Tonbridge WWTW	7.4 km	32	26.4 a year	18 days 21 hours
Priory Mill, Tonbridge	7.4 km	101	69.7 a year	57 days 19 hours
Cannon Lane, Tonbridge	7.4 km	72	56.6 a year	23 days 0 hours

Source: *Environment Agency, Event Duration Monitoring, Storm Overflow Annual Return 2024 (Southern Water). The 2024 England average was about 31 spills per monitored site.*

B.4 Neighbouring systems with full (Level 3) plans

System	Selected schemes	Cost	When
Paddock Wood	Increase treatment capacity (growth)	£4.0m	2025 to 2030
Paddock Wood	Reduce discharges at storm overflow	£9.2m	2040 to 2045
Tonbridge	Increase treatment capacity (major expansion)	£35.9m	2040 to 2045
Tonbridge	Storm reduction at Priory Mill and Cannon Lane	£3.2m and £3.6m	2025 to 2030
Horsmonden	Total identified investment (excluding one flood scheme still to be costed)	about £27.1m	Various

Source: *Southern Water DWMP Level 3 Wastewater System Plans: Paddock Wood (l3_pawd), Tonbridge (l3_tonb), Horsmonden (l3_hors), May 2023.*

B.5 Why Horsmonden and Staplehurst were assessed (Section 4.4)

Evidence	Detail
Screening tier	Horsmonden (7,766 people), Staplehurst (5,866) and EPEC (3,211) all rated “Low” concern
Southern Water policy	Level 3 went to the highest-risk systems “as well as some smaller ones that our partner organisations asked us to include”
Recorded request (19 May 2021)	A stakeholder asked why Horsmonden and Staplehurst were not ranked higher; Southern Water replied that they “have all been progressed”
East Peckham	Full search of the 88-page stakeholder register: no mention of “Peckham” or “EPEC”

Source: *Southern Water DWMP Regional Plan (final), page 5; Southern Water Medway DWMP Register of Stakeholder Comments.*

B.6 What the Regulation 19 evidence says

Item	Detail
IDP planned schemes to 2030	Tonbridge and Ham Hill growth schemes; none at East Peckham
IDP position on treatment capacity	Permit changes are “business-as-usual for Southern Water and not a ‘showstopper’ to new development”
EP1 (site 59782)	Wastewater network reinforcement, “Essential”, cost and timing to be confirmed, developer funded; critical sewer rising main crosses eastern part of site
EP2 (site 68376)	No site-specific wastewater row in the IDP delivery schedule

Source: *TMBC Infrastructure Delivery Plan (August 2026), Utilities: Wastewater; IDP Annex 1 delivery schedules, wastewater rows; TMBC Regulation 19 Draft Local Plan, Annex 6 criteria for EP1.*

B.7 River water quality (Section 4.6)

Water body	Reference	Ecological status	Chemical status
River Bourne (Medway)	GB106040018210	Poor	Fail
Mid Medway, Eden confluence to Yalding	GB106040018182	Moderate	Fail
Tudeley Brook	GB106040018120	Moderate	Fail

Source: *Environment Agency Catchment Data Explorer, South East River Basin Management Plan 2022 to 2027, retrieved 30 June 2026. Confidence of reaching good status by 2027 is Low for all three. The Coult Stream is a statutory Main River on the Environment Agency Main River Map.*

APPENDIX C: GAS: SGN

C.1 Gas pipes in the parish by decade laid

Decade	Segments	Notes
1920s	2	Steel mains, 106 years old
1940s	4	Cast iron
1950s	4	Cast iron
1960s	3	
1970s	3	
1980s	69	
1990s	77	Includes seven 250 mm intermediate-pressure steel mains laid in 1992
2000s	75	
2010s	109	
2020s	27	
Not recorded	1	
Total	374	27.7 km; 92.4% polyethylene, 7.6% older metal

Source: *SGN Open Data Portal, Distribution Pipe Network (Tonbridge and Malling and Maidstone extracts), downloaded June 2026; filtered to the parish boundary. Service pipes to individual homes are under-recorded in this data.*

C.2 Customer numbers by scenario (whole SGN network)

Year	Holistic Transition (net zero path)	Counterfactual (slower transition)
2031	-7%	+2%
2036	-29%	+1%
2041	-60% (3.8 million customers)	-12% (650,000 customers)

Source: *SGN RIIO-GD3 Business Plan 2026 to 2031 (submitted to Ofgem 11 December 2024), using NESO Future Energy Scenarios.*

C.3 Other SGN and TMBC findings

Item	Detail
Near-term demand	+8.6% over the next decade, recovering to pre-pandemic levels by 2028 (Long Term Development Statement 2025)
Major projects, South East zone	“None” in every category and pressure tier (LTDS 2025 workbook, tabs 10 and 11)
Wider-area demand (TN12 outcode)	189.4 GWh a year: domestic 68.5%, commercial 10.9%, industrial 20.6% (covers Paddock Wood and other villages)
Capacity for the allocations	SGN “have confirmed that there are no network capacity restraints” (TMBC IDP, August 2026)
New homes	Future Homes and Buildings Standards in force 24 March 2027, subject to transitional provisions, requiring low-carbon heating

Source: *SGN Long Term Development Statement 2025 and workbook; SGN Customer Demand dataset; TMBC Infrastructure Delivery Plan (August 2026), Utilities: Gas; MHCLG, Future Homes and Buildings Standards consultation response (March 2026).*

APPENDIX D: ELECTRICITY: UK POWER NETWORKS

Two different parts of the network

D.1 covers the 29 local transformers inside the parish, which connect directly to homes. D.2 to D.4 cover the primary substations that feed them and serve a much wider area. All 29 transformers were checked as inside the parish in three ways: UK Power Networks' own parish field, its own census-area field, and a map test against the parish boundary.

D.1 The 29 local transformers in the parish (most heavily loaded first)

Ref	Type	Rating	Customers	Utilisation	Headroom	Postcode
1391419	Pole	100 kVA	23	**100 to 120%**	-20 to 0%	n/a
1391451	Pole	50 kVA	13	**80 to 100%**	0 to 20%	n/a
1391439	Pole	100 kVA	65	**80 to 100%**	0 to 20%	n/a
1394642	Ground	100 kVA	14	60 to 80%	20 to 40%	TN12 5HZ
1391437	Pole	100 kVA	42	60 to 80%	20 to 40%	n/a
1393785	Pole	100 kVA	27	60 to 80%	20 to 40%	n/a
1400064	Ground	100 kVA	10	60 to 80%	20 to 40%	TN12 5LN
1391432	Ground	300 kVA	188	60 to 80%	20 to 40%	TN12 5EG
1391430	Ground	500 kVA	189	40 to 60%	40 to 60%	TN12 5HB
1393567	Ground	500 kVA	162	40 to 60%	40 to 60%	TN12 5PB
1393839	Ground	200 kVA	9	40 to 60%	40 to 60%	TN12 5NH
1391442	Pole	100 kVA	14	40 to 60%	40 to 60%	n/a
1391435	Ground	800 kVA	53	40 to 60%	40 to 60%	TN12 5HF
1391423	Ground	300 kVA	158	40 to 60%	40 to 60%	TN12 5HT
1391428	Ground	500 kVA	279	40 to 60%	40 to 60%	TN12 5AY
1391414	Pole	50 kVA	14	40 to 60%	40 to 60%	n/a
1391446	Pole	100 kVA	20	40 to 60%	40 to 60%	n/a
1391431	Ground	315 kVA	89	40 to 60%	40 to 60%	TN12 5EU
1391417	Pole	100 kVA	18	20 to 40%	60 to 80%	n/a
1443422	Pole	100 kVA	11	20 to 40%	60 to 80%	n/a (Paddock Wood feed)
1391434	Ground	750 kVA	9	20 to 40%	60 to 80%	TN12 5LG
1443431	Ground	500 kVA	8	20 to 40%	60 to 80%	TN12 6PY
1391418	Pole	100 kVA	14	20 to 40%	60 to 80%	n/a
1391396	Ground	315 kVA	16	20 to 40%	60 to 80%	TN12 5NF
1391424	Pole	100 kVA	30	20 to 40%	60 to 80%	n/a
1391427	Pole	315 kVA	9	0 to 20%	80 to 100%	n/a
1391415	Pole	200 kVA	16	0 to 20%	80 to 100%	TN12 5NA
1392652	Pole	200 kVA	18	0 to 20%	80 to 100%	n/a

Ref	Type	Rating	Customers	Utilisation	Headroom	Postcode
1391321	Pole	100 kVA	8	0 to 20%	80 to 100%	n/a

Totals: 29 transformers, 7,095 kVA, 1,526 customer connections; 16 pole-mounted (55%) and 13 ground-mounted. 28 are fed from Mereworth primary substation and one (1443422) from Paddock Wood. No reinforcement date is recorded for any of them.

Source: *UK Power Networks Open Data Portal, Secondary Sites and Secondary Site Utilisation datasets, exported 22 June 2026 (registered account). The portal is login-controlled, so these exports cannot be refreshed publicly; UK Power Networks updates the data twice a year.*

D.2 Mereworth primary substation (feeds 28 of 29)

Measure	Value
Location	Seven Mile Lane, Mereworth (site SPN-S000000008643)
Transformers	2 × 17.1 MVA (summer) / 20.1 MVA (winter)
Maximum demand	9.1 MVA summer / 12.9 MVA winter
Demand headroom today	+6.7 MW (39%)
Forecast	Positive to about 2035; deficit in 3 of 4 scenarios by 2040; deficit in all 4 by 2050 (-1.1 to -5.1 MW)
Export (generation) headroom, Holistic Transition scenario	+19.9 MW (2024), -20.3 MW (2040), -66.5 MW (2050)

Source: *UK Power Networks, Grid and Primary Sites dataset and DFES Network Scenario Headroom Report, exported 22 June 2026.*

D.3 Who else uses Mereworth

Area	Transformers	Customers	Share
Kings Hill	25	3,083	43.4%
East Peckham	28	1,515	21.3%
11 other parishes (Mereworth, West Malling, Plaxtol, West Peckham, Wateringbury, Ightham, Hadlow, Nettlestead, Platt, Offham, Shipbourne)	74	2,502	35.3%
Total	127	7,100	100%

The Regulation 19 plan allocates around 1,300 homes at Land at Broadwater Farm, Kings Hill (KH1), plus 84 homes at KH2 and 254 homes on five existing office sites (KH3 to KH7). Whether each would connect through Mereworth is not confirmed.

Source: *UK Power Networks Secondary Sites dataset filtered by primary feeder (exported 22 June 2026, analysed 3 July 2026); TMBC Regulation 19 Draft Local Plan, Chapter 14, allocations KH1 to KH7.*

D.4 Paddock Wood primary substation (feeds 1 of 29)

Measure	Value
Transformers	2 × 16.70 MVA (summer) / 22.30 MVA (winter)
Maximum demand	9.5 MVA summer / 15.8 MVA winter
Demand headroom today	+6.4 MW (29%)
Forecast	Deficit in all 4 scenarios by 2040 (-2.1 to -4.2 MW); -4.2 to -8.0 MW by 2050

Source: *UK Power Networks, Grid and Primary Sites dataset and DFES Network Scenario Headroom Report (Paddock Wood 11kV), exported 22 June 2026.*

D.5 What the Borough Council's infrastructure plan assessed

Primary substation	IDP finding
Tonbridge East	Sufficient capacity
Townsend Hook	Sufficient capacity
Chatham West	Sufficient capacity
Wrotham Heath	Not expected to have sufficient capacity for the larger developments
Aylesford	Some spare capacity, but insufficient once all connected sites are counted
Mereworth	Listed as a primary site in the borough; not among the five assessed

Source: *TMBC Infrastructure Delivery Plan (August 2026), Utilities: Electricity. The IDP also states that "there are no load driven projects that are currently planned for delivery within Tonbridge and Malling borough" and that local circuit suitability has not been assessed.*

D.6 Low-carbon technology already connected, and how demand combines

Item	Value
EV charge points (parish census areas)	61 (461 kW)
Solar installations	86 (331 kW export)
Heat pumps	10 (77 across the Mereworth area)
Battery systems	22
EV diversity (UKPN standard EDS 08-5050, Table 7-2)	50% of full demand at up to 14 chargers on one asset, falling to 22% above 274
Heat pump diversity (UKPN innovation project, indicative)	About 43% retained at large pool sizes (about 1.7 kW per unit)

Source: *UK Power Networks, Low Carbon Technologies by LSOA dataset (exported 22 June 2026); UKPN Engineering Design Standard EDS 08-5050 v4.1 (November 2023); UKPN Neighbourhood Green project.*

D.7 Overhead lines and undergrounding

Finding	Detail
Parish asset mix	16 of 29 transformers pole-mounted, including all three at or above 80% utilisation
National research	"The main assets affected by wind are overhead lines through poles being blown over and trees falling on lines"; targeted undergrounding treated by all network operators as a low-regret measure in some cases
UKPN programme	Over 115 km of overhead line removed from protected landscapes in the South East since 2006, including over 25 km in the Kent Downs; funded by an Ofgem allowance limited to designated landscapes

Source: *Newcastle University and University of Manchester for DESNZ, Enhancing Resilience in UK Energy Networks (April 2024); Kent Downs National Landscape, undergrounding scheme information; UK Power Networks Annual Review 2023/24.*

APPENDIX E: DIGITAL CONNECTIVITY

All figures use the parish's 141 postcodes (136 in TN12 5, 2 in TN12 6, 4 in TN11 0 and 1 in ME18 5). Each postcode was checked against the parish boundary rather than taken from a whole postcode district.

E.1 Coverage by postcode

Measure	Value
Superfast (30 Mbit/s or more)	89.2%
Gigabit-capable	59.1% (57 postcodes at 100%, 43 at 0%)
Below the 10 Mbit/s universal service minimum	0%
No superfast at all	13 of 141 postcodes (about 9%)

E.2 Coverage by land area

Tier	Area	Share of parish
No superfast	565.9 ha	43.9%
Superfast only	292.5 ha	22.7%
Gigabit-capable	430.2 ha	33.4%
Total	1,288.6 ha	100%

Method: each postcode's area is approximated by the land nearer to it than to any other postcode, clipped to the parish boundary. The total matches the parish area, but the method is an approximation and the figures show the broad pattern rather than exact coverage.

E.3 Upload speeds by download band (parish census areas)

Download band	Average upload
10 to 30 Mbit/s	2.1 Mbit/s
30 to 100 Mbit/s (superfast)	14.9 Mbit/s
100 to 300 Mbit/s	120.1 Mbit/s
300 Mbit/s and above	320.9 Mbit/s

E.4 Comparisons and mobile

Measure	Value
Tonbridge and Malling: superfast / full fibre / gigabit-capable	96.6% / 75.2% / 83.8%
Rural England: gigabit-capable / full fibre	61% / 60%
Tonbridge constituency: indoor 4G from all four operators	74.5% (rural England 57%)
Tonbridge constituency: indoor voice from all four operators	81.2% (rural England 66%)
Tonbridge constituency: 5G outdoor, all four operators (high confidence)	18.7%
Working mainly from home, 2021 Census	East Peckham 34.7%; Tonbridge and Malling 37.0%; England 31.5%

Source: *Ofcom Connected Nations 2025 (reference date 1 July 2025): fixed broadband coverage by postcode and local authority, fixed broadband performance by Output Area, mobile coverage by parliamentary constituency, and England report; ONS Census 2021 table TS061. Mobile figures are Ofcom's modelled predictions, not measurements.*

E.5 Providers and rules

Item	Detail
Openreach	Rollout map (checked 26 June 2026): no confirmed plans to build full fibre on the East Peckham exchange under a major programme
Trooli	Full-fibre company registered at Branbridges Industrial Estate, East Peckham; build reported under way in East Peckham in 2020. Likely source of gigabit coverage, not confirmed by the company
Building Regulations Part R	In force 26 December 2022: gigabit-ready infrastructure in new homes; gigabit connection where available within a £2,000 per home cost cap
Overhead lines	About half of UK premises served by overhead cable (Ofcom, 2018); no legal requirement for new lines to be underground
Regulation 19 Policy INF1(10)	Early engagement with providers; high-speed broadband "with full fibre where available"

Source: *Openreach rollout map; Companies House; Kent Online (10 February 2020); Approved Document R (2022 edition); Ofcom Freedom of Information response ref. 1904536 (6 November 2024), citing Wholesale Local Access Market Review 2018; Electronic Communications Code (Communications Act 2003, Schedule 3A); TMBC Regulation 19 Draft Local Plan, Policy INF1.*

APPENDIX F: WASTE AND RECYCLING

F.1 Collection performance (Tonbridge and Malling)

Year	Residual waste per household (kg)	Recycling rate
2010/11	562.0	44.6%
2018/19	540.8	41.9%
2022/23	456.6	47.8%
2023/24	468.4	48.2%
2024/25	448.7	48.4%

Source: *DEFRA, Local Authority Collected Waste Management, Annual Results 2024/25, Tables 3 and 3a. England 42.0%; South East 45.7%.*

F.2 Disposal facilities

Facility	Position in the IDP
North Farm transfer station, Tunbridge Wells	Receives kerbside waste from the southern half of the borough; “predicted to be at capacity within the next 5 years”; cannot be expanded
North Farm recycling centre (HWRC)	Nearest centre for southern residents; expected to be at capacity within 5 years
New transfer station for the south of the borough	Essential; phasing 2030; cost to be confirmed; site to be identified in Tunbridge Wells or Tonbridge; East Peckham named among wards served
Developer contributions	£142.13 per home (transfer station) and £52.00 per home (recycling centre)

Source: *TMBC Infrastructure Delivery Plan (August 2026), section 6, and Annex 1 delivery schedule; Kent County Council Developer Contributions Guide, Appendix 18.*

F.3 Nearest recycling centres

Centre	Straight-line distance from East Peckham
North Farm, Tunbridge Wells	5.5 miles
Tovil, Maidstone	6.3 miles
Allington (Laverstoke Road, ME16 0LE)	7.1 miles

The IDP states there is no recycling centre within the borough. The national postcode directory places the Allington centre’s postcode in Tonbridge and Malling (Aylesford parish). The difference does not change which centre East Peckham residents are directed to.

Source: *Kent County Council, Household Waste Recycling Centres; distances by great-circle method from postcode centroids; ONS postcode directory via postcodes.io (retrieved September 2026).*

APPENDIX G: ACCESS TO SERVICES

Measure	Value
DfT Transport Connectivity Metric 2025: parish census areas	44.86 and 36.84 (population-weighted 40.72)
Same dataset, parish-level figure used in Topic Paper 6	45.05
Tonbridge and Malling average / England and Wales average	55.35 / about 64
Indices of Deprivation 2025, geographical barriers	Both census areas in the most isolated 20% of English neighbourhoods (deciles 1 and 2)
Beltring station, 2024/25	14,532 entries and exits (about 40 a day); no parking; unstaffed
Year-round bus services	Two; no evening or Sunday service

Source: *Department for Transport, Transport Connectivity Metric 2025; MHCLG, English Indices of Deprivation 2025, File 7; Office of Rail and Road, Estimates of Station Usage 2024/25; DfT Bus Open Data Service. Full detail in Topic Paper 6 (Transport and Connections).*

APPENDIX H: HOUSING STOCK AND ENERGY

H.1 Energy Performance Certificates (666 homes on the parish's 141 postcodes)

Band	Homes	Share
A	4	0.6%
B	63	9.5%
C	178	26.7%
D	265	39.8%
E	121	18.2%
F	29	4.4%
G	6	0.9%
D or below	421	63.2%
E, F or G	156	23.4%

Source: *MHCLG Energy Performance of Buildings Register (domestic), all certificates lodged for the 141 postcodes verified as inside the parish boundary. Not every home has a certificate.*

H.2 Heating fuel

Heating	Households (parish estimate)	Share
Mains gas only	965	71.4%
Two or more types	151	11.2%
Electric only	93	6.9%
Oil only	88	6.5%
Tank or bottled gas only	21	1.6%
No central heating	15	1.1%
Other	17	1.3%

Source: *ONS Census 2021, central heating (via Nomis), scaled from the two census areas to the parish.*

H.3 Fuel poverty and energy use

Measure	East Peckham	Tonbridge and Malling	England
Households in fuel poverty (2024)	about 9.6%	7.3%	9.9%
Electricity per household (kWh a year)	4,136	3,694	3,353
Gas per household (kWh a year)	12,243	11,697	11,391

Source: *DESNZ, Sub-regional fuel poverty statistics 2026 (2024 data), Table 4; DESNZ sub-national electricity and gas consumption statistics.*

APPENDIX I: SOURCES AND HOW TO CHECK THEM

Every figure in this paper comes from one of the sources below. Where the Parish Council has done its own calculation (for example, converting spare water capacity into homes, or checking postcodes against the parish boundary), the method is stated where the figure appears. The Parish Council holds local copies of each source, with download dates, and can provide references on request.

Topic	Publisher	Document or dataset	Date	Where to find it
Water	South East Water	Water Resources Management Plan 2024: final statutory tables, Technical Overview, Baseline Demand Forecast, Options Appraisal	October 2024	South East Water website, water resources plan pages
Water	South East Water	Response to TMBC Regulation 18 consultation	17 December 2025	Annex 3 to TMBC Full Council report, 3 September 2026
Water	South East Water	Planning Position and Options Statement (Regulation 19)	August 2026	TMBC Local Plan evidence base (document 48)
Water	Defra and MHCLG	Joint letter to TMBC on water supply	August 2026	Annex 4 to TMBC Full Council report
Water	South East Water	Draft Drought Plan 2027 to 2032 and appendices; temporary use ban notice	May 2026; 3 July 2026	South East Water website
Water	Tunbridge Wells BC; Ashford BC	Local Plan Table 4 and Main Modifications; housing trajectory TWLP/157; Ashford draft Local Plan 2042	2024 to 2025	Council websites and examination libraries
Wastewater	Southern Water	Drainage and Wastewater Management Plan: regional plan, Medway catchment, Level 3 plans, stakeholder register	2021 to 2023	Southern Water website, DWMP pages
Wastewater	Environment Agency	Permit register; Storm Overflow Annual Return 2024; Catchment Data Explorer; Main River Map	2024 to 2026	environment.data.gov.uk
Gas	SGN	Open data (pipe network, customer demand); Long Term Development Statement 2025; RIIO-GD3 Business Plan	2024 to 2026	SGN website and open data portal
Electricity	UK Power Networks	Secondary sites, utilisation, primary sites, DFES headroom report, low-carbon technologies; EDS 08-5050	Exported 22 June 2026	UKPN Open Data Portal (free registration required)

Topic	Publisher	Document or dataset	Date	Where to find it
Electricity	DESNZ (commissioned)	Enhancing Resilience in UK Energy Networks	April 2024	gov.uk
Digital	Ofcom	Connected Nations 2025 data and reports; FOI response 1904536	July 2025; November 2024	ofcom.org.uk
Digital	Openreach; MHCLG	Full fibre rollout map; Approved Document R (2022)	2022 to 2026	openreach.com; gov.uk
Waste	DEFRA; KCC	Local authority waste statistics 2024/25; Developer Contributions Guide	2025 to 2026	gov.uk; kent.gov.uk
Planning	TMBC	Regulation 19 Draft Local Plan 2024 to 2042; Infrastructure Delivery Plan and Annex 1; Sustainability Appraisal; Strategic Flood Risk Assessment; Land Availability Assessment 2026; Full Council report	August to September 2026	tmbc.gov.uk, Local Plan pages
Planning	MHCLG	National Planning Policy Framework (August 2026 and December 2024 editions); Future Homes and Buildings Standards response	2024 to 2026	gov.uk
Street works	UK legislation; KCC	New Roads and Street Works Act 1991, section 59; Kent Permit Scheme	1991; 2015	legislation.gov.uk; kent.gov.uk
Planning application	TMBC planning register	TM/26/01252/FL (64 homes, Church Lane): potable water note; consultee responses	June to August 2026	TMBC planning portal
Census and statistics	ONS; DfT; MHCLG; DESNZ	Census 2021; Transport Connectivity Metric 2025; Indices of Deprivation 2025; fuel poverty and energy statistics; EPC register	2021 to 2026	nomisweb.co.uk; gov.uk; epc.opendatacommunities.org
Cross-reference	East Peckham NDP	Topic Paper 5 (Amenities and Services); Topic Paper 6 (Transport and Connections)	2026	East Peckham NDP website