

GOLDEN RULES FOR REGULATION 19 REPRESENTATIONS

How to write an effective representation to the Planning Inspector

The Planning Inspector is not asking...

- ✗ "Do you like this development?"
- ✗ "Would it spoil your view?"
- ✗ "Would you rather it was built somewhere else?"

The Inspector is asking:

Is this Local Plan legally compliant and sound?

Everything you write should help answer that question.

1. Evidence always beats opinion

Instead of writing:

✗ "This development will be a disaster."

Write:

✓ "The Council has not demonstrated that sufficient water infrastructure exists to support this allocation."

Planning Inspectors deal in evidence—not emotion.

2. Always explain WHY

Don't just say:

✗ "Traffic will be terrible."

Explain:

- ✓ Why.
- ✓ Where.
- ✓ What evidence supports this.

Example:

Junction 3 already experiences congestion. The Local Plan has not demonstrated that the additional traffic generated by this allocation can be accommodated without severe impacts.

3. Quote evidence whenever possible

Good evidence includes:

- Sevenoaks District Council evidence base
- Infrastructure Delivery Plan
- Water Cycle Study
- Strategic Flood Risk Assessment
- National Landscape evidence
- Natural England
- Environment Agency
- Thames Water
- National Highways

- Local Transport Assessments

The more you can refer to published evidence, the stronger your representation.

4. Avoid emotional language

Avoid words such as:

- ✗ disastrous
- ✗ catastrophic
- ✗ shocking
- ✗ outrageous
- ✗ ridiculous
- ✗ unacceptable

Instead write:

- ✓ significant
- ✓ substantial
- ✓ harmful
- ✓ unsupported
- ✓ inconsistent
- ✓ not demonstrated
- ✓ not justified

These are planning terms.

5. Don't guess

Avoid statements like:

- ✗ "There will probably be..."
- ✗ "It must be..."
- ✗ "Surely..."

If you don't know, say:

"The Local Plan has not demonstrated..."

or

"The evidence does not explain..."

That is much stronger.

6. Keep asking one question

Throughout your submission ask:

Has the Council proved this?

If the answer is no...

Say so.

For example:

Has the Council demonstrated:

- ☐ enough water?
- ☐ enough sewage capacity?
- ☐ highways work?
- ☐ flood safety?
- ☐ biodiversity?
- ☐ Green Belt justification?
- ☐ deliverability?

7. Focus on planning issues

Relevant issues include:

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- ✓ Green Belt
- ✓ National Landscape
- ✓ Flooding
- ✓ Water supply
- ✓ Sewage
- ✓ Ecology
- ✓ Heritage
- ✓ Air quality
- ✓ Highways
- ✓ Infrastructure
- ✓ Deliverability
- ✓ Soundness

Less weight is given to:

- ✗ House prices
- ✗ Personal dislike
- ✗ Loss of private views
- ✗ General politics
- ✗ Who owns the land

8. Explain the consequence

Don't stop at saying something is wrong.

Explain why it matters.

Example:

"The Water Cycle Study identifies existing water stress. The Local Plan does not demonstrate how additional demand from this allocation can be met without adverse environmental effects."

9. Be specific

Avoid:

✗ "Wildlife will suffer."

Instead:

✓ "The allocation would affect ecological connectivity between the Kent Downs National Landscape and the River Darent corridor."

Specific always carries more weight.

10. Support every claim

For every statement ask yourself:

How do I know this?

Can I point to:

- a report?
- a policy?
- a statutory consultee?
- published evidence?
- a map?
- photographs?

If not, reconsider whether to include it.

11. Write professionally

The strongest representations read like expert reports.

Imagine the Inspector reading hundreds of submissions.

The calm, evidence-based one will stand out.

12. Finish with the planning conclusion

Don't simply finish by saying:

✗ "Please reject this site."

Instead conclude:

For the reasons set out above, the allocation has not been demonstrated to be justified, effective or consistent with national planning policy. The site should therefore be removed from the Local Plan.

Common mistakes

- ✗ Too emotional
- ✗ No evidence
- ✗ Repeating Facebook rumours
- ✗ Making assumptions
- ✗ Long personal stories
- ✗ Speculation
- ✗ Political arguments

What carries the greatest weight?

- ★★★★★ Statutory consultee evidence
- ★★★★★ Council's own evidence base
- ★★★★★ National planning policy
- ★★★★★ Technical reports
- ★★★★★ Local knowledge supported by evidence
- ★★★ Personal opinion
- ★ Social media claims or rumours

Final thought

The Planning Inspector is not looking for the loudest objection—they are looking for the best evidenced one.

A clear, factual, well-referenced representation will always carry more weight than an emotional one.