

Comment

Consultee [REDACTED] (1279144)
Email Address [REDACTED]
Address
Event Name CSR Main Modifications
Comment by [REDACTED] (1279144)
Comment ID 1
Response Date 10/5/21 8:12 AM
Consultation Point Table MM09.01 ([View](#))
Status Processed
Submission Type Web
Version 0.3

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

KCC Highways supports the amendment to the policy regarding the monitor and manage approach. The exact details of this approach will be confirmed as part of KCC's response to the proposed amendments to the planning application in due course and then secured through a Section 106 Legal Agreement with the District Council

Comment

	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
Event Name	CSR Main Modifications
Comment by	[REDACTED] (333026)
Comment ID	2
Response Date	10/7/21 1:44 PM
Consultation Point	Table MM19.03 (View)
Status	Processed
Submission Type	Email
Version	0.3

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

The layout for traffic to turn into Pottons is dangerous, the traffic coming from Folkestone come round a blind bend at Grove House, and a car park for the Dukes head Pub. There is a lot more traffic at these points with the new estates, which will have accidents. There is not enough room on the road or pavements to cope.

In the Daily Telegraph today 4.10.21:

Oliver Dowden vows to protect the countryside from ugly developments after Michael Gove pressed pause on the controversial Planning Bill. Otterpool is not wanted or needed . Several ugly developments have already happened in Sellindge and now is the time to stop and rethink before any more damage is done to our green spaces.

The prime minister says that no more building must be built on green fields. Please take note. No more housing in Sellindge and Otterpool.

Comment

Consultee [REDACTED] (333026)

Email Address [REDACTED]

Address [REDACTED]

Event Name CSR Main Modifications

Comment by [REDACTED] (333026)

Comment ID 3

Response Date 10/7/21 1:59 PM

Consultation Point Table MM06.01 ([View](#))

Status Processed

Submission Type Email

Version 0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

In the Daily Telegraph today 4.10.21

Oliver Dowden vows to protect the countryside from ugly developments after Michael Gove pressed pause on the controversial Planning Bill. Otterpool is not wanted or needed . Several ugly developments have already happened in Sellindge and now is the time to stop and rethink before any more damage is done to our green spaces.

The prime minister says that no more building must be built on green fields. Please take note. No more housing in Sellindge and Otterpool.

Comment

Consultee [REDACTED] 279506)

Email Address [REDACTED]

Address [REDACTED]

Event Name CSR Main Modifications

Comment by [REDACTED] 1279506)

Comment ID 4

Response Date 10/7/21 2:09 PM

Consultation Point Table MM01.02 ([View](#))

Status Processed

Submission Type Email

Version 0.3

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Proposed NEW PARA in MM01 commences:

“The Nuclear Decommissioning Authority is expected to announce its decision on whether this approach will be adopted for Dungeness A in the near term. EDF’s Dungeness B station is expected to continue generating electricity until 2028, following which it will be decommissioned over a lengthy period.”

This is inaccurate, and it follows that it makes the rest of the paragraph incorrect as well.

EDF Energy announced in June that Dungeness B has now ceased generation, and is being defueled. <https://www.edfenergy.com/media-centre/news-releases/edf-decides-movedungeness-b-defuelling-phase>

It has not generated electricity since September 2018, and never will again. The proposed modification is, therefore, not in any way true.

Please set out what changes to the proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

What change(s) you consider necessary:

Do not insert new paragraph. Alternatively amend it to reflect the reality that Dungeness B will not generate electricity again, is in the defuelling stage, and that that will impact the jobs profile there earlier rather than later.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate?

No, I do not wish to participate at the public hearings

Comment

Consultee	[REDACTED] (1279947)
Email Address	[REDACTED]
Company / Organization	Affinity Water Ltd
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Affinity Water Ltd [REDACTED] - 1279947)
Comment ID	5
Response Date	10/12/21 9:34 AM
Consultation Point	Table MM16.04 (View)
Status	Processed
Submission Type	Email
Version	0.3

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Thank you for the opportunity to comment on the Main Modifications to the Folkstone & Hythe Core Strategy Review.

We have no comments regarding the Main Modifications proposed, however the water efficiency requirements for new developments set out within the Plan are welcomed.

Aside from the mechanisms designed into developments to improve water efficiency, we are currently exploring methods to improve water efficiency within these schemes post-occupation. Improving awareness and understanding amongst the occupants and users of new developments regarding the importance of efficient water use is one of the key tools available to achieve this. We would be pleased to work with local authorities on this matter.

It is expected that the methods used to monitor performance against the water consumption target will be determined by the local authority. This target should be implemented for all new developments.

Comment

Consultee [REDACTED] (1032113)
Email Address [REDACTED]
Address Kent Downs AONB
[REDACTED]
[REDACTED]
Event Name CSR Main Modifications
Comment by [REDACTED] (1032113)
Comment ID 6
Response Date 11/5/21 3:43 PM
Consultation Point Table MM15.03 ([View](#))
Status Processed
Submission Type Web
Version 0.2

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

We would raise a fundamental concern regarding the regularities of the proposed Main Modification MM15 and specifically the changes proposed labelled as 2 iv. The Modification proposes significant and fundamental alterations to the policy wording which do not appear to be put forward at the request of the Inspectors, nor have the proposed changes been the subject of any scrutiny as part of the Local Plan examination process, nor were they included in the Modifications submitted to the Inspectors in June 2021 (FHDC EX124).

Notwithstanding these procedural concerns, we consider the proposed wording to not be compliant with the NPPF in respect of AONB policy. Here, at paragraph 176 (previously paragraph 172), AONBs (along with National Parks) are placed in a special category of protection, requiring *great weight* to be afforded to them; this is only applied to a small number of other interests in the NPPF and places the conservation of the landscape and scenic beauty of an AONB into a special category of material consideration. This was addressed in the original wording of the policy with the requirement for conservation and enhancement of the AONB to *'take priority over other planning considerations'*. The proposed removal of this wording and reliance on planning decisions *'having close regard to the need for conservation and enhancement'* of the AONB provides a reduced level of protection to the Kent Downs AONBs that is not consistent with national policy.

The AONB Unit therefore strongly objects to this Modification.

Please set out what changes to the proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

What change(s) you consider necessary:

The wording should be amended to more accurately reflect the NPPF with reference to 'great weight' being included or retaining the current wording 'which will take priority over other planning considerations'.

Comment

Agent	[REDACTED] (1298034)
Email Address	[REDACTED]
Company / Organization	Avison Young
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Nuclear Decommissioning Authority (1204443)
Address	Not Given Not given Not Given
Event Name	CSR Main Modifications
Comment by	Nuclear Decommissioning Authority (1204443)
Comment ID	7
Response Date	11/8/21 1:44 PM
Consultation Point	Table MM01.02 (View)
Status	Processed
Submission Type	Email
Version	0.4

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

The Nuclear Decommissioning Authority would like to register their support in relation to proposed Main Modification MM01 of the Folkestone & Hythe Core Strategy Review.

Discussions between the NDA and Local Authority have been productive in the inclusion of appropriately worded policy text relating to decommissioning of Dungeness A Power Station within the emerging Policy documentation. The NDA reserve the right to make further comment in relation to other policy documents such as future iterations of the Place and Policies Local Plan in due course.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate? No, I do not wish to participate at the public hearings

Comment

Consultee [REDACTED] (1165852)

Email Address [REDACTED]

Company / Organization Southern Water

Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Southern Water ([REDACTED] - 1165852)

Comment ID 8

Response Date 11/10/21 1:25 PM

Consultation Point Table MM01.01 ([View](#))

Status Processed

Submission Type Email

Version 0.3

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Thank you for notifying Southern Water of the consultation on the Main Modifications of the Folkestone & Hythe Core Strategy Review. I confirm we have reviewed the proposed modifications and have no comments to make on this occasion.

We look forward to being kept informed of the Strategy's progress.

Comment

Consultee	██████████ (1042306)
Email Address	██
Company / Organization	Historic England
Address	n/a n/a n/a
Event Name	CSR Main Modifications
Comment by	Historic England (██████████ - 1042306)
Comment ID	9
Response Date	11/11/21 1:30 PM
Consultation Point	Table MM03.02 (View)
Status	Processed
Submission Type	Email
Version	0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and welcomes the opportunity to comment upon this key planning document.

MM3 - Policy SS3 Place-shaping and Sustainable Settlements Strategy

Sub-section d) - There is no legal or national policy support for the term 'wherever possible' and this should be removed from the policy wording; the requirement to preserve and enhance heritage assets is an absolute statutory duty (ref. Planning (Listed Buildings and Conservation Areas) Act 1990) and should not be qualified.

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan which may, in overview, have adverse effects on the historic environment.

Comment

Consultee [REDACTED] (1298446)
Email Address [REDACTED]
Address
Event Name CSR Main Modifications
Comment by [REDACTED] (1298446)
Comment ID 13
Response Date 11/14/21 7:10 PM
Consultation Point Table MM06.02 ([View](#))
Status Processed
Submission Type Web
Version 0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

The section "Other phases coming forward where they are well connected to an existing primary village" there is no mention of ensuring that these primary villages must also be supported and have the necessary infrastructure, ensuring they are not overwhelmed by these proposed phases of development. Traffic calming, footpaths and cycle paths to and from these primary villages must be in place before development is started.

This should link in with MM07 Policy SS7: New Garden Settlement – Place-Shaping Principles Policy SS7 New Garden Settlement – Place Shaping Principles.

Point H: The nearby communities of Lypne, Barrow Hill, Sellindge, Westenhanger, Saltwood, Stanford and Postling should have appropriate access to and benefit from the infrastructure provided.

Sellindge is shown as a key Village Community Hub in the Core Strategy. The Otterpool garden development (MM06, Policy SS6) and the phase to the West of Otterpool Lane, clearly is expected to use Sellindge village as a community hub, though to access these services, the A20 Barrow Hill is the only road, cycle and foot path access between these separate communities. The M20 motorway and both rail links, are a barrier, which prevents any other access. Due to this, The A20 Barrow Hill, should be prioritised for speed reduction and road traffic calming, with improved foot and cycle access linking both the existing community hub to these proposed new phased developments and Westenhanger.

Comment

Consultee	██████████ (1298446)
Email Address	████████████████████
Address	
Event Name	CSR Main Modifications
Comment by	██████████ (1298446)
Comment ID	14
Response Date	11/14/21 7:14 PM
Consultation Point	Table MM07.02 (View)
Status	Processed
Submission Type	Web
Version	0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

This policy should not just cover Lympne, but also other current existing village communities in this area, particularly Barrow Hill Sellindge, where on either side of these existing houses there is planned extensive housing development as part of the garden development to the West Of Otterpool Town. The current plan does not have sufficient landscaping character to prevent the coalescence between the new proposed development and Sellindge Barrow Hill community.

Comment

Consultee	██████████ (1298446)
Email Address	████████████████████
Address	
Event Name	CSR Main Modifications
Comment by	██████████ (1298446)
Comment ID	15
Response Date	11/14/21 7:18 PM
Consultation Point	Table MM09.02 (View)
Status	Processed
Submission Type	Web
Version	0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

It is imperative that Sellindge and particularly the area of the A20 Barrow Hill has this investment in infrastructure, to ensure the safe connectivity by pedestrian, cyclists and vehicles, between these proposed new phases of development from these garden settlements, linking them to Sellindge which is intended to be a Key Community Village hub. If the A20 is intended to have safe foot and cycle lanes, then the stretch of the A20 at Barrow Hill must have this infrastructure also.

Comment

Consultee	[REDACTED] (1298446)
Email Address	[REDACTED]
Address	
Event Name	CSR Main Modifications
Comment by	[REDACTED] (1298446)
Comment ID	16
Response Date	11/14/21 7:30 PM
Consultation Point	Table MM19.03 (View)
Status	Processed
Submission Type	Web
Version	0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

This should link into our other comments regarding the Core Strategy in particular linking CSD9 infrastructure to MM09 Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management Policy SS9 New Garden Settlement – Infrastructure, Delivery, Phasing and Management (1) Delivery of infrastructure and phasing.

The Sellindge strategy and the Garden Town development are so interlinked and geographically close, that the funding for infrastructure must allow for the safe and systematic connectivity between these communities via the A20, for pedestrian and cyclists as well as vehicle and public transport.

This is especially important as in this document main modifications, in policy CSD9, Sellindge Strategy (points “2 h” and “3 c”) removed key important public footpath and cycle infrastructure between Sellindge and Westenhanger Station. This appears to go against the infrastructure, delivery and management policy SS9, New Settlement and the phasing of these developments, which will require to use the existing village community hubs (Sellindge) to access key facilities with in the village of Sellindge.

By removing these points, the safe footpath access and cycle access to Westenhanger station from Sellindge is completely removed. These points which are being removed are as follows:

CSD9, point 2. h: The eastorn development are will provide improved pedestrian and cyscle access along the northern boundary (public Right of Way HE273).

CSD9, point 3. c: Both phases of the development shall, contribute to the provision of a safe, lit surfaced cycle and pedestrian access to Westenhanger station from Sellindge through the upgrade of existing bridleways and public rights of way (HE217A and HE274).

By removing these two sections, the A20 Barrow Hill is the only pedestrian and cycle access, which is not safe and fit for purpose. Cycling on the A20 road is dangerous, with HGV traffic travelling to Otterpool industrial Estate. For this reason, no adult or child would consider it safe to take on this gauntlet and put their lives at risk cycling from Sellindge & Barrow Hill along the A20. This will be the same for anyone leaving in the proposed new Otterpool Town development, who are expected in the initial stages to access the facilities of Sellindge community hub.

If these pedestrian and cycle public right of way improvements are to be removed, then a priority must be to extending traffic calming measures along the A20, including Barrow Hill to incorporate a cycle and improved pedestrian path, as has been done as part of the recent traffic calming measures in Sellindge village. This green transport connectivity link along the A20 Barrow Hill should be incorporated at this early stages into the core strategy to ensure this safe link between policy SCD9 community and the proposed new communities within the phases of the garden settlements. This is especially needed now that the above points have been removed from the CSD9 plan.

Comment

Consultee	[REDACTED] (347301)
Email Address	[REDACTED]
Company / Organization	Sellindge District Residents Association
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Sellindge District Residents Association [REDACTED] - 347301)
Comment ID	22
Response Date	11/15/21 4:30 PM
Consultation Point	Table MM01.01 (View)
Status	Processed
Submission Type	Web
Version	0.4
Please state whether you are:	Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Policy SS01. The phrase “designed to avoid or minimise adverse impact on the AONB”, simply put, says nothing, there is no quantitative or qualitative aspect to the words. This provides meaningless protection.

Comment

Consultee	[REDACTED] (347301)
Email Address	[REDACTED]
Company / Organization	Sellindge District Residents Association
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Sellindge District Residents Association [REDACTED] - 347301)
Comment ID	23
Response Date	11/15/21 4:31 PM
Consultation Point	Table MM02.01 (View)
Status	Processed
Submission Type	Web
Version	0.4
Please state whether you are:	Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

4.43Where a single major strategic project is intended to provide the greatest portion of proposed new housing it is inevitable that the rate of provision will vary so identifying a range of phase to provision seems entirely appropriate. However in truth this is not much more than a mathematical equation since we also know that projected housing need will also be a major variable driven by national policy as well as local need. The numeric adjustments that are implied by this new policy paragraph within SS2 must also be reflected in policies to do with the phased provision of any major new settlement, such that as demand and elements alter then the provided project must make sense at any given point in its development, and to have within it rational provision for the cessation of development.

I.e, these developments must make cogent sense at every step of the way and not appear as scattergun developments.This policy should not be used as an excuse to allow development outside the confines of any proposed major development as an alternative.

Comment

Consultee	[REDACTED] (347301)
Email Address	[REDACTED]
Company / Organization	Sellindge District Residents Association
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Sellindge District Residents Association ([REDACTED] - 347301)
Comment ID	24
Response Date	11/15/21 4:33 PM
Consultation Point	Table MM03.02 (View)
Status	Processed
Submission Type	Web
Version	0.4
Please state whether you are:	Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

MM03The amendments to policy SS3 at sub-paragraph 'a' are welcomed, but what will be more welcome is an actual implementation that is consistent across the whole district. The notion of proportionality of alterations within an area , an organic evolution of place, and the character and community of that place is so important.

Comment

Consultee [REDACTED] (347301)

Email Address [REDACTED]

Company / Organization Sellindge District Residents Association

Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Sellindge District Residents Association ([REDACTED] - 347301)

Comment ID 25

Response Date 11/15/21 4:34 PM

Consultation Point Table MM05 ([View](#))

Status Processed

Submission Type Web

Version 0.5

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

MM05

The amendments at item 3C and item 4 should also include a requirement to consider the impact on at the very least adjacent areas where these will be affected by proposals of any substance. The application of CIL payments or similar contributions/provisions should not be limited to the promoting project alone.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate? Yes, I wish to participate at the public hearings

Comment

Consultee	[REDACTED] (347301)
Email Address	[REDACTED]
Company / Organization	Sellindge District Residents Association
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Sellindge District Residents Association [REDACTED] - 347301)
Comment ID	26
Response Date	11/15/21 4:36 PM
Consultation Point	Table MM06.01 (View)
Status	Processed
Submission Type	Web
Version	0.5

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Policy SS6 Whilst the amended text emphasises landscape-led proposals, it does little to assist in setting any measurable value as to what would be considered sufficiently minimal adverse impact on the AONB. This judgement will be largely an aesthetic opinion that should not be undermined simply on the basis of some financial equation. Just who is to be the arbiter in these circumstances?

Comment

Consultee	[REDACTED] (347301)
Email Address	[REDACTED]
Company / Organization	Sellindge District Residents Association
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Sellindge District Residents Association ([REDACTED] - 347301)
Comment ID	27
Response Date	11/15/21 4:37 PM
Consultation Point	Table MM07.02 (View)
Status	Processed
Submission Type	Web
Version	0.5

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

SS7 (1)aAdvanced landscape implementation is of course welcome. This emphasises the need for a clear long-term landscape master plan that should be protected from future change. If there is anything that a core strategy long-term plan should offer existing communities it is a long-term vision.

Comment

Consultee [REDACTED] (347301)

Email Address [REDACTED]

Company / Organization Sellindge District Residents Association

Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Sellindge District Residents Association ([REDACTED] - 347301)

Comment ID 28

Response Date 11/15/21 4:37 PM

Consultation Point Table MM08 ([View](#))

Status Processed

Submission Type Web

Version 0.5

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

MM08

SS8 (1)b

Of all the modifications made to the core strategy document the amendments that increased the proposed maximum usage of water from 90 to 110 L per person et cetera is amongst the most disappointing of all. Excepting that enforcement might well be difficult, there is no question in an area of water scarcity that reducing consumption must be prioritised. If the changes made because there is some greater authority on this matter then the inclusion of a number here is irrelevant. If there is no greater authority then why not retain 90 as the maximum usage figure. The introduction of economies and efficiencies in water utilisation surely falls within the boundaries of the climate emergency that Folkestone and Hythe district Council has already declared.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate? Yes, I wish to participate at the public hearings

Comment

Consultee	[REDACTED] (347301)
Email Address	[REDACTED]
Company / Organization	Sellindge District Residents Association
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Sellindge District Residents Association ([REDACTED] - 347301)
Comment ID	29
Response Date	11/15/21 4:39 PM
Consultation Point	Table MM09.01 (View)
Status	Processed
Submission Type	Web
Version	0.5
Please state whether you are:	Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

4.190History would suggest that early provision of infrastructure in all its forms is rarely satisfactorily achieved in development of scale, there are always delays and “reasons” why things are not implemented at an early stage. The notion of infrastructure first has always been a core principle behind all of the presentations of the new garden settlement to the community, and it is one which is most expected to be fulfilled. If it is not fulfilled the existing communities suffer. Taking highways impacts in particular the express aim of watch and wait is concerning, as the probable impacts are highly predictable. Local history of several developments in this locality is that they all promised an idea that all traffic would head to junction nine. Local experience is that this doesn’t happen.

If watch and wait is to be the adopted practice then it must be accompanied by rapid reactions to what we considered to be the inevitable, with immediate interventions.

Locally, little distinction is drawn between how motorways, trunk roads, A and B roads are managed or invigilated. The vehicles are all the same. Policies for the new garden settlement and the proposals in CSD9 for Sellindge are unclear on how the impacts on the existing settlement and community will be mitigated.

Comment

Consultee	[REDACTED] (347301)
Email Address	[REDACTED]
Company / Organization	Sellindge District Residents Association
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Sellindge District Residents Association ([REDACTED] - 347301)
Comment ID	30
Response Date	11/15/21 4:40 PM
Consultation Point	Table MM12.01 (View)
Status	Processed
Submission Type	Web
Version	0.7
Please state whether you are:	Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

CSD1The proposal for site specific viability assessments to be provided as a mechanism for reducing affordable housing provision should be defined as something to be considered in exceptional circumstances and not as the rule. "Reasonable satisfaction" is too weak a definition, The justification should be much stronger, and particularly so for larger developments.

Comment

Consultee	[REDACTED] (347301)
Email Address	[REDACTED]
Company / Organization	Sellindge District Residents Association
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Sellindge District Residents Association ([REDACTED] - 347301)
Comment ID	31
Response Date	11/15/21 4:41 PM
Consultation Point	Table MM19.03 (View)
Status	Processed
Submission Type	Web
Version	0.4
Please state whether you are:	Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

MM19

CSD9

The amended text which recognises that the first 250 houses have almost been built is of course completely welcome.

The amended text discusses site A & B within the second phase. It states that planning permission will not be granted in the absence of meeting policy CSD5D which is understood.

However site B has already been granted outline planning permission for development, and there is an application in place for outline consent for site A.

The amended text is misleading.

There is no evidence of any form of master plan for both of these sites either individually or in conjunction with each other, not entirely surprising as the developers are different. It is difficult to see how this policy is capable of being considered sound. It hovers between being unenforceable and already unenforced.

Prior to the design and implementation of what is now called phase 1 of the Sellindge development there was a substantial master plan exercise carried out independently, and from that the scheme implemented evolved.

Given the emergence of the much more recent garden settlement proposals scheme it becomes increasingly difficult to understand that there is any justification whatsoever for site A within this policy, recognising that site B already has consent.

Policy CSD9 continues to lack any form of coherence.

FHDC EX130

The Sustainability Appraisal Assessment Addendum dated September 2021 identifies in paragraph 1.15 that increased "protection and conservation" of the setting of non-designated heritage assets generates a new minor positive (+) effect for policy CSD9. This really defies logical appraisal and should be disregarded.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate?

Yes, I wish to participate at the public hearings

Comment

Consultee	[REDACTED] (1298522)
Email Address	[REDACTED]
Address	
Event Name	CSR Main Modifications
Comment by	[REDACTED] (1298522)
Comment ID	33
Response Date	11/15/21 4:54 PM
Consultation Point	Table MM19.03 (View)
Status	Processed
Submission Type	Web
Version	0.5

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

MM19 Point b.j Deliver pedestrian and cycle enhancements to the A20 through (as a minimum) informal traffic-calming features at key locations, and perceived narrowing of the carriageway outside Sellindge primary school and associated highways improvement. Phase 2 shall extend the highways improvement area to be delivered by phase 1 **extending the principles of the Rural Masterplan; Comment** Phase one has provided excellent traffic calming and pedestrian and cycle enhancements, phase 2 needs to match this providing the enhancements for the rest of the village especially Barrow Hill with its historic houses, and a fair size population. It is also important that extending the 30 mph to the whole village.

Comment

Consultee [REDACTED] (1298522)
Email Address [REDACTED]
Address
Event Name CSR Main Modifications
Comment by [REDACTED] (1298522)
Comment ID 34
Response Date 11/15/21 4:44 PM
Consultation Point Table MM08 ([View](#))
Status Processed
Submission Type Web
Version 0.3

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Concern that the total water per person per day has risen from 90 to 110 ltrs per day, feel 100 would be more acceptable

Comment

Consultee	[REDACTED] (1298522)
Email Address	[REDACTED]
Address	
Event Name	CSR Main Modifications
Comment by	[REDACTED] (1298522)
Comment ID	36
Response Date	11/15/21 4:51 PM
Consultation Point	Table MM19.03 (View)
Status	Processed
Submission Type	Web
Version	0.5

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

MM19 Point 2-a.i.

*Provide, **or contribute to, convenient and safe** wherever possible internal links within the sites itself and externally links to neighbouring sites to ensure there is ease of access by a range of transport modes to new and existing development **and** /facilities within the village **and cycle and pedestrian access to Westenhanger Station;***

The cycle / pedestrian access to Westenhanger station should be surfaced and lit, and use existing public rights of way (HE217A and HE274

Comment

Consultee (1202187)
Email Address [REDACTED]
Company / Organization Ashford Borough Council
Address [REDACTED]
Event Name CSR Main Modifications
Comment by Ashford Borough Council (- 1202187)
Comment ID 37
Response Date 11/15/21 11:52 AM
Consultation Point Table MM01.01 ([View](#))
Status Processed
Submission Type Email
Version 0.5

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Thank you for consulting Ashford Borough Council on the Main Modifications Consultation of the Core Strategy Review, which ends on 15 November.

Ashford Borough Council has no comments to make on the proposed modifications.

Comment

Consultee [REDACTED] (333873)
Email Address [REDACTED]
Address [REDACTED]
Event Name CSR Main Modifications
Comment by [REDACTED] (333873)
Comment ID 38
Response Date 11/15/21 12:09 PM
Consultation Point Table MM05 ([View](#))
Status Processed
Submission Type Email
Version 0.7

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Unfortunately, Policy SS5 is still titled "District Infrastructure Planning" (my underlining), and Policy SS5.1 begins by referring only to "the district's current and future infrastructure needs" (my underlining). Both the underlined parts of these should have been deleted, as it is now recognised in Policy SS9 that certain impacts (e.g. local and strategic highway networks) extend beyond the district. For the introductory policy regarding infrastructure to still refer to the district is wrong, misleading, and results in an incoherent and contradictory position alongside SS9.

The text I have underlined above ought to be simply deleted. But I recognise that no amendment to those two texts has been proposed, whereas the new policy SS5.4 has been put forward and in procedural terms, it will be easier to amend the Policy SS5.4 to resolve the contradiction and incoherence, than to launch another pair of amendments as I requested.

Please set out what changes to the proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

What change(s) you consider necessary:

Therefore I propose amending the opening words of Policy SS5.4 to remove any contradictions that otherwise arise with Policy SS9, as follows:-

"4. Where the provision of infrastructure (whether within or outside Folkestone & Hythe District) is necessary to facilitate..."

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate?

Yes, I wish to participate at the public hearings

Comment

Consultee [REDACTED] (333873)
Email Address [REDACTED]
Address [REDACTED]
Event Name CSR Main Modifications
Comment by [REDACTED] (333873)
Comment ID 39
Response Date 11/15/21 1:29 PM
Consultation Point Table MM09.02 ([View](#))
Status Processed
Submission Type Email
Version 0.5

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

I very much welcome the explicit recognition that there may be highway impacts / need for highway improvements outside F&H District, and that there shall be consultation with the relevant local authority concerned.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate? No, I do not wish to participate at the public hearings

Comment

Consultee	[REDACTED] (1199318)
Email Address	[REDACTED]
Company / Organization	Lydd Airport Action Group
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Lydd Airport Action Group ([REDACTED] - 1199318)
Comment ID	40
Response Date	11/15/21 1:29 PM
Consultation Point	Table MM01.01 (View)
Status	Processed
Submission Type	Email
Version	0.7

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

I am referring to the modifications below on page 6:

*Should development proposals come forward for the further **material** expansion of London Ashford Airport at Lydd (**beyond the existing permissions and permitted development rights**), the council will work with the airport, local community and other stakeholders to prepare and adopt an Action Area **Action Plan** for the site. **The council will support small-scale operational development integral to, and required to maintain, the airport use, subject to being satisfied that there would be no significant adverse impacts to the integrity of the nationally and internationally designated sites of biodiversity value.***

The preparation of Area Action Plan(s) for the Dungeness A or London Ashford Airport sites will be accompanied by Habitats Regulations Assessment(s) (including Appropriate Assessment) to assess the potential effect of the Area Action Plan proposals on sites within the Natura 2000 network that are protected under the European Birds and Habitats Directives. The Habitats Regulation Assessment(s) must show that development would not result in significant adverse effects on these sites of biodiversity value, either alone or in combination with other projects and plans.

The changes are unsound as they are illogical.

(1) Lydd Airport already has an Area Action Plan through the granting in April 2013 of its planning application to take this small local airport to a regional airport capable of supporting 500,000ppa. There has been very little effect to this Action Plan. During 2016 Lydd Airport's runway extension was implemented from a planning perspective, but has not been extended physically. During the same year (2016) the number of permitted helicopter movements was quietly changed to allow Bristow Helicopters Ltd's search and rescue (SAR) operation to operate from Lydd Airport after Manston Airport's closure. The airport thus remains a small local airport which has yet to enact its original Action Plan.

(2) When this planning application was granted it was after a decade of acrimony because of deep and well founded concerns about: (a) the impact this expansion would have on the environment, particularly the surrounding protected habitats and (b) nuclear safety. The scale of the conditions which accompanied the 2013 planning permission set out by Natural England are testament to the extent to which this planning application pushes the outer reaches of acceptability with respect to environmental damage.

So the airport's original Action Plan has not been enacted and that Plan itself is acknowledged to be at the boundaries of Environmental acceptability in law. So why is an Action Plan being advocated to support "**further material expansion of London Ashford Airport at Lydd (beyond the existing permissions and permitted development rights)**" when environmental assessments will not allow the in combination impacts of the existing planning applications for airport expansion (the current Action Plan) plus additional material expansion. This is illogical.

The only logical and sound wording is to refer to the replacement of the existing Action Plan – there cannot be both.

We need clear, logical policies to avoid wasteful community acrimony and to protect the environment. How can we as a country be advocating nature based solutions for climate change at COP 26 when sloppy policies are allowing developers to degrade the environment?

The fact that there was common ground statement between Lydd Airport and the Council is irrelevant. If the policies are unsound they should not be pursued. This is a council which is in awe of the Arab owners of the airport and has been deluded by the commercial opportunities it allegedly offers (the airport continues to employ fewer people than Littlestone Golf Club and the Folkestone & Hythe light railway). There is no surprise there is common ground between them.

The addition of the paragraph below (in brackets) is worthy but adds nothing to improve the flawed policy as the law requires these assessments anyway.

[The preparation of Area Action Plan(s) for the Dungeness A or London Ashford Airport sites will be accompanied by Habitats Regulations Assessment(s) (including Appropriate Assessment) to assess the potential effect of the Area Action Plan proposals on sites within the Natura 2000 network that are protected under the European Birds and Habitats Directives. The Habitats Regulation Assessment(s) must show that development would not result in significant adverse effects on these sites of biodiversity value, either alone or in combination with other projects and plans.]

As regards an Action Plan for Dungeness, this is wholly appropriate as it represents the intended purpose of an Action Plan, given the loss of the two stations and the need to assess a future for this site. Policies for Lydd Airport and the Dungeness sites (A and now Dungeness B) require separate wording – the two should not be conflated.

Please set out what changes to the proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

What change(s) you consider necessary:

Should development proposals come forward for the further material expansion of London Ashford Airport at Lydd to replace existing permissions the council will work with the airport, local community and other stakeholders to prepare and adopt an Action Area Action Plan for the site. The council will support small-scale operational development integral to, and required to maintain, the airport

use, subject to being satisfied that there would be no significant adverse impacts to the integrity of the nationally and internationally designated sites of biodiversity value.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate?

Yes, I wish to participate at the public hearings

Comment

Consultee	[REDACTED]
[REDACTED]	[REDACTED]
Company / Organization	Lydd Airport Action Group
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Lydd Airport Action Group ([REDACTED] - 1199318)
Comment ID	41
Response Date	11/15/21 1:52 PM
Consultation Point	Table MM01.02 (View)
Status	Processed
Submission Type	Email
Version	0.5

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

I am referring to the modifications below on page 8 & 9

*4.37 Opportunities also exist for employment development at London Ashford Airport at Lydd, through the implementation of the existing planning permission. **The council acknowledges the positive impact that Lydd Airport could deliver in supporting the regeneration of Romney Marsh and surrounding areas, accordingly should further material development proposals arise, beyond the existing permissions and permitted development rights, the council will seek to work with the airport, local community and other stakeholders to agree a framework by preparing an Action Area Action Plan for the site. The further development of the Mountfield Road Industrial Estate and investment within the nuclear and tourism industries also present opportunities for job creation.***

The changes are unsound as they are illogical.

(1) Lydd Airport already has an Area Action Plan through the granting in April 2013 of its planning application to take this small local airport to a regional airport capable of supporting 500,000ppa. There has been very little effect to this Action Plan. During 2016 Lydd Airport's runway extension was implemented from a planning perspective, but has not been extended physically. During the same year (2016) the number of permitted helicopter movements was quietly changed to allow Bristow Helicopters Ltd's search and rescue (SAR) operation to operate from Lydd Airport after Manston

Airport's closure. The airport thus remains a small local airport which has yet to enact its original Action Plan.

(2) When this planning application was granted it was after a decade of acrimony because of deep and well founded concerns about: (a) the impact this expansion would have on the environment, particularly the surrounding protected habitats and (b) nuclear safety. The scale of the conditions which accompanied the 2013 planning permission set out by Natural England are testament to the extent to which this planning application pushes the outer reaches of acceptability with respect to environmental damage.

So the airport's original Action Plan has not been enacted and that Plan itself is acknowledged to be at the boundaries of Environmental acceptability in law. So why is an Action Plan being advocated to support "**further material expansion of London Ashford Airport at Lydd (beyond the existing permissions and permitted development rights)**" when environmental assessments will not allow the in combination impacts of the existing planning applications for airport expansion (the current Action Plan) plus additional material expansion. This is illogical.

The only logical and sound wording is to refer to the replacement of the existing Action Plan – there cannot be both.

We need clear, logical policies to avoid wasteful community acrimony and to protect the environment. How can we as a country be advocating nature based solutions for climate change at COP 26 when sloppy policies are allowing developers to degrade the environment?

The fact that there was common ground statement between Lydd Airport and the Council is irrelevant. If the policies are unsound they should not be pursued. This is a council which is in awe of the Arab owners of the airport and has been deluded by the commercial opportunities it allegedly offers (the airport continues to employ fewer people than Littlestone Golf Club and the Folkestone & Hythe light railway). There is no surprise there is common ground between them.

The addition of the paragraph below (in brackets) is worthy but adds nothing to improve the flawed policy as the law requires these assessments anyway.

[The preparation of Area Action Plan(s) for the Dungeness A or London Ashford Airport sites will be accompanied by Habitats Regulations Assessment(s) (including Appropriate Assessment) to assess the potential effect of the Area Action Plan proposals on sites within the Natura 2000 network that are protected under the European Birds and Habitats Directives. The Habitats Regulation Assessment(s) must show that development would not result in significant adverse effects on these sites of biodiversity value, either alone or in combination with other projects and plans.]

As regards an Action Plan for Dungeness, this is wholly appropriate as it represents the intended purpose of an Action Plan, given the loss of the two stations and the need to assess a future for this site. Policies for Lydd Airport and the Dungeness sites (A and now Dungeness B) require separate wording – the two should not be conflated.

Please set out what changes to the proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

What change(s) you consider necessary:

*4.37 Opportunities also exist for employment development at London Ashford Airport at Lydd, through the implementation of the existing planning permission. **The council acknowledges the positive impact that Lydd Airport could deliver in supporting the regeneration of Romney Marsh and surrounding areas, accordingly** should further material development proposals arise, to replace existing permissions the council will seek to work with the airport, local community and other stakeholders to agree a framework by preparing an ~~Action~~ **Action Plan** for the site. The further development of the Mountfield Road Industrial Estate and investment within the nuclear and tourism industries also present opportunities for job creation.*

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate?

Yes, I wish to participate at the public hearings

Comment

Consultee	[REDACTED] (1202996)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	[REDACTED] (1202996)
Comment ID	42
Response Date	11/15/21 2:49 PM
Consultation Point	Table MM02.03 (View)
Status	Processed
Submission Type	Email
Version	0.6

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Table 4.2

The Council argued to local residents that the new town (Otterpool Park) was a means by which there could be housing delivery without putting pressure on the constrained areas (1) within the district. Equally, the Inspector has accepted the logic of having a new town to overcome the constraints to housing development in the district.

Against this background, the numbers outlined in the tables for housing are unsound because (a) the new town is not fulfilling its prescribed role over the planned period to 2037 and (b) there is no narrative to outline how areas outside of Otterpool Park can deliver housing in a sustainable manner given the recognised constraints that many of these areas face. Table 4.3 shows that 5,593 dwellings out of a total minimum of 13,407 will be contributed by the Otterpool in the 18 year period to 2037 – another downward adjustment to the delivery from Otterpool. When this Core Strategy consultation first started in 2019 (Folkestone & Hythe District Council Core Strategy Review 2019), there were 6,375 dwellings from Otterpool, out of a minimum number of 13,160 over 19 years.

Today this means the balance of 7,814 dwellings (out of 13,407) must come from elsewhere in the District (outside Otterpool). To put this into context, the last Core Strategy prescribed a minimum total housing number for the whole district of 8,750 dwellings in the 25 year period to 2030/31.

The 7,814 dwellings scaled up over a comparable 25 period gives a figure of 10,852 dwellings – this means the areas outside Otterpool must supply 24% more houses than the total allocation for the whole of the Folkestone & Hythe District under the previous Core Strategy.

My detailed analysis of the data in the Core Strategy Review: Revised Housing Need and Supply, Evidence Paper, by character area (submitted in Jan 2020) demonstrated the extent to which Romney Marsh, relative to other areas, would be taking up the housing slack in the early years and that the constant re-setting of the base line locks in unsustainably high housing numbers because the later period of lower annual housing build out never occurs because of the rebasing.

The situation is also unsound because this information about the impact of housing on character areas and how it conflicts with the accepted wisdom about the constraints to housing faced by areas such as Marsh Marsh, was not made available to the public. It took a week of solid analysis to produce the information from the raw data provided by the council. This breakdown of housing delivery/supply by character areas ought to have been made publicly available by the council and must be provided in the annual monitoring reports.

If policies in the Core Strategy and other legislations give Romney Marsh Core sufficient protection, then it would not be possible for it to furnish the scale of housing delivery which is implied. The Core strategy is flawed because it is not clear about how these areas outside Otterpool, and particularly those with acknowledged constraints, will furnish housing supply.

1Much of North Downs character area is under AONB, much of Romney Marsh inhibited by flooding, protected habitats and the need to protect grade 1 agricultural land, while the Urban character areas are constrained by space.

Please set out what changes to the proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

What change(s) you consider necessary:

There is one way in which to solve this problem – reduce the number of houses prescribed for the district as a whole. Alternatively provide policies which set out the contribution to be made by each character area either in % or numerical terms and justify how this will be achieved within the constraints of the character areas.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate?

Yes, I wish to participate at the public hearings

Comment

Consultee	[REDACTED] (1202996)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	[REDACTED] (1202996)
Comment ID	43
Response Date	11/15/21 3:03 PM
Consultation Point	Table MM02.04 (View)
Status	Processed
Submission Type	Email
Version	0.5

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Table 4.3

The Council argued to local residents that the new town (Otterpool Park) was a means by which there could be housing delivery without putting pressure on the constrained areas (1) within the district. Equally, the Inspector has accepted the logic of having a new town to overcome the constraints to housing development in the district.

Against this background, the numbers outlined in the tables for housing are unsound because (a) the new town is not fulfilling its prescribed role over the planned period to 2037 and (b) there is no narrative to outline how areas outside of Otterpool Park can deliver housing in a sustainable manner given the recognised constraints that many of these areas face. Table 4.3 shows that 5,593 dwellings out of a total minimum of 13,407 will be contributed by the Otterpool in the 18 year period to 2037 – another downward adjustment to the delivery from Otterpool. When this Core Strategy consultation first started in 2019 (Folkestone & Hythe District Council Core Strategy Review 2019), there were 6,375 dwellings from Otterpool, out of a minimum number of 13,160 over 19 years.

Today this means the balance of 7,814 dwellings (out of 13,407) must come from elsewhere in the District (outside Otterpool). To put this into context, the last Core Strategy prescribed a minimum total housing number for the whole district of 8,750 dwellings in the 25 year period to 2030/31.

The 7,814 dwellings scaled up over a comparable 25 period gives a figure of 10,852 dwellings – this means the areas outside Otterpool must supply 24% more houses than the total allocation for the whole of the Folkestone & Hythe District under the previous Core Strategy.

My detailed analysis of the data in the Core Strategy Review: Revised Housing Need and Supply, Evidence Paper, by character area (submitted in Jan 2020) demonstrated the extent to which Romney Marsh, relative to other areas, would be taking up the housing slack in the early years and that the constant re-setting of the base line locks in unsustainably high housing numbers because the later period of lower annual housing build out never occurs because of the rebasing.

The situation is also unsound because this information about the impact of housing on character areas and how it conflicts with the accepted wisdom about the constraints to housing faced by areas such as Marsh Marsh, was not made available to the public. It took a week of solid analysis to produce the information from the raw data provided by the council. This breakdown of housing delivery/supply by character areas ought to have been made publicly available by the council and must be provided in the annual monitoring reports.

If policies in the Core Strategy and other legislations give Romney Marsh Core sufficient protection, then it would not be possible for it to furnish the scale of housing delivery which is implied. The Core strategy is flawed because it is not clear about how these areas outside Otterpool, and particularly those with acknowledged constraints, will furnish housing supply.

1Much of North Downs character area is under AONB, much of Romney Marsh inhibited by flooding, protected habitats and the need to protect grade 1 agricultural land, while the Urban character areas are constrained by

Please set out what changes to the proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

What change(s) you consider necessary:

There is one way in which to solve this problem – reduce the number of houses prescribed for the district as a whole. Alternatively provide policies which set out the contribution to be made by each character area either in % or numerical terms and justify how this will be achieved within the constraints of the character areas.

Comment

Consultee [REDACTED] (1202996)
Email Address [REDACTED]
Address [REDACTED]
Event Name CSR Main Modifications
Comment by [REDACTED] (1202996)
Comment ID 44
Response Date 11/15/21 3:25 PM
Consultation Point Table MM16.05 ([View](#))
Status Processed
Submission Type Email
Version 0.5

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

The changes are unsound as they are far too vague and do not seek the necessary outcome. Eutrophication is already a major problem. Mitigation is not the answer as this implies diminution of the impact of development, not stopping further Eutrophication.

This is essential to prevent even greater damage to the system. We have a biodiversity crisis and the Council and the developers have a responsibility to ensure at the very least, the situation is not made worse by this development.

If the development is not sound, it could affect housing delivery. The ESG (Environment, Social and Governance) movement is a growing phenomenon in the investment community. Even if the Council proves to be lax over environmental standards, house builders might be forced not to take on the work due to pressure from their shareholders. Private companies will not escape as their suppliers and banks might take a dim view of the nature of the work.

Please set out what changes to the proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

What change(s) you consider necessary:

For example the paragraph on page 74 below:

Developers are encouraged to enter into pre-application discussions with Natural England and the district council before submitting their proposals. On submission, the applicant will be required to provide a nutrient budget calculation to determine whether mitigation is required.

Should be changed to:

Developers are encouraged to enter into pre-application discussions with Natural England and the district council before submitting their proposals. On submission, the applicant will be required to provide a nutrient budget calculation to determine the initiatives required to ensure nutrient levels remain unchanged or reduced over the longer term.

Similarly on page 71

If this methodology identifies that additional nutrients will be generated, then mitigation will be required.

Should be changed to:

If this methodology identifies that additional nutrients will be generated, then initiatives will be required to ensure nutrient levels remain unchanged or reduced over the longer term.

Comment

Consultee [REDACTED] (1202996)
Email Address [REDACTED]
Address [REDACTED]
Event Name CSR Main Modifications
Comment by [REDACTED] (1202996)
Comment ID 45
Response Date 11/15/21 9:28 AM
Consultation Point Table MM09.02 ([View](#))
Status Processed
Submission Type Email
Version 0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

The changes remain unsound as policies are too vague and will ultimately lead to the damage to the North Downs AONB. For example, thousands more people will commute to Canterbury, a major urban attraction and shopping centre, via Junction 11 and B2068/Stone Street – the famous Roman Road to Canterbury. This road is one of the most scenic roads in Kent and passes through the AONB. It can barely cope with existing traffic, let alone the planned influx from Otterpool. Any roundabouts, road widening initiatives or other traffic coping mechanisms will totally ruin the integrity and setting of the AONB. Traffic needs to be diverted to other more suitable roads and this needs to be written into policy now.

Please set out what changes to the proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

What change(s) you consider necessary:

A separate policy is required to uphold the setting and integrity of the North Downs AONB, to the effect that traffic initiatives must be implemented prior to development, to divert traffic away from the B2068/Stone Street Road to Canterbury.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate?

Yes, I wish to participate at the public hearings

Comment

Consultee [REDACTED] (1162685)

Email Address [REDACTED]

Company / Organization CPRE Shepway

Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by CPRE Shepway ([REDACTED] - 1162685)

Comment ID 46

Response Date 11/15/21 10:18 AM

Consultation Point Table MM12.01 ([View](#))

Status Processed

Submission Type Email

Version 0.5

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

CPRE Kent objects to the watering down of requirements for affordable housing. History shows that the words "subject to viability" inevitably leads to developers securing a reduction from the specified proportion of affordable homes. The plan however, by applying this wording throughout, provides no opportunity for shortfalls on some sites to be compensated by extra provision on other sites. F&HDC through its wholly-owned Otterpool Park LLC is uniquely placed to redress any shortfall in overall numbers. This is especially so in the early years of the plan where the stepped delivery profile implies stepped delivery of affordable homes.

Comment

Consultee [REDACTED] (1162685)

Email Address [REDACTED]

Company / Organization CPRE Shepway

Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by CPRE Shepway ([REDACTED] - 1162685)

Comment ID 47

Response Date 11/15/21 10:31 AM

Consultation Point Table MM06.02 ([View](#))

Status Processed

Submission Type Email

Version 0.5

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

CPRE Kent objects to the new text "Other phases of development ... overall delivery". We are concerned that this will result in a scattergun approach to building within the master plan envelope. The result will be at odds with the notion that this will be a self-contained garden town. Any of these 'tandem developments' having better connections to an existing rural centre than to the garden town centre will become de-facto suburbs of the existing centre(s). This would be expansion of Sellindge and/or Lymgne by stealth and not in accordance with the respective policies for these settlements. Early residents will not identify themselves with the garden town and we fear that proper governance of the new town would be compromised.

Moreover, there is a technical problem of providing early infrastructure over a much wider area just to reach these tandem sites, given the infrastructure in the existing settlements cannot cope. This is addressed in MM09 (SS9(1)(b) "Proposals which would deliver unsustainable, disconnected and isolated development will be refused." which we support, and in SS9(1)(h). This conflict should be resolved in favour of SS9.

We assume this sentence has been added in reponse to the discussion at the hearings on rate of housing delivery. If so, there are ways to provide access to parts of the master plan area to multiple housebuilders while maintaining a desirable strategy of building from the centre outwards.

We feel the sentence adds nothing to understanding the strategy while encouraging some unwelcome outcomes and it ought to be removed. An example of the wrong approach may be seen today at Chilmington Green where there is no connection between sites being developed at opposite ends of the project area.

Comment

Consultee [REDACTED] (329173)

Email Address [REDACTED]

Company / Organization Environment Agency, Kent Area Office

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Environment Agency, Kent Area Office ([REDACTED] - 329173)

Comment ID 48

Response Date 11/15/21 10:39 AM

Consultation Point Table MM03.01 ([View](#))

Status Processed

Submission Type Email

Version 0.7

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

None

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate? No, I do not wish to participate at the public hearings

Comment

Consultee [REDACTED] (329173)

Email Address [REDACTED]

Company / Organization Environment Agency, Kent Area Office

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Environment Agency, Kent Area Office ([REDACTED] - 329173)

Comment ID 49

Response Date 11/15/21 10:46 AM

Consultation Point Table MM03.02 ([View](#))

Status Processed

Submission Type Email

Version 0.7

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

None

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate? No, I do not wish to participate at the public hearings

Comment

Consultee [REDACTED] (329173)

Email Address [REDACTED]

Company / Organization Environment Agency, Kent Area Office

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Environment Agency, Kent Area Office ([REDACTED] - 329173)

Comment ID 50

Response Date 11/19/21 10:48 AM

Consultation Point Table MM07.02 ([View](#))

Status Processed

Submission Type Email

Version 0.7

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

It is stated that 'Clear net biodiversity gains over and above residual losses'. It should be noted and clearly stated that with the introduction of the up-coming Environment Bill, it will be mandatory for developers to achieve a minimum of 10% Biodiversity Net Gain (BNG). Furthermore, Kent County Council is investigating the potential of a mandatory 20% BNG.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate? No, I do not wish to participate at the public hearings

Comment

Consultee	[REDACTED] (329173)
Email Address	[REDACTED]
Company / Organization	Environment Agency, Kent Area Office
Address	[REDACTED]
Event Name	CSR Main Modifications
Comment by	Environment Agency, Kent Area Office ([REDACTED] - 329173)
Comment ID	51
Response Date	11/15/21 11:04 AM
Consultation Point	Table MM09.01 (View)
Status	Processed
Submission Type	Email
Version	0.6

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Should options 1 or 2 be selected for development, upgrades to WwTW should include measures to treat increased nutrient loads at the source of treated water entering the river environments to prevent deterioration to the immediate aquatic and riparian ecology.

It is stated: "*Proposals for wastewater treatment should meet the requirements of Policy CSD5 regarding nutrient neutrality*".

Please set out what changes to the proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

What change(s) you consider necessary:

We would recommend a change of wording to read as follows:

"Proposals for wastewater treatment should meet the requirements of (1) Policy CSD5 regarding nutrient neutrality and (2) Environmental Permitting Regulations".

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate?

No, I do not wish to participate at the public hearings

Comment

Consultee [REDACTED] (329173)

Email Address [REDACTED]

Company / Organization Environment Agency, Kent Area Office

Address [REDACTED]

Event Name CSR Main Modifications

Comment by Environment Agency, Kent Area Office ([REDACTED] - 329173)

Comment ID 52

Response Date 11/15/21 11:09 AM

Consultation Point Table MM16.03 ([View](#))

Status Processed

Submission Type Email

Version 0.5

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

None

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate? No, I do not wish to participate at the public hearings

Comment

Consultee	[REDACTED] (329173)
Email Address	[REDACTED]
Company / Organization	Environment Agency, Kent Area Office
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Environment Agency, Kent Area Office ([REDACTED] - 329173)
Comment ID	53
Response Date	11/15/21 11:10 AM
Consultation Point	Table MM16.05 (View)
Status	Processed
Submission Type	Email
Version	0.6

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

5.72 – support proposed modifications

Comments:

Nutrient Neutrality It is stated that there will be full consultation with Natural England with regards to Nutrient Neutrality in line with the potential impacts developments may have on the Stodmarsh designated areas downstream. The council must also consult the Environment Agency during the early stages of their Nutrient Neutrality consultations as proposals to offset any nutrient budget may involve the creation of wetlands (online and/or offline) and possible abstraction from Main River. As well as protecting the designated sites, developments must also not have a detrimental impact to protected species, river ecology and fisheries interest under the Water Framework Directive (WFD).

Comment

Consultee [REDACTED] (329173)

Email Address [REDACTED]

Company / Organization Environment Agency, Kent Area Office

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Environment Agency, Kent Area Office ([REDACTED] - 329173)

Comment ID 54

Response Date 11/15/21 11:18 AM

Consultation Point Table MM16.04 ([View](#))

Status Processed

Submission Type Email

Version 0.6

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Applicants should be made aware of the following:

Any plan or project which requires an environmental permit from the Environment Agency must comply with the requirements under the Environmental Permitting Regulations as well as what is needed to comply with the Habitats Regulations. Complying with the nutrient neutrality requirements under the Habitats Directive does not negate the need for complying with Environmental Permitting Regulations.

Nutrient Neutrality mitigation must not give rise to other environmental issues. Where mitigation proposals may create other environmental risks, early advice from the Environment Agency is recommended.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate? No, I do not wish to participate at the public hearings

Comment

Consultee [REDACTED] (1299059)

Email Address [REDACTED]

Company / Organization Gladman Developments Ltd

Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Gladman Developments Ltd ([REDACTED] - 1299059)

Comment ID 55

Response Date 11/15/21 11:29 AM

Consultation Point Table MM01.01 ([View](#))

Status Processed

Submission Type Email

Version 0.6

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Gladman support Main Modification 01, which confirms the Council's spatial strategy for the district at Policy SS1. The additional wording ensuring that all new development in the North Downs Area is designed to avoid or minimise adverse impact on the AONB and the requirement for all developments to satisfy the requirements of Policy CSD5 d. in order to avoid any significant impact on the water quality of the Stodmarsh European designated sites is understood. The requirements of Policy CSD5 d. will be expanded on further in this response.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate? Yes, I wish to participate at the public hearings

Comment

Consultee [REDACTED] (1299059)

Email Address [REDACTED]

Company / Organization Gladman Developments Ltd

Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Gladman Developments Ltd ([REDACTED] - 1299059)

Comment ID 56

Response Date 11/15/21 11:35 AM

Consultation Point Table MM16.03 ([View](#))

Status Processed

Submission Type Email

Version 0.5

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

The addition of supporting text at paragraphs 5.56 and 5.66 is supported by Gladman where the requirement for new dwellings to meet the standards of 110 l/p/d have been justified in the context of advice within national Planning Practice Guidance.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate? Yes, I wish to participate at the public hearings

Comment

Consultee [REDACTED] (1299059)

Email Address [REDACTED]

Company / Organization Gladman Developments Ltd

Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Gladman Developments Ltd ([REDACTED] - 1299059)

Comment ID 57

Response Date 11/15/21 11:37 AM

Consultation Point Table MM16.04 ([View](#))

Status Processed

Submission Type Email

Version 0.6

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Gladman support the additions to part c. of Policy CSD5, in regard to the inclusion of greenfield development achieving greenfield surface water run-off rates through the incorporation of SuDS where feasible. The water quality parameters have not been defined however, and there are no details of what improved water quality means in the supporting text and as such no further comments on this element of Policy CSD5 can be made.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate? Yes, I wish to participate at the public hearings

Comment

Consultee	[REDACTED] (1299059)
Email Address	[REDACTED]
Company / Organization	Gladman Developments Ltd
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Gladman Developments Ltd ([REDACTED] - 1299059)
Comment ID	58
Response Date	11/15/21 11:44 AM
Consultation Point	Table MM16.04 (View)
Status	Processed
Submission Type	Email
Version	0.4

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Gladman accepts the addition of part d. to Policy CSD5 which focuses on the relationship between developments within the Stour Operational Catchment or within the catchment areas of the Wastewater Treatment Works discharging into the Stour Operational Catchment and the water quality in the Stodmarsh European-designated sites. Two criteria are outlined which must be met if applications are to be granted planning permission.

Gladman accepts the inclusion of Point i) of Policy CSD5 d. ensuring that applicants can demonstrate, subject to meeting the tests of the Habitat Regulations, that the development would not have a significant effect on the Stodmarsh European sites either alone or in combination with other plans and projects.

Gladman accepts that point ii) of Policy CSD5 d. is in line with Habitat Regulations and requires applicants to submit a Design and Implementation Plan outlining details of the mitigation measures, implementation and how these are to be secured for the lifetime of the development. Gladman are supportive of this requirement, however the Policy does not define in detail the requirements for each stage of the Design and Implementation Plan and a separate guidance note may be required in this regard.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate?

Yes, I wish to participate at the public hearings

Comment

Consultee	[REDACTED] (1299059)
Email Address	[REDACTED]
Company / Organization	Gladman Developments Ltd
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Gladman Developments Ltd ([REDACTED] - 1299059)
Comment ID	59
Response Date	11/15/21 11:47 AM
Consultation Point	Table MM16.05 (View)
Status	Processed
Submission Type	Email
Version	0.5
Please state whether you are:	Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Gladman acknowledges the clarity given in supporting text in regards to nutrient neutrality and the catchment map in Figure 5.4 and welcome the Council's commitment to proactively collaborating with Natural England in assessing development proposals with a view to helping unlock development in the catchment areas and ensuring that development proposals can provide an appropriate and proportionate response to guidance in the Natural England advice note on Nutrient Neutrality (November 2020).

Gladman accepts the approach taken by FHDC which allows for developers to demonstrate that either their proposals will not have a significant effect on the Stodmarsh sites or that mitigation measures can be delivered on-site or secured off-site to avoid any impact.

It is noted that there is an emphasis on on-site mitigation at page 75 of the MM document, "Mitigation measures are likely to be delivered on-site....". Gladman accepts that on-site mitigation measures may be considered first but that the wording of this paragraph is very ambitious and slightly misguided as off-site mitigation measures must also be accepted by the Council as a means of unlocking development. There are emerging allocations where on site solutions will not be practicable, due to locational and other considerations. The plan must be flexible enough to support off site solutions, where these are the most appropriate solution.

Regarding off-site measures, the Main Modifications Document states that “it will need to be established that there is a clear scientific link between the proposed development and the mitigation and that the mitigation package ensures that the proposed development will be nutrient neutral.” Gladman accepts this approach as there has to be a link between the discharge from the site and the mitigation site in the context of the Stour operational catchment. There may be circumstances, given the size of the catchment, where off site mitigation solutions are located in adjoining local authority areas. There should be a clear commitment by the Council to pro-actively work with other authorities, Natural England and other stakeholders to help secure the delivery of such solutions.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate?

Yes, I wish to participate at the public hearings

Comment

Consultee	[REDACTED] (1299059)
Email Address	[REDACTED]
Company / Organization	Gladman Developments Ltd
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Gladman Developments Ltd ([REDACTED] - 1299059)
Comment ID	60
Response Date	11/15/21 11:54 AM
Consultation Point	Table MM19.01 (View)
Status	Processed
Submission Type	Email
Version	0.4

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Gladman note the amendment made to paragraphs 5.156 in regards to the form of entry expansion of 1.5 FE to Sellindge Primary School a reduction from 2 FE. It is our understanding that the developers of the first phase of the Sellindge Expansion have made land available to the Local Education Authority which is adjoining Sellindge Primary School. The wording is currently unclear whether further additional land is required to expand the school to accommodate the combined Phase 2 requirement.

The additional information included in paragraphs 5.157 include the request for applicants to consider the findings of the Sellindge Rural Masterplan (2011) and are encouraged to discuss proposals for further improvements to the A20 or other roads with the Parish Council and the Local Highways Authority. Improvements are also to be made to the PROW network adjacent to or crossing the broad locations, Gladman acknowledge the importance of improving sustainable connectivity and thus accepts the clause to improve the PROWs which cross the broad locations however Gladman highlights that any requirement for improvements to be made to PROWs which are outside/adjacent to the broad location boundary (in third party ownership) could only be made through financial contributions.

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate?

Yes, I wish to participate at the public hearings

Comment

Consultee	[REDACTED] (1299059)
Email Address	[REDACTED]
Company / Organization	Gladman Developments Ltd
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Gladman Developments Ltd ([REDACTED] 1299059)
Comment ID	61
Response Date	11/15/21 11:56 AM
Consultation Point	Table MM19.03 (View)
Status	Processed
Submission Type	Email
Version	0.4
Please state whether you are:	Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Gladman broadly supports the updated wording to CSD9 and the removal of the reference to the first phase of development which already had permission and is now near completion in the build out phase. This results in a clearer policy. Gladman also broadly supports the updated figure 5.7 for CSD9 which clearly identifies the two broad locations for the second phases of development. Gladman notes and supports the reference at paragraph 5.163 that figure 5.7 is indicative only. It may well be that the most appropriate areas for phase 2 housing and landscaping within the broad location may vary once the detailed technical work that underpins application proposals has been completed.

The wording for the policy requirement for “proposals to accompanied by a masterplan for Sites A and B” is unclear and needs to be revised to be ensure that a masterplan for each of the separate broad locations (Sites A and B) is required rather than the current wording which could be interpreted as a masterplan being required for Sites A and B combined.

Gladman broadly supports the updated wording to CSD9 and the removal of the reference to the first phase of development which already had permission and is now near completion in the build out phase. This results in a clearer policy. Gladman also broadly supports the updated figure 5.7 for CSD9 which clearly identifies the two broad locations for the second phases of development. Gladman notes and supports the reference at paragraph 5.163 that figure 5.7 is indicative only. It may well be that the most appropriate areas for phase 2 housing and landscaping within the broad location may vary once the detailed technical work that underpins application proposals has been completed.

The wording for the policy requirement for “proposals to accompanied by a masterplan for Sites A and B” is unclear and needs to be revised to be ensure that a masterplan for each of the separate broad locations (Sites A and B) is required rather than the current wording which could be interpreted as a masterplan being required for Sites A and B combined.

Comment

Consultee	[REDACTED] (75200)
Email Address	[REDACTED]
Company / Organization	National Highways
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	National Highways ([REDACTED] - 75200)
Comment ID	62
Response Date	11/15/21 11:01 AM
Consultation Point	Table MM02.01 (View)
Status	Processed
Submission Type	Email
Version	0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

We note that the Council is seeking to amend the phasing of the housing to be brought forward during the CSR plan period. However, we have not seen or agreed a revised transport evidence base that demonstrates that the amended can be accommodated without the need for further or different, identified, designed, governed, timed and fully funded mitigation.

Therefore, we are obliged to OBJECT to this Modification at this time. However, we will work with all parties to assess the implications of the proposed Modification to identify, what if any mitigations are required and how any might be incorporated into the wider Monitor & manage Strategy and Framework.

Comment

Consultee	[REDACTED] (75200)
Email Address	[REDACTED]
Company / Organization	National Highways
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	National Highways [REDACTED] - 75200)
Comment ID	63
Response Date	11/15/21 11:04 AM
Consultation Point	Table MM02.01 (View)
Status	Processed
Submission Type	Email
Version	0.3

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

We note that the Council is seeking to amend the floorspace quantities to be brought forward during the CSR plan period. However, we have not seen or agreed a revised transport evidence base that demonstrates that the revised quantum of floorspace can be accommodated without the need for further or different, identified, designed governanced, timed and fully funded mitigation.

Therefore, we are obliged to OBJECT to this modification at this time. However, we will work with all parties to assess the implications of the proposed Modification to identify, what if any mitigations are required and how any might be incorporated into the wider Monitor & manage Strategy and Framework.

Comment

Consultee [REDACTED] (75200)

Email Address [REDACTED]

Company / Organization National Highways

Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by National Highways ([REDACTED] - 75200)

Comment ID 64

Response Date 11/15/21 11:07 AM

Consultation Point Table MM05 ([View](#))

Status Processed

Submission Type Email

Version 0.3

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

We welcome the inclusion of the new paragraph that covers the use of S278 agreements to delivery highway mitigations.

Comment

Consultee	[REDACTED] (75200)
Email Address	[REDACTED]
Company / Organization	National Highways
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	National Highways ([REDACTED] - 75200)
Comment ID	65
Response Date	11/15/21 11:12 AM
Consultation Point	Table MM06.02 (View)
Status	Processed
Submission Type	Email
Version	0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

We note that mention is made of the delivery of the full 8,000 to 10,000 homes version of Otterpool being

subject to detailed masterplanning and an assessment of potential impacts on the Kent Downs AONB in line with Policy SS7

However, as was agreed as part of the Examination, in terms of Highways mitigation it is only the first circa 6,000 homes (plus other ancillary development) that has been mitigated via the CSR. Therefore, we are obliged to OBJECT unless the Modification text is amended to made it clear that as part of any Masterplanning or other further development at Otterpool beyond the circa 6,000 homes the transport impacts will be assessed and fully mitigated.

Comment

Consultee	[REDACTED] (75200)
Email Address	[REDACTED]
Company / Organization	National Highways
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	National Highways ([REDACTED] - 75200)
Comment ID	66
Response Date	11/15/21 11:20 AM
Consultation Point	Table 1 (View)
Status	Processed
Submission Type	Email
Version	0.4
Please state whether you are:	Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

We note that, as written, the Modifications appear to leave the mitigations required as a result of Otterpool underfunded, since the text and tables appear to suggest that Otterpool will contribute less than 100% of the costs.

We are therefore obliged to OBJECT on the basis that it must be made certain through the CSR that if development occurs, then so too will the necessary mitigation. With regards Otterpool, unless the Monitor & Manage Framework in the future demonstrates otherwise, Otterpool will only be able to be progressed if it is supported by the list of mitigations set out in the Statement of Common Ground dated 4 June between the then Highways England and Folkestone & Hythe Council. Therefore whether or not other development may also have an impact and hence could contribute to the costs is immaterial. As part of the Otterpool development the mitigations are required and hence Otterpool must full fund them, unless at a later stage or via the CSR now alternative sources are identified and confirmed.

We also note that as yet the suggested costs of schemes have not been independently verified. Therefore, there are no more than guide prices. The CSR in policy and text must commit that the mitigation will be fully funded.

We will continue to work with all parties to progress Otterpool proposals, including via the application due to be resubmitted in the short-term. It may be that we will require phasing of the development to be aligned with Grampian conditions in order to ensure that mitigation keeps pace with delivery.

Comment

Consultee [REDACTED] (1299249)

Email Address [REDACTED]

Company / Organization Kent County Council

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Kent County Council ([REDACTED] - 1299249)

Comment ID 67

Response Date 11/15/21 11:33 AM

Consultation Point Table MM01.02 ([View](#))

Status Processed

Submission Type Email

Version 0.6

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

The County Council notes the paragraphs added in respect of Dungeness Power Station and recommends these are updated to reflect the EDF announcement in June 2021 regarding the defueling of Dungeness B.

Comment

Consultee [REDACTED] (1299249)

Email Address [REDACTED]

Company / Organization Kent County Council

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Kent County Council ([REDACTED] - 1299249)

Comment ID 68

Response Date 11/15/21 11:48 AM

Consultation Point Table MM02.01 ([View](#))

Status Processed

Submission Type Email

Version 0.4

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

KCC welcomes the additional paragraph that makes reference to the need for local authorities to make a realistic assessment of likely rates of delivery, given the lead-in times for large-scale sites (as set out in National Planning Policy Framework, paragraph 73).

Comment

Consultee [REDACTED] (1299249)

Email Address [REDACTED]

Company / Organization [REDACTED]

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Kent County Council ([REDACTED] - 1299249)

Comment ID 69

Response Date 11/15/21 11:53 AM

Consultation Point Table MM03.02 ([View](#))

Status Processed

Submission Type Email

Version 0.6

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

In respect of Policy SS3 part e - KCC is supportive of the proposed changes, which strengthen the commitment to the conservation and enhancement of heritage assets in the district.

Comment

Consultee [REDACTED] (1299249)

Email Address [REDACTED]

Company / Organization Kent County Council

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Kent County Council ([REDACTED] - 1299249)

Comment ID 70

Response Date 11/15/21 11:55 AM

Consultation Point Table MM05 ([View](#))

Status Processed

Submission Type Email

Version 0.4

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Provision and Delivery of County Council Community Services and Infrastructure: The County Council supports the inclusion of paragraph 4 of Policy SS5, which states "...developers will be required, where necessary, to provide the necessary infrastructure and/or make a proportionate contribution towards such infrastructure" and would highlight the importance of section 106 agreements to secure funding for necessary infrastructure.

Comment

Consultee	[REDACTED] (1299249)
Email Address	[REDACTED]
Company / Organization	Kent County Council
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Kent County Council ([REDACTED] - 1299249)
Comment ID	71
Response Date	11/15/21 11:57 AM
Consultation Point	Table MM06.01 (View)
Status	Processed
Submission Type	Email
Version	0.4

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Provision and Delivery of County Council Community Services and Infrastructure: The County Council welcomes the amendment, which makes reference to the three-tier approval structure in respect of the preparation and consultation of the masterplan. In respect of part d, the County Council would emphasise that if other phases of development come forward at the same time as the early phases within and around the town centre, the Local Planning Authority will need to consider the cumulative impact on existing infrastructure including, but not limited to, school places and social care provision.

Comment

Consultee	[REDACTED] (1299249)
Email Address	[REDACTED]
Company / Organization	Kent County Council
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Kent County Council ([REDACTED] - 1299249)
Comment ID	72
Response Date	11/15/21 12:01 PM
Consultation Point	Table MM07.01 (View)
Status	Processed
Submission Type	Email
Version	0.7

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

KCC fully supports the need to engage with Network Rail and other partners to encourage sufficient rail capacity for the garden settlement to support the future population.

Heritage Conservation: KCC welcomes the additional requirement for a Landscape and Visual Impact Assessment to be prepared for the new garden settlement. This is essential in ensuring that the new development does not detract from the setting of Westenhanger Castle and will help the new development benefit from the proximity of the heritage asset.

Comment

Consultee [REDACTED] (1299249)

Email Address [REDACTED]

Company / Organization Kent County Council

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Kent County Council ([REDACTED] - 1299249)

Comment ID 73

Response Date 11/15/21 12:12 PM

Consultation Point Table MM09.01 ([View](#))

Status Processed

Submission Type Email

Version 0.4

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Provision and Delivery of County Council Community Services and Infrastructure: The County Council welcomes the additional paragraph, which makes reference to the three-tier approach in respect of the need for flexibility with regard to phasing.

Comment

Consultee [REDACTED] r (1299249)

Email Address [REDACTED]

Company / Organization Kent County Council

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Kent County Council ([REDACTED] - 1299249)

Comment ID 74

Response Date 11/15/21 12:14 PM

Consultation Point Table MM09.02 ([View](#))

Status Processed

Submission Type Email

Version 0.6

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Highways and Transportation: KCC supports the references made within the new paragraphs to the 'monitor and manage' approach. The exact details of this approach will be set out as part of the County Council's response to the proposed amendments to the new garden settlement planning application, which is expected in due course. The requirements will then be secured through a section 106 agreement with the district council.

Comment

Consultee [REDACTED] (1299249)

Email Address [REDACTED]

Company / Organization Kent County Council

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Kent County Council ([REDACTED] - 1299249)

Comment ID 75

Response Date 11/15/21 12:17 PM

Consultation Point Table MM09.02 ([View](#))

Status Processed

Submission Type Email

Version 0.5

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Waste Management: There remains some concern that waste management is not fully considered by the Local Plan. Whilst reference to waste is made within Policy SS9 (p48), under the 'delivery of infrastructure and phasing' paragraph, from reading the supporting paragraphs it is not clear whether it is in fact referring to waste management or wastewater provision. Folkestone and Hythe district does not have a waste transfer facility and KCC is aware that operational teams at the district council have raised the need for one. The district currently uses the Waste Transfer Station at Ashford but its capacity is diminishing. There is a critical need for a new waste transfer station in the Folkestone and Hythe district, and the pressure resulting from the Otterpool Park development particularly, will make it extremely challenging for the County Council, as Waste Disposal Authority, to meet its statutory requirements. It is vital that KCC is supported in identifying land suitable for a facility within the district. Without a new facility, the waste management service will not be sustainable, which would be contrary to Policy SS5.

Comment

Consultee [REDACTED] (1299249)
Email Address [REDACTED]
Company / Organization Kent County Council
Address [REDACTED]
Event Name CSR Main Modifications
Comment by Kent County Council ([REDACTED] - 1299249)
Comment ID 76
Response Date 11/15/21 12:20 PM
Consultation Point Table MM12.01 ([View](#))
Status Processed
Submission Type Email
Version 0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Provision and Delivery of County Council Community Services and Infrastructure: The County Council notes the additional paragraph within this policy around site specific viability assessments and affordable housing. It is not clear whether 'the requirements' refers specifically to affordable housing, or whether it applies to the range of infrastructure requirements. If the latter, the County Council would strongly request engagement to ensure that the necessary infrastructure is provided.

Comment

Consultee [REDACTED] (1299249)

Email Address [REDACTED]

Company / Organization Kent County Council

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Kent County Council ([REDACTED] - 1299249)

Comment ID 77

Response Date 11/15/21 12:22 PM

Consultation Point Table MM14.01 ([View](#))

Status Processed

Submission Type Email

Version 0.5

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Heritage Conservation: The County Council is supportive of the new sentence (part k), which will help ensure the future of heritage assets.

Comment

Consultee [REDACTED] (1299249)

Email Address [REDACTED]

Company / Organization Kent County Council

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Kent County Council ([REDACTED] - 1299249)

Comment ID 78

Response Date 11/15/21 1:28 PM

Consultation Point Table MM15.03 ([View](#))

Status Processed

Submission Type Email

Version 0.7

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Public Rights of Way and Access Service: KCC would recommend reference is made to the Public Rights of Way (PRoW) network within Policy CSD4.

Comment

Consultee [REDACTED] (1299249)

Email Address [REDACTED]

Company / Organization Kent County Council

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Kent County Council ([REDACTED] - 1299249)

Comment ID 79

Response Date 11/15/21 1:59 PM

Consultation Point Table MM16.04 ([View](#))

Status Processed

Submission Type Email

Version 0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Public Rights of Way and Access Service: KCC would recommend that reference is made to the newly created National Trail - the England Coast Path. As a coastal National Trail, any development should ensure that the England Coast Path is contiguous with the coast and not forced inland whenever development is proposed.

Comment

Consultee	[REDACTED] (1299249)
Email Address	[REDACTED]
Company / Organization	Kent County Council
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Kent County Council ([REDACTED] - 1299249)
Comment ID	80
Response Date	11/15/21 2:00 PM
Consultation Point	Table MM19.01 (View)
Status	Processed
Submission Type	Email
Version	0.4

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Public Rights of Way and Access Service: The County Council is supportive of the additional text within paragraph 5.157 and suggests that reference to the Kent County Council Rights of Way Improvement Plan would also be appropriate here (https://www.kent.gov.uk/_data/assets/pdf_file/0005/90491/Rights-of-Way-Improvement-Plan-2018-2028.pdf).

Comment

Consultee [REDACTED] (1299249)

Email Address [REDACTED]

Company / Organization Kent County Council

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Kent County Council ([REDACTED] - 1299249)

Comment ID 81

Response Date 11/15/21 2:02 PM

Consultation Point Table MM19.02 ([View](#))

Status Processed

Submission Type Email

Version 0.4

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Heritage Conservation: The County Council welcomes the additional text, which highlights the archaeological potential of the Sellindge site.

Comment

Consultee	[REDACTED] (1299249)
Email Address	[REDACTED]
Company / Organization	Kent County Council
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Kent County Council ([REDACTED] - 1299249)
Comment ID	82
Response Date	11/15/21 2:03 PM
Consultation Point	Table 9 (View)
Status	Processed
Submission Type	Email
Version	0.6
Please state whether you are:	Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Provision and Delivery of County Council Community Services and Infrastructure: KCC cannot accept the option for delivery of primary, secondary or special educational needs (SEN) school provision by Otterpool Park LLP at this stage. Any consideration of this proposal will be taken at a later stage and will be subject to both legal advice and Member approval.

Given the uncertainty of the exact quantum of school places required over the lifetime of this development, the County Council is supportive of the “monitor and manage” approach proposed by the applicant. However, it is the County Council who has the statutory duty to ensure that school places exist for all resident statutory school aged children who require one. School place planning remains the responsibility of the County Council as the Local Education Authority. Expansion of any grammar school places (either The Harvey Grammar School or The Folkestone School for Girls) in the district will be subject to land availability.

KCC notes the indicative timings for education referred to in the table, but reserves taking any view until detail relating to housing tenures and phasing has been shared. Instead, the County Council proposes the timing reads “*delivered throughout construction of development*” - akin to the wording for timing of other infrastructure.

The County Council strongly recommends that the timing of SEN provision is amended from “*late in the development*” to “*delivered throughout construction of development*”.

Current local SEN provision at the Beacon School is at capacity and therefore places to mitigate the impact of SEN demand created at Otterpool Park will be required far earlier than at the point of delivery of the first 6,000 homes, as indicated. KCC cannot accept the current proposal drafted in Table 9 relating to timing of SEN provision. SEN provision is critical and necessary infrastructure for the garden settlement. Permanent SEN provision will be required early in the development, in line with need created by the development.

KCC is concerned that there is no mention of critical and necessary infrastructure relating to social care. Consideration of infrastructure relating to social care must be given in order to plan for the garden settlement. Please refer to KCC's response to the Otterpool Park Planning Application (July 2019) and subsequent requirements.

Public Rights of Way and Access Service: The County Council strongly advises that "*KCC PRow and Access Service for Otterpool and Sellindge*" is included under the '*Delivered by*' in respect of '*On Site Pedestrian / Cycle Routes (Away from Spine Roads)*'.

Comment

Consultee [REDACTED] (1299249)

Email Address [REDACTED]

Company / Organization Kent County Council

Address [REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by Kent County Council ([REDACTED] - 1299249)

Comment ID 83

Response Date 11/15/21 3:33 PM

Consultation Point Table 10 ([View](#))

Status Processed

Submission Type Email

Version 0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Public Rights of Way and Access Service: The County Council strongly advises that “*KCC PRow and Access Service for Otterpool and Sellindge*” is included under the ‘*Delivered by*’ in respect of ‘*On Site Pedestrian / Cycle Routes (Away from Spine Roads)*’.

Provision and Delivery of County Council Community Services and Infrastructure: KCC notes that comments relating to the timing of SEN provision and lack of necessary infrastructure for social care in Table 9 are equally relevant for Table 10.

Comment

Agent [REDACTED] (1160560)
Email Address [REDACTED]
Company / Organization Indigo Planning Ltd.
Address [REDACTED]
Consultee London Ashford Airport (140344)
Address [REDACTED]
Event Name CSR Main Modifications
Comment by London Ashford Airport (140344)
Comment ID 84
Response Date 11/15/21 3:44 PM
Consultation Point Table MM01.02 ([View](#))
Status Processed
Submission Type Email
Version 0.4

Please state whether you are: Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

We write on behalf of London Ashford Airport (LAA) to comment on the Main Modifications in regards to the Core Strategy Review. We have been involved in the consultations and were present during the Hearing sessions with the Council. We have reviewed the wording to draft Policy SS1 and we are pleased that we have been able to come to an agreed wording with the Council and this matter has been positively resolved. We, therefore, have no further comments to make on the policy wording.

Comment

Consultee	Marine Management (1042990)
Email Address	[REDACTED]
Company / Organization	Marine Management Organisation
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Marine Management Organisation ([REDACTED] [REDACTED] - 1042990)
Comment ID	85
Response Date	11/15/21 3:48 PM
Consultation Point	Table MM16.01 (View)
Status	Processed
Submission Type	Email
Version	0.4
Please state whether you are:	Supporting the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Thank you for giving us the opportunity to comment on the Core Strategy Review – Proposed Main Modifications. The comments provided within this letter refer to the document entitled Folkestone & Hythe District Core Strategy Review – Proposed Main Modifications.

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the South Inshore and South Offshore Marine Plan is of relevance. The South Marine Plan covers the area from the river Dart in Devon to Folkestone in Kent, including the tidal extent of any rivers within this area.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the South Inshore and South Offshore Marine Plan, or the UK Marine

Policy Statement (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our Online Guidance, Explore Marine Plans and the Planning Advisory Service soundness self-assessment checklist.

It is great to have your cooperation regarding the incorporation of marine planning within this document as it is noted that **MM16** includes reference to the South Inshore and South Offshore Marine Plan, and the need for an integrated approach between land and marine planning regimes is referenced. It is also noted that **MM16** makes reference to the district's Places and Policies Local Plan, particularly policies NE8: Integrated Coastal Zone Management and NE9: Development Around the Coast, which also include a statement on marine planning. Marine

Comment

Consultee	Marine Management (1042990)
Email Address	[REDACTED]
Company / Organization	Marine Management Organisation
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Marine Management Organisation ([REDACTED] [REDACTED] - 1042990)
Comment ID	86
Response Date	11/15/21 3:53 PM
Consultation Point	Table MM09.01 (View)
Status	Processed
Submission Type	Email
Version	0.4
Please state whether you are:	Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Marine Licensing

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area. The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters. The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

Should you require Marine Licences, please consider signposting to the Coastal Concordat. The Coastal Concordat requires each council to be signed up by 2021, as per the 25 Year Environment Plan: “The government’s 25 Year Environment Plan includes a commitment for all local authorities with a coastal interest in England to be signed up to the coastal concordat by 2021. The concordat will be periodically reviewed, as was done in 2018 and 2019 to monitor the progress of this commitment.”

Policies

Please see below suggested policies from the South Inshore and Offshore Marine Plan that are considered to be most relevant to your document, in particular for SS9 and CSD3 and the relevant modifications **MM09** and **MM14**.

These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South Inshore and Offshore Marine Plan is completed in order to review of all of the policies:

- . Access S-ACC-1: Proposals, including in relation to tourism and recreation, should demonstrate that they will, in order of preference:
 - a) avoid b) minimise c) mitigate significant adverse impacts on public access.
- . Access S-ACC-2: Proposals demonstrating enhanced public access to and within the marine area will be supported.
- . Employment S-EMP-1: Proposals that develop skills related to marine activities, particularly in line with local skills strategies, will be supported.
- . Employment S-EMP-2: Proposals resulting in a net increase to marine related employment will be supported, particularly where they are in line with the skills available in and adjacent to the south marine plan areas.
- . Infrastructure S-INF-1: Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported
- . Tourism and Recreation S-TR-1: Proposals supporting, promoting or facilitating tourism and recreation activities, particularly where this creates additional utilisation of related facilities beyond typical usage patterns, should be supported.
- . Tourism and Recreation S-TR-2: Proposals that enhance or promote tourism and recreation activities will be supported. Proposals for development must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts on tourism and recreation activities.

As previously stated, these are recommendations and we suggest that your own interpretation of the South Marine Plans is completed. Please consult the following references for further information and full details of all the policies: South Inshore and South Offshore Marine Plan and Explore Marine Plans.

You may be interested to read the three year report for the South Marine Plan which has now been published.

Comment

Consultee	Marine Management (1042990)
Email Address	[REDACTED]
Company / Organization	Marine Management Organisation
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Marine Management Organisation ([REDACTED] [REDACTED] - 1042990)
Comment ID	87
Response Date	11/15/21 3:59 PM
Consultation Point	Table MM14.01 (View)
Status	Processed
Submission Type	Email
Version	0.4
Please state whether you are:	Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Marine Licensing

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the UK marine area. The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters. The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

Should you require Marine Licences, please consider signposting to the Coastal Concordat. The Coastal Concordat requires each council to be signed up by 2021, as per the 25 Year Environment Plan: “The government’s 25 Year Environment Plan includes a commitment for all local authorities with a coastal interest in England to be signed up to the coastal concordat by 2021. The concordat will be periodically reviewed, as was done in 2018 and 2019 to monitor the progress of this commitment.”

Policies

Please see below suggested policies from the South Inshore and Offshore Marine Plan that are considered to be most relevant to your document, in particular for SS9 and CSD3 and the relevant modifications **MM09** and **MM14**.

These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South Inshore and Offshore Marine Plan is completed in order to review of all of the policies:

- . Access S-ACC-1: Proposals, including in relation to tourism and recreation, should demonstrate that they will, in order of preference:
 - a) avoid b) minimise c) mitigate significant adverse impacts on public access.
- . Access S-ACC-2: Proposals demonstrating enhanced public access to and within the marine area will be supported.
- . Employment S-EMP-1: Proposals that develop skills related to marine activities, particularly in line with local skills strategies, will be supported.
- . Employment S-EMP-2: Proposals resulting in a net increase to marine related employment will be supported, particularly where they are in line with the skills available in and adjacent to the south marine plan areas.
- . Infrastructure S-INF-1: Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported
- . Tourism and Recreation S-TR-1: Proposals supporting, promoting or facilitating tourism and recreation activities, particularly where this creates additional utilisation of related facilities beyond typical usage patterns, should be supported.
- . Tourism and Recreation S-TR-2: Proposals that enhance or promote tourism and recreation activities will be supported. Proposals for development must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate significant adverse impacts on tourism and recreation activities.

As previously stated, these are recommendations and we suggest that your own interpretation of the South Marine Plans is completed. Please consult the following references for further information and full details of all the policies: South Inshore and South Offshore Marine Plan and Explore Marine Plans.

You may be interested to read the three year report for the South Marine Plan which has now been published.

Comment

Agent	[REDACTED] (1160307)
Email Address	[REDACTED]
Company / Organization	Quod Limited
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	Otterpool Park LLP (1299290)
Company / Organization	Otterpool Park LLP
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Otterpool Park LLP (Otterpool Park LLP - 1299290)
Comment ID	88
Response Date	11/15/21 4:07 PM
Consultation Point	Table MM09.01 (View)
Status	Processed
Submission Type	Email
Version	0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

The proposed insertion at paragraph 4.190:

"[New para.] Policies for the new garden settlement are supported by the infrastructure delivery schedule set out in Appendix 5. This is intended to give adequate certainty to guide a development of this scale, given that it will be built out over several decades with some development beyond the plan period, while recognising that it is not possible to fix every element of the scheme before the development commences. Some elements of infrastructure provision will be affected by new technologies, for example, or wider changes in society such as the ability to work from home, that cannot be predicted with certainty looking several decades ahead."

The infrastructure schedule represents an indicative infrastructure delivery schedule, which will need to be clarified further at planning application stage in order to ensure that the requisite

infrastructure provision/capacity is available to support the development. As noted in the inserted narrative it is necessary to ensure that the final version of the infrastructure to be secured will need to reflect the technologies and assumptions relevant at the point when the requirement is crystallised. Therefore, the narrative should insert 'indicative' to reflect the spirit of this schedule, which is intended to provide relevant headings and themes with exact requirements being confirmed at the relevant point in the planning application and delivery process. It is therefore proposed to re-word the paragraph as follows:

"[New para.] Policies for the new garden settlement are supported by the **indicative** infrastructure delivery schedule set out in Appendix 5. This is intended to give adequate certainty to guide a development of this scale, given that it will be built out over several decades with some development beyond the plan period, while recognising that it is not possible to fix every element of the scheme before the development commences. Some elements of infrastructure provision will be affected by new technologies, for example, or wider changes in society such as the ability to work from home, that cannot be predicted with certainty looking several decades ahead."

Comment

Consultee	Otterpool Park LLP (1299290)
Company / Organization	Otterpool Park LLP
Address	
Event Name	CSR Main Modifications
Comment by	Otterpool Park LLP (Otterpool Park LLP - 1299290)
Comment ID	89
Response Date	11/22/21 4:28 PM
Consultation Point	Table MM09.01 (View)
Status	Processed
Submission Type	Email
Version	0.6

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Main Modification 09: Supporting text: New paragraphs following existing paragraph 4.190, notably addressing ‘Monitor and manage’ approach to highways infrastructure – Strategic/Local Road NetworkThe strategic approach to monitoring traffic levels to more accurately define required infrastructure requirements during the delivery of the New Garden Settlement is supported by the LLP. However, more clarity is required to address uncertainties presented by the draft wording. These are set out below.

“[New para.] If the need for intervention is triggered, it will be contingent on the associated developer(s) to implement traffic calming and other sustainable transport measures as a means to encourage modal shift and act as a deterrent to seek to reduce traffic to the distribution shown within the modelling.”

The reference to ‘associated developer(s)’ is ambiguous and needs to be defined more clearly. This is brought into focus in the following paragraph which states:

“[New para.] The legal agreement will need to secure a sustainable transport funding agreement with the applicant for sustainable transport and off-site traffic calming measures...”

The LLP have some concern around the intent of these two separate sentences, and whether there is to be a distinction between the ‘associated developers’ and the ‘applicant’. A more appropriate reference could be made to the obligation and the mechanism to secure the intervention being discussed rather than the actor/party responsible at this stage.

It is proposed to amend the paragraph referenced at 3.13 of these representations to read:

“[New para.] If the need for intervention is triggered, traffic calming and other sustainable transport measures will be secured as a means to encourage modal shift and act as a deterrent to seek to reduce traffic to the distribution shown within the modelling.”

Comment

Consultee	Otterpool Park LLP (1299290)
Company / Organization	Otterpool Park LLP
Address	
Event Name	CSR Main Modifications
Comment by	Otterpool Park LLP (Otterpool Park LLP - 1299290)
Comment ID	90
Response Date	11/23/21 8:21 AM
Consultation Point	Table MM09.02 (View)
Status	Processed
Submission Type	Email
Version	0.5

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Main Modification 09: Policy SS9: New Garden Settlement – Infrastructure, Delivery and ManagementIt is proposed to insert new wording at Policy SS9(1), notably sub-part (e), which proposes:

“e. Traffic volumes shall be monitored through the plan period to inform when, or if, mitigation shall be required and implemented in relation to the Strategic Road Network, and specifically M20 Junction 11, M20 Junction 12 to Junction 13 and the Alkham Valley Interchange (A20/A260). Mitigation will be delivered in accordance with schemes approved by Highways England and the relevant local highway authority, and the mitigation frameworks for the Strategic and Local Highway Networks set out in Appendix 5, as appropriate in order to achieve net zero harm in terms of highway capacity and highway safety;”

The new paragraph inserts flexibility in the first sentence, and then removes this flexibility to implement the necessary infrastructure to secure sufficient highway capacity and secure highway safety in the second sentence by rigidly requiring mitigation to be delivered in accordance with the schemes designed and approved by Highways England (set out within Appendix 5). This removes any scope for alternatives to be agreed with the highway authorities and sets a clear series of mitigations that, regardless of the operation of the monitor and management framework, would be required as part of the New Garden Settlement. This is not the intention of the policy or expectation of any of the parties involvement in the debate on this matter. Reference should be inserted to there being the potential to agree alternative means of securing net zero harm to highway capacity and safety in a future planning application.

Comment

Consultee	Otterpool Park LLP (1299290)
Company / Organization	Otterpool Park LLP
Address	
Event Name	CSR Main Modifications
Comment by	Otterpool Park LLP (Otterpool Park LLP - 1299290)
Comment ID	91
Response Date	11/15/21 8:35 AM
Consultation Point	Table MM09.02 (View)
Status	Processed
Submission Type	Email
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Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Main Modification 09: Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management

Further wording is proposed to be inserted at new part (f) to Policy SS9:

“f. Development proposals will be required to be supported by planning obligations that provide for the payment of proportionate contributions towards the carrying out and/or implementation of strategic and other necessary highway mitigation works and improvements, or by direct delivery of the works and improvements, where monitoring identifies the need for such works at any stage during the lifetime of the development and which cannot otherwise be managed. Where necessary and appropriate, the occupation of the development shall be regulated by reference to the completion of any such works;”

The LLP has concern around the potential scope of this part of the policy and how it relates to those delivering the New Garden Settlement allocation (both the elements within the LLP ownership and that which lies outside of this to the south west). Policy SS9 relates solely to the New Garden Settlement. Whilst the sub-element set out above ought to relate solely to the New Garden Settlement and its impacts, this could be more clearly worded to ensure no ambiguity around the tenet of Policy SS9. If the intent is for the wider district and development coming forward therein, then it ought to be translated within the wider policies of the plan.

The final sentence of new part (f) also makes limited reference to the CIL tests, but should be more appropriately referencing the CIL obligation tests in their entirety and not selectively addressing elements thereof. For the avoidance of doubt this should reference the need to ensure that such works

as mitigating infrastructure must be necessary to make the development acceptable, must be directly related to the development and must be demonstrably fairly and reasonably related in scale and kind to the development.

Comment

Consultee	Otterpool Park LLP (1299290)
Company / Organization	Otterpool Park LLP
Address	
Event Name	CSR Main Modifications
Comment by	Otterpool Park LLP (Otterpool Park LLP - 1299290)
Comment ID	92
Response Date	11/15/21 8:41 AM
Consultation Point	Table MM21 (View)
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Submission Type	Email
Version	0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Main Modification 21: Appendix 5: Indicative Infrastructure Delivery and Phasing ScheduleThe highways infrastructure tables relative to both the Strategic Road Network and the Local Highway Network (tables 1 to 8) should be referenced to a specific modelling scenario as the trigger and indicative points for delivery relate to 'trajectory profiling and modelling assumptions'. It is not readily apparent where these are set out and can be considered ambiguous.

Tables 1 to 8 also selectively indicate the Delivery body responsible for delivering identified intervention. It may be more suitably removed altogether.

Comment

Agent	[REDACTED] (1201989)
Email Address	[REDACTED]
Company / Organisation	Iceni Projects
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Consultee	(908770)
Company / Organisation	Quinn Estates
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Quinn Estates (- 908770)
Comment ID	93
Response Date	15/11/21 08:55
Consultation Point	Table MM19.03 (View)
Status	Processed
Submission Type	Email
Version	0.9
Files	Folkestone and Hythe Proposed Mods Response on behalf of Quinn Estates i.. Redacted (003).pdf

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

As outlined in previous representations, Quinn Estates have significant land interests at Sellindge, both at Rhodes Park (referred to in the draft Local Plan as "Site B – Land to the East of Phase 1") and Elm Tree Farm to the north of Sellindge school. Quinn secured planning permission on Site B – land 15th to east of Phase 1 on January 2019 for up to 162 homes, up to 929sqm of B1 floorspace and associated green recreation, highway infrastructure and associated landscaping. Corresponding reserved matters applications have been and are being submitted to Folkestone & Hythe District Council.

Quinn continues to harbour concerns regarding the deliverability and suitability of the spatial strategy articulated in the Local Plan for Sellindge, and accordingly this representation focuses on MM19, which concerns changes to Policy CSD9 (Sellindge) and the supporting text.

The proposed modifications to CSD9 are as per the Council's written response to Inspectors' Actions Points emanating from the Examination session on Sellindge, which is the Examination Document FHDC EX077, available to view through this weblink:

<https://www.folkestone-hythe.gov.uk/downloads/file/1863/fhdc-ex004-1-3mb-council-s-response-to-the-inspectors-letter-fhdc-ex003->

At Appendix 3 of the document, the Council includes correspondence from a landowner in respect of the Area A broad location for development. This correspondence was supplied due to concerns raised at the Examination regarding the deliverability of Area A and the correspondence from the landowner confirms that the land is available for development. However, the landholding forms only part of the envisaged broad location for development, and it does not include the key eastern part of the broad location area, which would enable the proposed extension to connect into Phase 1 to create a cohesive development with connecting footpath infrastructure, as envisaged in the Plan Diagram.

Figure 1 below delineates the landholding within the broad location that is deliverable, figure 2 delineates the critical 5.6Ha landholding necessary to connect Area A to the first phase 250 homes and village infrastructure currently being developed out and Figure 3 contains the key diagram showing how the Area A broad location should connect into the first phase. Whilst the broad location is indicative, it is evident that both the landholding in Figure 1 and the landholding in Figure 2 would need to be developed to achieve the development concept articulated in the draft Plan.

As highlighted at the Examination, the landholding delineated at Figure 2 is not considered to be available or deliverable within the plan period, which critically undermines the Area A Broad Location and the wider Sellindge strategy for circa 600 homes.

Quinn Estates principal concern with the proposed modification is that despite reverting to Broad Locations rather than detailed allocation sites, the policy continues to promote a development concept that the Council has been unable to demonstrate to be deliverable, and which Quinn Estates considers to be wholly undeliverable given their discussions with landowners in the locality over many years.

Accordingly, Quinn Estates consider the policy to not be justified given the absence of proportionate evidence as to the broad location's deliverability, and not effective, given the absence of any evidence to demonstrate that the key landholding necessary to connect the two phases of development to create a unified connected development is remotely deliverable.

(please see attachment for figures)

Please set out what changes to the proposed Main Modification you consider necessary. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

What change(s) you consider necessary:

Quinn Estates considers the Plan must be changed to address the issue of the deliverability of Phase 2 and specifically, the undeliverability of Broad Location Area A. The simplest way of addressing this would be to provide greater importance to a Masterplan for Sellindge Phase 2. This approach would empower the residents of Sellindge in a similar way to that done through the current Core Strategy, which enabled the residents to play a leading role in formulating a Masterplan for the Phase 1 development comprising 250 homes and village infrastructure and supporting that development through the planning process.

Strengthening the importance of a Masterplan for the second phase of development would also ensure that the critical requirements of Policy CSD9 are met i.e. the sum of the developments at Sellindge amount to a cohesive, unified, well connected settlement and that the strategy is clearly deliverable.

The policy should therefore be modified to amplify the importance of masterplanning and to highlight that the indicative broad locations are merely that, and that the precise areas of land needed to deliver the policy criteria set out in CSD9 should be defined in the Masterplan process.

In its current form, the revised policy wording requires a Masterplan to be produced demonstrating how the sites will be integrated with Phase 1 and the existing settlement. However, it is silent as to who should produce the Masterplan, the role of the Parish Council and other local stakeholders in contributing to the Masterplan and the implications for the Sellindge spatial strategy if there isn't a deliverable Masterplan that connects the broad location sites to Phase 1 and the existing settlement, which Quinn Estates contends to be the position based on the unavailability of the critical land parcel that would connect Area A to Phase 1.

Quinn Estates would therefore respectfully request that the relevant part of Policy CSD9 be amended as follows:

“Proposals for the second phase for the residential-led development should be accompanied by a Masterplan should be agreed with the Parish Council for Sites A and B which demonstrates the second phase of residential-led development to be deliverable and shows how the sites will be able to be integrated with Phase 1 and the existing settlement. Two indicative broad locations for development have been identified, though the Masterplan will need to consider the extent to which specific sites can achieve a deliverable and integrated development for Sellindge and how . Development shall meet all the following criteria can be met...”

The Inspectors may consider it necessary to hold another public hearing to discuss the representations received.

If a public hearing is held would you like to participate?

Yes, I wish to participate at the public hearings

Comment

Consultee	[REDACTED] (347301)
Email Address	[REDACTED]
Company / Organization	Sellindge District Residents Association
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Sellindge District Residents Association ([REDACTED] - 347301)
Comment ID	94
Response Date	11/15/21 11:06 AM
Consultation Point	Table MM06.02 (View)
Status	Processed
Submission Type	Email
Version	0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

SS6 (1) NEW HOMES

The proposed new text in subparagraph D makes no sense.

The new settlement, Otterpool Park, is promoted as a standalone sustainable settlement, infrastructure-led. It is not conceivable that to “other phases of development” should have any reason to come forward or to be promoted or to be supported.

The implication behind this phrase is that developments such as those proposed in the enlargement of Sellindge and policy CSD9 ought to be considered as part of the Otterpool Park SS6 and subsequent policies.

The phasing of the new town construction and the various infrastructure is required for it should be brought forward as a cogent step-by-step evolution. Not scattergun. The scale of the new settlement is such that it would dwarf any of the existing local villages, irrespective of definitions as rural centres or primary villages. This would be damaging to local communities and the effect would be contrary to other stated aims within the core strategy review.

Comment

Consultee	[REDACTED] (347301)
Email Address	[REDACTED]
Company / Organization	Sellindge District Residents Association
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Sellindge District Residents Association [REDACTED] - 347301)
Comment ID	95
Response Date	11/15/21 11:11 AM
Consultation Point	Table MM07.01 (View)
Status	Processed
Submission Type	Email
Version	0.4
Please state whether you are:	Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

4.179 The provision of retail floor space in the new garden settlement should also be considered against a measure of carbon footprint and carbon expenditure. Reading this amended text in a hopefully post Covid and COP 26 climate emergency responding world it is likely that many of the recent changes in shopping characteristics will stick. In very simple terms the provisions within a New garden settlement should be geared to serving that settlement, and retail activities elsewhere in the district should continue serving their local environments, and where appropriate wider district requirements “for those special once-in-a-lifetime purchases”.

4.180 Whilst the new text here might seem to represent a laudable aspiration, if the council has limited direct control over it then it cannot form an integral part of the core strategy. This is at the very least a regional strategic issue and in the absence of the regional strategic authority then the drive must come from national government. In addition the nature of demand, and the idea of promoting commuter travel at a time when all of the indicators are that “unnecessary” journeys should be avoided, or again at least planned out of the system rather than into it.

Comment

Consultee	Hythe Civic Society (1037608)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	CSR Main Modifications
Comment by	Hythe Civic Society (1037608)
Comment ID	96
Response Date	11/16/21 11:46 AM
Consultation Point	CSR Main Modifications (View)
Status	Processed
Submission Type	Email
Version	0.4

Please state whether you are: Commenting on the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

I refer to your email of 1 October 2021 regarding the above.

After careful consideration of the main modifications document Hythe Civic Society has no comments to make and accepts the modifications proposed.

Comment

Consultee [REDACTED] (336345)

Email Address [REDACTED]

Address [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Event Name CSR Main Modifications

Comment by [REDACTED] (336345)

Comment ID 97

Response Date 11/15/21 11:35 AM

Consultation Point Table MM08 ([View](#))

Status Processed

Submission Type Email

Version 0.4

Please state whether you are: Objecting to the Main Modification

Please use this space to set out your comments on the Main Modification. Please be as precise as possible.

Details of your comment:

Commenting on the modification MM08. The sustainability of a new town is questionable pertaining to water supply given that 90% of the Districts water supply is fed from groundwater reserves which fill during the Winter period and depletes over the Spring, Autumn and Summer months. Affinity Water has stated a PCC of 155 litres is the norm for the South East area and is skeptical of the PCC figure of 110 litres. It is stated on CSR documentation that the first 1500 homes could be supplied with potable water using the existing infrastructure, although initially that figure was 1000 homes as stated in emails between KCC and Affinity Water. However, any reduction in water use, PCC, would be welcomed and would go a little way in leaving additional headroom in the supply over average (155 PCC).

The use of a grey water recycling system, as stated in b i is to be applauded but there is still no evidence that water savings would be achieved through such strategies.

As I understand it, Albion Water (the NAV) will be the infrastructure installer to Otterpool Town with Affinity Water being the wholesale water supplier. With 10-12,000 homes being built it would be advantageous to know the average PCC, once built, of, say, the first 1000-1500 houses for Affinity Water to assess or predict the supply load for the future.

It should be stated that there is no legislation to restrict a persons water supply, for whatever reason, and therefore a PCC figure can only be an estimate. I would respectfully ask that the first phase data be assessed and reviewed going forward for an accurate account of water supply to be realised.