



Our Ref: AJ/JW/TJS  
10<sup>th</sup> October, 2017

Lympne Parish Council  
29 Honeywood Close  
Lympne  
Kent  
CT21 4JS

Dear Lympne Parish Council

## **Otterpool Park Proposal – First Stage Feasibility Report**

Thank you for letter and the comments and questions that the parish council has prepared on Otterpool Park. We appreciate the thorough analysis you have provided and have answered each question below to the extent we can from the work completed so far. We will be happy to meet with you in the near future as suggested to discuss this in greater detail.

As you are aware the council is the local planning authority (LPA) and has duties and responsibilities under the town planning acts. The council will carry out its statutory functions accordingly and nothing in this letter is to be taken as indicating that the council has in any way prejudged how it will exercise those functions.

Before turning to your questions in detail I note that you make comments on the actions of the council, its members and officers. I do not think the criticisms are justified but I will not dwell on this aspect of your letter.

1. *Where is there mention of existing communities and retaining these communities?*

In preparing the masterplan, the starting point for the consultant team has been to understand the context of the local area, including the characteristics and identity of existing communities. We hope that the subsequent work that has taken place since the Stage 1 Feasibility and Capacity Report, and following feedback at the community engagement in December 2016, has addressed this concern.

2. *We request assurances from the Leader of SDC and the cabinet that this will not continue and that our request for information and the*

*responses we and indeed our residents receive are of a more professional and open manner and acknowledgement that mistakes have been made to date please.*

The council and its landowner partner Cozumel is in the process of setting up quarterly update meetings with each of the local parish councils directly affected by Otterpool Park and we look forward to discussing progress openly with you at these meetings. I hope you can appreciate however that the council (and others) will have, at times, commercial and other interests which may mean that some information may not be made public.

- 3. We would ask that SDC consider how development across the District is leading to some areas being marginalised as areas only for those who can afford luxury dwellings and how this is impacting on other sectors of the local population being excluded from purchasing properties where they live, especially first time buyers.*

To create a balanced community Otterpool Park will need to provide a wide range of housing for all ages and incomes, and opportunities for both buying and renting, and affordable housing. Larger family homes will be provided alongside smaller units suitable for first time buyers. Housing will need to respond to the housing need identified in the Local Planning Authority's (LPA) Strategic Housing Market Assessment (SHMA).

- 4. We would like to know what might be demolished prior to planning permission being granted and ask if demolition prior to this would be a sensible use of taxpayer funds?*

Reference to demolition was intended as a general point about early work that could take place at Otterpool Park rather than having a particular programme of demolition in mind.

- 5. What is appropriate segregation from existing settlement using a shared green infrastructure asset?*

This means creating a public open space that can be used by both new and existing residents, and acts as a buffer to protect the identity of Lympe and other communities.

- 6. Does this apply to Lympe and other communities?*

*Yes.*

7. *We ask for proper assurances that this is the case here should Planning permission be granted.*

We would agree that the project needs careful planning and should not be rushed as it moves toward more detailed design, ensuring careful consideration is given. As you know the LPA is currently reviewing the Core Strategy Local Plan (CSLP), and any allocation for development in this location will be independently scrutinised at the CSLP Examination in Public by a planning inspector. The point being made in section 5 of the report was related more to avoiding unnecessary delay in the process, eg when examining the draft local plan by a planning inspector.

8. *Has the strategic housing market assessment advised the local planning authority on the level of objectively assessed housing need yet (April was the month mentioned for this) and can we have a copy of the document?*

Yes. The SHMA will inform the council's future planning policy, and is available on the Council's website: <https://www.shepway.gov.uk/planning/planning-policy/local-plan/core-strategy-review-2016>

9. *Have these been discussed with Highways England in relation to the options for widening junction 11 carriageways? (This may be covered later in the document).*

The consultant team has been in contact with Highways England (HE) to discuss impacts on the wider strategic road network including Junction 11. The next step is to agree with HE a programme of detailed traffic modeling for all junctions on the strategic road network impacted by this proposal. This will form the basis of a Transport Assessment to be submitted to HE and Kent County Council (KCC). The effects on Junction 11 will be studied in detail and options for mitigating the effects will be tested and agreed with HE.

10. *We note below some of the key points made about the potential of Westenhanger and wonder how this impacts on the proposal of a new town and designs to date bearing in mind that the findings are not particularly positive or optimistic at this stage?*

The extract you refer to was made in relation to an evaluation of options for a Parkway Station at the time of the introduction of the high-speed train service. The proposal for a parkway station at

Westenhanger was being assessed against a park and ride facility at Folkestone West. For a range of reasons the latter option was selected. This assessment pre-dates any proposal for a new settlement, and the plans for Otterpool Park create a large, new prospective customer base for rail services, all within easy access on foot or cycle.

11. *What about the impact of high density housing and therefore increased population impacting upon these three key areas? Highlighting these three key ? Highlighting these areas to remain as green infrastructure will surely lead to negative impacts unless there is wider green infrastructure around them? Often around new housing development small areas of woodland are left as a green infrastructure resource and experience shows they are overused?*

We would agree that existing woodland and habitat should be protected by providing an additional green buffer space around them. This will allow usable green space to be provided so that more sensitive areas can be protected.

12. *Will SDC do the same for its residents?*

Shepway District Council (SDC) does not currently have any plans for a dark skies policy. However issues of light pollution will be considered by the design team.

13. *Will the future impact of potential climate change be modelled against the water demand increases bearing in mind that the area is already a water stressed area with demand already exceeding supply?*

Water supply is an important issue for Otterpool Park as you have suggested, given that this area is of water scarcity. Dialogue has been taking place with Affinity Water that confirm the site can be supplied although significant further investment will be required in the long-term, with the details now the subject of further discussion. It is also likely that further measures will be put in place to restrict the amount of extra potable water consumed by each household. Affinity Water does have a good track record in recent years of reducing rather than increasing water use from existing development, through metering and other water saving measures. Risk of climate change impacts will be considered as part of Affinity Water's business planning to ensure sufficient resilience to water supply.

14. *What assurances can be provided that this will happen?*

We agree that the issue of flooding and drainage needs to be taken seriously. Discussions have been taking place with the Environment Agency (EA) and the Lead Local Flood Authority (KCC) and detailed studies on water and drainage are underway to understand risks and

mitigation solutions, for example, the drainage patterns, soil conditions and topography on the site. This will inform the drainage strategy. This strategy will need to fulfill the EA's and KCC's criteria for both this site and the lorry park that both must manage drainage within its own site so as to avoid additional water being discharged in to the East Stour.

- 15. What discussions are to take place with British Farmers Association and other interested parties involved in agricultural production and what consideration has been given to self sufficiency in national food production having regard to future population increases and possible trading tariffs following Brexit?*

We accept that there will be some loss of agricultural land in productive use to create Otterpool Park. However the strategic consideration must balance this against the need to provide housing and jobs, and the lack of other suitable alternative locations for doing so. This is a consideration that the LPA will also need to weigh up when it ultimately determines the planning application. Some local food production through providing allotment will be made, which will give residents the opportunity to produce their own food.

- 16. Where is there a strategic consideration for this aspect?*  
See above

- 17. What consideration has been given to the changes in land use impacting upon the region's cultural traditions in this respect also?*

We look forward to discussing with you how the range of different cultural traditions in and around Lympne and this part of Kent can be reflected at Otterpool Park.

- 18. This area does not appear to be covered at this stage, will it be before planning permission is granted as the area currently has a very low crime rate?*

As the plans progress and more detailed layouts of streets and spaces are prepared, these will be assessed to ensure they minimise opportunity for crime and anti-social behaviour. There is a good deal of research in this area and there are lessons that can be learned from elsewhere.

- 19. What reassurances can be provided before planning permission might be granted?*

The guiding principles for Otterpool Park commit to use of innovation and new technologies. No decision has been made yet about standards that should be set for energy. The LPA will also be setting standards for energy efficiency through its CSLP policy.

A community farm sounds like a good idea but all parties involved should be focusing on ensuring farms already in operation in the area are not overlooked, is this to be the case? Discussions will continue to take place with those currently farming within this area about their future intentions. The timescales for development should be borne in mind – many areas of the site will not be developed for another 20 years and can continue to be farmed during that time.

*21. Has contact been made with Rural plc Kent?*

No contact has been made with Rural PLC Kent. However Otterpool Park will offer a significantly wider range of new job opportunities for the area.

*22. Reintroduction of forest is a positive idea and should be a serious consideration and what assurances can be given that this will not be overlooked and forgotten about?*

Comment is noted. Proposals to reintroduce forest continue to be part of the landscape strategy. Habitat enhancement and creation in general will be considered as part of the mitigation design, this will include woodlands, hedgerow, grasslands, ponds, swales and other habitat that will be created for dedicated species mitigation. Habitat quality and connectivity within the site and with the wider area will be key design considerations.

*23. What plans have been made to date regarding these important matters and what discussions have taken place if any between Health, Education, KCC and SDC and what are the results of those discussions?*

Healthcare and education provision are important issues that have been raised through consultation. Discussions have been taking place with both local Clinical Commissioning Groups (CCGs) and KCC to ensure these facilities are properly planned for the new community. We understand that the local primary schools are currently at capacity, so a new primary school will need to be planned early on in the first phase of development. Regarding healthcare provision, Otterpool Park can build a health centre that meets the requirements of new models for healthcare being promoted by CCGs that provide a wider range of services locally, taking the burden for more routine services off the hospitals. Equally important is the necessity to plan preventative health by encouraging healthier lifestyles, and designing homes and spaces better for an aging population. The issue of a shortage of GPs and healthcare staff is noted – there is an opportunity to provide housing and an attractive location for such key workers.

*24. We note the Dover MP, Mr Elphick, appears to support moving diesel emissions away from his residents to those of Mr Damian Collins*

*and therefore into the back gardens and through the open windows of Stanford and Westenhanger residents instead. Combine this with the extension to Stop 24 at Junction 11 for overnight facilities for HGV's, the M20 and the Eurotunnel traffic and the proposal for a new town next to an already busy main road, the A20 it is easy to realise the residents in the area are concerned and none of the experts appear to be seriously considering this.*

*New evidence is constantly coming to light of the harm of diesel pollution on human health.*

*It appears that Highways England and other agencies such as the Port of Dover etc are unsure and not necessarily in agreement with how the whole strategic road network in the area should be managed in future.*

*25. How are the public to have confidence in the decision making participants and processes? What plans are there to ensure a strategic view is taken and which organisation do you suggest should all meet to agree this?*

**This area is not currently an Air Quality Management Area ie an area where air quality standards are not being met but will be continue to be monitored.**

**We will continue to liaise with HE over the impact on the strategic road network of this site and cumulative impact with the lorry holding area. We will also be required to monitor air quality to protect human health. A full Environmental Impact Assessment (EIA) is being carried out for the application, which will include Transport Impact, Air Quality and Noise assessments, and the scope of these assessments is to be agreed with the Environment Agency (EA). Regarding the A260 off the A20 – the HE has already confirmed that the A260 is to be included in the transport, and therefore air quality and noise, assessments. These assessments will need to take account of all existing and planned developments, including the Lorry Holding Area.**

*26. What evidence can you provide that these matters are being seriously considered and cumulatively?*

**All technical studies including air quality, transport and drainage for Otterpool Park need to take account of the cumulative impacts of all developments currently proposed in the area as part of the planning application.**

*27. Bearing in mind all the policies in existence which apparently contradict this proposal please provide evidence of how these policies are upheld in relation to this proposal, detailing each one please?*

We would like to make it clear that no formal opinion has been sought from any of the statutory bodies including Historic England, Area of Outstanding Natural Beauty (AONB) and Natural England. Informal discussions and guidance throughout the planning process will help to ensure any concerns or opportunities raised by these agencies are taken into account before plans are formally submitted for their consideration. The impact on the setting of the AONB remains an important consideration that is being taken into account – we believe that introducing buildings into the views to and from the AONB can constructively contribute to the view if it is carefully designed and planned. The planning application for the site will need to take account of all policies noted in the CSLP (or any subsequent plans) and Kent Structure Plan. These policies provide guidance for the design of future development but do not in our view prohibit it in this location.

*28. Has this been agreed?*

Discussions have continued with Natural England throughout the design process to ensure that its objectives for green infrastructure and habitat are taken into account in the masterplan and future strategies for biodiversity and green infrastructure.

*29. Do your organisation have possession of this widely available data and will it be considered and highlighted in the next stage?*

Surveys have continued throughout this year for important ecological receptors identified on site. This includes dormice, water voles and kingfishers. Biodiversity is richest in the existing woodland and river corridor, and protection and enhancement of these habitats will form part of the strategy for the area. The agricultural land around the Otterpool Site is generally habitat-poor (other than hedgerows) with limited field margins and therefore much of the site offers the opportunity for improving biodiversity. During the EIA local, regional and national data will be reviewed to contextualize the relative nature conservation importance of the populations and habitats of the important ecological receptors within the Otterpool Site.

*30. Agricultural land is mentioned as an asset already present but not in the proposed functions re the benefit to the development so an assumption none will remain possibly, can this be clarified?*

No decision has been yet on whether existing agricultural land will be included in the proposal for Otterpool Park.

*31. What plans are in place to study these cumulative impacts, what modeling techniques will be used to provide evidence of real risk to Biodiversity not in isolation to each aspect?*



Within the EIA recreational impacts will be considered for all important ecological receptors.

*32. Please explain how you will ensure this does not become a commuter town.*

It is important that Otterpool Park provides a balance of homes and jobs to ensure it is not simply a commuter town (see reference below to the Employment Opportunities Study currently underway). While inevitably there will be some out-commuting this should be balanced against the new job opportunities that will be provided locally, both through new business development and jobs created within the schools, health facilities and shops. Regarding where people are likely to move from, there has been some interesting data collected at Shorncliffe Barracks (provided to the LPA) that suggests around 75% of purchasers to date are very local (Folkestone/ Hawkinge/ Hythe/ Dymchurch). At Ebbsfleet 85 % of people to date have moved from within 10 miles (based on around 1000 completed homes). This information relates to early phases of development so we cannot predict with certainty whether this trend will continue, but it does suggest that these developments are meeting local needs.

*33. Please explain how this proposal does not contradict the draft WIP and above mentioned principles?*

Could you clarify this question please, if it has not already been covered above?

*34. Would these not be essential services anyway?*

Yes these services would need to be provided but we need to ensure that a mechanism is in place to maintain these to high standards. The fact that SDC owns land in this location means that profits can be reinvested in both the new community and for the wider benefit of the residents of Shepway. This land value capture may take the form of better quality facilities delivered earlier than would otherwise happen, or provide a wider range of housing.

*35. Can this point be clarified?*

It is correct to say that Department for Communities and Local Government (DCLG) is actively promoting both brownfield sites and public sector land. SDC owns a significant area of this site, which is therefore considered public sector land. The majority of the site is greenfield, but the built area of the racecourse can be considered brownfield land.

*36. What data/information is available, if any, on water resource capacity over the last decade and will be a model be produced of the*

*cumulative impact of extra development set against predicted climate change for the future and how this impacts water resources?*

Affinity Water in consultation with the EA will use their existing Water Resource Management Plan, supporting technical data along with their ongoing investigations to determine the best way to supply the proposed site, other development sites and existing communities whilst considering climate change and water resources impacts. We will work with Affinity water and EA and undertake additional analysis to fully understand water demand needs, water resource capacity and minimise extra potable water consumption through a well-designed water management system that aims to enhance the water environment following the assessment of range of potential scenarios and options.

*37. Will there be a clearer solution/plan once the number of dwellings planned for has been decided?*

An energy strategy will be prepared as part of the planning application once the number of dwellings and broad layout has been finalised.

*38. Does this not contradict the purpose of a garden town?*

One of the benefits of planning a garden town comprehensively is to maximise the opportunity for sustainable travel. Housing and employment can be designed to provide easy access by foot and cycle to the station and bus routes. Neighbourhood centres and facilities such as schools should all be within walking distance of the majority of residents. The town centre will be located close to the station to maximise the number of homes and businesses within its immediate proximity.

*39. What sort of incentives are being considered, where will additional funding be found and if businesses are currently not attracted to the area due to the distance from Junction 11 then how will this be resolved?*

SDC corporately has commissioned consultants Lichfields to prepare an Employment Opportunities Study to look at the employment sectors and types of business that could be attracted to Otterpool Park. This includes understanding the facilities and other incentives they may require to be attracted to this area. Both the council and the promoter will need to respond to the actions that will be identified in this report (which will be completed in October and will be publicly available once it has been signed off). The masterplan currently allocates land for employment close to junction 11 and the station, which will provide an accessible location for business.

*40. If Kent is to be so badly affected how can a new town being built in this location be a sensible idea especially if it is in addition to the building of 8,000 other homes in the district?*

We would agree about the need to take seriously the impacts of climate change. New development will respond to this challenge with a range of landscaping measures as part of the proposed blue-green infrastructure measures and building design adaptation measures so as to mitigate the effects of overheating and the risk of flooding. The EA will be considering the impact of climate change on designated flood plain when assessing proposals for drainage and flood management.

*41. To what extent do these constraints affect the plausibility of a "Garden Town"?*

See response to earlier questions relating to the constraints noted in this question.

*42. How much road widening would be acceptable bearing in mind the demands on limited land space already identified elsewhere in the study?*

Once the effects on Junction 11 have been quantified, a range of options for the mitigation of effects will be tested in conjunction with HE. Options include localised widening of one or more of the approach and exit arms on the Junction 11 roundabout, but other methods of improving junction capacity, such as the signalisation of the roundabout, will also be tested. The final mitigation scheme design is likely to include a combination of measures.

*43. Would road widening involve compulsory purchases of existing dwellings and what would the implications be to the cost and financial viability of the proposal?*

The design of highways works has not yet been finalised so any requirement for compulsory purchases of existing dwellings is not yet known.

*44. Will this be resolved prior to the proposal going to a planning committee and how will the costs be met?*

Discussions have been taking place over the last few months with utilities companies about indicative costs for connecting their services. The total cost will indeed need to be resolved prior to going to planning committee so that the LPA can be assured of the viability and deliverability of the development. Costs for supply of this infrastructure are generally split between the utility company and the developer (who must pay for the service to be connected to the site and any further on site costs).

***45. Is it sensible to suggest investment in an area of already such rich Biodiversity which contains agricultural land within an AONB setting amongst villages that will likely be swallowed up by this proposal when there is deprivation in this District which has been ongoing for a long time and when growth is likely to be highest in Folkestone and Hythe where there is infrastructure already in place?***

Development at Otterpool Park will bring new job opportunities to the area, in addition to opportunities for training and skills throughout the planning and construction process. SDC has led on a range of initiatives aimed at tackling deprivation in Folkestone town centre, and will continue to do so (through eg The Community Led Local Development funding bid to the European Regional Development Fund). In terms of future growth, both Folkestone and Hythe have significant sites already proposed or underway on brownfield land (including Folkestone seafront, Shorncliffe Barracks and Nickolls Quarry) and have very little capacity left for further growth.

No question 46 is included

No question 47 is included

***48. We suggest that such sites are not viewed just as a resource but there is consideration of their importance in their own right. Might this be a better way of showing there is respect for what already exists and which moulds the character of this area already?***

1. Although the Cultural Heritage Desk-Based assessment (DBA) did refer to some of the heritage assets on the site as 'resources' which could inform the history and identity of the area, this was meant to be an affirmation of the importance of the site's diverse heritage. 'Resource' is a term that is commonly used to highlight the positive contribution that archaeological remains make, not just to developments but to the wider community. Certain aspects of the site's archaeological landscape - such as the pattern of historic fields, roads and hedgerows and the survival of historic buildings will be incorporated into the masterplan and will play an important role the new town's layout, design and character. This is especially true for Westenhanger Castle.

The DBA describes the heritage assets in many different ways and gives the reason for the appraisals as 'to help inform a better understanding for decision making and to inform master-planning'. The DBA contains sections on the significance of all the heritage assets described, including their historical, evidential, aesthetic and communal values.

Since the feasibility study was issued we have undertaken significant work on the various areas that were highlighted by KCC and Historic

England as needing further consideration. These appraisals focus on the inherent value of each heritage 'resource' and discuss in depth how have they have moulded the area and how they can be enhanced within the scheme. Those more ephemeral archaeological 'resources' that cannot be preserved within the scheme will have the effects of the development mitigated by further archaeological fieldwork to maximise our understanding of them and to provide information that can be fed back into the community and the wider public.

*49. This seems to miss the point in that it is ok to lose this land because there is apparently more of it in this locate in than elsewhere and would therefore depend on your viewpoint rather than mathematics. Perhaps consideration of the attitude to such land should be reviewed?*

The planning application will explain the loss of agricultural land, which is something the LPA will need to consider, balanced against other positive and negative impacts of the development.

*50. We would request confirmation of this due to new evidence of effects of diesel pollution, this was an area Highways England did also not include in their plan for the Lorry Holding Area. Smaller particulate matter can adversely affect human health even more than PM10 precisely because of the size.*

NO<sub>2</sub> was monitored as it is a pollutant of concern and there is the potential for NO<sub>2</sub> concentrations to increase close to, or above the annual mean objective of 40ug/m<sup>3</sup> as a result of the proposed application in the local area. There are a number of reasons why PM<sub>10</sub> and PM<sub>2.5</sub> are not generally monitored for new developments:

- Annual mean PM<sub>10</sub> and PM<sub>2.5</sub> rarely exceeds the respective particulate AQS objectives (PM<sub>10</sub> - 40ug/m<sup>3</sup>) (PM<sub>2.5</sub> - 25ug/m<sup>3</sup>), and when it does, it is typically in built up and congested areas such as central London. 2017 Defra modelled background concentrations in Shepway indicate PM<sub>10</sub> & PM<sub>2.5</sub> backgrounds are 17.0ug/m<sup>3</sup> and 12.5ug/m<sup>3</sup> which are well below the respective annual mean AQS objectives.
- Shepway Council's 2015 Updating and Screening Assessment ([https://www.shepway.gov.uk/media/4008/Air-Quality-Updating-and-Screening-Assessment-2015/pdf/Air\\_Quality\\_Updating\\_and\\_Screening\\_Assessment\\_2015.pdf](https://www.shepway.gov.uk/media/4008/Air-Quality-Updating-and-Screening-Assessment-2015/pdf/Air_Quality_Updating_and_Screening_Assessment_2015.pdf)) stated that 'No monitoring of PM<sub>10</sub> takes place in the district. All previous Local Air Quality Management reports have concluded that there is no likely exceedance of PM<sub>10</sub>.'
- Additionally vehicle emission rates of PM<sub>10/2.5</sub> are much lower than the equivalent NO<sub>2</sub> emission rates; therefore larger changes in traffic flow are required to achieve a 1ug/m<sup>3</sup> increase in

PM10/2.5 than is required to increase NO2 concentrations by the same margin. With consideration of this, the likelihood of significant increases in PM10/2.5 concentrations as a result of the proposed Scheme is vastly smaller than the likelihood of impacts from NO2.

- The purpose of the pre-scheme NO2 monitoring is to inform model verification. Model verification is a complex and involved process and is a necessary step in the production of the final modelled pollutant concentrations. In summary, model verification is the process for comparing the modelled pollutant concentrations with the monitored concentrations for the same pollutant and where necessary adjusting the modelled results so they better align with the monitoring data.
- The NO2 monitoring has been undertaken using passive diffusion tube monitors which are quickly deployable, cost-effective, small and are not constrained by power supply. There are no equivalent means of sampling particulates passively. A network of automatic PM10 monitors would require land permissions, power supply, security, and are expensive.
- A modeller would typically use PM10/2.5 automatic data sampled by the local authority, however Shepway do not undertake any automatic monitoring of NO2, PM10 or PM2.5. Defra's Local Air Quality Management Technical Guidance (LAQM TG. (16)) states that 'In the absence of any PM10 data for verification, it may be appropriate to apply the roadNOx adjustment to the modelled road-PM10. If this identifies exceedances of the objective, then it would be appropriate to monitor PM10 to confirm the findings'. Owing to the reasons cited in point 2, it is extremely unlikely that PM10 or PM2.5 will exceed AQS objectives once the scheme is operational. Refer to 7.527 (onwards) of <https://laqm.defra.gov.uk/documents/LAQM-TG16-April-16-v1.pdf> for further detail on model verification and monitoring.

*51. This does raise the matter of how residents currently are affected by noise and whether the proposal will have a severe adverse impact especially during prolonged construction phases as this is highlighted as a long term project? Should the current noise baseline be established and used to assess this then what are the upper limits of acceptability for noise?*

We confirm that Lympne Industrial Estate will be remaining on site.

With regards to the existing noise environment a baseline noise survey is to be undertaken with noise monitoring of typical conditions carried out at various locations across the site to establish the typical current noise conditions.

Impacts that may result from the construction phase of the project will be assessed with any potential adverse effects upon sensitive receptors such as residential properties, schools and care homes carefully considered. The assessment will be based on current national standards and guidelines. For instances where any adverse impacts are identified, appropriate mitigation measures and best practice

construction techniques will be considered. The assessment of the severity of potential impacts created by construction noise will not be solely based upon the noise level, any potential impact will also consider the period of day and duration of any such activity, any mitigation measures that can be employed and the distance of the receptor from the noise source.

I note that you intend to put your letter on the parish council's website. You did not indicate specifically whether you intend to put this letter on the website but I think it would be helpful if it was so published.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andy Jarrett'. The signature is fluid and cursive, with the first name 'Andy' being more prominent than the last name 'Jarrett'.

Andy Jarrett

Head of Strategic Projects  
Shepway District Council

Cc Cllr David Monk, Shepway District Council  
Kevin Murray, Kevin Murray Associates  
Rebecca Kearney, Arcadis

