

July 2017

Otterpool Stage 1 Feasibility report, Arcadis - Review by Lymgne Parish Council

2.6

Development Principles outlined include three pillars, one of those is Social.

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

2.11.9

Public Relations

There is no mention of existing communities here, only the media.

Past PR has been fairly disastrous due to the lack of transparency and atmosphere of distrust caused solely by the leader of the Council, Cabinet members and the Chief Executive.

This is based upon their actions during and after the purchase of the land which were queried but not answered satisfactorily on a number of occasions, holding closed meetings regarding the proposal and excluding the public, an appalling attitude to local residents during radio interviews and media responses as well as telling the wider public completely inaccurate details of a meeting held in June 2016 with a large number of Parish Councillors at SDC. This as well as SDC being in partnership with Cozumel Estates, part of the Reuben Brothers multi billionaire empire, has led to the distrust and bad feeling .

PR should involve a degree of courtesy and respect for communities already present who have had this proposal forced upon them in a manner that appears to point to the truth not being made fully available by SDC and a complete eradication of any control for local residents concerning the future of their lives.

This breeds panic and resistance to any proposal, a direct result of taking away control, and misleading people and failing to be open and honest reinforces this reaction.

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 acknowledgment that mistakes have been made to date please.

3.2

Coastal town price increases are no surprise in Hythe, development agreed by SDC for recent developments have been totally unaffordable for local residents e.g. Fisherman's Beach.

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.

3.27

Demolition in advance of planning permission to create momentum.

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?

4.16

Segregation using shared green infrastructure assets.

5. What is appropriate segregation from existing settlements using a shared green infrastructure asset?

6. Does this apply to Lympe and other communities ?

Town and country planning.

National policy.

5.

The assumption that new garden settlements should be dealt with as quickly as possible; we wish to state this should not lead to the project being rushed at any cost or mistakes will be made.

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

5.6

Strategic housing market assessment results for Shepway.

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 ?

Site assessment, summary of key technical constraints.

6.3, 6.4, 6.5

The constraints on traffic capacity.

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

6.7

Regarding Westenhanger Railway station, discussions between network rail and Shepway district Council have apparently taken place.

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?

Westenhanger Parkway

Situated in the approximate area of the existing station, between Ashford International and Sandling. The proposal would provide parkway facilities close to the M20 motorway at Junction 11 and Hythe.

The site does not fulfil any strategic gap identified in the RUS.

The station would serve existing domestic, and potentially high speed services, providing a range of destinations in London and connections within the RUS area and beyond.

It would be anticipated that the station would serve high speed services. Alterations to existing stopping patterns would be needed to maintain journey times. This would be likely to involve a review of stopping patterns for both Folkestone stations.

Westenhanger Parkway

It is unlikely that improved car parking and station facilities at Westenhanger would unlock significant new demand in the Shepway District area and would therefore not present a positive business case.

Additionally, a review of high speed stopping patterns would be a disbenefit for passengers in Folkestone and Dover.

The RUS notes these issues and does not propose further action unless a firm proposal is made given the disbenefits noted above.

Habitats and biodiversity

6.14, 6.15

The three key areas taken into account with green infrastructure designed in these places, e.g. Ancient Woodland.

11. What about the impact of high density housing and therefore increased population impacting upon these three key areas? 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 developments small areas of Woodland are left as a green infrastructure resource and experience shows they are overused?

6.19

Light

There is no mention of protecting dark skies to the east of the site and therefore minimising light pollution to the East, only mention that Ashford Borough Council have requested this for their residents to the West.

12. Will SDC do the same for its residents?

Flood risk

6.21

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?

6.22

With the risk of flooding already apparent from the mitigation measures designed for the Lorry holding area to the north of the site and the risk of flooding the proposed new town apparently brings with it, the impact of flooding to the whole area of these proposals combined needs not only to be “understood” but fully analysed and modelled to predict the risk accurately.

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

6.25

The presence of good quality agricultural land should be considered in light of this country leaving the EU, potential impact of climate change, combined increased risk of flooding due to the new town proposals and the Lorry holding area.

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?

16. Where is there a strategic consideration for this aspect?

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

Masterplan Concepts

7.13 Hammerby, Stockholm, an example amongst others of Garden cities /towns.

High density housing is desirable with regard to increasing the amount of green space and/or a denser population per square metre of land but regard should be had to designing out low level crime which can accompany high density housing.

An example of this is Stanhope Housing Estate which may have been modelled on a Garden town development. It eventually led to the Estate being one of the most deprived in the Country and with a huge concentration of crime including Anti Social Behaviour.

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?

7.16

Zero carbon housing development is a must for the scale of this proposal, no new housing developments should be built that do not use the latest technology to reduce carbon output and the true meaning of sustainable development should really be applied .

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

Burning of biomass is no longer considered as a true green, clean energy. Ideas such as the recent biomass power station application for CHP are really not a good idea.

20. A community farm sounds like a good idea but all parties involved should be focussing on ensuring farms already in operation in the area are not overlooked, is this to be the case?

This again returns to the point of ensuring that local and national food production and security are seriously considered.

21. Has contact been made with Rural plc Kent?

7.25

Reintroduction of forest is mentioned.

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?

8

Next Steps

Education and Health Assessment

Recent media reports have highlighted a crisis of a shortage of GPs across the Shepway District.

Ashford housing development has continued at pace, discussions between SDC, their agents and East Kent Health should be a priority .

There is uncertainty about the future of Kent and Canterbury Hospital due to a shortage of doctors.

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?

The closure of Pent Valley Secondary School has already had a huge impact on other Shepway Secondary Schools and has impacted on Schools in Dover also.

Testing Junction 11 capacity

Consultation with Highways England regarding the proposed Lorry Holding Area should continue, as should consultation about Dover TAP which is currently under review. There is congestion at the A260, Hawkinge exit of the A20 on a regular basis, Aycliff residents have serious concerns about the health impact of diesel emissions from HGVs waiting in TAP and questions are being raised about moving TAP back towards the A260 exit.

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 HGVs, 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 the 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 organisations do you suggest should all meet to agree this?

The impacts of a huge lorry Holding Area combined with a proposed town being built immediately on the other side of the M20 should be considered in conjunction with the effects on the residents already present including their quality of life, mental and physical health and devaluation of their properties, the impact on the AONB, the impact on flooding risk to the whole area, reduction in farming productivity across the district, impact on tourism and biodiversity and quality of life.

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

Appendices

A planning

B Green Infrastructure and Biodiversity

From initial walk throughs of the site by Arcadis there are a number of identified and suspected species in the Search Area including otters upstream, water voles, Harvest Dormice, Great Crested Newts, Badger Setts, reptiles and bats.

There are approximately 30 ponds on site and 10 adjacent.

Approximately 20 hectares of woodland and hundreds of individual trees, 220 of improved grassland and approximately 70 hectares of semi Improved grassland, 270 ha of arable land and approximately 14km of rivers, streams and ditches and approximately 10km of hedgerows and scrub including significant areas associated with the East Stour.

Wintering and breeding birds some of which are qualifying species, owls, kingfishers and farmland birds, notable plants including orchids and bluebells.

No culverting of the East Stour is permitted.

Species surveys have not been conducted in the optimum period yet.

Natural England have opposed development due to perceived impacts on the birds connected with Romney Marsh and Rye Bay SPA, based on presumed functionally linked habitats with SPA and the lake/ponds around rear of Newingreen/Stone Street. A Natural England licence will also be required for trans locating great crested newts.

Landscape and Visual Impact

Significant visual impacts are expected from the proposed town and also cumulative impacts based on other development planned in the area. Research has taken place at similar AONB sites in the Country to assist “mitigation”.

Tranquillity mapping shows lower tranquillity already along the line of the M20 and HS1 line, approximately 3 to 4 km wide compared to areas deeper within the AONB and along the greensand escarpment. Greater light pollution along this strip is also noted and marked intensity around the M20 service station, Eurotunnel site and Link Industrial Park. To the north of the site is relative darkness. Light pollution is already evident in the area without the new town proposal.

Visual impacts on the AONB and Parks of Historic interest (Sandling Park, Lympne Castle and Port Lympne) will involve consultation with Natural England and Historic England .National Planning Policy Framework advises “ great weight should be given to conserving landscape and scenic beauty in nationally designated landscapes including AONBS, which have the highest status of protection in relation to landscape and scenic beauty “.

SDC’s Core Strategy and Local Plan 2013 has a Policy, SS1, this refers to future spatial priority for new development and accommodation of development outside the AONB without material impact on its setting, it also refers to place-shaping entailing facilitating development where the quality of life and the physical environment is lower and only encourages development in locations of high townscape, strategic landscape, established historic or biodiversity value where it reinforces or contributes to local character and sustainability.

This is further reinforced by Policy CSD4 about the AONB and its setting taking priority over other planning considerations . “Elsewhere development must not jeopardise the protection and enhancement of the distinctive and diverse local landscapes in Shepway (especially where these support the setting of the AONB) and must reflect the need for attractive and high quality open spaces throughout the district “.

Hence possibly why much of the PR emphasis 'is about enhancing the landscape and “improving” the landscape etc as the new town proposal directly opposes the above policies.

There are other policies, Structure Plan Policy ENV4, C04, BE18, BE4, NE3 (which especially mentions that development should not lead to actual or perceived coalescence of settlements or

undermine the integrity or predominantly open and undeveloped rural character of the AONB or its setting) and NE5 (light pollution).

Mention is made of development proposals not being permitted unless there is a need to secure economic and social Wellbeing that outweighs the protection of AONB setting or Special Landscape Areas. The Lympne escarpment is described as “higher ground affording dramatic views of Romney Marsh and Hythe Bay.

The report mentions engagement has already taken place with Historic England, (HE), Natural England, (NE), KCC, and local Landscape Officers.

HE and NE appear to oppose the location of the scheme and especially mention cumulative impacts of development, (Lorry Holding Area especially), the poor example of Hawkinge as a development site, other developments in Sellindge etc. A mention is made of retaining local farms.

The report mentions to research examples of recent declined planning applications because of impacts on AONB, including Waterside Park, J8, M20 and Farthingloe, Dover.

New risks have been recorded by Arcadis: differing LCA assessment results with SDC so common ground cannot as yet be agreed with SDC or their advisors , AECOM.

High risk of continuing opposition by key stakeholder, AONB unit.

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?

Appendix B

Green Infrastructure

Lots of policies and mapping diagrams referred to again in this section of the report.

Of note is Shepway's own local policy, CSD4, about achieving net gains in Biodiversity, improving and increasing green infrastructure , high levels of protection will be given to SSSIs and Ancient woodland to avoid any significant impact etc.

Policy CO1 refers to where development proposals would significantly conflict with enhancing, preserving etc, it will only be permitted if it can be shown there is an overriding social or economic need.

This really is extremely questionable I would have thought with Otterpool Park, bearing in mind allocated housing already in Shepway.

I think this needs evidencing and economic opportunities surely exist with investment in existing towns in the District with empty retail premises, business parks etc and planned industrial parks.

Natural England held a meeting with Arcadis I presume, 7th December 2016, and expressed a keen interest to be involved at the design stage with Green Infrastructure Design and its planning at a high level.

28. Has this been agreed ?

Three critically important areas for Biodiversity, pond/lake in racecourse, Harrington Brooks and east Stour river corridors.

This chapter identifies a complexity and quantity of restraints with the view that these constraints offer opportunity for enhancement and integration into the scheme. The constraints mainly refer to the habitats, Biodiversity, woodlands, rivers etc and how management of these is needed to enable the development to proceed, if you take it from a particular stance.

There have been very recent concerns over the last 2 months from nationally recognised groups regarding the decline of Harvest Dormice being greater than previously realised, along with water voles and Kingfishers especially in drier areas of the Country due to lower water levels.

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

The table produced in this section lists the assets of the site, their current functions and proposed functions as Green Infrastructure.

Most of the proposed functions actually focus on how already present assets can enhance the development in some way, e.g. reduce windchill, absorb pollution, provide recreation (apart from Ancient Woodland in this respect as previously highlighted above re concerns of high usage), provide visual mitigation and so on.

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 ?

The waterbodies, (Racecourse Lake, Benjamin Water Farm Lake, Burnbrae pond and Newingreen Spring) are listed as additional receptor sites for Great Crested Newts moved from elsewhere on the site.

Proposed green infrastructure includes playing fields, skateparks, allotments, community orchards, waste water management sites, recreation corridors, public gardens, village greens, attenuation ponds and green roofs and walls, all listed as having proposed habitat and Biodiversity benefits including bat and bird "boxes" and valuable habitats and resources.

Considering the richness of the Biodiversity that has been assessed as existing on the site so far where there is relatively much less human intervention this does sound somewhat like a wish list and perhaps questions should be asked about proper assessment of the effects of cumulative impacts. There is mention of creating habitats which are non publicly accessible to increase population stability and provide climate change mitigation for species.

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

From reading this whole section you might wonder what space there is left for housing, infrastructure, medical facilities, schools, shops etc and the Proposal of 12,000 dwellings seems hugely optimistic.

Either that or all this Biodiversity, habitat, green infrastructure mentioned above will need to be on a much smaller scale than it is made to sound or sold.

Draft WIP

With regard to Design Principles, Original and Evolving-Overview

Investment is a key Design Aspect in this part of the Report, Garden City Principles were designed as self-sustaining, existing Garden Suburbs are described as Commuter towns, not self sustained.

2014 Principles and 2012 document state that self-sufficiency is impossible but travel for work should be reduced as much as possible. 2016 DCLG Principles state self-sustaining, not dormitory suburbs, attract private investors and Shepway EOI 2016 only states opportunity to attract private investors.

The point to listing these is that the 8,000 houses planned for Shepway deal with need and meeting targets, Shepway's Plan for this site has already led to suspicions that this will become a commuter town with London "overspill" and this Draft WIP does nothing to contradict this as does a recent Radio interview with Andy Jarrett, SDC. There is much mention of sustainable development and climate change in this Appendix and it seems to be totally at odds with building on agricultural land and impacting on a rich Biodiversity and habitats in an area where demand for water outstrips supply and other parts of the District are already urbanised and in need of re-development without impacting on the AONB also.

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

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

Land Value Capture is another design aspect with the aim of distribution of profits to the community, Shepway's EOI is for investment in Community services such as sewerage , utilities and schools.

34. Would these not be essential services anyway?

2016 DCLG (Department for Communities and Local Government)states site selection to promote use of brownfield land/public sector land. Shepway EOI is blank and that must surely be because none is brownfield land and was purchased to become public sector land with the intention of developing it.

35. Can this point please be clarified ?

APPENDIX D

Water management-proposals and constraints found by Arcadis.

Proposal

Designed for 105 litres water usage per person per day .

Flood risk must not increase.

No adverse impact on drinking water resources .

Greenfield water run off rate should not be exceeded by development run off rate.

East Stour corridor along northern part of site a significant area of flood risk, there are also areas of localised flooding associated with this.

Existing wastewater treatment works unlikely to accommodate extra flows.

Aldington flood storage area is downstream and protects Ashford from flooding .

Other planned development needs to be considered cumulatively .

Arcadis see more opportunities than constraints with regard to water. A SuDS strategy will apparently recharge aquifers, rain harvesting and water re-use will help, the northern part of the site should have limited development due to the flood risk.

Water will be presented as an amenity feature , will provide habitats etc and provide education to local schools and community groups regarding the importance of sustainability, a somewhat contradictory statement bearing in mind the true definition.

36. What data/information is available, if any, on water resource capacity over the last decade and will 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 ?

5.1

Appendix D Site context Sustainability and Resources

This section is concerned with opportunities and constraints.

There are constraints due to the area being undeveloped, existing ecosystems, competing land use needs, economic pressures of cost may affect vision of sustainability, lack of existing utilities.

Energy

District Heating visions mention solar power , biomass, energy from waste plant or sewerage works, heat pumps and conventional gas boilers.

Housing density is important for the idea of providing District heating, use of solar farms requires land space and additional investment, these are just a few. Housing density is likely to be too low for this sort of vision.

Individual houses producing their own power from solar for example also comes with its' own constraints such as insufficient scale, adding to the local electricity demand, more challenging to meet carbon targets, reduces flexibility for new technologies.

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

For transport constraints; these include Westenhanger station being on the NE edge of the site, capacity issues on existing roads and junctions, potential for commuters to London due to location and station facilities being inadequate, increase in private car use to reach station.

38. Does this not contradict the purpose of a Garden Town?

For Biodiversity; constraints include Biodiversity and improving it, constrained by other development pressures and pressure on land for water management etc.

Health and wellbeing ; noise and air quality for area of site close to M20, size of site may reduce incentive for active transport.

Economy; may need funding, incentives, support to attract business.

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?

Climate change adaption; Kent likely to suffer from some of the severest impacts in the UK, warmer wetter winters, longer drier summers and more extreme weather events. Adaption requires landscape measures and therefore adds to competing land use but if adaption is not sufficient then there is risk of flooding and overheating .

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?

Materials and Waste

There are a number of opportunities listed but include sourcing materials from as close to site as possible without stating what type or where from so another wish list really, also on-site composting to reduce greenhouse gas emissions and make compost for local food production which will not exactly make up for loss of all the agricultural land.

Throughout Appendix D there are lots of terms frequently used such as Smart systems, best use of technology, energy efficiency, transport corridors, aspirations of sustainable communities, energy from waste streams, passive design principles etc.

It seems the “visions” exist but realities such as flood risk areas reducing locations on the site for development, competing land use requirements to enable these visions, a rail service not close enough to ensure private cars are not required and many more may mean these visions fading away.

41. To what extent do these constraints affect the plausibility of a “Garden town”?

As the North of the site is not able to be developed as densely as the South due to the East Stour and flood risk this also reduces the amount of land available and may well lead to high density housing concentrations away from these areas with less active transport than desired.

The scale of water and waste management required will put a huge amount of pressure on land use as will the vision of sustainable energy resources.

The key concepts of the “strategic vision” are sustainable design, low carbon infrastructure , circular economy, energy and resources to be considered not as “individual strands of demand and consumption, but within a holistic, integrated, resilient and efficient system”.

Examples are harvesting rainwater, food growing, composting organic waste, renewable energy.

A robust Energy strategy is to be produced (as opposed to a not so robust one?).

Appendix E Access and Travel

AECOM commissioned to model junctions in early 2016, Arcadis also obtained traffic data as the two did not tie in with each other.

Junction 11 is deemed to have capacity whereas some other junctions such as Newingreen are beyond capacity.

The current bus service and bus infrastructure would need significantly upgrading and at present any improvements considered in the KCC draft local transport plan would require extra funding

and there is no programme of delivery. Future modelling would need to include London Road, Hythe and Junction 10a M20.

Constraints and opportunities are listed again, of note that local roads could be realigned and widened, a new highway link to junction11, removal of the pinch point at Barrow Hill under HS line, a new link to bypass this, a new road network, an upgrade to Stone Street for access to Westenhanger Railway Station.

Based on Stage 1 findings the capacity of Junction 11 has been raised to a “red risk rating”.

Appendix B M20 Junction 11 Capacity Testing Summary Note

With some capacity enhancements J11 might accommodate 7,500 homes and operate at 94% capacity.

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

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?

Appendix F Ground conditions, site infrastructure , Utilities

All utilities companies have confirmed they would be able to connect the development to their networks but there is no information at this stage on capacity, budgetary costs etc by each company and they would all need to undertake their own capacity assessment following a formal application for each which would incur additional costs.

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

Land quality may be affected by unexploded bombs, radioactivity, contamination by fuels.

Appendix G

Socioeconomics

Generally low unemployment, Educational qualifications differ according to location at present.

Majority of growth likely to take place in Folkestone and Hythe up to 2026.

Most deprivation is Folkestone East, Folkestone Harbour, Folkestone Central and Ford.

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?

Appendix A Tables and figures

Annex A Gazetteer of Heritage Assets

709ha, long agricultural history, includes historic hedgerows, coppiced wood and historic woodland copses.

41 listed buildings, 7 scheduled monuments within 1km of site, 4 military crash sites, 47 non-designated built Heritage assets, 121 non-designated archaeological assets within 500 m of site.

Consultations with Historic England and KCC and SDC heritage advisers identify specific areas:

Westenhanger Castle and Grade 1 listed buildings and it's setting.

Palaeo-environmental potential , Hythe beds and Head deposits .

Two barrows in the North.

Lympne Conservation Area.

Registered parks.

Military buildings, (related to Lympne airfield)

Arts and Crafts Cottages, Stone Street

Otterpool Manor

Historic landscape characteristics .

Appraisal of the key heritage sites is recommended to optimise their role as a resource for the new town!

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?

A comprehensive list of buildings and heritage sites are listed along with policies from the Local Planning Policy Framework in relation to such assets. Detailed assessment of assets will be undertaken.

Agriculture

Grade 2 and 3 land present but Arcadis mention that as Kent has a higher percentage of Grade 2 land compared to the England average then its importance can be downgraded slightly and focus should be on utilising the lowest grade land.

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 location than elsewhere and would therefore depend on your viewpoint rather than mathematics. Perhaps consideration of the attitude to such land should be reviewed?

Landowners and managers will be interviewed and Natural England consulted.

Opportunities include Grade 2 land for allotments and Green infrastructure as there are no mitigation measures for its loss which is deeply concerning .

Appendix I, Annex A Air Quality Monitoring Sites

6 months of baseline monitoring will take place, it is recommended that houses and schools be set back from the motorway. No monitoring sites have previously been located next to M20 and so concentrations there are presently unknown.

This should be interesting with regard to the potential lorry Holding Area Plan but we should also ensure that monitoring includes the smallest NO2 particulates, PM 2.5, not just PM10.

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.

Appendix H Noise

Arcadis acoustics team is to liaise with SDC Environmental Health Dept to agree a baseline noise monitoring scope but it is thought acoustic screening is likely to be needed in relation to M20, HS1, A20 and Lympne Industrial Estate if it remains on site-(we ask if it is likely to be removed then?)

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.

Waste

Waste materials in relation to demolition and building are considered with possible storage areas near Westenhanger so removal could be by train and re-use of materials from demolition is recommended.

SUMMARY

Arcadis does seem to be conducting a thorough assessment of “the site” and as well as Kevin Murray Associates appear to be a very professional company who tend to be respectful in their dealings with local residents.

The northern part is likely to have less dense development, agricultural land will be lost, infrastructure is a huge issue especially with regard to building 12,000 homes.

Economic development does not sound overly hopeful at this stage, there seems to be no plan.

Along with Andy Jarrett’s radio interview recently it would seem this has potential to become a dormitory town for London commuters which goes against the principle of what a Garden town should be.

Biodiversity is regarded as something to benefit the new town and not in itself a benefit and should be a priority area.

SDC would be better developing the towns it already has, the land bought for development would seem to be much more valuable (not financially) than the purpose for which it was purchased.

Costs of connecting utilities and making everything “sustainable “ are likely to be high.

There is a risk of flooding to the area and towards Ashford and water scarcity is an issue.

The number of houses built may need to be less or else there will need to be a higher density because the general theme is that there will be demands on land use from other factors such as waste and water management, energy provision, preventing flooding, green infrastructure. As for shops, schools etc there does not seem to be enough room.

Many of the visions and principles are made to sound rather nice but the picture painted on paper does not seem to fit with the future reality of this proposal when all things are considered.

We are therefore extremely concerned in many ways about this proposed new town regardless of any public opinion that may have been expressed.