



Mr Andrew Byrne
Swale Borough Council
Mid Kent Planning Support
Maidstone House
King Street
Maidstone
ME13 6JQ

BY EMAIL ONLY

**Environment, Planning and
Enforcement**

Invicta House
County Hall
Maidstone
Kent
ME14 1XX

Phone: 03000 415673
Ask for: Francesca Potter
Email: Francesca.Potter@kent.gov.uk

23 March 2021

Dear Andrew

Re: EIA Scoping Opinion for a mixed-use development at Highsted Park Land to the South and East of Sittingbourne [Application reference 21/500819/EIASCO]

Thank you for consulting Kent County Council (KCC) on the request for a Scoping Opinion for the proposed mixed-use development including up to 8,000 residential dwellings and up to 33.2 Ha of commercial floorspace/land, retail, learning, non-residential institutions and community uses, the provision of open spaces, woodland and greenspace, highways and infrastructure works, including new junctions to the M2 and the A2, and associated link/relief road.

The County Council has reviewed the Environmental Impact Assessment (EIA) Scoping Report and sets out its comments below, following the order of the Report. This response should be read in conjunction with the KCC response to the EIA Scoping Opinion for a mixed-use development at Highsted Park Land to the West of Teynham London Road Teynham Kent [Application reference 21/500836/EIASCO].

Chapter 9 - Water Quality, Hydrology and Flood Risk

Sustainable Urban Drainage Systems

The County Council, as Lead Local Flood Authority agrees with the information presented in this Chapter and with the principles and methodology as demonstrated. The issues assessed are also considered appropriate.

KCC, as Lead Local Flood Authority notes that the site is traversed by several “fingers” of surface water flood risk which may be associated with dry valleys but are actually connected

to a number of areas of local flood risk. These flow routes must be appropriately assessed and accommodated within any masterplan developed for the site.

KCC would strongly recommend that ground information informs the development of the masterplan for the extent of this site to ensure that infiltration is maximised where possible.

National guidance promotes the use of infiltration in the first instance for management of surface water. The underlying ground conditions do support the use of infiltration, and greenfield runoff rates are expected to be low. Site conditions will require careful consideration in the development of the drainage strategy as there are dispersed areas of highly variable permeability. Drainage features will need to be integrated into the overall site masterplan and open space.

Chapter 10 Archaeology and Heritage assets / Chapter 12 Built Heritage

The Council's Principal Archaeological Officer provided advice with regards to the screening and Scoping Reports submitted for the Highsted Park site in January 2018 (KCC's formal response to Application reference 17/506551/EIAS is appended to this response (Appendix 1)). KCC's comments below draw upon that advice. Since the provision of advice in 2018, KCC and Historic England have been in discussion with the applicants and their archaeological and heritage consultants. In summary, that has included an accompanied tour of the main parts of the site, comments on a draft Archaeological and Historic Landscape Desk-Based Assessment (Wessex Archaeology, July 2019), and discussions on a proposal for a geophysical survey of the site. The geophysical works, an initial stage of the archaeological evaluation of this scheme, were due to be undertaken late in 2020 but KCC has not been provided with the results to date. Please note that Historic England and the Swale Borough Council Conservation team will lead on advice with respect to built heritage.

KCC is pleased to see archaeology and built heritage scoped in as key issues and will form proposed chapters in the EIA. The proposed scope for archaeology is set out briefly in Chapter 10 of the report, while built heritage is covered in Chapter 12. Chapter 11 is missing. In carrying out the studies for the two proposed chapters, it will be important to examine the overlap between them. It is noted that in paragraph 10.6, there is a reference to an 'Archaeology and Heritage chapter' though this is not consistent with the heading of the proposed chapter. Historic landscapes and historic landscape features, which will be of particular significance to this landscape, are to be considered in the archaeology chapter but would also have a significant relationship to the built heritage and landscape chapters.

Heritage – key issues - the Scoping Report does not provide any detail on the archaeology and heritage baseline, but reference is made to the drafting of the Archaeological and Historic Landscape Desk-Based Assessment in paragraph 10.9. As mentioned above, KCC has reviewed an early draft of this document and provided comments to the applicant's heritage consultants. Those comments should be taken account of in the drafting of the assessment.

In the absence of baseline information in the Scoping Report, KCC repeats the key issues that were raised in respect of a previous Scoping Report for this site (Appendix 1).

The proposal covers a very substantial part of the landscape south and east of Sittingbourne from the A2 corridor in the north, and into the Chalk North Downs to the south. The landscape around Sittingbourne is known to be of high archaeological value, the A2 corridor follows the original main Roman road between the coast and London and KCC is aware of considerable Roman and later activity alongside it and in the farmlands south and north. The area is also rich in prehistoric activity, dating from the Late Palaeolithic deposits known to survive in Brickearth deposits within the proposal site, through to Bronze Age and Iron Age remains. The Kent Historic Environment Record (HER) provides an indication of the presence and distribution of archaeology in this area but would tend to also illustrate the bias arising from the location of previous development and investigation in the northern areas of the proposal site. Recent investigations and discoveries are starting to reveal evidence of early use of the downland areas.

Particular highlights include:

- Roman road – Watling Street – running within fields south of the present A2 around Hempstead. Roman activity alongside.
- Palaeolithic and Mesolithic artefacts found in the upper gravels and lower brickearth deposits in the northern areas of the proposal site. A regionally important geological deposit – Limons a Doublet - survives in the Brickearth in the area.
- Later prehistoric activity has been found in several areas in or close to the northern parts of the site.
- Iron Age and Roman burial sites are known near to and within the proposal site.
- Prehistoric sites including a possible tumulus are reported from woodlands in or close to the site.
- Medieval landscape features are likely to survive as archaeology throughout the area.

The landscape itself includes a pattern of settlement, routes, farmland and enclosures, woodland, industry and individual historic features that have developed from at least medieval times and possibly earlier. The manors of Cromers and Pitstock (later Woodstock) both have a rich medieval history with the formal parkland landscape around Woodstock being particularly rich and sensitive.

As explained in Chapter 12, the site is located close to a number of designated heritage assets including the Conservation Area at Rodmersham Green. It is also important to note that the Conservation Area to the north at Tonge lies close to the northern part of the proposal site, as does Tonge Castle.

Place-shaping - the National Planning Policy Framework (NPPF) recognises the important role that the historic environment and heritage assets can play in the making of new places. It is important that the development of a place on this scale in particular, takes account of its historic environment ensuring that the new place is grounded in the past, takes advantage of

its distinct historic character and conserves and makes best use of its heritage assets – those that are undesignated as well as those that are protected through designation.

It is important that the historic environment and landscape studies for this development proposal clearly identifies the heritage of the area and examines its potential positive contribution to place making. Any forthcoming master-planning of the area should clearly demonstrate how the heritage of the site and its surroundings has meaningfully contributed to the development proposals.

Potential Impacts – KCC notes the impacts considered in paragraphs 10.3-10.5 for archaeology and historic landscapes and in paragraphs 12.24-12.33 for built heritage. It is also important that the setting of undesignated heritage assets is considered and that off-site impacts such as the introduction of additional traffic through historic villages and country lanes are included. This also applies to the change in character of historic landscapes as well as the direct impacts noted in paragraph 10.5.

The proposed methodology for the EIA by and large focuses on the impacts that will be made on the area's heritage while it is important that opportunities for enhancement are set out and included in the development effects.

The assessment should also consider potential benefits which may include opportunities for beneficial use and restoration of heritage assets, community archaeology and interpretation.

Cumulative impacts, particularly when taken in conjunction with the Highsted Park proposals to the north of the A2 should be assessed.

Assessment Methodology - It is important that the applicant continues to engage with KCC's archaeologists, Historic England and the Conservation Officers at Swale Borough Council throughout the assessment work. As noted above KCC has already provided comments on a draft of the desk study which should be taken into account.

As previously stated, given the richness of the landscape for archaeology and the potential bias in the archaeological record arising from the focus of past investigation and survey, archaeological field evaluation will be needed to inform the planning application. KCC has already provided input on the scope of geophysical survey referred to in paragraph 10.10 and the results of that survey along with the desk-based work and walk over survey should be used to inform the scope of further evaluation (including Palaeolithic and geoarchaeological evaluation) that may be needed to clarify the archaeological potential of the site. It is important that following the survey works, the desk-based study is updated to bring together all the heritage that has been identified and clearly models the heritage potential across the landscape.

The assessment should include a thorough analysis of the historic landscape and historic landscape features and the potential effects of the development, both at landscape scale and on individual features and components.

The study for the EIA needs to include a thorough assessment of significance based on current Historic England guidance and how that significance will be affected by the development proposals. The Scoping Report is not clear in distinguishing between the significance of heritage assets and the significance in terms of the magnitude of change. Paragraph 10.11 refers to the latter while for built heritage the term 'value' is defined (12.6) for the former. It is important that on completion of the baseline studies, a statement of significance of the identified heritage assets is provided both for individual assets and collectively. Mapping of heritage significance can be used to help inform the development of the Masterplan and where the most important heritage can be preserved or enhanced. This is needed to help the EIA set out the significance of the effects of the scheme. KCC would welcome discussions on the significance of the archaeological heritage further with the applicant's consultants and assist with their understanding of the local and regional context of the assets.

Mitigation of the scheme may include preservation of archaeological assets where appropriate. Given the scale of development in what is a rich archaeological landscape it is inevitable that substantial areas of investigation will be needed to mitigate development impacts. Such archaeological investigation would need to be undertaken to an appropriately high archaeological standard and make provision for publication and archiving of the results. Given the extent and value of the archaeology that is likely to be excavated the planning submission should include a consideration how this will be addressed.

It may be, given the extent and potential long programme of development, that an Archaeological Framework is developed that sets out a research design, strategy, phasing and methodologies for the archaeological work. Specific Written Schemes of Investigation would be developed from such a framework and agreed.

A programme of post excavation assessment, analysis, reporting and publication would be agreed through the Framework and Written Schemes. Such a programme is likely to be substantial and result in technical, academic and popular reports.

Widescale archaeological excavation is likely to result in a large archaeological archive of finds, environmental assemblages and documentation. Provision should be made for archiving the findings in a suitable museum or archive. Such provision is likely to require funding for deposition with the receiving body for storage.

KCC is pleased to see that in 10.13 the EIA proposes to take account of the Guiding Principles for Cultural Heritage in Environmental Impact Assessment published by the County Council and will draw upon our specification for desk-based assessment and walkover. The scope and methodology of fieldwork that will be needed to assess the site should be agreed with our office and take account of KCC standard requirements where appropriate.

Chapter 13 Ecology and Nature Conservation

The County Council provided comments direct to Swale Borough Council on 12 March 2021 (Appendix 2)

Chapter 14 Soils, Geology, Contaminated Land and Waste

Minerals and Waste

The County Council, as Minerals and Waste Planning Authority notes the constraints that will be investigated, and that any adverse effects will be minimised through embedded and additional mitigation where practicable. This should ensure that the safeguarding provisions of the Kent Minerals and Waste Local Plan 2013-30 policies CSM 5 and DM 7 are addressed.

Once the assessment(s) have been carried out and submitted as part of a planning application(s), the County Council, as Minerals and Waste Planning Authority, would welcome engagement regarding any land-won minerals safeguarding findings.

The County Council would also draw attention to previous commentary submitted in respect of a previous Scoping Report for this site (Appendix 1).

Waste Management

KCC welcomes reference to waste management and the recognition of the 'significant new demand on existing waste infrastructure' that the development will create. KCC would welcome further discussions with the applicant over how these can be best addressed and mitigated to ensure a sustainable waste management solution is found. On this basis, KCC requests that consultation with the County Council as Waste Disposal Authority is included as part of the proposed waste assessment detailed in sections 14.16.

This proposed development will be served by the KCC Waste Transfer Station in Sittingbourne, which takes kerbside collected waste from the whole of the Swale District. In addition, KCC provides two Household Waste and Recycling Centre (HWRC) facilities in the vicinity for residents to dispose of household waste, one co-located with the Waste Transfer Station (WTS) and one at Faversham. The third HWRC within the Swale District is located in Sheerness; this is unlikely to be impacted by the increase in demand from the Highsted Park development.

KCC has already fed into Swale's Local Plan and Infrastructure Development Plan (IDP), identifying projects required to ensure sufficient capacity is available to serve new developments, including Highsted Park. Developer contributions will be requested to support these projects, details of which are given below, and they should be considered when the waste assessment is carried out. (see also KCC's comments under Chapter 16 below, in the *Summary of Education and Community Requirements* table).

Sittingbourne WTS/HWRC – to support the proposed development, relocation of the existing Sittingbourne HWRC facility is required to allow expansion of the co-located WTS. All of the kerbside collected waste from the Highsted Park development will be taken to this one WTS facility. This existing facility is now considered to be at operational capacity (100%) hence any increase in tonnages in the future as a result of development proposed at Highsted Park

would require mitigation. The performance of the WTS is monitored through regular contract board meetings with the Operator and the Waste Collection Authority (WCA). Regular complaints over the length of time WCA vehicles queue along the access road are received. Measures to improve the efficiency of the site have been investigated and where possible implemented over the past few years, i.e. installation of a second weighbridge and provision of additional infrastructure to enable food waste to be accepted. However, demand has continued to grow, such that there are now no practicable options to make further improvements at this site. The location of the site, surrounded by two closed Landfill sites, as well as the Sittingbourne and Kemsley Light Railway and Milton Creek would make any expansion challenging. It is therefore proposed to remove the HWRC facility and expand the existing WTS to the whole footprint of the site. A new HWRC will be constructed to serve the residents of Sittingbourne and surrounds. KCC would like to see land allocated or safeguarded for the provision of the relocated Sittingbourne HWRC. The Highsted Park development to the south of Sittingbourne Town Centre, could potentially be an ideal location; a site of around 1 hectare would be required. It would need to be suitably located as to not impact upon the residential properties and have good transport links.

Faversham HWRC – the significant development at Highsted Park as well as that proposed in and around the Faversham area means that a project to extend the Faversham HWRC is required, even with the relocated Sittingbourne HWRC project. The current layout of the site is such that it currently has to be closed when full waste containers are changed over for empty ones, resulting in long queues for residents. KCC has plans to extend the Faversham HWRC on to adjacent KCC owned land to allow the layout to be altered and additional capacity created.

Chapter 15 Transportation

Highways and Transportation

The County Council, as Local Highway Authority confirms that the scale of the development is such that a planning application for the proposed development on this site will require the submission of a full Transport Assessment and Transport Impact Assessment to accompany the application.

It should be noted that the applicant has engaged with the Local Highway Authority prior to this application, and they are therefore already aware of what information should be submitted to allow the development proposals to be adequately assessed in transport terms.

In respect of the submitted Scoping Report, the methodology proposed in the following submitted paragraphs is agreed:

15.3 A Transport Assessment (TA) will be carried out to examine the implications of the Proposed Development on the surrounding transport network. The results of this will be summarised in the ES.

15.4 The TA will be completed in accordance with National Planning Practice Guidance, published online in 2014 by the Department for Communities and Local Government and subject to regular updates.

15.5 The assessment will consider the potential significant transport effects arising from the development, in accordance with the best practice guidelines for the Environmental Assessment of Road Traffic (IEA, 1993).

15.6 The potential effects will cover: • Construction vehicle activity; • Additional car trips; • Additional highways infrastructure; • Additional site delivery activity; • Additional public transport use; and • Additional walking / cycling activity.

15.7 The TA and therefore the ES Transport Chapter will adopt the Swale Strategic Transport model as the basis for its assessment.

15.8 Various measures will be proposed to mitigate any significance adverse impacts, to include various travel management strategies, as follows: • Off-site highway network mitigation; • Delivery of additional on-site highway infrastructure that provides a net benefit to over highway conditions; • Delivery of transport infrastructure/service improvements to encourage modal shift; • Framework Travel Plan (to manage people movements); • Delivery & Servicing Plan (to manage deliveries and servicing trips, including waste); and • Construction Management Plan (to manage the transport of materials and workers to and from the Site during the construction period).

In addition to the above it should be expected that a micro simulation highways assignment model will be required to demonstrate the cumulative impacts of junctions in the local area.

Public Rights of Way and Access

The County Council is committed to working in partnership with the applicant to achieve the aims contained within the Rights of Way Improvement Plan (ROWIP) and Strategic Statement for Kent. Specifically, these relate to quality of life, supporting the rural economy, tackling disadvantage and safety issues, and providing sustainable transport choices.

Public Footpaths ZR194, ZR682, ZR196, ZR197, ZR199, ZR208, ZR209, ZU31, ZU30, ZR147, ZR155, ZR158, ZR156, ZR157, ZR150, ZR185, ZR49, and Restricted Byways ZU34A, ZU35 and ZR151 are located within the site and would be directly affected by the proposed development. The locations of these paths are indicated Map (Appendix 3). The existence of the Rights of Way is a material consideration.

KCC recommends that the PRow network is specifically referenced in this chapter where walking and cycling are referenced to ensure the opportunities that the network can provide through positive incorporation, and early planning are not missed.

The substantial size of this development will have an adverse impact on the PRow network, through increased use, loss of amenity and potential generation of traffic. Significant

measures will need to be taken to help mitigate all these impacts and future proof sustainable Active Travel in both the development and the wider area of the Borough. The increase in investment and policy from both central and local government towards a modal shift away from short car journeys should focus this project to provide a sustainable development for the future.

The application should consider the necessity to mitigate the loss of amenity, increased use and subsequent surface improvements that will be required in the wider network as the area is developed.

KCC urges consideration of the following:

- The likely usage and visual impact on users participating in recreational activity on the above mentioned footpaths and restricted byways.
- The likely loss of recreational walks within open countryside.
- The impact of increased vehicular traffic along rural lanes, which currently provide valuable connections for equestrians and cyclists travelling between off-road PRoW routes. The proposed development could deter public use of the PRoW network if vehicular traffic increases along these roads.
- The viability of upgrading existing PRoW, as a means of providing walking and cycling between residential dwellings, education facilities, employment hubs and local amenities, to encourage active travel.
- The creation of new walking, cycling and equestrian routes that connect the site with the surrounding countryside, providing opportunities for outdoor recreation.
- The provision of safe crossings points over the A2 for non-motorised PRoW users, to address safety concerns and improve network connectivity.

In consideration of Kent Design standards and Police guidance, any forthcoming master plan should keep PRoW within overlooked areas of Open Space, to facilitate a safer environment for path users. Path extinguishments and long term severance of routes should also be avoided, to prevent fragmentation of the PRoW network.

Chapter 16 Socio-Economics, Population and Human Health

Provision and delivery of County Council community services and facilities

The scale of the development proposed will generate significant additional demand on services delivered by the County Council. It will not be possible to accommodate this additional demand within any existing surplus and therefore additional service capacity will be required in direct response to the development. Given the scale of the proposal, it would be necessary for many of these services to be delivered within the development; this will enable residents to directly access provision and is necessary to ensure the development is sustainable.

Primary Education - The proposed development is estimated to generate 2,240 primary pupils (based on up to 8000 units set out in the Scoping Report); equivalent to 10.66 Forms of Entry. New primary schools are commissioned as either two or three forms of entry, and therefore the number of new schools required to support the development will vary depending on the proposed sizes of the schools. The appropriate sizes for the new schools will be determined using a number of factors including development layout and phasing; up to six new primary schools would be required given the housing numbers and mix currently proposed.

Secondary Education - The development is estimated to produce 1,600 secondary pupils, equating to 10.66 Forms of Entry. To accommodate this additional demand, new provision would need to be integrated within the development in the form of one 6FE and one 7FE secondary schools.

Specialist Education - A proportion of pupils generated by the development will also have specialist educational needs. Given the scale of the proposed development, the total number of these pupils could not be accommodated within existing specialist provision and therefore additional provision will be required within the development to directly accommodate them, both integrated within the primary school and secondary schools and through stand-alone specialist provision. Integration of nursery/early years provision within the development should also be a key consideration in the master planning process.

Community Facilities - The scale of the proposal will also result in significant additional demand on the library service, community learning, youth service, social care, and waste services (which is already discussed above). Provision of on-site facilities such as a community hub alongside increasing capacity within existing service delivery points local to the development is likely to be required to meet the needs of the development. Therefore, identifying a strategy for this mitigation is most appropriately done alongside the master planning process to ensure full integration of services within the new community.

Potential provision of care homes - Concerning older people's care homes in Kent, the County Council has seen a steady decline in overall numbers of care homes in the past five years, with the situation further exacerbated by Covid-19. Consequently, there are specific types of care homes which, the County Council would wish to support. For example, there is a significant demand for residential and nursing care homes that can meet the needs of people with challenging and complex dementia. KCC would also encourage any new residential care home provider to join the KCC Care Home Contract and to operate a mixed economy of both local authority funded and private funded residents. As such, we would recommend that the applicant works with KCC Adult Social Services to develop the most appropriate form of care delivery.

Summary

The planning obligations accompanying the development will be required to provide the full cost of constructing and providing the necessary amenities including schools and community facilities and make available the land for their provision at no cost to the County Council. It is

imperative that the infrastructure needed to support the development is integrated within it as early as possible. The County Council requests that discussion takes place at the earliest opportunity so that an infrastructure strategy can be identified, costed and agreed between the necessary parties prior to the proposals progressing.

Summary of Education and Community Requirements¹

	Per 'Applicable' House	Per 'Applicable' flat	Total (Up to (8000 Dwellings)	Project
Nursery	26 place Nursery at each new 2 Form Entry Primary School – Provided as part of the 2FE Primary School			
Primary Education	£6,800	£1,700	£*	5-6 No. New on-site 2FE Primary Schools
Primary Land	6 No. 2FE Primary School sites of 2.05ha at 'nil' cost to the County Council (transferred as per KCC's General Site Transfer Requirements)			
Special Education Needs	£1051.82	£262.96	£*	Contribution towards an existing/new special needs school serving this development
SEN** Land	1 No. SEN site of 2.05ha at 'nil' cost to the County Council (transferred as per KCC's General Site Transfer Requirements)			
Secondary Education	£5,176.00	£1,294.00	£*	Towards new Secondary Schools to serve this and the adjoining Highsted Park (North) development
Secondary Land**	1 No. 8Ha and 1 No. 9.7Ha sites to be provided on site at 'nil' cost to the County Council (transferred as per KCC's General Site Transfer Requirements)			

	Per Dwelling (x8000)	Total	On Site Community Buildings	Project
Community Learning	£16.42	£131,360.00	Free use of on-site Community facilities for classes	Towards additional resources (including portable teaching and mobile IT equipment), and additional sessions and venues for the delivery of additional Adult Education courses locally.
Youth Service	£65.50	£524,000.00	Free use of on-site Community facilities for youth sessions	Towards additional resources and upgrade of existing youth facilities including the New House Sports and Youth Centre in

¹ 'Applicable' excludes: 1 bed units of less than 56 sqm GIA, and sheltered accommodation.

* mix currently unknown.

** Secondary land & SEN Land – The combined Highsted Park North & South sites will require 2 new on-site Secondary Schools and 1 new SEN School to be provided. As Highsted Park is a split site and if the Secondary & SEN Schools are located on the South site, a Development Equalisation Agreement will be required between the North and South sites if they are in separate ownerships with this North site contributing towards the Secondary & SEN School sites on the South site.

				Sittingbourne to accommodate the additional attendees, as well as resources and equipment to enable outreach services in the vicinity of the development.
Libraries	£55.45	£443,600.00	Free use of on-site Community facilities for library purposes	Towards additional resources services and stock, the local mobile Library service and works to Sittingbourne Library.
Social Care	£146.88	£1,175,040.00	Free use of new Community facilities on-site for meetings, group, and therapy sessions	Towards specialist Housing Provision in the District, adaptation of community facilities, technology to promote independence, multi- sensory facilities and changing place facilities in the vicinity of the development.
				All Homes built as Wheelchair Accessible & Adaptable Dwellings in accordance with Building Regs Part M 4 (2)
On-site Community Buildings specification:	*Design that is Dementia friendly with dementia friendly decoration and signage. *A catering area which is compliant with the Equality Duty 2010, such as adjustable height work surfaces, wash areas, cupboards etc. *Toilets and changing facilities for the profoundly disabled in accordance with the Changing Places specification set out in Kent County Council's Kent Adult Social Services Glossary document dated October 2008 or any successor document or as modified by legislation or best practice or otherwise agreed which are Equality Duty 2010 Compliant https://riseadapt.co.uk/changing-places/			
Waste	£183.67	£1,469,360.00	Towards increases in capacity at the Household Waste Recycling Centre and Waste Transfer Station in Sittingbourne.	
Waste - Land	1No. site of 1 Ha to be provided at 'nil' cost to the County Council to provide the new HWRC, suitably located as to not impact upon the residential properties and have good transport links.			

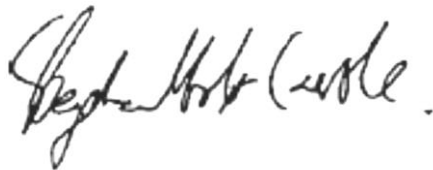
Please note that these figures:

- are subject to review and are currently **index linked by the BCIS General Building Cost Index from April 2020 to the date of payment** (April 20 Index 360.3)
- are valid for 3 months from the date of this letter after which they may need to be recalculated due to changes in district council housing trajectories, on-going planning applications, changes in capacities and forecast rolls, projects and build costs.
- Bonds may be required by KCC for the Education contributions if the applicant wishes to pay the contribution in instalments. If the contributions are paid in instalments, the applicant will also be required to cover KCC's borrowing costs for the construction of the schools.

The County Council will continue to work closely with the Borough Council to help to ensure the delivery of new housing and infrastructure in response to local needs. In addition, the County Council welcomes any further engagement with the Borough Council and the applicant as this major development proposal progresses.

If you require any further information or clarification on any matter, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stephanie Holt-Castle'.

Stephanie Holt-Castle

Interim Director for Environment, Planning and Enforcement

Encs:

- [Appendix 1](#): Kent County Council response to Scoping Report (Application reference 17/506551/EIAS) dated 26 January 2018
- [Appendix 2](#): KCC Biodiversity response dated 12 March 2021
- [Appendix 3](#): Extract of the Network Map