

APPENDIX 1

Consultee Responses

Organisation	Initial Comments (April 2017)	Reconsultation 1 (August 2017)	Reconsultation 2 (November 2017)	EDC Officer Comments
DBC	<p>Letter 25.04.17</p> <ul style="list-style-type: none"> • S73 submission is not appropriate mechanism – changes are fundamental and so fresh submission is needed • Contrary to the local plan • Land ownership concerns 	<p>Letter 25.09.17</p> <ul style="list-style-type: none"> • Maintain OBJECTION • contrary to adopted Local Plan policy (specifically Policy CS5) • Potential significant and wide-reaching impact on the wider area: <ul style="list-style-type: none"> - encouraging greater car use - creating stand-alone large retail, leisure and commercial areas separated from the residential areas they serve - creating significant unrelieved residential areas and therefore failing to create the sustainable mixed use communities that are sought through the Local Plan • ALL Strategies should be submitted for review - only [separate detailed comments on the submitted strategies to be provided] • 2006 RIA is out of date and therefore cannot be relied upon for this application • Location of commercial centre to west is contrary to policy CS5 • No community/education uses within commercial area • Challenge assumptions made in submitted Town Centre statement • Change in shopping patterns since original RIA • Further assessment should be carried out on the convenience store and its catchment • Residents more likely to drive to convenience store • Insufficient justification of why re-location of market centre would not make a difference which makes no reference of key issues at play • Proposed mixed use commercial centre consisting of retail/leisure/hotel makes destination in its own right • Reduction of residential floorspace by 1/3rd therefore earlier RIA not representative of expenditure previously envisaged • Visibility of new market centre – drawing people in from outside • No reference to Diagram 6 of policy CS5 ‘used to inform detailed proposals’ • Impact of location market centre part of discussion when proposal originally determined (minutes can be provided) • Village centres are not geographically central and therefore mean greater travelling • No justification why “main shopping needs” met by Market Centre would not actually be met at Bluewater - & what are main shopping needs? – dissemination used affecting viability / car trips • Leisure Impact Assessment may be required due to 	<p><i>No comments received</i></p>	<p>The original proposal was referred to DBC Cabinet on 25.05.17 with an objection and recommendation that EDC refuse the application. DBC Members resolved to approve this recommendation.</p> <p>Following amendments to the scheme, the proposal returned to Cabinet with a recommendation that the previous objection is withdrawn but Officers engage with EDC with regard to details of the strategies, S106 conditions and the HRA. DBC Members resolved to approve this recommendation.</p> <p>Comments from the latest Cabinet report have been referred to in the committee report. Matters raised in respect of the concern that use of the open space is conflicted has been addressed under the Landscape and Open Space Strategy section (cttee report paragraph 9.57 on) and provision of off-site pitches has also been resolved (cttee report paragraph 9.66).</p>

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		<p>effect of character of mixed use commercial area now proposed</p> <ul style="list-style-type: none"> Density is too low, particularly medium density parameters – would not create critical mass of direct access to Fastrack to support viability and landtake increase at the expense of open spaces / ecology areas No playing fields shown on-site Impact on highways changed from spatial issues – more analysis required Road layout contrary to outline permission which aims to make routes less attractive by car Proposal is contrary to the approved Transport Strategy Double-counting of open spaces where local park falls within Major Urban Park Distribution of open spaces is uneven Failure to connect footpath DS20 with open spaces Challenges made in respect of Consultation Response matrix submitted S73 process is not appropriate 		
Environment Agency	<i>No comments received</i>	<p>Letter 01.09.17</p> <ul style="list-style-type: none"> No comments 	<p>Letter 20.11.17</p> <ul style="list-style-type: none"> No comments 	Acknowledged.
GBC	<ul style="list-style-type: none"> Object to the application Relocation of market centre would complement Bluewater offer which could have detrimental impact on traditional town centres Relocation of market centre would allow for early delivery drawing trade from elsewhere as residents may not be on-site Market Centre in less sustainable location Reliance on 2006 retail impact assessment is wholly unacceptable due to change in retail market since this time and have concerns with 2006 assessment Objections raised during implementation framework discussions Lack of compliance with policy CS5 and diagram 6 Conditions do not restrict much Regard to be had to policy CS12 Query ES conclusions that traffic generation would be the same 	<p>Letter 22.09.17</p> <ul style="list-style-type: none"> Maintain Objection Original grounds still valid Contrary to policy Current permission based on RIA which is now dated and unreliable – should not be relied on for current assessment Retail / leisure context has changed since permission granted – other permissions granted Detailed assessment of changes being sought in relation to retail floorspace Proposed distribution retail/leisure will not adequately serve the new resident population of the site Distribution of retail/leisure will increase the potential for journeys to other retail and leisure provision outside the site Greater prominence and accessibility from new location of market centre will increase appeal of retail and leisure offering to potential trade from outside the site S73 procedure inappropriate 	<i>No comments received</i>	Initial comments have been addressed through the revision to the plans. Other matters raised are addressed throughout the committee report.
Highways England	<ul style="list-style-type: none"> S73 point Impact on the SRN and lack of information Changes to proposal could impact on SRN STIPS contributions Meeting requested 	<p>Email of 24.08.17 – response to Technical note (Additional Transport Information) (non-statutory response):</p> <ul style="list-style-type: none"> No evidence submitted to support assumption that no additional traffic generated from proposed redistribution of land uses Additional information still required: initial comparison undertaken between original and proposed layout which considers accessibility of the Market Centre (and other facilities) from residential 	<p>Letter 29.11.17</p> <ul style="list-style-type: none"> No objection Are satisfied that the revised Parameters Schedule (and associated disposition of development table) and Transport Strategy remain in line with the previously consented parameters and broad masterplan layout. 	Previous concerns have been overcome. Recommendation to Transport Strategy has been implemented.

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		<p>properties in terms of appropriate walk distance, and in terms of public transport (within an appropriate journey time and frequency) to highlight the potential scale of residential properties which may make an alternative choice and therefore travel outside of the EQ development site.</p> <p><i>Alternatives welcomed if argued by developer</i></p> <p><i>(This info requested before statutory response period started)</i></p>	<ul style="list-style-type: none"> Recommend a minor amendment to paragraph 120 of Transport Strategy to ensure that the Local Planning Authority must consult Highways England and Kent Highways on any future reviews of the Transport Strategy. Are otherwise satisfied the proposed amendments would not significantly alter the impacts and outcomes identified within the previously agreed impact assessment for the Site and content to rely on the previously agreed mitigation for the Site to ensure the development will not impact on the safety, reliability or operational efficiency of the strategic road network. 	
KCC Ecology	<p>Letter 26.04.17</p> <ul style="list-style-type: none"> Applicant has good understanding of ecological aspects but further information is needed: - <ul style="list-style-type: none"> Current Phase 1 species surveys to be submitted Demonstration that proposed habitat retention / creation is sufficient to support required mitigation 	<p>Email of 30.08.17</p> <ul style="list-style-type: none"> Information previously requested has not been provided – not included in updated BAP References in BAP are out of date No Phase 1 map dated 2017 can be located, despite consultation tracker making reference to it. Question why an ecology document comparing the ecological impacts/mitigation associated with the original application vs the S73 application has not been carried out as it has for transport and retail. 	<p>Letter 07.12.17</p> <ul style="list-style-type: none"> Acknowledge reduction in size of open space Concerned that the submitted information has not fully assessed the impact on these areas due to an increase in recreational pressure particularly in reference to the extent of open space that has restricted public access. Alternative wording suggested to condition 15 for clarification 	<p>Further work has been carried out with the applicant to address concerns regarding impact on ecology arising from recreation. This is addressed with KCC's comments in the sections on Landscape and Open Space Strategy (cttee report paragraph 9.57) and BAP (cttee report paragraph 9.81)</p>
KCC Economic Development	<p>Letter 26.05.17</p> <ul style="list-style-type: none"> Approach of separation would be better once Castle Hill RMA consents were complete Need S106 and inc KCC to be signatory Need fastrack retention, discourage through traffic and consider timing of access points and phasing Query levels of the education campus and primary school 3 Transport strategy should look at sustainability of development. Retain and possibly strengthen on site travel obligations 	<p><i>No comments received</i></p>	<p>Letter 17.12.17</p> <ul style="list-style-type: none"> Does not consider changes to the parameters to be significant. Supports position of education facilities, commercial centre returned to central village and central route of Fastrack. Notes that Fastrack tunnel falls in the final phase of the development but should be delivered early. Matters of minor clarification and corrections requested on minor points in strategies Expect KCC to be included in S106 negotiations 	<p>KCC will be engaged in ongoing discussions to secure a new S106 if Members resolve to approve the application. As part of this process, a page-turn exercise will be undertaken with the applicant which will address the minor amendments sought. Other points of clarification have been requested from the applicant.</p>
KCC Highways	<p>Letter 26.05.17</p> <ul style="list-style-type: none"> Relocation of market centre will lead to more car use Cycle corridor gradients should be as low as possible Significant east – west traffic Fastrack corridor and transport strategy P39 conflict Higher density housing should be closer to fastrack Various comments on transport strategy 	<p><i>(Prepared in conjunction with Highways England – please refer)</i></p>	<p>Letter 04.12.17</p> <ul style="list-style-type: none"> No objection The revised Parameters Schedule will not undermine assumptions incorporated into the original Transport Assessment and a significant increase in traffic generation is not anticipated from the proposal Concerns relating to provision of routes that would enable 'rat-running', funnelling of traffic through the central part of the site, aligning key vehicle route next to Fastrack and depiction of long straight sections of road shown in SWMP can be overcome through detailed design work at the AMP stage. Recommended updates to wording of Transport 	<p>Initial concerns have been addressed by the re-location of the commercial area back to the central village. Concerns are acknowledged and discussed at the relevant section of the committee report on the movement corridor (paragraph 9.13) and Transport Strategy (paragraph 9.73).</p> <p>It is acknowledged Highways would like to be closely involved in the development of the Area Masterplans going forward. Although they would be consulted as standard, this request is noted and the applicant can be advised to engage on early pre-application discussions.</p>

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			Strategy in relation to Fastrack widths and consultation with the highway authority for any proposed amendments.	
KCC : Local Lead Flood Authority	<ul style="list-style-type: none"> Water management plan principles submitted in 2007 have changed and so concern is raised 	Letter 05.09.17 <ul style="list-style-type: none"> Require calculations produced from the modelling in microdrainage 	Letter 05.12.17 <ul style="list-style-type: none"> No Objection Request that when design of primary network is submitted in advance of individual plots, it is accompanied by evidence proving that sufficient capacity exists within the network for future connections and what the allocation (rate and volume) is for each of the plot connections. 	Initial concerns have been overcome. Request for details in respect of the details required in association with the primary network has been added to the decision notice as an informative.
KCC : Public Rights Of Way	Letter 21.04.17 <ul style="list-style-type: none"> Identify position of local public rights of way proposed pedestrian and cycle links through the development site would be a valuable addition to the public rights of way network but consideration needed regarding ongoing maintenance - expected that these will not become the responsibility of the County Council Disappointing to see removal of two connections to the south of the site but reasons for this are accepted. Creation of additional link to western boundary through Bluewater tunnels is welcomed. 	Letter 12.09.17 <ul style="list-style-type: none"> Earlier response remains valid and to be considered at determination 	Letter 05.12.17 <ul style="list-style-type: none"> Earlier comments remain appropriate and to be considered at determination. 	In respect of maintenance, the applicant is committed to managing the open spaces under service level agreement. Measures are already in place for Castle Hill and this will be rolled out across the site. This has been discussed at paragraph 9.33 of the committee report.
Medway Council	Letter 17.05.17 <ul style="list-style-type: none"> Objects to proposal Proposed changed fundamentally change principles previously established by extant permission Proposed location of retail and leisure uses are inappropriate 	<i>No comments received</i>	<i>No comments received</i>	Comments overcome through submission of amended plans. It is noted that Medway Council are not a statutory consultee but have been included in this matrix for information.
Natural England	Letter 24.04.17 <ul style="list-style-type: none"> No objection subject to mitigation on SAMMS impact and mitigation strategies for protected species 	Letter 11.09.17 <ul style="list-style-type: none"> Same comments as before 	Letter 02.12.17 <ul style="list-style-type: none"> Previous comments apply. The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal. 	Applicant has committed to the payment of the relevant contributions to the SAMMS which addresses comments raised. This will be secured through the S106, as set out in the recommendation and discussed in the committee report – paragraph 9.110.
Secretary of State	Email 08.05.17: <ul style="list-style-type: none"> No Comment to make 	<i>No comments received</i>	<i>No comments received</i>	No further action to be taken.
Sport England	<ul style="list-style-type: none"> Not statutory consultee but object to the application No formal sports facilities for community 	Email 11.09.17 <ul style="list-style-type: none"> Refers to CIL contributions More consideration could be given to the pitch sizes 	Email 21.11.17 <ul style="list-style-type: none"> Do not considered previous comments have been sufficiently addressed. 	Sport England are not a statutory consultee. Notwithstanding this, their comments have been considered. A response to their September

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	<p>use are proposed apart from potential use of education campus. Sport England keen to explore this further and it should be designed to accord with policy</p>	<ul style="list-style-type: none"> • Based on numbers, likely to be demand for 10 natural grass pitches • Noted 4 community pitches but further information/clarification on the location of these community facilities is required • Recommendations for turf pitch, artificial pitch and pavilion design which have not been included in Community & Leisure Strat or Masterplan • Sufficient car parking to be provided • Community Use Agreement is expected 	<ul style="list-style-type: none"> • Still unknown the location and type of community pitches proposed • Ne details of pavilion • No further information on Community Use Agreement • No acknowledgement of England Hockey's concerns and desires. 	<p>comments was provided by the applicant and no subsequent response has been received from them. The details of this discussion is examined in association with the Community and Leisure Facilities Strategy in the committee report (paragraph 9.68).</p>
Southern Water	<p>Letter 25.04.17</p> <ul style="list-style-type: none"> • No comments to make 	<p>Letter 11.09.17</p> <ul style="list-style-type: none"> • No comments to make 	<p>Letter 05.12.17</p> <ul style="list-style-type: none"> • No comments to make 	<p>No action required.</p>
Swanscombe & Greenhithe Town Council	<ul style="list-style-type: none"> • Objection raised • Loss of Alkenden Farm which was shown in previous proposals as a community hub. Important to Town heritage • Residents should have early access to public transport to assist with accessing facilities • Lack of delivery of local community improvements which were previously offered 	<p>Letter 13.09.17</p> <ul style="list-style-type: none"> • Potential transport implications by moving Business Centre to the West (closer to Bluewater) which could increase traffic movements from Swanscombe and Ebbsfleet Green as it would then be further to walk/cycle to from these areas. 	<p>Letter 29.11.17</p> <ul style="list-style-type: none"> • No further observations but members would draw attention to the previous submissions made by the Town Council and Mr Geoff Baker in April 2017. 	<p>Earlier objections have been overcome. No further action required.</p>