

Chapter / site	Number of responses			Headings / Main issues raised	Requested changes
	No of reps	object	support		
Chapter 1				Introduction	
1.1 3	2		1	<p>Concerned about the spatial strategy the quantity of development and the sites chosen.</p> <p>Not sustainable development.</p> <p>Concerned that the consultation was set out as a Reg 19 or modification consultation even though a formal modification consultation will also be needed.</p> <p>Insufficient time give for consultation, duty to co-operate not undertaken.</p> <p>Planning permission granted for Thanington prior to amendment consultation closing.</p> <p>No viability or transport modelling information available.</p>	
1.2 2	1		1	<p>Not dealt with Inspectors queries.</p> <p>Proposed amendments do not evidence how 16000 houses can be achieved.</p> <p>Status of amendments. Concerned that the consultation was set out as a Reg 19 or modification consultation.</p> <p>No viability or transport modelling information available.</p> <p>CDLP 4.16 SHLAA Proposed Amendments and CDLP 5.8 Housing Land Supply position statement were not put on the website until January.</p>	
1.3				No comments	
1.4				No Comments	
Chapter 2				Meeting the Inspector's Requests	
2.1 7	4		3	<p>Highways Authority, Coal authority, Greater London Authority have no specific comments to make.</p> <p>Reduce housing numbers to a more realistic level.</p> <p>The late publishing of the Housing Land supply revised position statement just</p>	<p>Allocate deliverable sites</p> <p>Update SP2 and SP4</p>

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				<p>before the end of the consultation did not allow time to assess it.</p> <p>Unsound because it is ineffective as 5 year supply not demonstrated realistically CCC only has a 3.04-4.16 year supply.</p> <p>Due to a persistent under supply since 2011 a 20% buffer should be applied.</p> <p>Disagree with the use of the Liverpool method as the DTC not met, not meeting housing need, allowing for 910 units on strategic sites while using the Liverpool Method due to the need for infrastructure.</p> <p>Council's 5 year supply is undeliverable due to, over-estimated delivery rates and underestimated lead in times. That quantity of housing has never been delivered and the strategic sites are constrained.</p> <p>Amend Policies SP2 and SP4 to allow other sites to come forward.</p>	
2.2				<p>Reduce housing numbers to a more realistic level.</p> <p>Unsound because there are too many assumptions.</p>	
2	2				
2.3				<p>Reduce housing numbers to a more realistic level.</p>	
2	1		1		
2.4				<p>This received a large number of objections predominately based on a replicated letter (approx. 102). This letter raised concerns with respect to:</p> <ul style="list-style-type: none"> • Not in compliance with NPPF • Does not comply with policies and text in local plan. • The area is a high flood risk and building here will increase flood risk for other residents. • Creation of a divided community. • The impact on the local road network in terms of safety and congestion particularly Reeves Way. • Emergency access to Ridgeway is not possible as it is a private road. • Noise and air pollution resulting from additional traffic and increase industry/heavy Goods vehicles. 	<p>Deallocate Grasmere Pasture</p> <p>Include SHLAA/135 Golden Hill</p> <p>Consult with Parish Council and include road/traffic details.</p>
114	113		1		

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				<ul style="list-style-type: none"> Capacity of public and surface water sewers to cope with additional connections/load. Impacts on biodiversity and protected species. Need for public transport. Due to site complexities doubt that site can be delivered in the next 5 years. Over development Allocation of site is not soundly based or deliverable. <p>Sustainability Appraisal has fundamental flaws.</p> <p>Object to Thanington Park because the planning application was considered in advance of the Local Plan consultation finishing, it ignored Sustainability Appraisal and traffic implications not considered. No consultation with Parish Council.</p> <p>Reduce housing numbers to a more realistic level.</p>	
2.5 4	4			<p>Process is prejudice.</p> <p>Sustainability Appraisal only included information on sites to be included or removed no information provided on additional sites.</p> <p>Smaller omission sites that are sustainable and could be delivered within 5 years need to be looked at.</p> <p>Include additional sites.</p> <p>A further consultation period should take place, with all the assessment information made available.</p> <p>Reduce housing numbers to a more realistic level.</p>	<p>Allocate SHLAA/135 Golden Hill, SHLAA/50 Staines Hill and SHLAA/217 Blean Common.</p> <p>Undertake a further consultation period with all information available.</p>
2.6 3	3			<p>Evidence has not been provided as to how alternative sites have been assessed and how the additional sites fit into the spatial strategy.</p> <p>Reduce housing numbers to a more realistic level.</p> <p>Site assessments incorrect and outdated.</p>	<p>Allocate SHLAA/178 Bodkin Farm and SHLAA/45 Herne Bay Rd, Broadoak</p>

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2.7 6	6			<p>NPPF criteria not followed in determining sites.</p> <p>Object to the removal of brownfield sites where there has been no response from landowner.</p> <p>Status of amendments. Concerned that the consultation was set out as a Reg 19 or modification consultation</p> <p>No viability or transport modelling information available. The detail of the expected timing and deliverability of the allocated housing sites and viability was not available to critically review.</p> <p>Reduce housing numbers to a more realistic level.</p>	Allocate SHLAA/135 Golden Hill
2.8 7	4		3	<p>Status of amendments. Concerned that the consultation was set out as a Reg 19 or modification consultation.</p> <p>No viability or transport modelling information available. Will this be available and subject to further consultation?</p> <p>The detail of the expected timing and deliverability of the allocated housing sites and viability was not available to critically review.</p> <p>Council stance on viability has changed. With respect to developer profit, Strategic Access Management and Monitoring Strategies and school places.</p> <p>Have not made modifications with respect to other changes in government policy.</p> <p>Reduce housing numbers to a more realistic level.</p>	
2.9 1	1			Reduce housing numbers to a more realistic level.	
				The consultation what happens next	
2.10				No Comments	
2.11				The amendment adding Brickfields at Bridge not positively prepared as it	Delete brickfields site

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1	1			undermines the emerging Bridge Parish Plan and makes no acknowledgement of Cantley proposals.	
2.12				No Comments	
2.13				No Comments	
2.14				No Comments	
Chapter 3				Proposed Amendments	
				Proposed changes to existing site allocations	
3.1				Site assessments have not benefited from viability or transport work. So cannot know if the sites put forward are the most suitable.	
1	1				
PA/001	1			Site 8 Land north of Hersden	
15	10	2	3	<p>Development should be on brownfield land to the south of Hersden rather than greenfield land to the north.</p> <p>Affordable housing, community centres and children services should be provided.</p> <p>Will worsen traffic congestion and pollution in Canterbury. No consideration of traffic and parking impacts of stadium.</p> <p>Lack of technical information on deliverability, viability and compliance with the spatial strategy and why alternative sites were not considered.</p> <p>Appropriate biodiversity site survey required (Kent Wildlife Trust).</p> <p>Site plan needs amending to change the boundary to reduce the impact on the listed farmhouse and incorporate the football stadium. (Persimmon Homes)</p> <p>Part of allocation is on a former landfill site, investigations and remediation required, soakaways should not be used (Environment Agency)</p> <p>Policy unsound, the development needs to ensure access to existing water and sewerage infrastructure for maintenance and ensure connection to the sewerage is at the nearest point of adequate capacity. (Southern Water)</p>	<p>Do not allocate site.</p> <p>Amend plan to take account of latest master plan.</p> <p>Allocate SHLAA/178 Bodkin Farm and SHLAA/041 Former Chislet Colliery site.</p> <p>A connection to the sewerage network is provided at the nearest point of adequate capacity, and access is provided for maintenance of sewerage and water infrastructure, in collaboration with the service provider</p> <p>Provide land for an extension to the</p>

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				<p>Impact on the setting of the listed farmhouse. (Historic England)</p> <p>Document any changes to the Habitat Regulations Assessment arising from new allocations, including recreational disturbance, air quality and water supply/quality issues. Site triggers coastal Impact Risk Zone, make provision for mitigation. (Natural England)</p> <p>Expansion of the local school to 2 form entry, requiring 6695m² of land. Contributions to community learning and Sturry by-pass also required. (Kent County Council)</p>	school.
PA/002				Site 10 Land at the Kent and Canterbury Hospital, Ridlands Farm and Langton Field	
22	19		3	<p>Will worsen traffic congestion, parking issues and pollution and thus public health.</p> <p>The site has poor access. Will conflict with/impact on the access to the hospital.</p> <p>There is a shortage of open space in south Canterbury and this will cause the loss of agricultural land, public open space, recreation potential and the area's amenity value.</p> <p>Impact on AONB, AHLV and wildlife.</p> <p>Unclear how this has been assessed. No traffic study or viability information.</p> <p>Lack of local facilities and impact on utilities and local services. These will need to be provided. Where will hospital provision be made?</p> <p>Disturbance to the neighbouring area.</p> <p>No justification for allocation of site which is not sustainable. There is an oversupply of houses so Site 10 not needed and there are more suitable alternative sites.</p> <p>No evidence of co-operation and not compliant with NPPF.</p> <p>Site is partly within a Source Protection Zone 2 and 3 and surface water drainage design would have to take this into account (Environment Agency).</p> <p>Include wording to ensure that adequate sewage disposal is provided (Southern Water).</p>	<p>Remove allocation, provide housing elsewhere.</p> <p>Reduce density</p> <p>A connection to the sewerage network is provided at the nearest point of adequate capacity, in collaboration with the service provider.</p>

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				Additional sites	
3.2 3	2		1	Amendments do not address the five year land supply. <ul style="list-style-type: none"> Allocate approved planning permission for the Hill Littlebourne SHLAA/087. 	Allocate land at the Hill Littlebourne (SHLAA/087).
3.3 16	11		5	Question the 5 year supply calculations. Allocate the following sites: <ul style="list-style-type: none"> SHLAA/178 land at Bodkin Farm for housing. Land at Milton Manor for mixed uses. Network Rail land at Roper Road for housing. Land between Bigbury Road and Tonford Land. Hoplands Farm (SHLAA/187) for mixed use. Land at Highland Court Farm for housing, commercial, retirement and holiday villages. Land at Millstrood Road (SHLAA/094) for 45 houses and remove protected open space designation. Extend former Spires School, Westbere (SHLAA200) housing allocation by 21 ha - 3.1ha or 90 housing units and open space. Former Chislet Colliery (SHLAA/041) for housing. Increase Sturry/Broad Oak allocation to 1150 houses by increasing allocation by 100 and allocating a site at Shallock Road for 50 houses. 140ha of land south of Aylesham. 	Allocate additional sites.
3.4			1	Kent Police are content	
3.5			1	Kent Police are content	
PA/003				Site 11 Land at and adjacent to Cockerling Farm, Thanington	
86	77	2	7	This received a large number of objections predominately based on a replicated letter. This letter raised concerns with respect to: <ul style="list-style-type: none"> Not compliant with duty to co-operate, legally compliant nor sound because wording does not tally with Kent County Council advice to provide the entire 	Amend text to state that the full funding of the A2 slip be provided by the site.

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				<p>cost of the slip road to mitigate traffic impacts.</p> <ul style="list-style-type: none"> • A2 slip needed to relieve congestion in Wincheap, Rheims Way, Harbledown and Chartham Hatch. • Other road improvements also suggested. <p>Road improvements are needed before development takes place.</p> <p>Will cause a massive increase in traffic and congestion and will make local roads unsafe.</p> <p>Object to new slip road.</p> <p>Need to ensure cycleways, footpaths and public transport are improved and provided.</p> <p>Development too large for the area and will cause a detrimental effect on the character of the landscape and the AHLV. Loss of farmland.</p> <p>Surface water runoff and flooding. Drainage will need improving.</p> <p>The increase in air pollution will impact on residents' health.</p> <p>Viability and transport studies were unavailable. Doubts as to the viability of the site and infrastructure.</p> <p>Concerns about provision of structural and community infrastructure and impact on local services.</p> <p>Not consistent with NPPF</p> <p>Provide 50% affordable housing.</p> <p>Some of the site has already been given planning permission, pre-empting local plan consultation and local plan process.</p> <p>Error on boundary line incorporates some of Milton Manor land. Either amend to correct boundary or include all of the package.</p> <p>Concerned about the impact of a new community on Larkey Valley SSSI. There is a need for wardening and monitoring. Also the landscaping strip is not an extension to</p>	<p>Correct boundary line or incorporate all of the land at Milton Manor.</p> <p>Ensure cycleway, footpath and public transports links are provided and improved.</p> <p>A connection to the sewerage network is provided at the nearest point of adequate capacity, and access is provided for maintenance of sewerage and water infrastructure, in collaboration with the service provider</p> <p>Remove mention of buffer strip being an "addition" to Larkey Valley Wood.</p> <p>Amend to include provision of 2.05ha of land for a school along with education services and road improvement contributions.</p>

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				<p>the woodland but is a buffer strip to protect the woodland. (Kent Wildlife Trust)</p> <p>Site is in Source Protection Zones 1 and 2 so needs to ensure no effluent to ground. Investigations and strategies required. (Environment Agency)</p> <p>Policy unsound, the development needs to ensure access to existing water and sewerage infrastructure for maintenance and ensure connection to the sewerage is at the nearest point of adequate capacity. Also ensure sufficient distance from Chartham wastewater works (Southern Water).</p> <p>Potential impact on listed buildings and archaeology (Historic England).</p> <p>Need 2.04ha of land for primary school provision along with education and community services contributions. Contributions towards road improvements also. (Kent County Council)</p>	
PA/004				Site 12 Land south of Ridgeway	
196	188	1	7	<p>This received a large number of objections predominately based on 3 replicated letters and a petition. These letters raised concerns with respect to:</p> <ul style="list-style-type: none"> • Not in compliance with NPPF. • Does not comply with policies and text in local plan. • The area is a high flood risk and building here will increase flood risk for other residents through increased runoff. • Creation of a divided community. • Loss of open green space and an area for walking. • Accessibility issues for a landlocked site. • The impact 350 dwellings will have on the local road network in terms of safety and congestion particularly Reeves Way. • Emergency access to Ridgeway/Hillside is not possible as they are private roads. • Noise and air pollution resulting from additional traffic and increase industry/heavy goods vehicles. • Impact on community facilities and services such as schools and GP surgeries. 	<p>Clarify and consult on site access provision. Undertake an independent traffic impact assessment.</p> <p>Any flood risk assessment should cover surrounding area.</p> <p>Develop on brownfield sites or extend other more suitable development sites to fill housing gap.</p> <p>A connection to the sewerage network is provided at the nearest point of adequate capacity, and access is provided for maintenance of sewerage and water</p>

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				<ul style="list-style-type: none"> Capacity of public and surface water sewers to cope with additional connections/load. Impacts on biodiversity and protected species, esp. adders. Need for public transport. Due to site complexities doubt that site can be delivered in the next 5 years. Over development. Allocation of site is not soundly based or deliverable. <p>Loss of greenfield site that is Protected Open Space. Lack of recreation space in the area.</p> <p>Sustainability Appraisal is flawed.</p> <p>Provide 50% affordable housing and community services.</p> <p>Transport and viability studies not made available.</p> <p>Insufficient evidence to justify the allocation of this site in preference to other proposed sites.</p> <p>Impact on nearby conservation area.</p> <p>Through bus route can't be provided, so footpaths to bus stops needed. (Stagecoach)</p> <p>Document any changes to the Habitat Regulations Assessment arising from new allocations, including recreational disturbance, air quality and water supply/quality issues. Site triggers the Coastal Impact Risk Zones ensure mitigation is provided. (Natural England)</p> <p>Survey wildlife and provide for protection and enhancement. (Kent Wildlife Trust)</p> <p>Ensure flood risk assessment done and site is found safe and that site is sequentially tested and houses are located outside of floodzone (Environment Agency).</p> <p>Policy unsound, the development needs to ensure access to existing water and sewerage infrastructure for maintenance and ensure connection to the sewerage is at the nearest point of adequate capacity. (Southern Water)</p>	<p>infrastructure, in collaboration with the service provider</p> <p>Wildlife survey and protection.</p> <p>Amend to include provision of 2.05ha of land for a school along with education services and road improvement contributions.</p>

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				Need 2.04ha of land for primary school provision along with education and community services contributions. Contributions towards road improvements also. (Kent County Council)	
				Additional other site allocations	
PA/005				Herne Bay Driving Range	
11	4	2	5	<p>Provide affordable housing and community services.</p> <p>Lack of information especially transport and viability information.</p> <p>Development should not go ahead before Sturry by-pass complete.</p> <p>Within coastal Impact Risk Zones mitigation will be required. Document any changes to the Habitat Regulations Assessment arising from new allocations, including recreational disturbance, air quality and water supply/quality issues. (Natural England)</p> <p>Assessment will need to be made of the Greenhill/A2990 roundabout and site should contribute to Bullockstone Road upgrading to facilitate access and bus link (Kent County Council) (Stagecoach).</p> <p>Need archaeological assessment. (Kent County Council)</p>	Do not allocate site.
PA/006				Land at rear of Rough Common Road	
60	56		4	<p>This received a large number of objections predominately based on a replicated letter. This letter considered development unsound and raised concerns with respect to:</p> <ul style="list-style-type: none"> Does not comply with duty to co-operate because there has been no assessment of the impacts. Unsound because it does not comply with the Local Plan and is a departure from the Council's spatial strategy, nor is it strongly supported by the Sustainability Appraisal. Does not comply with duty to co-operate as there has been no proactive consultation with residents. 	<p>Remove PA/006 allocation. Retain brownfield sites instead:</p> <ul style="list-style-type: none"> PA/011 - 181 Sea St, PA/013 – Canterbury/Victoria Roads PA/014 – Ladysmith Grove PA/015 – Builders Yard Belmont Rd PA/017 – Hamilton Road PA/018 – Essex St

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				<ul style="list-style-type: none"> Other issues include that it is in a AHLV; impacts on visual amenity, biodiversity, habitats and the natural environment; greenfield land; downstream effects of water runoff; proximity of SAC; impacts on character of the village, countryside and historic environment; not infill development. <p>Provide 50% affordable housing.</p> <p>Disproportionate backland development and loss of agricultural land.</p> <p>Document any changes to the Habitat Regulations Assessment arising from new allocations, including recreational disturbance, air quality and water supply/quality issues. Site triggers North Kent Coast Impact Risk Zone make provision for mitigation. (Natural England)</p> <p>Policy unsound, the development needs to ensure access to existing water and sewerage infrastructure for maintenance and ensure connection to the sewerage is at the nearest point of adequate capacity. (Southern Water)</p>	<ul style="list-style-type: none"> PA/019 – Albert St. <p>A connection to the sewerage network is provided at the nearest point of adequate capacity, and access is provided for maintenance of sewerage and water infrastructure, in collaboration with the service provider.</p>
PA/007				Brickfield Farm, Mill Lane	
17	11		6	<p>Impact on AONB, conservation area and setting of a listed building.</p> <p>The allocation of a housing site at Bridge should be left to the neighbourhood plan. Allow neighbourhood plan to allocate a housing site on Cantley land (including SHLAA/ 201 and 221 and land at Conyngham Land) so the lease is renewed on recreation ground and other incentives are provided.</p> <p>Provide 50% affordable housing.</p> <p>Question the viability of affordable housing provision on site.</p> <p>No community engagement.</p> <p>No consultation with the Little Stour and Nailbourne Rivers Management Group, or Kent County Council (as lead flood authority). No consideration of the Nailbourne Infiltration Reduction Plan Dec 2014.</p> <p>No sewerage capacity.</p>	<p>Delete allocation</p> <p>Leave allocation to emerging Bridge Neighbourhood Plan.</p> <p>A connection to the sewerage network is provided at the nearest point of adequate capacity and access is provided for maintenance of sewerage and water infrastructure, in collaboration with the service provider.</p>

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				<p>Not in accordance with spatial strategy.</p> <p>Policy unsound, the development needs to ensure access to existing water and sewerage infrastructure and ensure connection to the sewerage is at the nearest point of adequate capacity. (Southern Water)</p> <p>Concerned about impacts on flood management and road infrastructure.</p> <p>Loss of greenfield land.</p>	
PA/008				Land adjacent Cranmer and Aspinall CI, Bekesbourne	
11	3	2	6	<p>No consultation with the Little Stour and Nailbourne Rivers Management Group, or Kent County Council (as lead flood authority). No consideration of the Nailbourne Infiltration Reduction Plan Dec 2014.</p> <p>No sewerage capacity.</p> <p>Provide affordable housing</p> <p>Site boundary needs to reflect landownership.</p> <p>There is need for improvements to the bus stops. (Stagecoach)</p> <p>Policy unsound, the development needs to ensure access to existing water and sewerage infrastructure and ensure connection to the sewer network is at the nearest point of adequate capacity. (Southern Water)</p> <p>Close to a scheduled monument so there is the potential for archaeological remains (Historic England).</p> <p>Site is 50m from a source protection zone, investigations and remediation maybe required. (Environment Agency)</p>	<p>A connection to the sewerage network is provided at the nearest point of adequate capacity and access is provided for maintenance of sewerage and water infrastructure, in collaboration with the service provider.</p> <p>Improve bus stop.</p>
				Proposed Sites to be removed	
3.6				Southern Water make no comment on sites to be removed	
1			1		

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PA/009				Canterbury East Station (North side) Car Park, Canterbury	
10	8	1	1	<p>This received a small number of objections predominately based on a replicated letter stating:</p> <ul style="list-style-type: none"> • No Sustainability Appraisal for the approach, unsustainable development. • Contrary to NPPF section 2. • Retain the western end for car parking and reprieve car park closer to town from development. • Council has not co-operated with Network Rail <p>Retain for the use of rail commuters and visitors.</p> <p>Do not remove allocation (Network Rail)</p>	<p>Retain residential allocation and extend.</p> <p>Allocate part of the site for housing and remove other car park allocations.</p>
PA/010				Land adjacent to Canterbury West Station	
10	8	1	1	<p>This received a small number of objections predominately based on a replicated letter stating:</p> <ul style="list-style-type: none"> • Amendment correct in principle. • Lack of response from Network Rail makes it impossible to assess use. • Housing development is not justified and is contrary to NPPF. • The whole of CA481 should be removed. • Community involvement inadequate and Council has not co-operated with Network Rail. <p>Retain for the use of rail commuters and visitors.</p>	Deallocate all of CA481 (Station Road West).
PA/011				181 Sea Street, Herne Bay	
4	3		1	<p>Objection to removal of small urban brownfield site.</p> <p>Engage with landowners before deallocating.</p>	Retain residential allocation
PA/012				Land at Herne Bay Station, Herne Bay	
4	2	1	1	<p>Do not remove allocation (Network Rail)</p> <p>Retain for the use of Rail Commuters and visitors.</p>	Retain residential allocation

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PA/013			1	Canterbury Rd/Victoria Rd, Corner of (Herne Bay)	
3	2		1	Objection to removal of small urban brownfield site. Engage with landowners before deallocating.	Retain residential allocation
PA/014				Land at Ladysmith Grove, Whitstable	
5	4		1	Developer is committed to bring the site forward and is currently preparing a planning application. Objection to removal of small urban brownfield site. Engage with landowners before deallocating.	Reinstated as an allocation
PA/015				Builders Yard r/o 3 Belmont Road, Whitstable	
3	2		1	Objection to removal of small urban brownfield site. Engage with landowners before deallocating.	Retain residential allocation
PA/016				Beresford Road North and South, Whitstable	
3		2	1	Support removal	
PA/017				Adjacent 15 Hamilton Rd, Whitstable	
3	2		1	Objection to removal of small urban brownfield site. Engage with landowners before deallocating.	Retain residential allocation
PA/0018				37 Essex Street, Whitstable	
3	2		1	Objection to removal of small urban brownfield site. Engage with landowners before deallocating.	Retain residential allocation
PA/019				Land adjacent to 100 Albert Street, Whitstable	
3	2		1	Objection to removal of small urban brownfield site. Engage with landowners before deallocating.	Retain residential allocation

Summary of estimated response figures from Objective

Number of responders	379			
Number of representations	644			
General comments	Object	Support	Comment	No response
	555	14	70	5
Legally compliant	No	Yes	No response	
	163	28	453	
Soundness	No	Yes	No Response	
	411	26	207	
	Not Positively prepared	Not justified	Not effective	Not consistent with national policy
	164	178	179	162
Duty to Co-Operate	No	Yes	No response	
	154	26	464	
Changes promoted	448			
New site reps	11			