

One Chapel Place
London
W1G 0BG

Canterbury City Council Offices
Military Road
Canterbury
CT1 1YW

Your ref: Aylesham South
Our ref: Aylesham South

VIA EMAIL: consultations@canterbury.gov.uk

21 May 2024

Dear Sir / Madam,

CANTERBURY DISTRICT LOCAL PLAN REGULATION 18 CONSULTATION (MARCH 2024) - LAND SOUTH OF AYLESHAM

On behalf of the Trustees of the Lord Fitzwalter 1988 Settlement, Carter Jonas (CJ) have pleasure in enclosing our representation to the Regulation 18 Consultation of Canterbury District Local Plan (the draft Local Plan) which is currently being undertaken by Canterbury City Council (the Council).

These representations relate to the **land south of Aylesham** (the Site). Our Vision Document for the site (which includes a site location plan) is included at **Appendix 1**.

THE OPPORTUNITY

The existing settlement of Aylesham is located within the administrative area of Dover District Council. The Regulation 19 version of the Dover District Local Plan identifies Aylesham as a rural service centre where there are a range of community facilities including a post office, pharmacy, health centre, primary school, rail station and shops selling convenience goods. The settlement is not located in the metropolitan Green Belt, nor is it situated within the National Landscapes (AONB) and is free from flooding or flood risk.

As part of the emerging Local Plan in Dover, the Council has prepared a comprehensive evidence base and the submission version of the Dover District Local Plan includes an allocation at 'Land to the South of Aylesham' (Draft Policy SAP24) to create a new neighbourhood of approximately 640 new homes with community facilities as well as formal and informal open space. The Dover draft allocation Policy SAP24 has been through the examination process with the Local Plan now at the Main Modifications stage (May 2024). The status of the emerging Dover Local Plan and inclusion of a major allocation at Aylesham indicates that Aylesham should be regarded as an area suitable for sustainable development growth.

On the basis of the above, the former draft Aylesham South allocation in Canterbury (R20), represents a logical location and opportunity for housing delivery in Canterbury District. Aylesham South is a large site which adjoins the existing settlement boundary in Dover and has relatively few constraints in terms of topography, landscape, heritage, ecology and views (see Figure 1).



Figure 1 - Draft Masterplan illustrating adjacent land South of Aylesham which is draft allocated in Dover District Council's emerging Local Plan.

LOCAL PLAN REGULATION 18 REPRESENTATIONS

The Council has invited comments on the Draft Local Plan, and our response is provided below.

The decision to proceed with the production of an updated Local Plan is supported in principle. The importance of creating a Plan-led approach to planning for development in Canterbury will ensure that the future needs of residents and businesses in the area can be met through the sustainable development of sites.

Plan Period

The Local Plan consultation is based on a Plan-period to 2040. Paragraph 22 of the NPPF explains that "Strategic policies should look ahead over a minimum 15 year period from adoption".

The Local Development Scheme (March 2024) envisages adoption of the Plan by March 2026, which represents a relatively optimistic timetable for a full local plan. Even if the Plan were adopted in late 2025/26

without delays, it would only cover no more than 14 full years. As such, the Local Plan period should be extended to cover at least 15 years. Notwithstanding this, it is highly likely that the Plan will require Modification arising from Examination and an adoption timeline commencing in 2026 should be planned for by the Council.

The Council should also confirm the exact Plan period as Draft Policy SS3 specifies a period from 2020/21 to 2040/41, whilst the housing trajectory in the Development Topic Paper (February 2024) refers to the period 2023/24 to 2039/40. This appears inconsistent and could lead to unnecessary confusion and debate.

Housing Requirement

The National Context

The Government's national housing target is to deliver 300,000 net new homes per year by the mid-2020s. However, in reality national statistics demonstrate that actual housing completions have continuously fallen short of government targets. This factor has played a key part in fuelling the current housing and affordability crisis in England. In March 2024, the Department for Levelling Up, Housing & Communities¹ confirmed that only 158,190 new homes were completed in 2023, a 11% fall from the previous year and just over half of the annual target. There was a 20% decrease in terms of planning permissions granted in 2023, amounting to 233,000 homes. Notably, the South East of England was one of the two regions suffering the largest decreases in housing starts (down 20%), impacting the short- and mid-term completions.

In the context of the acute affordability crisis and housing shortfall, there remains an absolute objective to significantly boost housing delivery across the country, but especially in the South East.

Against this background, we are concerned that a reduced housing target of 1,149 new dwellings per year set out in Draft Policy SS3 (Development Strategy for the district) and Housing Needs Assessment Addendum (February 2024), will not be effective in addressing the unmet housing need. With regards to this, Paragraph 61 of the NPPF states that, *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area ..."* (our emphasis).

Considering the standard method figure represents a 'minimum' 'starting point' for housing requirements, and given the historical under-delivery of housing, we consider a higher figure should be pursued in order to provide flexibility and a buffer for sites which fail to come forward as envisaged.

The Local Context

The need for an increased housing supply target is evidenced by Canterbury District's worsening housing situation, all of the indicators below specify a worsening trend. Canterbury's affordability crisis compounded in 2024, with the ONS's latest affordability ratio rising to 11, i.e. the average price of housing is now 11 times the local annual workplace-based earnings, double the amount of the recommended affordable threshold (5 times) and the national average (8.26 times). Indeed, this figure has worsened by 35.8% over the past 10 years since 2013, compared to 22.1% nationally over the same period. As such, we consider that the annual housing target should be revised to **at least** 1,176 homes per year (see Table 1).

¹ <https://www.gov.uk/government/statistics/housing-supply-indicators-of-new-supply-england-october-to-december-2023/housing-supply-indicators-of-new-supply-england-october-to-december-2023>

	CCC's Projections based on 2023 Affordability Ratio	CJ's Projections based on 2024 Affordability Ratio
Household Growth per year	818	818
Local Affordability Ratio	10.46	11
Affordability Adjustment Factor	1.40375	1.4375
Canterbury LHN	1,149	1,176

Table 1: Revised Housing Requirement Projections

Housing Delivery

The Council has also suffered a significant underperformance in housing delivery, with the latest Housing Delivery Test (HDT) result standing at 75%, marking a notable slowdown over the past five years from 117% in 2017/18.

The latest Authority Monitoring Report (March 2024) shows that Canterbury is failing to demonstrate a sufficient 5-year housing land supply (just 4.48 years).

Affordable Housing

In terms of affordable housing need and supply, Canterbury currently has the highest number of households on their housing need register in Kent (i.e. 2,809 people in 2021/22), accounting for 17.6% of the Kent total, as evidenced by KCC’s monitoring data (August 2023)².

This has been compounded by the Council's prolonged ongoing failure in meeting its own 30% affordable housing target envisaged in the adopted Local Plan, for which the Council’s monitoring data indicates that only 14% of affordable homes have been completed over the period since 2011/12, and that none of the recorded years can achieve the 30% affordable housing target (Table 2).

These statistics represent a worrying picture in the district regarding housing delivery and as such, it is our view that additional deliverable housing sites must be allocated in sustainable locations where there is access to a range of modes of travel (such as Aylesham), to ensure that the minimum housing requirement can be met, and delivered across the Plan period to seek to address the acute housing need and affordability crisis in the district, and to support other growth initiatives in the emerging Local Plan.

	Net Completions	Affordable housing completions	Affordable %
2011/12	655	144	22%
2012/13	597	121	20%
2013/14	641	70	11%
2014/15	555	40	7%

² https://www.kent.gov.uk/__data/assets/pdf_file/0007/138940/Housing-register-2021-22.pdf

2015/16	594	50	8%
2016/17	422	48	11%
2017/18	1119	45	4%
2018/19	444	56	13%
2019/20	597	139	23%
2020/21	474	57	12%
2021/22	785	143	18%
2022/23	693	158	23%
Total/Average	7,576	1,071	14%

Table 2: Affordable Housing Completions (Source: AMR)

Proposed Housing Trajectory

Paragraph 35 of the NPPF requires that local plans and spatial development strategies should meet the test of soundness, including:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; (our emphasis)

We consider that the Council’s proposed housing trajectory as set out in Table 3 (below) demonstrates that that the emerging Local Plan is neither positively prepared nor effective in terms of ensuring sufficient housing land supply to meet the district’s acute housing need.

In this regard, Table 3 (below) shows that the proposed strategy fails to properly address the minimum housing requirements envisaged in Draft Policy SS3, which will result in a shortfall of 717 homes by the end of the Plan period.

In the context of the Council’s poor housing delivery of 75% and its failure to demonstrate a sufficient 5 year housing land supply, together with various estimates of build-out rates being overoptimistic, we contend that the housing trajectory could not be effectively delivered during the plan period, and will therefore widen the shortfall in meeting the area’s objectively assessed needs.

We are also concerned that the Council does not have a sufficient level of housing allocations in the early part of the Local Plan. There is an over reliance on major housing allocations for its housing land supply which can only be realised in the mid/long term parts of the Plan period due to major infrastructure, utilities and highway

improvements required. Given that the majority of the allocated sites at present are not already in progress, alongside the time required for infrastructure enhancement, we encourage the Council to include additional sites, including **land south of Aylesham**, as part of the allocations to ensure a robust and effective housing strategy.

To meet the draft housing target of 1,149 homes, the Development Topic Paper (February 2024) provides the following housing trajectory; identifying an overall shortfall of 717 dwellings in terms of Local Plan allocations.

	Y1-5 (2023-2028)	Y6-10 (2028-2033)	Y11 and above (2033-2041)	
Carried forward 2017 Local Plan allocations	4,268	4,484	2,709	11,461
New allocations in draft Local Plan	345	3,363	4,365	8,073
New older persons housing allocations	-	105	326	431
Total allocations	4,613	7,952	7,400	19,965
Housing Target	5,745	5,745	9,192	20,682
Shortfall				- 717

Table 3: Housing Trajectory (Source: Development Topic Paper)

There are clear issues with the Regulation 18 Local Plan in terms of housing numbers including the length of the Local Plan period (and this not covering a full 15 years), the annual housing delivery target not reflecting the local need (which is greater), underperformance with regard to the Housing Delivery Test, the absence of a 5 year housing land supply (The Local Plan is showing a 4.48 year supply) and an overall shortfall in the housing trajectory of 717 dwellings. This could be addressed by reconsidering some of the previous Regulation 18 draft allocation such as R20; Aylesham South, which could deliver c. 420 dwellings.

Biodiversity Net Gain

Draft Policy SS1 and DS21 indicate the requirement for a minimum 20% biodiversity net gain for development across the district.

Whilst we do not object to the Council’s ambitions of conserving and enhancing the natural environment and seeking 20% biodiversity net gain, given the mandatory requirements of the Environment Bill sets this at least 10%, local policy should again be consistent with national legislation.

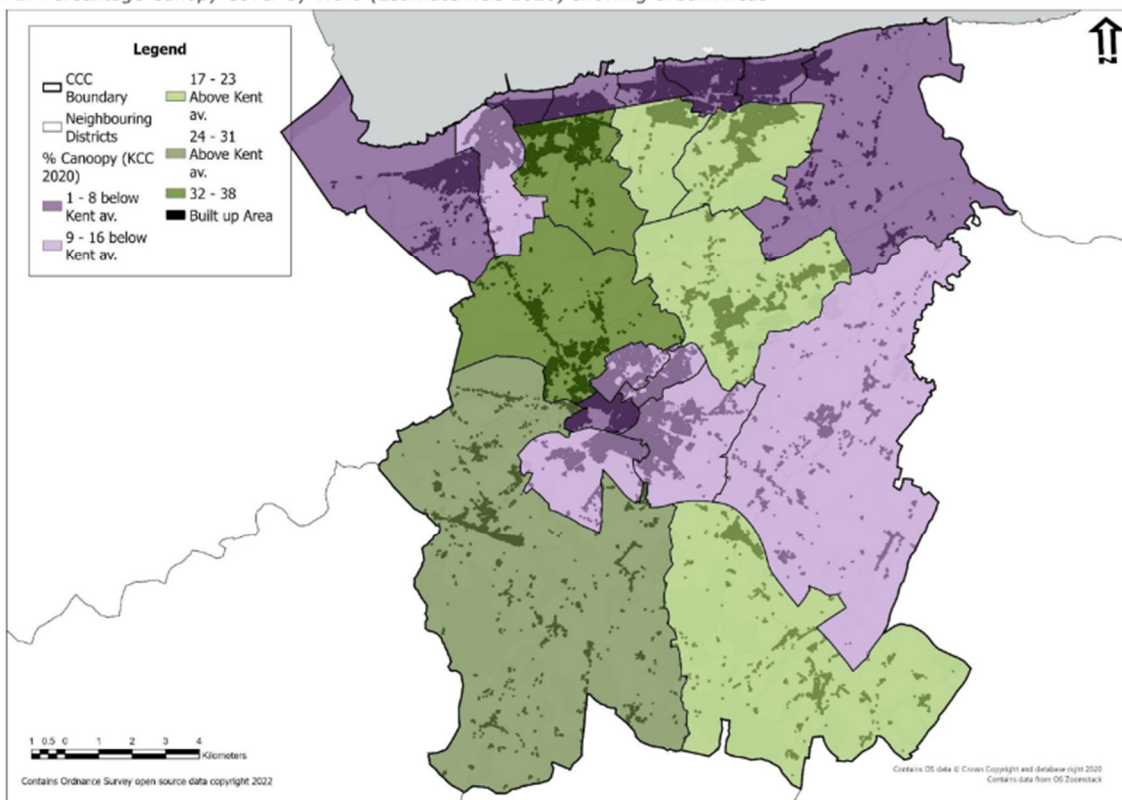
We are also mindful of the Department for Levelling Up, Housing and Communities (DLUHC)’s new PPG guidance (ID: 74-006-20240214), indicating that ***“Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented.”***

With regard to this, there is no evidence provided to justify whether and why there is a local need for a higher percentage, nor any feasibility assessment demonstrating local capacity for a higher provision. With reference to a recent local plan consultation in Horsham, their Biodiversity Net Gain Thresholds and Site Assessment Study (2023) demonstrates that 54.5% of their greenfield sites are unable to achieve 12% BNG provision as their draft local plan requires, with an average maximum BNG values achievable on site standing at just 9.76%. On the basis of this, and with a similar scenario testing evidence to be expected, we welcome further evidence to demonstrate the feasibility of 20% BNG provision.

Tree Cover

Draft Policy SS1 and Policy DS21 set out the requirement for a minimum of 20% tree cover for new developments of over 300 homes. The Canterbury District Tree, Woodland and Hedgerow Strategy (February 2024)³ identifies the existing canopy cover baseline across the area. While the average for Canterbury district estimated at 19.5%, the average for 'Little Stour and Adisham' sub-area is estimated to be 11.7%.

Plan 1: Percentage Canopy Cover by Ward (Estimate KCC 2020) showing Urban Areas



While we support the Council’s Vision for enhancing green infrastructure, we consider the relevant policy requirement should ensure sufficient flexibility given individual site circumstances, viability requirements and the need for achieving other development benefits.

Viability Study

³ https://drive.google.com/file/d/1fdq4e3XT_57iMh4TyPT7JcJXCGVCcHdH/view

The Local Plan Viability Study (May 2022, updated May 2023) includes 20% biodiversity net gain as part of their assumption. Table 10.3 of the 2022 Study⁴ includes an allowance of £5,617-£6,476 for greenfield sites per hectare and £54,437 for brownfield land per hectare.

We however consider this is not an accurate reflection of the reality as a higher BNG provision will have more cost implications than brownfield sites given higher biodiversity baseline and the need for off-site delivery or credit purchase. The assumed costing is substantially below the latest published statutory biodiversity credit prices (February 2024), which indicates that the price for one area credit will range from £42,000 to £650,000, while £44,000 for one linear credit. In the absence of evidence on the feasibility of 20% delivery as above mentioned, we are concerned the assumed cost will underestimate the cost required for 20% delivery on greenfield sites, which therefore undermine the deliverability and viability of the Plan.

We therefore request further justifications for the cost assumption to ensure the relevant policy requirement is positively prepared and effective.

Sustainability Appraisal

A full comparison of the proposed allocations in the 2022 Plan and 2024 Plan is provided in **Appendix 2**.

South Aylesham

The previous Sustainability Appraisal of Strategic Land Assessment Availability (2022) recommended South Aylesham site for allocation on the basis of the following scoring:

Reference number	Site Name	1. Air Quality	3. Biodiversity Overall	4. Geology Overall	5. Landscape	6. Water Overall	7. Flooding	9. Historic environment Overall	10. Housing	11. Land use	12. Employment Overall	13. Transport Overall	14. Sustainable communities Overall
SLAA180	Aylesham South	0	--	0	--	-	++	--	++	--	0	++/-	++/-

However, South Aylesham was removed as a draft allocation in the latest Sustainability Appraisal Report (February 2024)⁵ due to transport infrastructure and landscape constraints. The Sustainability Appraisal of the Strategic Land Availability Assessment (December 2023)⁶ notes that “following the Regulation 18 draft Local Plan consultation (2022), the council received a number of objections to development on the site. Kent County Council raised significant technical transport constraints, including impact on the highway network. Natural England and the Kent Downs AONB Unit also raised concerns about the impact of development on the landscape and setting of the AONB. Dover District Council also objected due to concern regarding the impact on the setting and character of Aylesham. The site developer has been unable to sufficiently address the outlined concerns and therefore the site is no longer proposed for allocation.”

Despite the above, there is no update in the SA scoring regarding the omission sites to demonstrate why South Aylesham cannot be progressed as a reasonable alternative through the site selection methodology.

We do not consider that the above comments accurately reflect the previous Regulation 18 feedback and they are now also now out of date as the position with regard to various points has now moved on.

⁴ <https://drive.google.com/file/d/1NPVuMGQMXEp8aJEeIQjHkacUixDpebWC/view>
⁵ https://drive.google.com/file/d/1zNiSUIIDA3YAzUlqrMhZwqvWR3ttP_kk/view
⁶ https://drive.google.com/file/d/1Mt-loIALdGOdYa_3bhkZUobluO-olZcs/view

Highways

In terms of highways, we submitted a Transport Statement prepared by Velocity Transport Planning in support of our previous Regulation 18 representations. This covered baseline transport conditions, the proposed access, junction mitigation schemes, trip generation and distribution and highway impact. Formal pre-application advice was also sought from KCC highways in respect of the Transport Statement and a written response was received on 2 May 2023 (**Appendix 3**). Of the points raised in KCC's pre-application feedback, there are numerous which are no longer relevant including:

- 1) A request for the future years scenario to consider the entire Local Plan process up to 2045. The Local Plan period no longer covers up to 2045 and has been reduced to cover the period up to 2040/2041.
- 2) We were encouraged to use the Canterbury VISSUM model as part of pre-application discussions. We met with Jacobs (Canterbury City Council's highways consultant) to discuss the use of the model and were told that we would be required to pay £1,725 as an initial access fee and then a quote for the modelling data would follow. When we asked for an estimate of what the fee might entail, the modelling team advised this could be an additional £40,000. This was not considered a reasonable requirement in circumstances where the Local Plan was still at the Regulation 18 stage and there was no guarantee that this site would be allocated in the future. Local Plan allocations should not be based on landowners spending large sums of money on technical data.
- 3) In terms of junction capacity assessments, KCC commented that a signalised junction at Wingham High Street would not be an acceptable solution. At the Dover District Council Examination in Public in November 2023, KCC accepted that the proposed development at Aylesham South in Dover (SAP24) would not have a material impact on the junction in the future year scenario. The available data on this junction has clearly moved on since KCC's previous comments and this is no longer considered a valid concern to object to a draft allocation at R20.

In addition to the above, KCC highways were also concerned about the potential cumulative impact of draft allocation R20 and draft allocation R1 at Cooting Farm. As the Cooting Farm draft allocation has now been removed, this is no longer considered to be an issue.

These highways points are relevant as clearly there has been a change in position with regard to the Local Plan period in Canterbury, the capacity of the Wingham junction and the removal of the draft allocation at Cooting Farm. Furthermore, requiring landowners to pay £40,000 to access highways modelling data is neither appropriate nor in the spirit of positively preparing a Local Plan.

Landscaping

We prepared a Landscaping and Visual Assessment which was submitted in support of the previous representations and shared with Kent Downs AONB Unit and Natural England. We received comments from Katie Miller at Kent Downs AONB in August 2023 (**Appendix 4**). The feedback reiterated her comments in respect of the draft allocation noting:

"... in terms of potential impacts on the setting of the Kent Downs AONB, it is considered that subject to the development being confined to the area not identified as a County Park on the Concept Masterplan, the relationship with the Kent Downs AONB looks more manageable and impacts potentially capable of being mitigated due to the site's closer association with existing and proposed development at Aylesham, its location on top of the ridge - corresponding with existing settlement pattern, increased separation from the AONB boundary, lesser intervisibility with the AONB, a lesser scale of development and extensive areas of proposed mitigation in the form of a country park between the developable part of the site and the AONB boundary".

Clearly this is positive. The letter goes on to state:

“We therefore welcome the provision of the additional landscape information and studies and the opportunity to discuss the proposals in more detail with you. As identified in our response to the proposed allocation in the Regulation 18 Local Plan, we consider there to be scope for the proposed strategic allocation in terms of AONB impacts however having viewed the additional information supplied, we remain concerned about the lack of appropriate safeguards to manage and mitigate AONB impacts in the policy wording as well as the emerging concept plan and in particular the juxtaposition of the proposed recreational facilities relative to the AONB boundary.

With regards to the proposed residential built form, we support the proposed location of this away from the AONB boundary. Nevertheless, as recognised in the LVA, the built form is likely to be seen from the AONB, including from highly sensitive recreational receptors of users of the North Downs Way, a national trail, introducing built form into what is currently a largely undeveloped and rural view. We therefore maintain our position that safeguards should be included in any policy wording allocating the site to assist in mitigating the impact of this. This should include for example, requirements for the development to be designed to avoid or minimise impacts on the AONB through siting, design, massing and material choice”.

It is considered that the wording of any draft future allocation for South Aylesham could be drafted in such a way that the AONB boundary is safeguarded and the AONB unit is comfortable with the allocation.

Whilst detailed concerns were raised regarding the recreational facilities proposed as part of the Vision Document and access to these facilities, these are aspects of a proposed layout which can be rearranged as part of the detailed Masterplanning process and are not reasons to remove a draft allocation.

We did not receive any feedback from Natural England in respect of the site.

In summary, none of the site in question is located within a designated landscape or a Conservation Area. The development identified in our previously submitted Vision document would be located in the north eastern corner of the site; this is the furthest point of the site from the AONB allowing for a large buffer and space for any necessary mitigation if required.

In addition to the above points, the draft allocation for Aylesham South in Dover (SAP24) is now in its advanced stages with the new Dover Local Plan likely to be adopted later in 2024. The former draft R20 allocation in Canterbury is clearly adjacent to a future development site making it more sustainable and an entirely logical location for future development. Given the above, it is clear that the Sustainability Appraisal requires updating.

Land North of University of Kent

We are concerned that the Sustainability Appraisal fails to adopt a consistent approach when considering additional allocations for the draft Local Plan, such as the proposed allocation at land north of University of Kent.

The Sustainability Appraisal of Strategic Land Assessment Availability (December 2023) recommends that the Site is allocated on the basis of the following scoring:

Table 5-8 - Summary SA of proposed new settlement north of University of Kent

SHELAA Site Ref:	Site Address:	SAO 1: Air Quality	SAO 3: Biodiversity	SAO 4: Geology	SAO 5: Landscape	SAO 6: Water	SAO 7: Flood Risk	SAO 9: Heritage	SAO 10: Housing	SAO 11: Land use	SAO 12: Economy	SAO 13: Transport	SAO 14: S Health and sustainable communities
SLAA319	Land north of University of Kent	0	--	--	--	--	++	--	++	++/--	++	++/--	++/-

However, we are concerned that the above assessment appears to be in conflict with the previous assessment in the 2022 study. For example, in terms of transport, the 2022 study⁷ noted that *“If residential housing there will be significant negative impacts as it will be a large-scale car dependent development”* and *“Tyler Hill Road is narrow, the junction between Tyler Hill Road and Blean Common has had several incidents meaning more traffic could cause significant negative impacts on the highway network and it would be a large-scale car dependent development.”* However, these significant negative impacts are not reflected in the 2023 study, as shown in Table 5.8 above.

Attention should be drawn to the fact that 26.2% of the respondents to the previous Regulation 18 consultation either object or strongly object to the proposed approach to the land north of University of Kent, opposed to 13.70% that were either “strongly agree” or “tend to agree”, as shown in Appendix 3.2.2 of Draft Canterbury District Local Plan Regulation 18 Response.

The Consultation responses to the previous Canterbury Draft Local Plan to 2045 (Regulation 18) highlighted the local concern about the development on the southern slope of University of Kent campus and the additional new student accommodation in the city centre.

Policy C26: Land north of University of Kent

26. **To what extent do you agree or disagree with the proposed approach set out in Policy C26?** Please tick one box only

Strongly agree	24	5.6%
Tend to agree	35	8.1%
Neither agree nor disagree	38	8.8%
Tend to disagree	24	5.6%
Strongly disagree	89	20.6%
Don't know	22	5.1%
No reply	199	46.2%

Summary

The decision to proceed with the production of an updated Local Plan is supported in principle. To support and enhance the Council’s Vision to provide affordable high-quality housing and create a thriving economy, it is imperative that the Council should further allocate well-located and accessible new residential sites to meet identified need. Additional sites are required in order to increase the housing supply in the district, meet the identified housing needs of local people and to ensure that housing is delivered at all stages of the Local Plan period (not just in the latter stages).

Aylesham South offers an excellent opportunity to deliver a high-quality residential scheme, which would make a meaningful contribution towards housing need in the District. As the Sustainability Appraisal (2022) established, the Site has limited constraints associated with it and aspects of the Dover Local Plan’s Examination in Public have demonstrated that some of the issues which were previously a concern for Kent County Council highways team have either evolved or been resolved.

It is envisaged that only part of the wider site is being promoted for residential development with the remainder of the site being retained as open space, in the form of a country park. This will benefit future residents as well as existing residents by providing a useable form of open space Ongoing work with Natural England and the

⁷

<https://docs.google.com/spreadsheets/d/1PSsICY56YoCujwHNGMVTnAXLtVyHHyCq/edit#gid=1844823603>

Kent Downs AONB Unit would be undertaken to ensure that there are no adverse impacts on the landscape and setting of the AONB.

Without major constraints impacting the wider area, the Site is capable of delivering a significant number of consequential benefits to the area.

In the context of the Inspector's feedback on the Dover Local Plan (April 2024) and the fact that the draft allocation directly adjoining the site to the east is to be included as part of the emerging Dover Local Plan, the Aylesham South site in Canterbury is considered a sustainable location which would benefit from the synergy effect in terms of highways improvements and community facilities as a result of the adjoining allocation.

We would be grateful if you could confirm receipt of these representations and keep us informed on the progress of the production of the Local Plan.

If you have any queries on any points covered in this submission, please do not hesitate to contact me or my colleague [REDACTED]

Yours faithfully

[REDACTED]

Jessica McSweeney

Partner

[REDACTED]
[REDACTED]
[REDACTED]