

2nd July 2018

Mr. Robert Allan
Major Projects Team Leader
Folkestone and Hythe District Council
Civic Centre
Castle Hill Avenue
Folkestone
Kent
CT20 2QY

19 Maltings Place
169 Tower Bridge Road
London SE1 3JB
Telephone
020 7089 2121
info@tibbalds.co.uk
www.tibbalds.co.uk

Dear Mr Allan

Re – Planning application Y17/1042/SH Land at Princes Parade

I refer to our meeting of 2nd May 2018, and subsequent correspondence, at which you set out the further information required from the applicant in order to allow the application to be reported to the Planning and Licencing Committee. As I recall this information fell into two broad areas relating to the Environmental Statement and the mitigation of the ecological impact of the scheme.

I have sought to summarise below the key points and provide a response to the issues raised. However, should you require any further clarification or wish the applicant to be involved in further discussions with the local planning authority or relevant stakeholders then please do not hesitate to contact me.

Environmental Statement

Issue 1 – Clarification that marine/beach ecology can be scoped out of the Environmental Assessment.

The key issue to be considered is the extent to which the proposed development will impact upon the adjoining beach, in particular through the placing of any substantial structures related to the discharging of surface water from the application site.

The applicants flood risk and drainage consultant, Herrington Consulting, have undertaken a further assessment of the surface water drainage requirements of the scheme and the potential solutions. An indicative scheme has been prepared that will discharge surface water to the Royal Military Canal (RMC) and this currently represents the applicants preferred option. It is estimated that the proposed scheme will control the off-site discharge rate, under the 1 in a 100 year rainfall event including a 20% increase for climate change, to 7.8 l/s. The existing greenfield run-off rate under the same rainfall event has been calculated as 12.8 l/s. At present surface water runoff has the opportunity to enter the RMC and to infiltrate through contaminated land, and as such ensuring only clean surface water is discharged to the RMC at a controlled rate will deliver betterment when assessed against the current situation.

The scheme will use a combination of permeable paving, cellular storage,

Directors

Jane Dann
BA MA(UD) DipArch MRTPI

Jennifer Ross
BA(Hons) MRTPI

Sue Rowlands
BA(Hons) DipArch
MA(UD) MRTPI

Hilary Satchwell
BA(Hons) DipArch RIBA

Associate Directors

Matt Shillito
BA(Hons) MSc DipUD MRTPI

Katja Stille
BA(Hons) DipArch MA(UD)

Associates

Lizzie Le Mare
BArch(Hons) MSc

Richard Crutchley
BA(Hons) DipTRP MCD MRTPI

Sarah Jenkinson
BA(Hons) MArch ADPPA ARB

Claire Perrott
BA(Hons) DipArch RIBA

Registered Company
Tibbalds Planning and
Urban Design Limited
Registered in England
Company number 4877097

storage tanks and a series of permanent/occasional ponds and swales. An indicative scheme is attached as Appendix 1.

As a result, the applicant's preferred approach will not introduce any structures onto the beach. It is therefore considered that there would be no effect on marine ecology and that this issue can justifiably be scoped out of the environmental impact assessment.

It is noted that Kent County Council, as Local Lead Flood Authority, have recommended in their representation, dated 10th October 2017, that a condition be applied, should planning permission be granted, requiring the submission and approval of a detailed surface water drainage strategy. The applicant would therefore welcome the opportunity to provide such a detailed scheme at an appropriate stage in the development process.

Issue 2 - High level inclusion of assessment of alternatives

The need for a "more robust" assessment of alternatives, as required by the Scoping Opinion, including the "do nothing" option, alternative processes, scales, layouts and designs and their associated environmental implications was raised.

The regulatory requirement (Schedule 4 of the 2011 Regs) is for an ES to include "An outline of the main alternatives studied by the applicant...and an indication of the main reasons for the choice made, taking into account the environmental effects."

The key themes are:

- Proportionality, as suggested by use of the terms "outline", "main" and "indication"; and
- Scope, i.e. only alternatives "studied by the applicant" need to be considered.

Alternatives and design development are addressed in Chapter 5 of the Environmental Assessment Main Report. Site selection and project need (i.e. in terms of doing nothing) were considered prior to the commencement of the planning and EIA process for the site at Princes Parade. They do not correspond to "alternatives studied by the applicant" for EIA purposes.

In addition, the scale and mix of development were determined by the economic thresholds that had to be met in order to accommodate and fund the leisure centre; a leisure centre-only option, for example, was not a viable alternative.

The main alternatives for EIA purposes were therefore confined to matters of development layout, as described in the ES. The existing information is therefore considered to meet the regulatory requirements.

Issue 3 - Further clarification on significance thresholds for cultural heritage, geo environmental and flood risk.

A further assessment of the approach taken in relation to significance in preparing the Environmental Statement, including consistency in describing the sensitivity, magnitude and nature of effects and the threshold for determining EIA significance, is set out in Appendix 2.

Issue 4 – Further clarification of the consultation undertaken to inform the preparation of the Environmental Statement.

