

# New Garden Settlement in the North Downs Area

Joint Delivery Statement  
**between Folkestone and Hythe District Council  
(LPA) and Otterpool Park LLP**

July 2020





This Delivery Statement has been prepared jointly by Otterpool Park LLP and Folkestone and Hythe District Council (LPA).

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# 1. Introduction

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## 1.1 About this Statement

This Delivery Statement has been prepared jointly by Otterpool Park LLP and Folkestone and Hythe District Council (LPA). Otterpool Park LLP is a company wholly owned by Folkestone and Hythe District Council, its key purpose is to deliver the Otterpool Park development. This Statement brings together the current evidence on the delivery of Otterpool Park, the work undertaken to date and provide a factual update on the proposals which underpin the Strategic Site Allocation (North Downs New Settlement SS6 – SS9). This Delivery Statement is prepared as supporting evidence to the examination.

Folkestone and Hythe District Council (as landowner) controls the majority of the masterplan area with the majority of the draft allocation (8,500 homes) being the subject of a live Outline Planning Application (see Appendix A) submitted in February 2019. The remainder is the subject of a wider masterplan. The applicant for the OPA has agreed options or owns outright around 86% of land within the planning application area, and is working alongside Homes England which owns around 10% (63ha).

## 1.2 Background to Strategic Site Allocation

### Policy Evolution and Formulation

The existing Core Strategy Local Plan was adopted in 2013 as National Planning Policy Framework (NPPF) compliant and planned for a growth target of 400 new homes a year, with a minimum requirement of 350 homes per year to 2026 based on a 2009 assessment of housing need<sup>1</sup>.

The existing Core Strategy sought to strike an overall balance between regeneration aspirations and protecting the district's sensitive landscapes and habitats. Since adoption the Council has been committed to a partial review of the Core Strategy to plan for development and growth to 2037 based on an updated assessment of housing needs (see below).

The current Core Strategy planned to deliver a target of 8,000 new homes (with a minimum requirement of 7,000 new homes) during the plan period from 2006 – 2026 and the emerging Places and Policies Local Plan provides appropriate allocations to meet this target. However, from 2016 emerging demographic evidence indicated the District's future housing need will be unmet unless new growth initiatives are brought forward. Therefore, the Council undertook to start work on an updated strategic response for providing significant medium and long term housing growth in the district.

The locations for providing significant housing growth in Folkestone and Hythe District remain constrained by the statutory designation of the North Downs Area of Outstanding Natural Beauty and the coverage of Romney Marsh by flood zone restrictions, with much of the Marsh located in Flood Zone 3a. Housing growth in Folkestone and Hythe has previously been met by a strategic expansion of the village of Hawkinge and on sites within the urban areas of Folkestone and Hythe, with more limited growth at Sellindge and New Romney.

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<sup>1</sup> <https://www.folkestone-hythe.gov.uk/article/279/Local-Plan-Evidence-Base-Documents>

Strategic Housing Land Availability Assessment (SHLAA) work undertaken preparing the Places and Policies Local Plan suggested that while there were enough smaller and medium sized housing sites available to meet the outstanding balance of current core strategy policy requirements, there was unlikely to be a sufficient quantum of smaller and medium sized sites to meet the housing need forecast in the Council's Strategic Housing Market Assessment (SHMA) that informed the Core Strategy review.

It was therefore envisaged that future growth (beyond that allocated in the Places and Policies Local Plan) would not be provided by in-filling within existing settlement boundaries and therefore a new, visionary response to meeting future housing need would need to be identified in the Core Strategy Review.

### **Expression of Interest for New Settlement**

In 2016, the Government indicated support for visionary new growth proposals in its consultation on changes to the NPPF proposed to strengthen national planning policy to:-

*"provide a more supportive approach for new settlements, within locally-led plans. We consider that local planning authorities should take a proactive approach to planning for new settlements where they can meet the sustainable development objectives of national policy, including taking account of the need to provide an adequate supply of new homes". (Para 20)*

*"A range of sites might be appropriate which could include new settlements. In such instances LPAs may need to consider whether a review or partial review of their plans are needed or whether such settlements can be delivered through additional development plan documents, such as Area Action Plans. Such an approach would present an opportunity for local planning authorities working with developers and their local communities to undertake rapid and targeted policy reviews, including appropriate consultation, so that additional land in sustainable locations can come forward" (Para 33).*

The Government on the 16<sup>th</sup> March 2016 issued a prospectus inviting expressions of interest from local authorities who wanted to create new communities based on Garden City principles<sup>2</sup>.

Following its Cabinet meeting on the 8<sup>th</sup> June 2016 the Council in response to the Government's prospectus for 'Locally Led Garden Villages, Towns and Cities' submitted an Expression of Interest for a new garden town at Otterpool Park. This completely new settlement would comprise of up to 12,000 new dwellings close to J11 of the M20 and Westenhanger railway station<sup>3</sup>. The proposal was supported by the former owners of Folkestone racecourse, Cozumel Estates, who until recently worked, on an equalised basis, with the Council to promote the project. Together the two parties assembled the land necessary to deliver the site and jointly commissioned the preparation of the OPA. In February 2020 the Council purchased the Cozumel Estates interest and then established Otterpool Park LLP as its delivery vehicle.

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<sup>2</sup> <https://www.gov.uk/government/publications/locally-led-garden-villages-towns-and-cities>

<sup>3</sup> [https://www.folkestone-hythe.gov.uk/media/1349/Otterpool-Park-Expression-of-Interest/pdf/Shepway\\_District\\_Council\\_Eoi.pdf?m=637098597291670000](https://www.folkestone-hythe.gov.uk/media/1349/Otterpool-Park-Expression-of-Interest/pdf/Shepway_District_Council_Eoi.pdf?m=637098597291670000)

The Council's Expression of Interest was without prejudice to any future decisions the Council might take in its capacity as LPA. The Council has taken considerable care with its governance arrangements to separate its responsibilities as LPA from its role as a joint promoter of a new settlement at Otterpool.

As part of this Strategic Review the LPA also undertook to test a number of potential locations for growth and levels of growth, including the area in the vicinity of Junction 11 of the M20 which has been identified within the Expression of Interest to government.

### **Growth Options Study (AECOM)**

In October 2016, AECOM were commissioned by Shepway District Council (SDC) (as was) to develop a Strategic Growth Options Study for the LPA to identify land suitable for strategic scale development across multiple plan periods.

The Strategic Growth Options Study was an evidence base document intended to inform the Local Plan process. The context for the Growth Options Study comprised a new calculation of Shepway's emerging Objectively Assessed Housing Need (OAHN) as part of a Strategic Housing Market Assessment (SHMA) carried out jointly with Dover District Council (DDC).

The SHMA, which was published in spring 2017, suggested that significantly more homes were needed across Folkestone & Hythe in the coming years compared to those planned for within the adopted Core Strategy<sup>1</sup>. In order to constitute sustainable development, these homes would require appropriate supporting infrastructure, including new employment opportunities.

The partial review was designed to help ensure that the uplift in housing numbers could be accommodated within the district and that the jobs and infrastructure to support the new homes could also be successfully delivered.

The Strategic Growth Options Study is therefore a crucial element of the evidence base for the Core Strategy partial review. It was intentionally carried out in parallel with the Sustainability Appraisal (SA) process for the partial review and designed to ensure that at various points these parallel processes informed one another.

The Strategic Growth Options Study comprised three elements: a High Level Options Report, a Phase Two Report and a High Level Landscape Appraisal that informed both the High Level Options Report and the Phase Two Report.

## 2. Delivery Statement

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### 2.1 Strategic Location

The Otterpool Park Framework Master Plan Area (OFMA) represents approximately 765 hectares (1,890 acres) of land, located in the west of the Folkestone and Hythe District (see plan).

The towns of Folkestone and Hythe are located to the south east with Ashford to the northwest. The area is bounded to the north by the M20 and Ashford-Folkestone railway line, to the east by the A20/Stone Street and Sandling Park, and to the west by Harringe Lane and to the south by Aldington Road. Westenhanger Railway station on the Ashford-Folkestone railway line is within the master plan area and a key opportunity for the location of the proposed Garden Town. This service currently includes hourly (two trains an hour at certain times) southbound services into Folkestone. Northbound, there is an hourly service to Ashford (half hourly at peak times), where high speed Eurostar (HS1) as well as regular services to Stratford International and London depart from.

The A20 is distributor road in Kent, carrying traffic between London and Dover. It crosses the Otterpool Park area from east to west and also forms the north-eastern boundary of the area. The A20 Ashford Road provides access to the M20, via junction 11. The road consists of a single carriageway subject to a 40mph speed limit.

The Kent Downs Area of Outstanding Natural Beauty (AONB) bounds the area along its eastern and southern edges. It also lies approximately 1.25km to the north.

The location therefore benefits from substantial existing infrastructure in terms of rail, road and wider connections to the countryside.

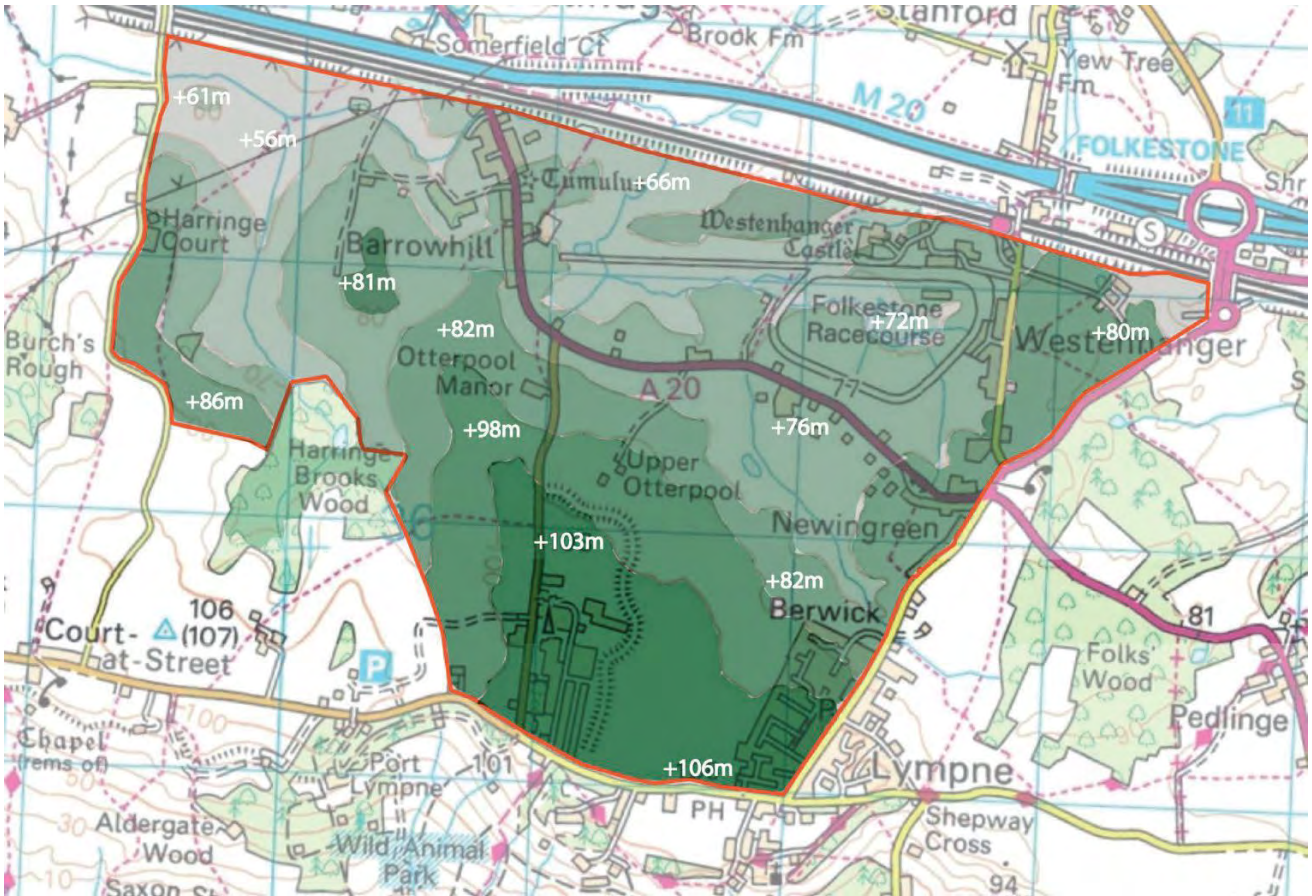


*Strategic location map*

## 2.2 Description of the Site

The site is broadly described as having a north sloping landform. The southern half exhibits the underlying geology of the Greensand escarpment and ridge. To the north the river valley clays, characterised by a fragmented pattern of remnant woodlands and pasture farmland.

Despite its predominant northward slope, the land form is gently rolling, and the localised geology gives rise to the a more intimate landscape character of small streams and springs, running downhill south to north to the clay of the 'Sellindge Plateau' and 'Stour Valley' character areas. The water courses historically lead to scattered settlements and farmsteads located near to the water source.



### *Landscape topography*

The landscape through this area is generally fragmented, and without a clear pattern. It contains sparse woodland cover that represents less than 5% of the site area with only occasional blocks of woodland and corridors of trees bordering valley streams.

Fields are generally large and occasionally enclosed by hedgerows, with hedgerow trees. The landscape a few kilometres to the west of the site, around Aldington, displays the kind of richer, more intimate and vegetated character sought by the 'Landscape Assessment of Kent' for the site and its surrounds.



### *Existing and surrounding communities*

Four distinct settlements are within or adjacent to the application area. Westenhanger to the north where, aside from the castle and station, existing buildings are primarily residential use. Lympe is a residential community which lies to the south east. Barrow Hill, Sellindge and Newingreen are small residential communities to the north-west and east respectively.

Lympe Distribution and Industrial Park (known as Link Park) lies to the south west. A large portion of the remainder of the area is used as agricultural land with small farmsteads. Beyond, lie a number of small villages including Stanford to the north, Sellindge to the north-west, Sandling to the north east, Pedlinge to the east and West Hythe to the south.

The existing settlements within or close to the application area are part of the continuing evolution of the area, with links to history and the 20th century changes. The settlements are dispersed along historic routes; however, their connectedness has been constrained by their separation and the effect of the A20, motorway and railway creating barriers to movement.

### *Existing land use and facilities*

The principal existing uses are former racecourse, arable farming and pasture generally on the steeper slopes. Away from the existing settlements, areas of commercial use and Folkestone Racecourse mixed farmland is the dominant land cover. There are many visual detractors associated with road and rail transport corridors and linear development.

## **Access & Connectivity**

### *Public Transport*

Westenhanger station, immediately adjacent to the master plan area on the north east boundary, provides the opportunity for developing sustainable travel patterns and a public transport hub. The station is currently served by 2 trains per hour between London and Dover with access to HS1 high speed trains at Ashford to allow journey times of just under an hour to London. Existing bus services 10 and 10A runs along the A20 between Folkestone, Hythe and Ashford, along with other less frequent services. A project aspiration is to deliver significant enhancements to Westenhanger Station, and discussions with Network Rail have begun on a phased programme of improvements.

### *Existing Roads*

The proposed garden settlement is well served in terms of strategic transport infrastructure, located close to Junction 11 of the M20 motorway and has direct access to the classic main line railway and potential to connect directly to high-speed railway (HS1) in the future. The A20 runs through the site connecting east to west. The local road network connections namely Otterpool Lane, Aldington Road, Stone Street, and Hythe Road require local improvements.

### *Existing Footpaths and Cycleways*

Currently there are very few public rights of way or opportunities for public access across the application site. The OPA and wider OMFA will deliver significant improvements in this regard, opening the site such routes via improved connectivity to existing pedestrian routes that exist around the site, and connecting these with new routes within the development. In turn, this will link and connect the new community within Otterpool with existing open space, recreational areas, landscape and the wider community in this part of the district.

## 2.3 Constraints and Opportunities

### Existing Landscape Character

The key landscape considerations are the designated landscapes adjacent the application boundary which present constraints and opportunities and have been key considerations in the master plan:

The Kent Downs AONB is located immediately to the east and south of the site, this element of constraint has been assessed and considered in the application.

Located immediately to the west of the site is Harringe Brooks Wood, a Local Wildlife Site (LWS) and Ancient Woodland. To maintain the functionality a buffer will be provided. Designated landscape within the application boundary, present constraints and opportunities which have been considerations in the development of the master plan.

In the centre of the site lies Otterpool Quarry, a Site of Special Scientific Interest (SSSI). Otterpool Quarry is located in the centre of the site. This feature is designated because of its geological value, rather than ecological or landscape value. Notwithstanding this, the constraints around this site are taken into consideration in the landscape strategy.

A 'Special Landscape Area - North Downs' that exists within the site's north-east corner: This is an area protected in F&HDC's Core Strategy and in their Local Plan Review and described as an area "of countywide landscape significance". The Core Strategy states that the SLA is "significant to the setting of the Kent Downs, and the Romney Marsh".



Diagram of landscape context

### *Built heritage*

Westenhanger Castle is a Scheduled Monument and grade 1 listed building in a significant location with the opportunity to contribute distinctive identity for the key open space of the garden town.

Otterpool Manor and Upper Otterpool are both grade 2 listed buildings and provide identity to the central open space.

Adjacent to the Site are many buildings constructed in the Kentish vernacular particularly the local traditions of the Holmesdale Vale and Kent Downs. These are structures built in the main from locally available materials that reflect custom and tradition more than mainstream architectural fashions.

### *Archaeology*

Several indicators of archaeological potential have been documented within the application boundary with discovery of a Roman villa near the A20, further prehistoric barrows at Barrow Hill and military remains at Lympe Airfield.

### *Ecology and Habitats*

The area supports a range of habitats, including broadleaved woodland, hedgerows, and ponds, running water courses, mature trees and grasslands. However, the largest areas of the existing site are improved grassland pasture and arable land. Within the master plan there is extensive opportunity for enhancement of the range, quality and connectivity of habitats across the site.

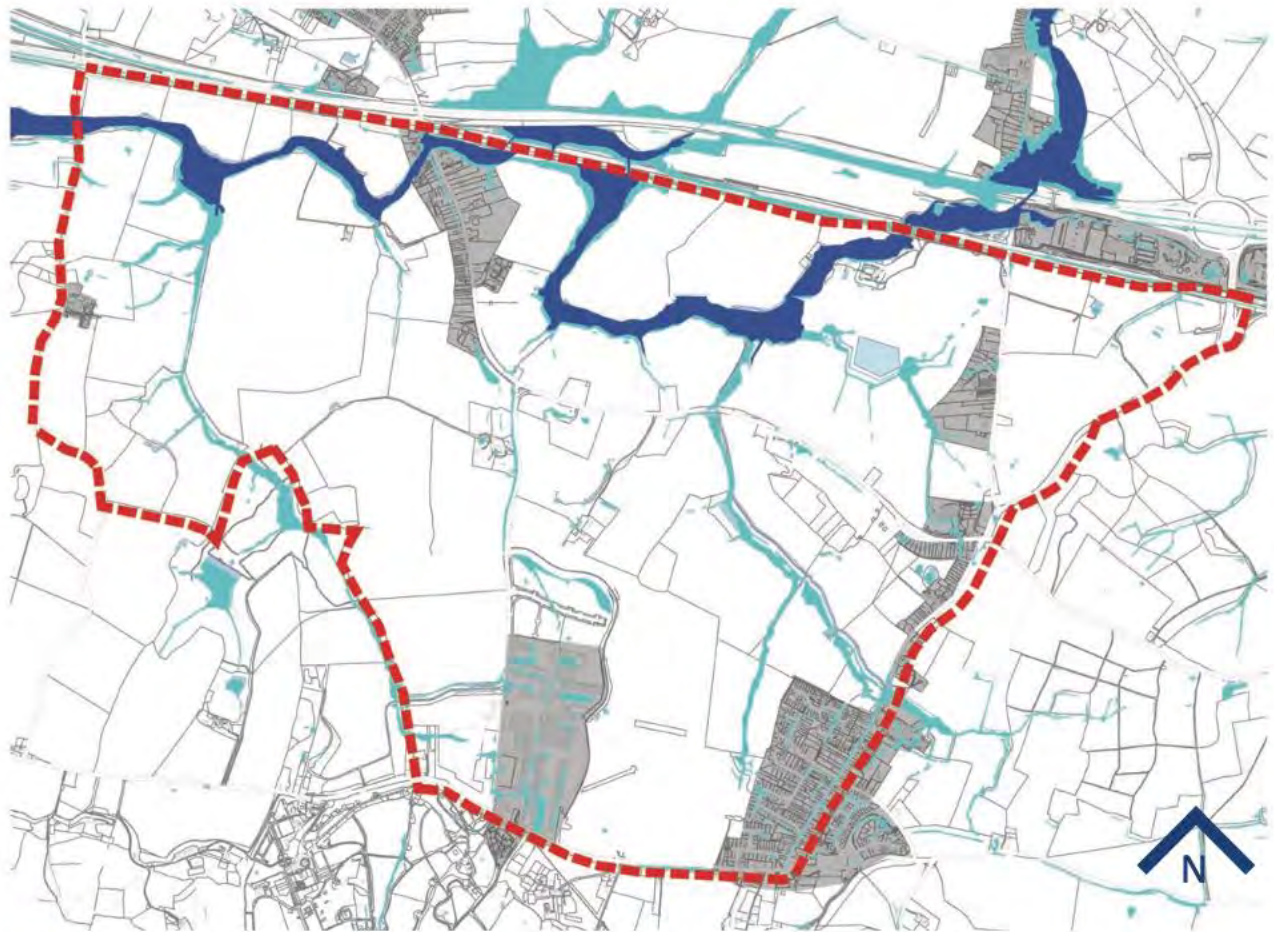
The value of the habitats is indicative of the current and historical usage, driven largely by farming methodologies and management. In many areas, the ecological value has been reduced by intensive farming, removal and degradation of hedgerows and application of fertilisers and other agricultural process.

### *Flood Risk & drainage*

There are several existing drainage features within the existing site boundary; these include the East Stour River and its tributary streams, ponds and ditches.

As the site is mostly greenfield, the surface water is drained naturally. Rainfall runoff patterns are governed by topography, soil type and the nature of the overlying surfaces. The existing streams and ditches all convey the surface water to the East Stour River, which flows through the northern section of the site from east to west, and then continue towards Ashford where the East Stour River converges with the Great Stour River.

Otterpool Park is generally at low risk of flooding, but the primary flood risk is from the East Stour River, which has a relatively shallow and wide floodplain. Limited flooding risk also exists along the drainage valleys from the small tributary streams and drainage ditches.



EA Flood Zone 2  
0.1% AEP (1 in 1000)

Surface Water Flood Risk  
0.1% AEP (1 in 1000)

*Diagram of flood risk*

## 2.4 Housing

The Core Strategy Review (CSR) sets a requirement for a minimum of 5,925 new homes in a phased manner (to 2036/37) with potential for future growth to 8,000 – 10,000 beyond the plan period and subject to masterplanning.

The parties agree with the vision for homes designed to be spacious, flexible and adaptable over time; to meet changing needs of their occupants. At the same time ensuring the homes are accessible to as many people as possible by offering a broader range of tenures than many smaller developments could deliver. A development of this scale has the ability to keep delivering through a number of economic cycles, in line with the Letwin Review. As noted elsewhere in this report, we also think home working will play an increasingly important role, and the potential to reduce the need to travel with it.

The overall quantum of development which supports these objectives is supported and is aligned with the scale of development envisaged in the NPPF for large scale new residential development, including new settlements. The parties accept that these numbers must be subject to an ongoing iterative masterplanning process which balances a range of constraints and opportunities. This will continue to be controlled through the three-tier approach outlined in the implementation section.

The parties think it is important a diverse range of homes and tenures is secured, offering homes for rent, intermediate and retirement housing, to ensure consistent delivery and still provide balanced and mixed communities. A further update to the Housing Strategy submitted with the OPA has been prepared to be consistent with the draft policies.

The parties agreed on the need for a local housing needs survey at Parish-level and this was undertaken by Opinion Research Services in early 2020. It has informed the updated Housing Strategy, and will help to understand how the needs of the established community could be better met. It will establish an evidence base for refining the scheme mix so that more opportunities are available for local people to remain local, given their current and future household circumstances. The survey will be updated every five years or in line with each phase, ensuring changing needs of local people continue to be addressed and secured via the s.106. A Local Allocations Plan will then evolve from this survey. This will ensure local allocations are approached using up-to-date surveys of housing needs.

In respect of self and custom build further work is underway to develop an Action Plan / Work Programme to deliver custom and self-build. This will illustrate how the work will be prepared, by whom, and the overall strategy for distribution. This will be appended to the Housing Strategy, secured via s.106, and reviewed at each phase.

The parties support the implementation of associated housing policies outlined in Policy SS6. In pursuance of these policies a review process is proposed, secured via s.106, that will seek to maximise the provision of affordable housing through the lifetime of the development with the objective of achieving policy compliance, as a minimum. The review would be undertaken on an 'open book' basis and will result in an approved project appraisal for each phase together with a phase affordable housing delivery plan. The LPA will also introduce, via condition, a requirement to submit a reconciliation statement, to demonstrate how each phase is consistent with, and will not prejudice, the delivery of site-wide targets.

## 2.5 Transport

### *Context*

Both the Local Planning Authority and scheme promoter are committed to securing the delivery of a development that prioritises walking, cycling and public transport and seeks to deliver the range of transport improvements set out in Core Strategy Review draft Policy SS7(6). As part of the ongoing discussions related to the outline planning application the scheme promoter is preparing an updated transport vision and strategy that seeks to deliver such a modal shift and allows the scheme to respond to changes in transport technology, public attitudes/behaviours and local and national policy in order that an innovative package of transport measures can be delivered that result in a range of environmental and health and well-being benefits. A monitor and manage approach will be adopted that links the provision of transport infrastructure to the demand generated by residents of the scheme whilst ensuring that the impact of the scheme on the local highway network is kept to an acceptable level.

The key elements of the Transport Assessment submitted with the OPA are considered in more detail below.

### *Background to the Transport Assessment*

The scope of the Transport work required for the OPA was discussed and agreed with Kent County Council, Folkestone & Hythe District Council and Highways England between April 2017 and March 2018.

As part of the scoping exercise, technical reports were producing setting out the methods by which the assessment was to be undertaken and preliminary assessment work was carried out to inform discussions. A series of meetings were held and correspondence was exchanged with the key stakeholders throughout the year-long scoping period, which culminated in a set of technical notes and scoping documents that set out the agreed scope and method for the assessment. Following comments received on the 2019 OPA, further scoping discussions have been held with all three parties in 2020. The discussions have led to variations in the scope and method of assessment, which will be reflected in the Transport Assessment to be produced for the revised OPA.

Given the distance between the site and the boundary of Folkestone & Hythe District, the primary effects that could have influence outside the District would be on the highway network. The scoping process has identified the need to assess highway impact in Ashford along the M20 to Junction 9 and on routes into Canterbury, as well as east from the site on routes into Hythe and Folkestone and along the M20 and A20 to Alkham Valley. The Transport Assessment completed for the 2019 OPA submission identified the need for mitigation at Junction 9 in Ashford and a solution was identified and tested. Upon their review, Kent County Council agreed that the mitigation represented a net benefit in capacity for the junction. This junction, along with all other junctions in the agreed study area, will be re-assessed for the revised OPA. The results will be discussed with Kent County Council and Folkestone & Hythe District Council and appropriate mitigation will be agreed where required.

The assessment of vehicle trips into Canterbury for the 2019 Transport Assessment identified a requirement for detailed assessment of two junctions in Canterbury City; B2068 Nackington Road / Old Dover Road and Old Dover Road / St Lawrence Road / The Drive. Based on the results of the assessment, Kent County Council requested for the applicant to fund the

provision of two new directional signs to the New Dover Road Park and Ride site from Faussett Hill and Bridge Road to sign drivers to use this route to access the Park and Ride site, to be secured through a planning condition should planning permission for this site be granted. The magnitude of vehicle trips expected to route between the Otterpool Park site and areas within Canterbury will be re-assessed for the revised application and the results and any mitigation requirements will be discussed and agreed with the highway authority.

Discussions were held with Highways England regarding the impact of the development on the M20 (and all relevant matters relating to the Strategic Road Network), as reflected within the signed Statement of Common Ground between the District Council and Highways England (ref FHDC EX004). Dialogue will continue as the highway impact assessment is updated for the revised Outline Planning Application. This will include the results of the merge/diverge assessments of the M20 slip roads within the study area. This work does not indicate any improvements will be required to the Strategic Road Network within the first five years of the plan period. It is expected that a revised SoCG will be entered into in due course.

A number of other on- and off-site highway mitigation measures are likely to be necessary, including upgrades to the A20 close to the site. Any proposed mitigation would be subject to a phased implementation plan. Actual travel behaviour of residents and visitors would be monitored along with background traffic on the transport networks. The requirement for mitigation measures would then be reviewed during the operational phase of the development in advance of their implementation. If the monitored travel behaviour and traffic flows suggest the mitigation as identified is not required, it would not be implemented, or it will be altered to suit the change in requirement. The method and program for monitoring would be agreed with the assessing authorities.

## **Public Transport Strategy**

The Transport Assessment (TA) also considers the impact of the proposed development on the bus and rail networks throughout the region. The 2019 Transport Assessment included an assessment of the number of additional rail trips arriving at and departing from Westenhanger station in each direction and the likely origin/destination of those trips. For the revised Transport Assessment, Folkestone & Hythe District Council requested a review of the level of rail trips expected to be generated by the proposed development. Following discussions with the Highways Authority during May and June 2020, revised rail trip generation assumptions were agreed for the revised Transport Assessment. The scope of the assessment of rail trips for the revised Transport Assessment is currently being discussed with Kent County Council and Folkestone & Hythe District Council.

### *Bus*

The Transport Assessment also includes an assessment of additional bus patronage and the likely origins and destinations, and therefore the bus service routes, of people routing to and from the site. The Assessment has informed the bus service element of the Transport Strategy will also inform ongoing discussions with Stagecoach and other stakeholders through the Quality bus Partnership regarding the level and timing of bus service enhancements required.

The bus services strategy is to provide an accessible, frequent and reliable service for residents to connect within the site to key destinations including local centres, schools, employment sites and Westenhanger Station and to key destinations, notably Ashford and

Hythe. It is intended that there would be a bus stop within 400 metres of the majority of homes and contributions to bus services to enable provision at 30-minute frequencies from early occupation. By the time of full development, it is envisaged that there would be a 15-minute frequency service, increasing to every 10 minutes once fully commercial. The aim is for people to be able to turn up and catch a bus within no more than an average 5-7 minutes wait.

Bus services would be likely to firstly involve an enhancement to the existing services on the A20, with additional buses being added to increase frequencies and provide a bus service through the development on the north and south side of the A20.

The bus strategy promotes two indicative Otterpool Park routes:

- From Sellindge on the A20, routing through the northern part of Otterpool Park to the town centre and station, and then via the business area of the masterplan to the A20 south to Newingreen and to Hythe (and vice versa); and
- From Sellindge on the A20, routing through the southern part of Otterpool Park, then across to the town centre and station, and then via the business area of the masterplan to the A20 south to Newingreen and to Hythe (and vice versa).

The development will be phased and built out in different areas of the Masterplan. Bus routes will develop through the build out of the development in conjunction with bus operators and it is important to allow for flexibility in provision whilst adhering to the strategy principles. The implementation of bus service changes would therefore be planned to reflect the development phasing to ensure that, as new settlement centres are established, walking distances to bus stops are minimised.

High quality bus stop facilities would be provided to make the services an attractive option for short and long journeys, with shelters, lighting and information. Infrastructure design will take account of the accessibility needs of the mobility impaired. Real time information on bus services would be available via bus stops or other appropriate technology for users. This can include real time information provided to Otterpool Park residents in their homes so that they can time their walk to the bus stop to minimise their journey wait times.

It is likely that bus services would be delivered by the bus operator and monitored by the Quality Bus Partnership (QBP) between Folkestone & Hythe District Council, Kent County Council and the bus operator, to achieve quality local bus services. The aim of a QBP is to develop and improve all aspects of bus travel within the District, including infrastructure, with the overall objective of increasing passenger numbers, thereby reducing the need to travel by car. The measures that the QBP might consider for the Route 10 which will pass through the Otterpool site might include investment in new vehicles, with consideration of hybrid or electric buses, as well as fare incentives and new infrastructure on the route, such as enhancements to existing bus stops and the provision of new high-quality facilities. However, at present discussions are ongoing as to the delivery of bus services for the development and various means of provision will be considered including use of demand responsive services in the early years.



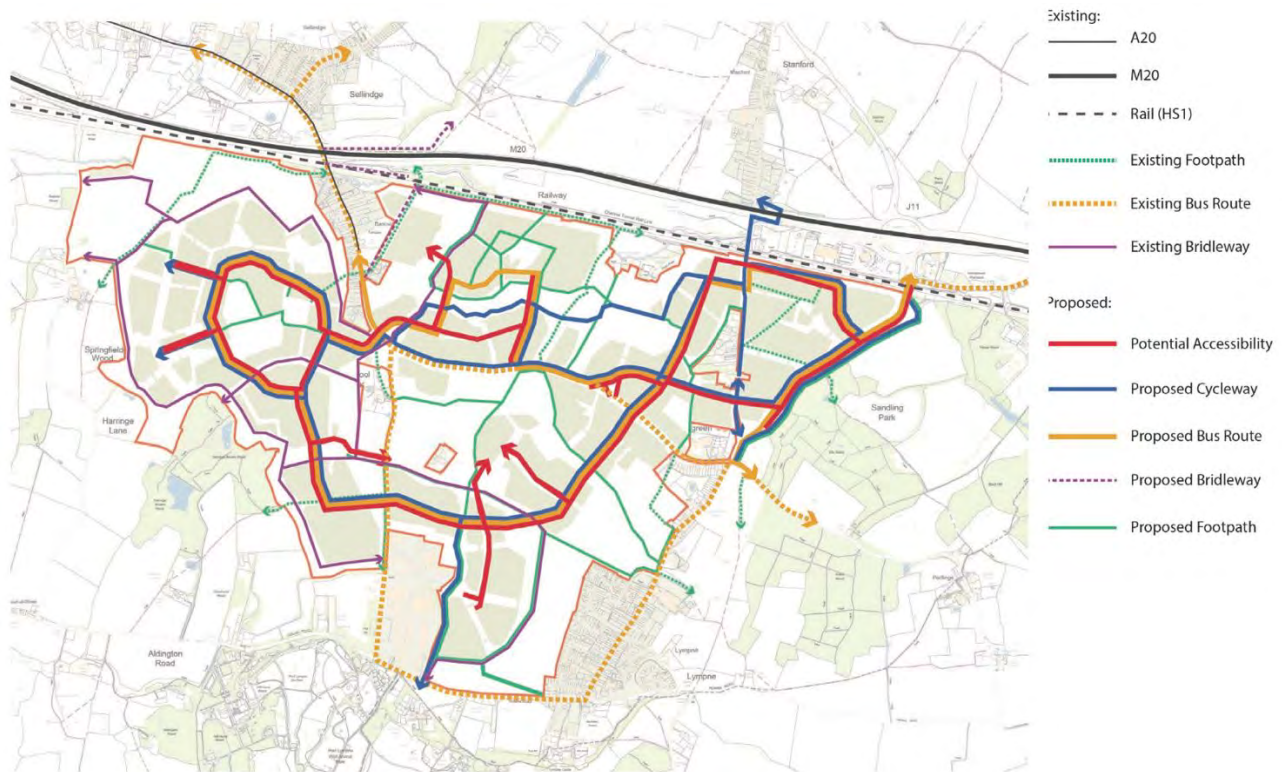


Diagram of transport and movement strategy

## Rail

An upgrade to the passenger facilities at Westenhanger Station is being sought in conjunction with key stakeholders including Network Rail. The station is intended to provide a major hub of activity within the settlement, enhanced transport interchange, an identity for commercial, social and residential land uses and improved linkages for visitors to Westenhanger Castle. It is envisaged that improvements would include:

- Access improvements for all modes;
- A new bus interchange;
- Secure cycle storage;
- Improved parking arrangements including EV charging spaces;
- Additional ticket machines and smart readers;
- Interactive information systems;
- Platform extensions;
- Part-covering of platforms with new canopies;
- A new pedestrian overbridge between platforms;
- Lift access to platforms;
- A new station building; and
- Potential for commercial provision of café/ retail facilities.

The potential to enhance rail services with additional direct services to London is also being explored with the aspiration of at least hourly direct services of less than 60 minutes journey time.

It is envisaged that a car park will be provided for the station which will initially be a surface car park and would be expanded over time with decking or structures to provide a multi-storey facility.

### *Future mobility and active travel*

A series of mobility hubs would be created across the site, of which the station would be one. The mobility hubs would incorporate a mixture of multi-modal travel options and would be set within a high-quality public realm. The hubs would provide a range of travel options and facilities for residents and commuters which could include:

- Bus stops with passenger facilities include shelters, seating, lighting and real-time information;
- Secure cycle storage, including the option for hire bikes, and bike repair stands;
- Other future mobility micro-mobility options such as scooters;
- Vehicle parking, preferentially for car club spaces and including electric vehicle charging points;
- Local area maps providing routing information and travel options for users; and
- Non-mobility facilities such as a food and drink kiosk, drinking fountain, artworks, seating, planting, children's play area, community exercise equipment and package delivery lockers facilitating 'click and collect' services.

The hubs would be optimised by their location across the site and would be designed to facilitate access between modes and to the other facilities they contain, creating a hierarchal network linking locations across the site. Hubs are expected to be located at points of key transport interchange on public transport routes, near neighbourhood centres. By providing a range of mode choices and complementary services, the hubs will provide 24-hour access to sustainable travel services and raise the visibility of the available alternatives to the private car. Signage would direct users to the hubs from the wider area. This can be expected to create an improved travel experience for users and increase patronage of sustainable modes.

The infrastructure of the masterplan will be complemented by bespoke green travel measures, which will build on the opportunities offered by the existing and proposed walking, cycling, equestrian and public transport infrastructure, and promote and develop sustainable travel opportunities as well as support low emissions vehicles and innovative transport solutions. A bespoke transport review group (see implementation section) will be established to monitor and manage the impacts of the transport measures implemented against agreed criteria secured via the Transport Strategy. The overall aim of the review group, in alignment with the aims of Otterpool Park LLP, will be to promote the delivery of sustainable transport measures informed by the monitoring of the travel patterns and behaviour of future residents and changes in transport policies and technology. As such both the promoter and LPA will work towards ensuring that the development seeks to secure a modal shift towards walking, cycling and the use of public transport, along with the associated environmental and health and well-being benefits that brings, whilst ensuring that sufficient mitigation measures are put in place to maintain sufficient capacity on both the local and strategic road network.

## 2.6 Utilities Infrastructure

### *Water*

The parties agree on the need for a holistic approach to water management. Extensive pre-application discussions with a wide range of partners involved in the design, delivery and management of water have been undertaken including potential new appointment water operators to provide innovative on-site solutions. There have been three options considered to dispose of the wastewater generated by the Otterpool Park development. Two of these reflect discharge to Southern Water Wastewater Treatment Works (WwTW) and a third provides an on-site solution proving a potential opportunity for a New Appointment appointed by OFWAT. The promoters of Otterpool Park have been working with the water companies to ensure that all options are feasible.

#### Option 1 – Southern Water Sellindge WwTW

Under this option, all the wastewater from Otterpool Park would be disposed of to the Sellindge WwTW operated by Southern Water. Southern Water have confirmed that it would be possible to upgrade the Sellindge WwTW to accommodate flows from the development and that the cost for undertaking these upgrade works would be met by Southern Water.

An initial connection to the WwTW can be made via Grove Bridge Pump Station if required but this has capacity for only 163 new units. Southern Water have confirmed that there is treatment capacity at Sellindge WwTW for approximately 1,000 new units. However, there is insufficient capacity within the existing pipe network between Grove Bridge Pump Station and Sellindge WwTW even if the pump station was upgraded. Therefore, under this option, the proposed Point of Connection would be directly to Sellindge WwTW via a new rising main (200mm diameter temporary rising main for the first phase increasing to 450mm diameter permanent rising main to accommodate the entire development) from the northwest boundary of the development to the WwTW crossing underneath HS1.

#### Option 2 – On-site Wastewater Treatment Works

Wastewater generated by the Otterpool Park development could also be treated on site. This would be facilitated through the engagement of a NAV.

NAV - New Appointments and Variations and are limited companies which provide a water and / or sewerage service to customers in an area which was previously provided by the incumbent monopoly provider. A new appointment is made when a limited company is appointed by Ofwat to provide water and/or sewerage services for a specific geographic area. It is proposed that an on-site WwTW would be located in the northwest corner of the site with treated discharge into the adjacent watercourse (East Stour). Albion Water and Severn Trent Water have been approached to provide a solution for this option. Evidence provided by potential NAV appointments demonstrates an on-site solution is capable of being delivered in a modular way and could also deliver significant added value in terms of long-term stewardship and integrated management of water services for future residents by a team based on-site.

The viability and cost review by Gerald Eve and Gardiner and Theobald on behalf of the LPA has confirmed its viability as part of overall infrastructure costs with the option of a phased modular build further enhancing its viability. The option is therefore viable, deliverable and

capable of securing long term environmental and community benefits commensurate with draft planning policies.

### Option 3 – Southern Water West Hythe Wastewater Treatment Works

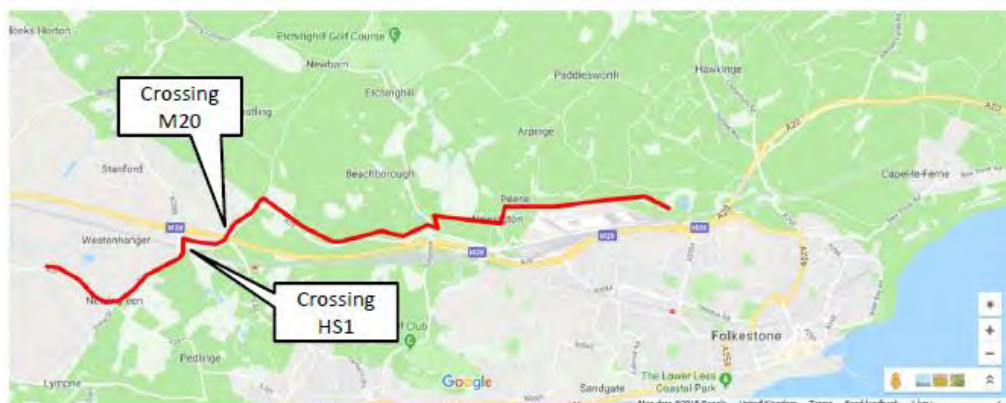
There is another existing WwTW; West Hythe, approximately 6km from the boundary of the Otterpool Park development which is being considered for the discharge of wastewater. West Hythe WwTW would need to be upgraded and this cost would be met by Southern Water subject to further benefit-cost assessment. However, these upgrades are more complex and costly compared to the upgrade works that would be required at Sellindge WwTW. The proposed point of connection would be via a new rising main (200mm diameter temporary rising main for the first phase increasing to 450mm diameter permanent rising main to accommodate the entire development) from the Otterpool Park boundary via the existing road network to the treatment works.

### *Potable Water*

The incumbent water utility provider for the area is Affinity Water. A new potable water supply will be required from Affinity Water to serve the new development. Affinity Water has confirmed that it is possible to supply the first 1,500 units from the existing network based on circa 400 litres per household/day; or 126 l/person/day. However, the parties agree on the need for a much higher standard and it is likely that the development aspiration will look for considerable reductions on this figure.

The remaining 7,000 units of the development will require upgrades to the sizing of the existing offsite and onsite mains to ensure sufficient water pressure is achieved and maintained between the reservoir and the development and neighbouring settlements. Affinity Water has confirmed that, a dedicated 560mm diameter water main would be required between the development and Paddlesworth Reservoir, over a length of approximately 11Km. The water main will follow the same alignment as the existing water main, which will serve the first 1,500 units. The route of this new water main will need to cross both the HS1 rail and the M20 road infrastructure. Please see image below.

The indicative implementation programme from the start of planning through to construction completion is 4-5 years to allow for the two crossings of strategic infrastructure.



Approximately 11km of 560mm OD (494mm ID) main. Total implementation period from the start of planning through to construction completion is 4-5 years to allow for the two crossings of strategic infrastructure.

*Diagram of potable water reinforcement*

### *Electricity*

It is intended that the residential element of Otterpool Park will be powered by electricity only. The existing electrical power network is owned and managed by the statutory supplier, UK Power Networks (UKPN). It has been confirmed by UKPN that as there is very limited capacity in the existing 11kV electricity network, reinforcement will be required for Otterpool.

Negotiations are ongoing with UKPN, but the reinforcement upgrade requires a new on-site primary substation within the Otterpool redline boundary, to cater for the full development. The new primary substation will either be connected to UKPNs 33kV or 132kV networks, to serve the entire development.

### *Telecommunications*

Delivering a fast, efficient and well-connected telecommunications network is a key principle for Otterpool Park. It will be an important consideration both for business wishing to locate here and new residents. Extending ultra-fast fibre optic broadband to the premises at Otterpool Park will also facilitate improved connectivity potential for the wider catchment and immediate neighbouring where there are existing issues with broadband speeds and connectivity.

BT Openreach has confirmed the nearest telecommunications exchange is in Sellindge. The network will be extended from the exchange into the development and there is capacity for broadband, within the existing BT Openreach network for the full development. The programme for the extension of the fibre network will be determined upon a formal application post planning approval, but it is intended that wider benefits will be realised by the existing local community struggling with high speed connections.

## 2.7 Economic development and retail

In February 2017 the Council commissioned Lichfields to undertake an employment opportunities study, including:

- Identifying the range and scale of potential employment opportunities including the offers in terms of the type of employment and sectors;
- Understanding what needs to be done to realize these employment opportunities;
- Considering the implications of the study outcomes on the master planning;
- Assessing the potential impacts of realizing these employment opportunities to support growth in the vicinity of M20, Junction 11 (including Otterpool Park) on other key places within Folkestone and Hythe District and the wider East Kent area.

A summary of Stage 1 of the study is appended to this statement (Appendix C) and includes the economic drivers that will influence the future economic role of Otterpool Park and the specific location factors and site attributes relevant to the economic planning of Otterpool Park.

The identified growth sectors blend together those already well established in the local area, with others not well established locally but are growing nationally. The outputs of the study were incorporated into the masterplanning and draft planning policies.

Growth sector	Potential to serve growing markets	Capacity to contribute to employment and GVA	Alignment with Govt. policy and funding	Inward investment track record	Builds on existing Shepway strengths
Green construction	●	◐	●	○	○
Low carbon environmental goods and services	●	●	●	◐	○
Advanced manufacturing	●	●	●	◐	◐
Creative, digital and media	●	●	●	◐	●
Business, finance and professional	●	●	○	●	●

*Extract from economic drivers: sector growth scorecard*

A separate Employment Land Review (ELR) was prepared by Lichfields for F&HDC to form part of the evidence base to inform and support implementation of policies contained within

the Council's Core Strategy Local Plan<sup>4</sup> in respect of employment land and all have influenced the approach to the role and function of the new settlement.

### *Total employment at Otterpool Park*

The employment that will be supported across the whole development has been calculated by applying the standard job densities from the HCA Employment Density Guide (2015). The OPA development would support around 8,950 direct jobs; this is equivalent to 7,195 FTEs. 50% of employment (4,475 jobs) is expected to be supported in office and light industrial jobs. The remaining employment is expected to be in retail (1,725), recreation and community uses (1,045) and in extra care and hotels (610). A further 1,095 jobs are expected to be supported through home working.

The OPA for Otterpool Park is proposed to have up to 77,500sq.m. (GIA) of B1, B2 and B8 commercial floorspace, 21,000sq.m. (NIA) of retail and leisure floorspace in addition to community uses.

In respect of the OPA, further work is underway by the applicant in response to a review of economic development and retail evidence.

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<sup>4</sup>[https://www.folkestone-hythe.gov.uk/media/329/Employment-Land-Review-2017/pdf/15084\\_Shepway\\_Employment\\_Land\\_Review\\_-\\_Final\\_Report\\_May\\_2017.pdf?m=637001698752030000](https://www.folkestone-hythe.gov.uk/media/329/Employment-Land-Review-2017/pdf/15084_Shepway_Employment_Land_Review_-_Final_Report_May_2017.pdf?m=637001698752030000)

## 2.8 Community Development and Social Infrastructure

The partners wish to secure tangible commitments to community development within the OPA, particularly in the early stages of development. A range of measures are being explored to foster greater community development and will be secured through a Delivery Management Strategy and s.106 agreement. The elements to be included:

- The employment of full-time Green Infrastructure Rangers;
- The employment of a Community Development Officer(s);
- Future 'Discovery or Community Days' such as the recent open day for the Castle – allowing existing and prospective residents to fully explore the area, community archaeology and other historic assets to generate interest and ownership, hosting sporting events or running events;
- Landscape monitoring of newly planted areas, particularly for the first five years after planting;
- Support for community-led efforts to encourage and look after local wildlife and habitats of Otterpool Park, particularly through use of educational interpretation and guides, setting up of local environmental groups, and residents information packages;
- Commitment to early provision of a farm shop/cafe and/or other community meeting space to help foster a strong sense of community early on.

### *Social Infrastructure*

Otterpool Park will aim to be self-sufficient in terms of providing its own schools, health centres, community facilities and integrated transport systems and community facilities, except where it is beneficial, in line with the strategic priorities of the relevant authorities, to provide these facilities (or part of these facilities) off-site.

Early phases of development will be planned in a way that will not disadvantage early residents in terms of access to essential facilities, or place pressure on existing local facilities and infrastructure while ensuring new facilities are viable and deliverable.

Commitments as set out within the OPA which relate to community and social infrastructure are set out below and specified in terms of requirements and proposals in the table below.

Key infrastructure, such as a new primary school, will be provided in phase one of the new settlement to support investment and community development.

The parties agree that it is important to adopt a monitor and manage approach to education provision. This will allow flexibility and additional land to meet unexpectedly high demand. This land would be safeguarded using s.106 obligations until such time as it is shown that it will not be needed. The approach to monitoring is set out in the implementation section.



Type		Identified need – 8,500 homes	Identified need - 10,000 homes	Proposals
Education	Early years	x15 nursery settings (52 places per setting)	x18.2* nursery settings (52 places per setting) *assumes 100% take-up	All primary schools will include nursery provision. Floorspace to support the provision of standalone private nurseries and childcare settings is included in the Development Specification and Parameters.
	Primary	Up to x7 primary schools (2FE or if necessary 3FE) including potential co-location with SEN/ Secondary provision 2.6 ha per site	Additional x12 FE primary school	1 x primary school (2FE) co-located with secondary and sixth form as per below (meeting minimum requirements for 2FE). 1 x flexible education site
	Secondary*	Up to 10.6FE x1 6FE to 8FE secondary school with sixth form co-located with other education provision (11.5ha site) x1 additional site for secondary provision and co-located with other education provision (primary, secondary; sixth form and/or SEN)	Up to 1926 pupils Additional 2.2FE required	1 x 6FE-8FE secondary school with sixth form (co-located with 2FE primary school) of 11.5ha, plus land for other co-located uses. Additional flexible site which could accommodate additional primary, secondary, sixth form or SEN uses.
	Sixth Form*	Up to 471 pupils in a full time education setting provided alongside secondary provision	Up to 558 pupils in a full time education setting provided alongside secondary provision	
	Further education	Up to 236 pupils in a full time education setting provided by the private sector	Up to 279 pupils in a full time education setting provided by the private sector	Not provided on-site
	Special Educational Needs (SEN)	An estimated 90-100 places.		As above – provided within the co-located site or at flexible site

Healthcare	Primary healthcare (GP provision)	8,500 homes: 10 FTE GPs 2,000 sqm GIA required for standard operations. Suggested additional 1,000 sqm GIA required for wider local care services	10,000 homes: 12 FTE GPs 2,000 sqm GIA required for standard operations. Suggested additional 1,000 sqm GIA required for wider local care services.	The Development Specification includes 12,980 sqm of healthcare (D1) floorspace. Proposals include one large practice in the town centre. To retain flexibility, three other smaller sites have been allocated for potential community floorspace which could include healthcare.
	Treatment Centre / Multi-specialty Community Provider (MCP)	There is an opportunity to provide a GP practice with extended services. The exact model for delivering these services will depend on the strategic plans, objectives and funding available to the CCGs at the time of detailed planning permission and delivery. The delivery model could be Multispecialty Community Provider (MCP) or a Treatment Centre.		
	Dentists, Opticians and Pharmacies	It is expected that the healthcare offer will also include dentists, opticians and pharmacies which will come forward in a mixture of private and NHS settings according to the NHS licencing programme for these facilities.		
	Care homes	Expected to deliver 648 specialist homes for older people based on the 8,500 homes scheme		
Other community facilities	Community Uses	Benchmark figures suggest one small 100 sqm village hall per 650 people – or 3,200 sqm	Benchmark figures suggest one small 100 sqm village hall per 650 people – or 3,700 sqm	The Development Specification includes up to 8,000 sqm of flexible community use floorspace. The shared use of school halls and other facilities can also provide excellent facilities for the community to meet, to hold events and to provide services such as adult education

\*10,000 need is indicated for Secondary Schools as these will be planned at a strategic level to meet the needs of the whole Strategic Site Allocation.

## *Health*

The joint vision is for the new settlement to include a state-of-the-art medical centre that provides a 'one-stop shop' for outpatients including a cluster of GPs and a wide range of diagnostic services. The medical centre will be located on an accessible site close to other community services. The specification for the facility will depend on the needs and strategic plans of the NHS and Clinical Commissioning Group (CCG) at the time of delivery. The S.106 will include covenants to provide the dedicated Health Care Facilities in accordance with a Health and Wellbeing Strategy submitted to, and approved by, the LPA (see below). It is the intention of both parties and the CCG that primary care treatment shall be provided as early as practical in the development programme. This early phase of provision may be on-site in new facilities or part of an extension to existing local facilities, with the most appropriate strategy to be decided by the applicant, LPA, the CCG and local stakeholders.

The applicant will be required to submit for approval a Health Care Facilities Strategy to be produced in consultation with NHS England and the CCG consisting of:

- The proposed location, timing, outline specification and delivery of any temporary GP facility;
- The proposed location of the health care facility within first phase;
- The proposed size of the facilities.

Health facilities will be phased and secured through the s.106. It is anticipated that the first premises will also provide some space for community use, to support the sustainability of the building for the first phases.

The health facility could either be modular in construction to enable expansion as and when the patient population requires or is built out in its entirety from the outset but with flexibility on use of the premises to avoid space being left vacant. Phasing options include:

- Before c. year 3 or 4 years of construction, a GP could operate temporarily from another building (e.g. a community or commercial building or existing local practice off-site) provided that the facilities and setting are appropriate to provide the quality of service and care required.
- A portion of the health centre could be built the early years, with space that is not required for healthcare to be let out on a short-term lease to other retail or commercial uses.
- Decanting of some or all of an existing local GP's facilities and services to the new site (subject to the considerations outlined above) could help with sustainability of a practice in the early years.
- Delivery of a wider range of additional services (education, training, social care, specialist care) etc could support the sustainability of the surgery in the early years.

The stakeholders continue to work proactively together across a range of community and social infrastructure to establish long-term monitoring arrangements to be secured through the legal agreement and a summary of these is set out later in the statement. Engagement with stakeholders on delivery of the facilities for first phase of development will continue leading to the discussions regarding the detailed design of facilities for the first phase of development on-site.

## 2.9 Landscape, Green Infrastructure and Biodiversity

Otterpool Park is planned as new community for the Folkestone & Hythe district, built on Garden City principles. The green infrastructure strategy aims to build upon and connect with the landscape study (LVIA) and biodiversity work to help integrate the new community into the natural setting and connect with the surrounding villages. The green infrastructure strategy considers a contribution across open spaces, along street corridors and green links such as footpaths and river corridors, supporting Otterpool Park as a walkable neighbourhood.

From a Green Infrastructure perspective, the vision for Otterpool Park focuses around the creation of three destination parks, which shape places for people to live and enable a closer connection with Nature and natural elements, benefitting the community.



*Destination Parks*

The Green Infrastructure philosophy ‘doorstep to countryside,’ underpins the aspiration that the natural or green elements will contribute to spaces from residential thresholds, along walkable streets, and destination parks toward the wider countryside. Whilst this strategy does not seek to control elements that may be placed inside private housing plots, it aims to establish the potential contribution to spaces like; housing frontages, green roofs and back gardens.



*Diagram of Green Infrastructure typologies*

## Typologies

Green Infrastructure typologies, assets and functions were identified and devised early in the process to inform proposals and are being incorporated into a strategy document. This document identifies the key typologies that will make up the GI (existing retained, and proposed), what assets fall within each typology, and the functions they will perform, highlighting the multi-functionality of the proposed GI network. The strategy connects with the work carried out on the LVIA study toward an advance planting program that will help integrate the community into its natural surroundings, focus key views and add value to natural navigation and sense of place.

The Otterpool Park Masterplan will provide in excess of 50% Green Infrastructure within the application boundary (excluding private gardens). This will comprise a mix of public open spaces and semi-natural habitat areas and will create an outstanding, nature rich living environment.

Proposed new green open spaces will help contribute woodlands, wetlands, meadows, allotments, and recreation areas, connected by green corridors with retained trees, hedgerows and water courses. A network of formal footpaths and cycle routes will be integrated with streets, to improve walkable access between communities and local centres. An additional network of leisure routes will provide routes with unlit rural paths, linked to surrounding footpaths and existing and proposed landscape assets.

The master plan will reflect existing landscape features on and in close proximity to the application site, including the parks, play areas, sports pitches, community orchards, allotments and burial ground, accounting for approximately 312 hectares of Green Infrastructure (GI) including;

- Natural areas hedgerows, woodlands of approximately 160 hectares.
- Sports pitches including secondary school pitches of approximately 30 hectares.
- General amenity, parks and gardens of approximately 50 hectares.
- Equipped play areas of approximately 6 hectares.
- Allotments and community orchards of approximately 10 hectares.
- Woodland burial ground approximately 2.5 hectares.

### *Overview on ecology and biodiversity*

Protecting the natural environment and providing a home to wildlife and nature is important at Otterpool Park. This is not only to preserve the valuable biodiversity of the Folkestone and Hythe district, but also to provide opportunities for residents, both new and existing, to experience wildlife and nature, and enjoy the health and wellbeing benefits that this confers.

The development will increase biodiversity across the site, which will be achieved through:

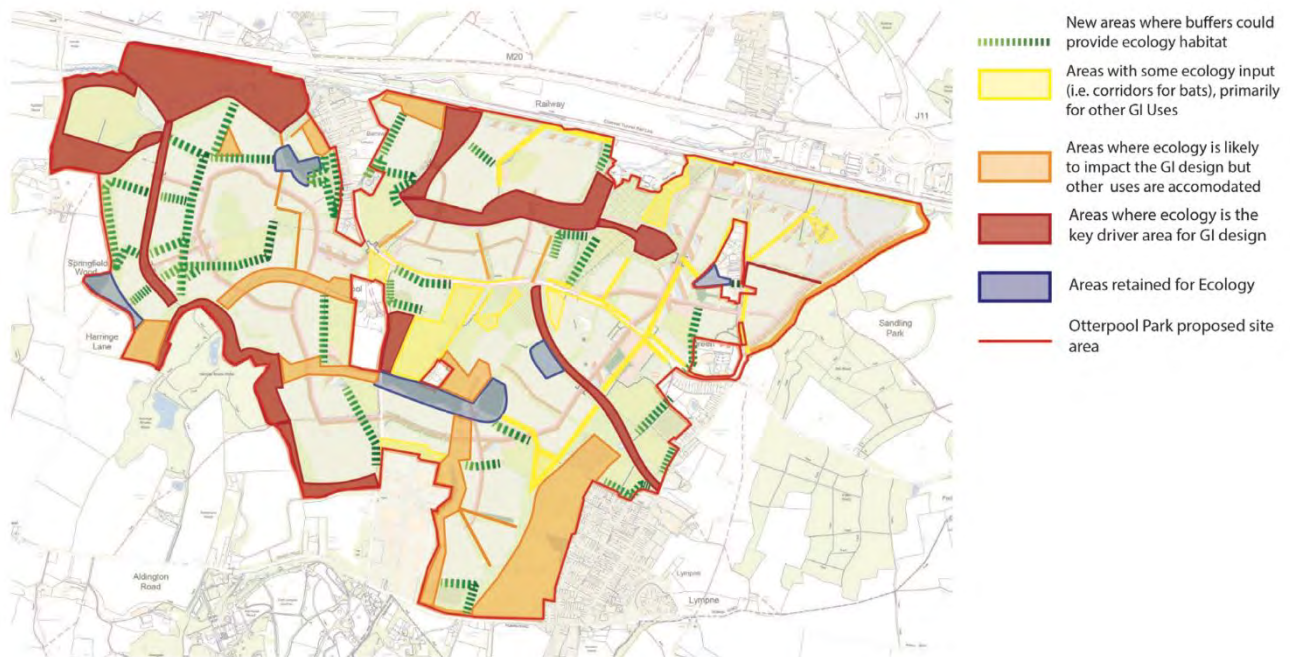
- Retention of key areas;
- Creation of new areas of valuable habitat; and
- Habitat enhancements

### *Retention of key areas*

From the early stages of the project, the design of the development has been iterated to ensure primarily that the most valuable habitats are retained, and impacts are avoided (in line with the mitigation hierarchy).

In order to inform the masterplan layout, following the initial habitat survey conducted, habitats and areas were valued depending on their value and their requirement for retention. The following categorisations were utilised:

- ‘Grade 1’: likely to contain S41 or uncommon habitat types that are likely to maintain multiple notable and/or protected species and deliver key ecosystem services and must be retained and buffered;
- ‘Grade 2’ contain habitats of high value and/or protected species and strongly recommended to retain and buffer;
- ‘Grade 3’: habitats that provide important connectivity or strategic value throughout the site or have value for notable species and are recommended to be retained;
- ‘Grade 4’: areas supporting less commonly found habitat across the site, retention desirable; and
- Other habitats: these areas have no intrinsic value for retention, however they may have value for associated notable species.



*Diagram of priority biodiversity areas*

This valuation was utilised to inform the masterplan and identify areas where development should not occur. Once identified, valuable retained habitats were buffered to reduce potential impacts, with buffers based upon the requirements of these habitats and the species which they support. Also, habitats were identified for enhancement to try and avoid or reduce the need for major restoration and/or offsets and compensation.

#### *Creation of new areas of valuable habitat*

The large areas of green space that have been incorporated into the development design which provide habitats of benefit to biodiversity, and as shown on the parameter plans for approval, are listed below:

- A ‘Country Park’;
- A Wildlife Area in the north-west of the site and a smaller area adjacent to the tributary to the East Stour south of the A20. These will be a species rich aquatic habitat providing a valuable habitat for a range of receptors;
- Lympne resilience area; an area of grassland in the south-east of the site;
- Barrowhill resilience area;
- East Stour riparian park; and
- A woodland burial area.

Further detailed design will come forward as part of future Tier 2 and RMA design work. Within these areas of substantial green space there would be the potential to create spaces and features that would support Section 41 habitats and species. S41 Habitats include: Orchards; Hedgerows; Ponds; Lowland meadows. These habitats would provide conditions suitable for the Section 41 species that have been recorded on the Development site and those that may colonise the site in the future: Amphibians, common toad, great crested newt; Reptiles: common lizard, grass snake; Mammals: hedgehog, bats (soprano pipistrelle, brown long-eared bat, noctule); and Invertebrates.

Within the Green Infrastructure, valuable habitats are to be created. These habitats to be created include:

- Ponds created for biodiversity - these will be designed to meet the prescriptions of the relevant 'habitat of principal importance' description. Areas where ponds are to be created include the buffer around Harringe Brooks Wood, adjacent to the East Stour River and in the 'Wildlife Area' in the northwest of the site.
- Areas of woodland planting, these areas are to be planted to screen the Otterpool park development and to create connectivity. This includes planting linking Harringe Brooks Wood to the river corridor to the north.
- SuDS features including ponds, drainage ditches, swales and rain gardens (these will not primarily be 'for biodiversity' but will have biodiversity value);
- Areas of ditch to be created for water voles;
- Hedgerows will be planted across the development. These will be native species hedges and will be planted to subdivide parcels within the development, but also to provide a permeable barrier for wildlife between properties and GI. These features will provide a notable habitat for a range of species.
- Areas of species rich wildflower grassland will be created across the site. The habitat composition / seed and planting mix should be based upon the soil present but would largely be based upon the descriptions of priority habitat (lowland meadow);
- Scattered trees are to be planted through the GI of the development. The species of these will be designed to safeguard against disease and climate change but will be native where appropriate.
- Areas of scrub will be created/allowed to develop, which will have value for invertebrates and provide a heterogeneous habitat for reptiles.
- Microhabitat features will also be created for a range of receptors, including earth banks and deadwood piles for invertebrates.

### *Habitat enhancements*

Areas where enhancement will occur includes (but is not limited to):

- Hedgerow enhancements to improve connectivity in the form of gapping up; improved management and restoration of ground flora;
- Pond enhancement to achieve the parameters of the 'habitats of principal importance' descriptions;
- Enhancements of the river corridor to increase the heterogeneity and improve the value for notable receptors, including water vole.

As explained above, the proposed design seeks to avoid the most valuable areas for habitats, species and ecosystem services. The proposed development uses and contributes to the existing mature green infrastructure to provide habitat corridors and ecological mitigation. It provides ecological connectivity through the site and to habitats present beyond the site. The green infrastructure proposed is designed to maximise the ecosystem services delivered by the scheme. It is anticipated that the development has the potential to achieve a net gain of approximately 20% in line with paragraph 170 of the NPPF (2019) and Draft Policy CSD4 of the Core Strategy Review (2020).



## 2.10 Sustainability

As demonstrated throughout this Joint Delivery Statement it is the aim of both the LPA and scheme promoter that Otterpool Park be delivered as an exemplar sustainable development that balances a range of environmental, economic and social aspirations. Key elements of the scheme that contribute to this objective include:

- An accessible location well served by rail from the existing Westenhanger Station facility.
- The provision of sustainable transport infrastructure across the site in order to encourage walking cycling and the use of public transport.
- A commitment to 50% of the scheme being open space in order to provide a range of leisure opportunities for local people as well as improving bio-diversity and the visual impact of the scheme.
- The provision, on site, of a range of employment, education, cultural, social and retail opportunities, reducing the need to travel and promoting a sense of community. Such facilities to be clustered around a main town centre area and a series of neighbourhood centres.
- A diverse housing mix, meeting a range of different housing needs, that supports a number of social and economic objectives and delivers a well-balanced and cohesive garden town.
- A commitment to protecting and enhancing the most valuable ecological, heritage and landscape related features including the achievement of bio-diversity net gain.
- The use of low carbon, energy efficient technologies as discussed in more detail below.

Discussions regarding energy and sustainability issues have continued since the LPA's initial response to the OPA in July 2019 (see Appendix B).

In relation to energy issues, the focus will remain on a fabric first approach in accordance with efficiency standards in Future Homes Standard (31% reduction in CO<sub>2</sub> from new dwellings, compared to the current standards). A low carbon heat strategy will be pursued involving a range of technologies and a commitment to recover heat from sewers to serve some properties, which would also support integration with an on-site water treatment solution. The stakeholders will also work together to trial new technologies and commercial options in the first phases of the development, including exploring the use of hydrogen.

The parties agree on the overall techno-economic model for energy with the aim to pursue an all-electric vision for the project. Provision for gas in early phases of the development has now been removed to ensure the development will be ready for no fossil fuels. This provides a clear pathway for the development in terms of an energy preference whilst retaining flexibility for the deployment of a range of renewable technologies at a phase level which will be secured via s.106.

The applicant will be required to submit for approval the Energy Strategy prior to submission of each Tier 2 phase documents (unless otherwise amended, varied or updated with the written approval of the LPA). This will set out, as a minimum:

- Energy targets and performance
- Approach to using reasonable endeavours to secure BREAAAM Communities Excellent rating
- Identify the measures that will be applied to achieve a reduction in carbon dioxide (CO2) emissions
- The requirement for energy centres and other infrastructures
- The requirements for renewable energy technology to achieve the % CO2 performance target
- Reasonable endeavours to trial use of hydrogen and incorporate into bus strategy
- Covenants to ensure that plot developers in any stage of development only submit RMAs which reflect the Approved Energy Strategy.

In addition to the above the scheme promoter, Otterpool Park LLP, will shortly be commissioning research to further investigate the range of factors capable of influencing the achievement a carbon neutral development over the lifetime of Otterpool Park. As well as the approach to the building fabric and the energy strategy for residential and commercial developments this will also consider issues such as the transport strategy, green infrastructure provision, waste strategy, water cycle strategy and the construction process. The results of this process will be fed into the Otterpool Park Business Plan and used to inform decisions taken by the LLP Board in terms of project development and developer selection.

## 2.11 Cultural Heritage and Archaeology

### Context

There are a number of heritage assets located either within the application site boundary or its immediate environs. They comprise designated and non-designated heritage assets with relationships to the proposed development in the form of settings or historic views which would be subject to impact. It also includes non-designated heritage assets of local, regional and potential national importance within the site boundary that could be physically impacted by the proposed development.

Following consultation with the statutory heritage consultees - Historic England (HE), Kent County Council (KCC) and F&HDC - between 2016 and 2018, it was requested that a series of desk-based appraisals and field evaluations be undertaken to further understand the baseline and provide early input to the proposed development design. The desk-based appraisals on the various aspects of the site's cultural heritage were completed between 2016 and 2019. Field evaluations consisting mainly of geophysical surveys and archaeological trial trenching took place between 2017 and 2018 and again in 2020. The results of all these studies has substantially increased our knowledge of the historic environment of Otterpool Park and has developed our understanding of known heritage assets such as Westenhangar Castle and its deerpark. The masterplan area contains significant heritage constraints but many provide opportunities for the proposed development in terms of placemaking and community involvement. The masterplan has been developed such that adverse impacts have been designed out early on, wherever possible.



Figure 79. A proposed Heritage Trail for Otterpool.

### Proposed Heritage Trail – key assets

## *Westenhanger Castle*

Folkestone and Hythe District Council own Westenhanger castle and a masterplan is currently being prepared with options for its future development and use. The key issues that have been considered are:

- The setting and views of the listed buildings, RPG and Conservation Area forms a major consideration in terms of potential impact. Non-listed buildings of equivalent value to listed buildings have also been considered and treated the same as Grade II listed buildings in terms of preserving setting;
- Its continued economic viability within the new garden settlement;
- Preservation and enhancement of the setting of the Castle and its barns; and
- Preservation and enhancement of the important elements of the Castle's landscape and formal grounds that are not designated. The remains of a 16th Century formal garden or orchard; earthworks and water features to the south of the Castle, in the area inside the circuit of the racecourse; a causeway leading from Ashford Road to the Castle which was the former principal access to the Castle at its heyday; remains relating to the Castle's deer park such as the park pale ditch and an animal pound may survive as earthworks or below ground remains within the outline application site boundary;
- Listed Buildings, Sandling Park Registered Park and Garden and Lympe Conservation Area.

## *Archaeological Remains*

The key issues that have been considered are:

- Throughout prehistory the site was favourable for settlement and trade due to its proximity to historic routeways and the former coastline. Neolithic and Bronze Age activity has been recorded on the higher slopes in several areas of the site;
- The archaeological resource is well represented in terms of potential at present but awaits the results of the ongoing field evaluation to determine the presence of further significant archaeological remains;
- Either side of Barrow Hill, Sellindge are groups of ring ditches seen from the air and on LiDAR. These are ploughed out and partially ploughed out Bronze Age burial mounds; a monument type which rarely survives above ground in the county. Although not scheduled, these burial mound monuments and their setting are of importance. Geophysical surveys, trial trenching evaluations, and geo-archaeological investigations have expanded our knowledge and understanding of the Prehistory of the site;
- The site later formed part of a Roman landscape near to the Roman fort of Stutfall Castle and close to Roman roads connecting it to Canterbury, Maidstone, Dover and a port at West Hythe. Evidence of Roman farming and settlement has been revealed by trial trenching west and north of Otterpool Manor. A Roman villa was found east of Otterpool Quarry and south of Ashford Road. This previously unknown site was uncovered as a result of the geophysics and trial trenching carried out for the Otterpool Park project;
- Anglo-Saxon remains are known from the immediate environs and there is potential for settlements or cemeteries of this date to be present on the Site; and Medieval and Post-medieval remains are known and more are expected to

be found. As well as the medieval manorial centres of Westenhanger Manor, Otterpool Manor and the moated site at Bellevue, the area was dotted by dispersed medieval farmsteads, some of which carried on into the post-medieval period and even to the present day.

### *Military Remains*

The majority of military structures are focused around Lympne Airfield and include the Battle HQ and bunkers, a Pickett Hamilton Fort, other pillboxes (no longer standing), an aircraft dispersal pen, RAF huts and a machine gun range, as well as the airfield itself; and Other areas of the Site such as the Racecourse also saw activity in the First and Second World Wars.

### *Historic Landscape*

The historic landscape is an important element in retaining a sense of continuity of the past while creating a new and attractive place to live. The masterplan has been designed to incorporate the historic grain of the landscape such as hedges, old routeways, historic woodland and waterbodies where possible.

### *Heritage Strategy*

A Heritage Strategy is being developed for the masterplan that will identify how the development will conserve and enhance local designated and non-designated heritage assets and their setting. The strategy will include mitigation measures for heritage assets and will also outline measures for future long-term viable use of heritage assets within the new development and where necessary provide mechanisms for their integration into the development. The Heritage Strategy will identify the positive role heritage can play in the district's future including acting as a catalyst for economic and social regeneration; encouraging tourism and visitor and contributing to improved public health and wellbeing.

### *Liaison with Historic England and stakeholders*

The scope of the cultural heritage work for the OPA was discussed and agreed with the Heritage Consultees (KCC and Historic England) between 2017 and 2018. Much liaison has also taken place about preservation of key heritage assets including the Roman Villa, the barrows and the landscape features of the Castle.

Consultation is ongoing including further assessment of the impacts to the Castle in the context of wider heritage benefits and benefits to the public. All the consultees want to see more work on viewpoints to and from the Castle. Historic England are being consulted on the masterplans for Westenhanger Castle and the new park that is to be created to the south. KCC and Historic England are being consulted with about the results of the ongoing archaeological fieldwork.

## 2.12 Governance and Long-Term Stewardship Strategy

The Outline Planning Application for Otterpool Park includes a 'Governance Strategy' which identifies the principles and approach to be taken to Governance. It groups all of the assets listed in Policy SS8, and the potential approach to Governance asset including what will be provided, how and who might be responsible for each asset and how they might be funded.

This approach follows the 'Garden City Principles' produced by the Town and Country Planning Association (<https://www.tcpa.org.uk/garden-city-principles>) which have been widely adopted in planning policy relating to garden towns and villages, new settlements and urban extensions. It brings together two of the principles:

- Land value capture for the benefit of the community; and
- Community ownership of land and long-term stewardship of assets

The Strategy was produced in consultation with the various service delivery departments of the County Council and District Council and representatives of local bodies including the Parish Councils. These meetings have informed the considerations of the options for stewardship of assets and the approach to Governance vehicles. The strategy was also informed by a review of best practice in other urban extensions and new settlements.

This strategy is currently being converted into a Business Plan which includes an asset register and identifies the capital and operational costs of each of the asset types grouped under the following headings:

- I. Schools
- II. Health
- III. Community (including Community Buildings and Nursery)
- IV. Heritage Assets
- V. Sport
- VI. Green Infrastructure, including non-adopted public realm
- VII. Other Infrastructure, including utilities

The top two items (schools and health) both have statutory provider routes and revenue funding sources.

Items (iii) to (vi) are likely to be incorporated into the governance/stewardship vehicles although there are different options for their management and delivery, for example sport and open space could be owned and managed by a specialist trust, similarly there could be a focussed body for heritage. To address this the Business Plan has incorporated lifecycle and operational cost benchmarks for each item based on other strategic developments with the precise legal and operational structure to be agreed as part of the planning application/Section 106 process.

For those assets to be transferred to the new 'Trusts'/'Governance Bodies' new dedicated funding streams will be required. This is likely to include an endowment (of land and financial contribution), funded by the developer. It may also include ongoing income from fees and charges, contributions from Energy or Multi Service Utilities Companies, or from additional assets (commercial or housing). Such contributions will be secured through Section 106 planning obligations. Such costs and income have been benchmarked against other strategic development sites – such as Chilmington Green in Ashford) to ensure deliverability.

In addition to these financial/deliverability considerations the Strategy also deals with Community Involvement and Accountability and has been developed in consultation with elected members of Folkestone and Hythe District Council and the Local Parishes. Governance structures will ensure that current and future residents of the area will be represented on the Trust/Management Body which will be responsible for the stewardship of the assets.

The level of detail of work undertaken to date on the strategy exceeds that undertaken for other strategic sites across England at the plan/pre-application/application stage with such issues usually left until the Section 106 agreement is agreed and at the point of implementation. This provides additional confidence that the strategy is deliverable.

## 2.13 Place Panel, Community and Stakeholder Engagement

### *Stakeholder engagement for Otterpool Park OPA*

In tandem with statutory consultation processes stakeholder engagement began at the earliest stage of emerging proposals of a new community in early 2016, as part of the preparation of the submission to government's Garden Cities, Towns and Villages programme. Letters of support were received from the MP, Kent County Council, Invicta Chamber of Commerce, Creative Foundation (now Creative Folkestone), Shepway Business Advisory Board, East Kent College and SELEP. Briefings were held with neighbouring authorities; all parish councils in the district, and neighbouring parishes in Ashford.

Work began on the masterplan and planning application in August 2016, and the consultant team included Kevin Murray Associates leading on a programme of community engagement, and Property House marketing leading on wider communications. The community consultation and engagement process on the masterplan and planning application was undertaken in three distinct stages in December 2016, April/June 2017 and June 2018. The time between each stage was used for further development of the draft masterplan proposals in response to stakeholder workshops and public consultation, as well as other site survey work and specialist research. The first two stages were about wider engagement at a formative stage of the project, encouraging debate around emerging ideas; the third was a consultation on the draft masterplan.

Further public consultation in the form of exhibitions, social media and publicity took place in 2019 during the formal consultation period on the planning application, led by consultants Pillory Barn.

The first set of public events were held in early December 2016 at multiple locations within the vicinity of the site. Over 500 participants attended events, drawn from community, local business, parish and district councillors and college students. The majority of participants were residents from close to the area of search for the Garden Town. At this stage some early technical and surveying work had been completed but no proposals had been drawn up. The purpose of this engagement was therefore to raise awareness of the project and the planning process, provide information and hear early ideas and concerns that could feed into the masterplan.

The second set of events was held in April – June 2017. Again, these were held at multiple locations and included workshops with policy & agency stakeholders; civic and business stakeholders; a local primary school and multiple community drop-in events. Around 400 people participated across these events. This was the second stage of an iterative process, building on the information and comments that were initially gathered at stage 1, and providing more detail on how the masterplan was being developed especially with respect to transport, housing, resources (including water) and landscape.

The third set of events was held in June 2018. This was primarily about consulting on the emerging draft masterplan that had been further developed, partly based on the comments from the two previous stages of engagement. This stage comprised two community stakeholder and business workshops, press and estate agency briefings and a community drop-in session. Across these events almost 300 people participated.



These events were (and continue to be ) part of a wider communications programme including social media; the Otterpool Park website; technical briefing notes; regular meetings and briefings with the five directly affected parish councils; workshops with other interested stakeholder organisations and working with schools and colleges.

### *Otterpool Park Place Panel*

In 2018, the LPA established a Place Panel<sup>5</sup> to support Folkestone & Hythe District Council in achieving high quality, innovative and sustainable placemaking. The Place Panel provides independent, objective expert advice to the planning authority as a 'critical friend' to support delivery of the vision set out in the Charter. This includes formulation of planning policy and development strategies. A number of workshop and place panel reviews have taken place since 2018 across a range of disciplines and will continue at the request of the LPA.

Generally, schemes are referred to the panel by planning officers at an early design stage to identify and consider the key assumptions of the proposed design. The panel's advice may assist the planning authority in negotiating design improvements and may support decision making by the planning committee, including refusal of planning permission where design quality is not of a sufficiently high standard. The Place Panel provides this support to Folkestone & Hythe District Council through both place review and specialist support. The formation of the Otterpool Park LLP by the council provides a strong option for taking responsibility for governance, though does not exclude the establishment of other community led bodies including town council in the future.

The level of detail of work undertaken to date on the strategy exceeds that undertaken for other strategic sites across England at the plan/pre-application/application stage with such issues usually left until the Section 106 agreement is agreed and at the point of implementation. This provides additional confidence that the strategy is deliverable and financially viable.

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<sup>5</sup>[https://www.folkestone-hythe.gov.uk/media/2595/2020-OPPP-terms-of-reference/pdf/2020\\_OPPP\\_terms\\_of\\_reference\\_Frame.pdf?m=637275778184570000](https://www.folkestone-hythe.gov.uk/media/2595/2020-OPPP-terms-of-reference/pdf/2020_OPPP_terms_of_reference_Frame.pdf?m=637275778184570000)

## 2.14 Viability and deliverability

As part of the preparation of the plan the council prepared initial viability evidence for the early stages of the Core Strategy Review and is continuing to review this as proposals for the new garden settlement advance and more detail becomes available.

For the initial work, the council instructed BPS Chartered Surveyors to assess the deliverability and viability of the proposed new garden settlement in conjunction with relevant policies in the Core Strategy Review. The output of the commission was the Assessment of Deliverability & Viability (EB 03.50) dated 22 January 2019.

The BPS report provides a review of the promoter's viability assessment, taking into account policy requirements in the Core Strategy Review. It has been produced to inform preparation of the Core Strategy Review and ensure that the emerging policies will be deliverable and effective.

Based on the information provided at that time, the review concludes there is no reason to doubt that the Project is deliverable over and beyond the plan period. The Argus appraisals created were relatively high-level but considered adequate for representing the potential viability of the Otterpool Park project. The overall methodology applied was considered fit for purpose and the level of detail provided at that stage in support of its viability assessment reasonable for this plan-making stage of the process; it being a 'high level' assessment which is to be expected for a multi-phase scheme over 30 years. As part of this initial stage of viability testing, BPS reviewed the inputs proposed by the Promoter and concluded whilst a number of inputs appear reasonable, further consideration would be needed to better understand a number of inputs at a granular level including costings of the identified infrastructure and Section 106 obligations.

### *Update Review 2020*

The parties continue to work together on these issues as part of discussions relating to the OPA. Given progress in terms of land assembly, detailed design work and the planning application, the promoter has developed the initial design work relating to key infrastructure to provide a more detailed estimate of costs. As part of preparation for the Local Plan and the determination of the planning application the LPA commissioned Gerald Eve, supported by cost consultants Gardiner and Theobald, to review the most up-to-date Strategic Infrastructure Cost Estimate and financial appraisals. This included an updated review of the deliverability and viability of the proposed new garden settlement development in order to test the emerging policies in the Core Strategy Local Plan and ensure that they will be deliverable and effective, as required by National policy. A summary of the findings is below:

- The overall deliverability and viability assessment relates to the outcome of the master development appraisal as this models the overall structure for delivery across the local plan period;
- The assessment of potential revenue and receipts from Plot Developer acquisitions has been subject to a detailed assessment based on market delivery and is considered to be robust;
- This revenue has been programmed to be received by the master developer at realistic time periods within each of the proposed phases;

- Finance costs have been included within the appraisal, creating more certainty on the viability of the scheme, reflecting a market situation whereby the Master Developer will be required to finance the upfront infrastructure costs;
- The strategic infrastructure construction costs have been provided by the Advisor. G&T have undertaken an independent review as part of this report. G&T consider the costs stated within the cost plan for the Scheme, including a 15% Risk allowance (on Professional and Local Authority fees), to be reasonable;
- In accordance with NPG (2019), in arriving at an opinion of a reasonable BLV, GE has applied a valuation judgement; informed by the relevant available facts, a realistic understanding of the local area and of the operation of the market. GE considers the Advisor's BLV appears to be reasonable based on the current land ownership status of the Site;
- Whilst the 15% risk allowance on the infrastructure is considered adequate, a further sensitivity analysis test has been undertaken including an additional allowance of 25% to reflect recent Inspector guidance that a contingency of c.20-40% should be included on strategic infrastructure items such as highways and the construction of new roads;
- As the scheme design work develops through the planning application stage and more investigations are undertaken, it will become evident as to whether this additional allowance is required. However, building in the flexibility at this stage further supports the viability and deliverability of the scheme in the longer term;
- Whilst the sensitivity analysis has demonstrated that proposed Scheme can be delivered and is financially viable and robust, within an ever-changing economic climate, it is important that the viability of the scheme is kept under review and consideration throughout the delivery process;
- Given the level of infrastructure proposed to be delivered as part of this Garden Town, Gerald Eve recommend that the LPA engages with government bodies such as Homes England to explore opportunities for external funding, for example, the Housing Infrastructure Fund to further support the upfront delivery programme.

To conclude, based on the evidence submitted in relation to the delivery of 8,500 units and associated uses as part of the Otterpool Park Core Strategy allocation, the Scheme is potentially capable of being viable. Gerald Eve recommend however that should the Scheme deviate, then a further assessment on deliverability and viability should be undertaken. The review has demonstrated that the proposed garden settlement of Otterpool Park is financially viable and deliverable within the plan period. Gerald Eve therefore consider the Core Strategy policies in relation to the garden settlement to be reasonable.

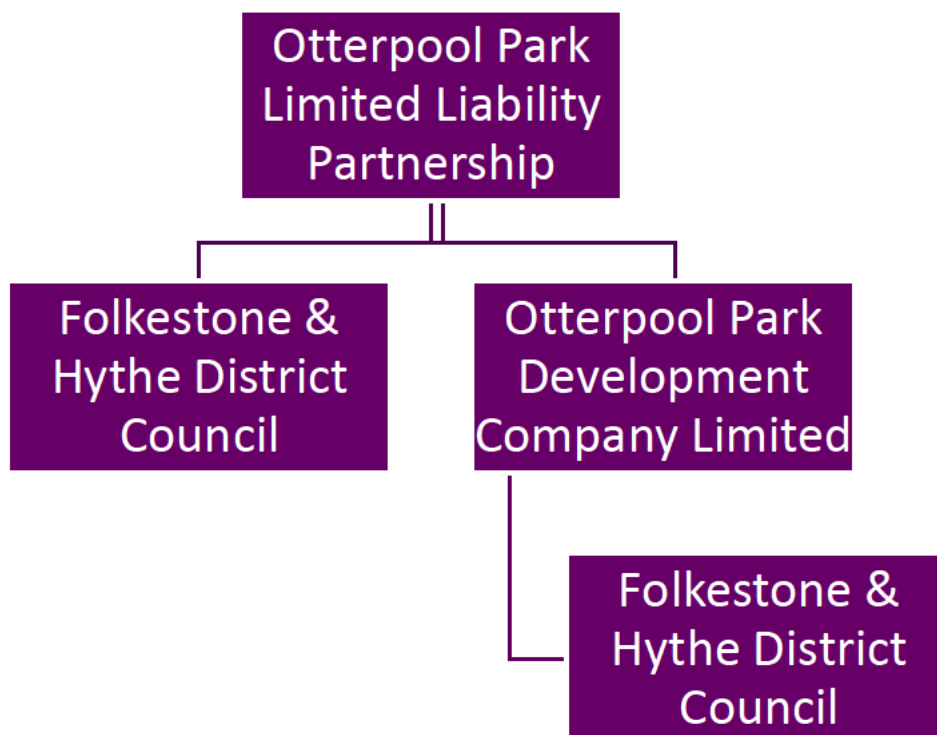
## 2.15 Approach to Delivery and Implementation

An OPA was submitted in February 2019 and following statutory consultation period the LPA and KCC provided a comprehensive response – see Appendix B. Following the applicant's purchase of land previously owned by Cozumel the parties have been working jointly to address the issues raised in accordance with a revised Planning Performance Agreement.

### *Delivery Vehicle*

From 2016 to Feb 2020 Otterpool Park has been driven forward through a partnership between the Folkestone & Hythe District Council (FHDC) and Cozumel Estates (owner of the former Folkestone Racecourse, wholly owned by the Reuben Brothers). A collaboration agreement was in place committing to working collaboratively to prepare a comprehensive masterplan and outline planning application, and to the equalisation of costs and values across the site. This equalisation applies to all options held by both parties. In Feb 2020 the council bought out Cozumel's land interests, and the collaboration agreement has been accordingly terminated. Within the OPA site the council has agreed options or owns outright the majority of the land within the planning application area, and is working alongside Homes England which owns around 10% (63ha). The council has bought out individual properties within the site to ensure routes for roads and other infrastructure can be provided without ransom.

The acquisition of Cozumel's land has allowed the Council to focus its attentions on delivery of the project beyond the current planning application. To this end the Council has set up a wholly owned Limited Liability Partnership that will act as a delivery company for the scheme (the subject of a report to the council's Cabinet on 27 May 2020). The partners to the LLP are FHDC and Otterpool Park Development Company Limited – see diagram below. The LLP will have the capacity to form partnerships or joint ventures in future with other public or private organisations, and able to enter into contracts, purchase land and trade.



The purpose of the delivery vehicle is to take on the role of master developer. This will include:

- delivering major infrastructure for the site, including enabling works
- Preparing planning applications for early works and interim uses on the site
- Promoting and selling serviced plots to housebuilders and other developers
- Designing and delivering open space and other community assets such as schools
- Liaising with other potential partners to explore options for joint ventures and other partnerships, including Homes England, housebuilders and housing associations
- Promoting commercial land for non-residential uses
- Controlling delivery of the town centre, and retaining land ownership
- Responsibility for long term stewardship of land and community assets including green space, heritage assets including Westenhanger Castle (now in the council's ownership), potentially through a separate community led body but with the land ownership remaining with the company.

A full business plan is currently being prepared that includes a programme for delivery of infrastructure based on that prepared by Arcadis.

### *Resourcing and funding the delivery vehicle*

It is proposed that a team of five staff will be seconded from FHDC with additional new posts to be recruited during 2020. A Service Level Agreement will be put in place to cover other services provided by the Council such as legal and Human Resources. The work of the team and staff resource cost is funded through £1.25million working capital fund from FHDC for 2020/21 (as set out in the May 2020 Cabinet report). Existing contractual arrangements with the consultant team remain in place, and work on the planning application continues at pace.

The Council has demonstrated its commitment to delivery of the project by creating a draw down fund of £100 million over five years from Nov 2019 to fund early infrastructure and other costs such as planning applications.

### *Programme*

Given the level of control of the project, strong political commitment and funding mechanism the Delivery Vehicle is in a strong position to deliver at pace, and has commenced work on delivery of the site at risk in parallel with ongoing work on the Outline Planning Application. Work on Tier 2 documents including the Design Code and Phase 1 masterplan have begun (Consultants Tibbalds commissioned in March 2020). This work will be informed by engagement with the development industry to ensure deliverability. Negotiations with utilities companies are advancing to allow timely decisions on infrastructure investment to meet the current programme.

### *Market testing and dialogue*

The Delivery Vehicle has been speaking to a range of developers for some time to nurture and test interest in the site, their likely commercial approach and understand potential land values. These range from small, local building companies to major volume housebuilders and housing associations. Given Otterpool Park is creating a new market, the council's commitment to creating a high quality environment and marketing the vision for the town is

imperative. Letters to demonstrate the soft market testing are appended including a range of housebuilders (see Appendix E).

### Three Tier Approach & Phasing

The LPA and the Delivery Vehicle wish to advance high-quality development through the OPA in a way that responds directly to the Government imperative to progress sustainable development without delay. We want to build in suitable flexibility to work up and work through detailed schemes efficiently, over time, based on the ‘master-developer’ model of delivery.

The LPA and the Delivery Vehicle have agreed the overall mechanics to planning applications to ensure that it aids early & long-term delivery but also secures the right level of information at the right time. This is key to any planning permission which gets investment underway and which facilitates delivery over the extended life of the project, without continual review and amendment.

The principles and approach is illustrated below and further explained in the LPA’s initial response to the OPA dated July 2019<sup>6</sup> (see Appendix B):

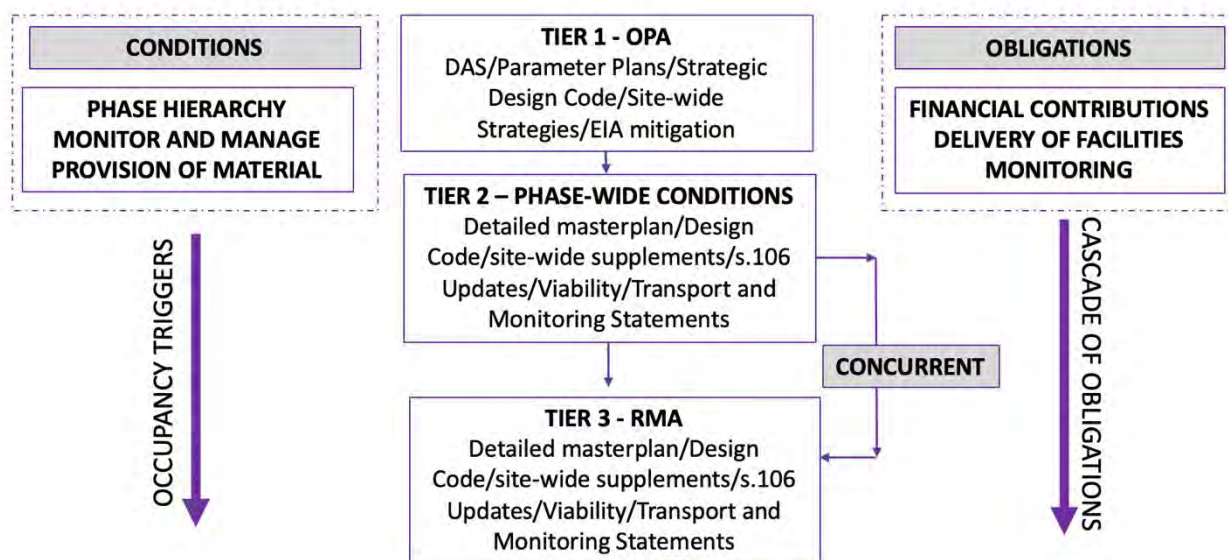


Diagram: Approach to planning applications

Due to the scale and complexity of delivering Otterpool Park, the OPA is being structured to facilitate a phased approach to implementation, with flexibility to determine the extent, components and location of each phase (within the parameters of any Outline Planning Permission) as delivery of the scheme progresses. The approach has been agreed between the applicant and the LPA to provide suitable flexibility for the specific master developer model of delivery being pursued. It is based on national best practice experience, including the Urban and Civic model of implementation successfully used at Alconbury Weald, Houlton and more recently Waterbeach in Cambridgeshire.

<sup>6</sup> [https://www.folkestone-hythe.gov.uk/media/1325/Otterpool-Park-Y19-0257-FH-Post-Consultation-Planning-Summary-Report/pdf/LPA\\_Formal\\_Review\\_Post\\_Consultation.pdf?m=637272327105370000](https://www.folkestone-hythe.gov.uk/media/1325/Otterpool-Park-Y19-0257-FH-Post-Consultation-Planning-Summary-Report/pdf/LPA_Formal_Review_Post_Consultation.pdf?m=637272327105370000)

Subject to the agreement of the LPA the applicant can define and bring forward a phase so as to best respond to conditions at the time it comes forward. Each phase of development will be supported by a sequence of submissions to the LPA, structured into three 'tiers', to provide a progressive layering of increasingly detailed information, from the over-arching and site wide (Tier 1), through substantive key phases (Tier 2), to detailed reserved matters applications for sub-phases within a specific phase and on individual development sites ("reserved matters areas") (Tier 3).

### Tier 1: OPA

The OPA provides the broad quantum and disposition of land uses as defined by the Development Specification, parameter plans and the spatial principles within the DAS. Submission and approval of a set of site wide strategies in relation to specific topics is also required by condition, prior to the commencement of development or approval of any reserved matters applications. The site wide strategies supplement the parameters fixed by any future planning permission. A Strategic Design Code will also form part of Tier 1.

### Tier 2: Phase

The phase tier requires additional detail to be submitted and approved by the LPA. This is in two parts: "Phase Definition"; and "Phase Framework or Masterplan". Any future planning permission would require approval of documentation to set the definition of, and provide a framework for, each phase. The required technical information then informs and establishes a base against which reserved matters applications within the phase can be assessed:

- Phase Definition Statement – to define and justify the content of the relevant Phase; and
- Phase Detailed Framework or Masterplan – following the definition of a Phase, a "Framework" is submitted to the LPA for approval. This includes a Design Code, a Delivery Plan, and other Phase specific documents (including any relevant supplements to the Site Wide Strategies submitted for approval in relation to Tier 1). These documents establish the design and delivery framework for the phase, and subsequent applications for reserved matters must accord with the framework.

The Design Code for a Phase will contain a "Regulatory Plan" and it is in this document that a significant amount of additional information will be presented, in accordance with the contents of the Phase Design Code itself. This includes further contextual information, technical details, and then a further layer of detail above that shown on the parameter plan in relation to green infrastructure, movement and access, commercial built form and residential built form.

### Tier 3: Reserved Matters

As the site wide application is submitted in outline, all matters, other than access, are reserved for later approval. This means for each development component (reserved matters area) detailed approval for that component is required before work can start on that reserved matters area.

Once a phase has been approved by the LPA (and the Phase Framework/Masterplan has been agreed) reserved matters applications can be brought forward. Each Reserved Matters

Application for individual parcels or infrastructure is then determined against the Framework and design specification for that phase.

Reserved matters applications can only be submitted for any part of the site where a Key Phase has been defined and all of the relevant Key Phase Framework documents have been approved (subject to certain limited exceptions). These reserved matters applications provide a further level of detailed design that needs to be in accordance with the design parameters and specifications for the Key Phase.

## **Monitoring**

The OPA will be subject to detailed conditions and obligations to ensure that the development is built and managed in accordance with the policy requirements and commitments made by the applicant through the planning process. This will be supplemented by the Tier 2 work and design codes, which will be required by enforceable planning conditions and with which the detailed proposals for plots and buildings will need to be consistent. There will also be bespoke review groups including key stakeholders (for example of Transport and Education) which will monitor the delivery of the development and triggering and delivery of mitigation measures – see below. A ‘monitor and manage’ approach will be adopted across a range of disciplines most notably transport, drainage and education.

The LPA and Delivery Vehicle recognise the monitoring and enforcement of these conditions and obligations are of major importance to both current and future residents who will want to be sure that all developers deliver what they have committed to. The LPA and Delivery Vehicle agree to the establishment of a Progress and Delivery Group (PDG) secured through legal agreement. The Group will consist of KCC, LPA, Master Developer, Plot Developer(s) (others as appropriate and at the discretion of the Core Group e.g. public transport operators and neighbouring authorities). The Delivery Vehicle will be required to submit to the Progress and Delivery Group (PDG) for its review the Annual Monitoring and Performance Review on each anniversary of the Implementation of the planning permission until five years after the disposal date of the last plot or the last RMA approved by the LPA whichever is the later or such earlier date as may be agreed by the PDG. The AMPR shall consist of:

- A report which sets out compliance and performance of:
  - the Three Tier Documents implemented under any OPP
  - any issues being encountered
  - recommendations for any variations that are required to Tier 2 and related documents
- Monitoring review of conditions and obligations
- Details of the residential units and retail/non-residential use that have been practically completed;
- Anticipated rates of build out for each stage.

## *Education*

The parties will establish an Education Monitor and Manage Group (‘EMMG’) as a consultative steering group that will facilitate joint working between stakeholders involved in the delivery of education provision within and outside the Masterplan area. Terms of reference for the group will be agreed and secured through the s.106 agreement.



KCC, the LPA and the applicant will put in place a timetable of milestones to ensure that the process of land transfer, detailed planning and design, construction and opening is managed to trigger schools opening when needed, in line with housing occupation. It is proposed that the first primary school will be delivered in Phase 1.

The Section 106 will set out the commitments and obligations of the relevant parties, which will ensure that the schools can and will be delivered to meet the needs of the new residents, but the detailed delivery mechanism for each school can be determined as part of the detailed design and Reserved Matters process.

### **Planning Performance Agreement**

A revised Planning Performance Agreement was agreed in April 2020<sup>7</sup> between the parties having regard to the advice set out in paragraphs 16 to 26 of the Planning Practice Guide and guidance with the Planning Advisory Service advice note on Planning Positively<sup>8</sup>.

This is not a legally binding document but is a project management tool that sets out an efficient and transparent planning process for taking forward this strategic level development. The PPA is intended as a project management tool which the LPA, KCC and the Promoter uses to agree timescales, actions and resources for taking forward planning proposals for Otterpool Park. Its purpose is to encourage co-operation, trust and effective communication between the LPA, County Council and the Applicant. Its aim is to ensure prompt, clear and robust decision-making.

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<sup>7</sup>[https://www.folkestone-hythe.gov.uk/media/2490/Revised-PPA-OPA-April-2020/pdf/Revised\\_PPA\\_OPA\\_April\\_2020.pdf?m=637239263493530000](https://www.folkestone-hythe.gov.uk/media/2490/Revised-PPA-OPA-April-2020/pdf/Revised_PPA_OPA_April_2020.pdf?m=637239263493530000)

<sup>8</sup> <https://www.local.gov.uk/pas/pas-topics/planning-applications/pre-application-suite>

### 3.0 Summary and Conclusions

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The Development Statement for the land as allocated within the Plan under Policy SS6-9 has been prepared by the LPA and Otterpool Park LLP. It is prepared as background evidence to inform the Examination into the soundness of the Core Strategy Review 2020 and the allocation of Otterpool Park as a new settlement.

The LPA and the Delivery Vehicle agree there are compelling strategic reasons for the decision to allocate land for a new Garden Settlement in this location in accordance with the approach to new settlements in Paragraph 72 of the National Planning Policy Framework; Otterpool Park is uniquely placed to benefit from existing infrastructure assets, including an operational rail station and motorway junction.

The Development Statement illustrates how, since its inception in 2016, significant strides have been made in the planning, masterplanning, land assembly and delivery aspects of the project to bring forward Otterpool Park as a new standalone settlement in partnership with a range of stakeholders. An OPA was submitted in February 2019 and in May 2020 a Delivery Vehicle was established to drive forward delivery. Otterpool Park LLP and Homes England control approximately 95% of the land to enable the first 8,500 homes and complementary land uses. This enables the delivery of homes throughout and beyond the period of the Core Strategy Review. The parties continue to work together in accordance with a Planning Performance Agreement (PPA) to address key issues relating to the OPA and to bring forward Tier 2 design work to accelerate early delivery. In combination, these factors demonstrate there is more than a 'reasonable prospect' that the new settlement will come forward and that the policy-making authority has engaged extensively and collaboratively to ensure infrastructure requirements are achievable within planned timescales.

The approach adopted to twin track technical evidence to support the development and submission of an OPA together with technical evidence for the preparation of the Core Strategy Review enables a high degree of confidence to be attached to the viability and deliverability of the proposals as well as helping to facilitate early delivery. The level of detail of work undertaken to date on the strategy across all disciplines exceeds that undertaken for other strategic sites across England at the plan/pre-application/application stage with such issues usually left until the point of implementation. This provides additional confidence that the strategy is deliverable.

The LPA and the Delivery Vehicle share an ambition to deliver an innovative new settlement of exceptional quality. A new settlement of this scale has the ability to keep delivering through a number of economic cycles, in line with the Letwin Review. It provides an opportunity to deliver growth through a master developer model, including the ability to take a longer-term view, offer a broader range of housing tenures than many smaller developments could deliver and 'lock-in' community assets for the long-term benefit of the community as a whole.

## Appendices

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APPENDIX A - OPA (Red Line)

APPENDIX B – Illustrative Masterplan

APPENDIX C – LPA Initial Summary Response to OPA

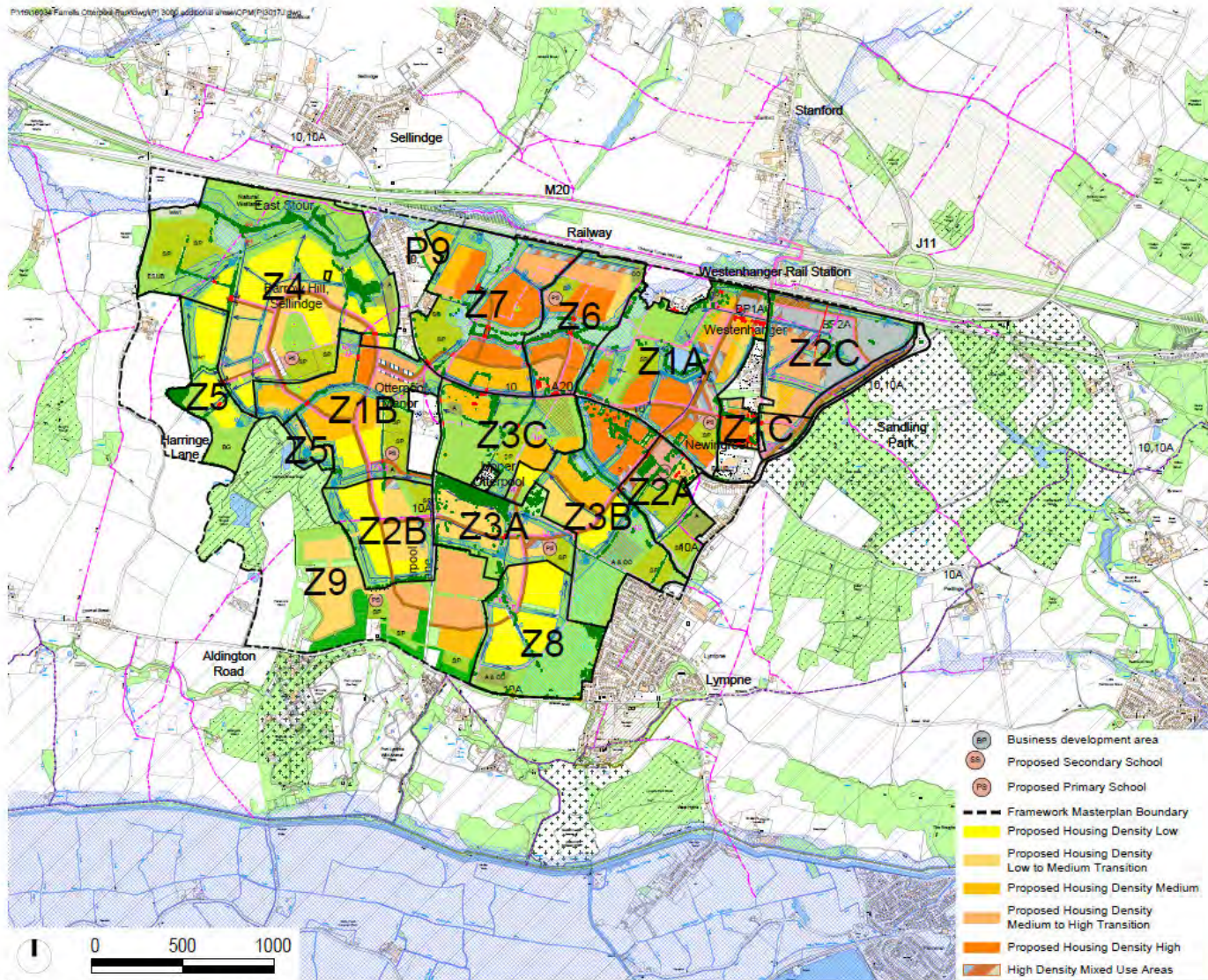
APPENDIX D – Employment Opportunities Study (Stage 1 Report, Lichfields, July 2017)

APPENDIX E – Soft market testing letters:

- Homes England
- Places for People
- Pentland Properties
- Clarion Housing Group
- Taylor Wimpey

**Appendix A – OPA (Red Line & Framework Masterplan Boundary)**

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- Existing**
- Existing Communities & Buildings
  - Existing Rivers, Streams and Ponds
  - Existing Woods outside application site
  - Existing Ancient Woodlands
  - Existing Registered Parklands
  - Existing Footpaths close to and in application site boundary
  - Existing Bridleway
  - Existing Saxon Shore Way
  - Existing Conservation Area
  - Existing Flood Zone 2 + 3
  - Area of Outstanding Natural Beauty (AONB)
  - Existing Scattered Trees
  - Existing Hedgerows and Tree Groups
  - Existing Trees with TPO
  - Existing Trees to be removed
- Proposed**
- Proposed Green Infrastructure
  - Proposed routes for Secondary Cyclepaths and Footpaths
  - Proposed Primary Roads
  - Proposed Bridge Crossing over Stream
  - Proposed Business development area
  - Proposed Community Orchards
  - Proposed Burial Ground area
  - Proposed Allotments
  - Proposed Sports Pitch areas
  - Proposed Play areas
  - Proposed landscape planting integrated within development
  - Proposed SUDS Water Management Areas
  - Proposed SUDS Infiltration Areas
  - Proposed Conveyance Swales
  - Proposed Road Connections
  - Proposed Primary Cyclepath Routes and Footpaths
  - Proposed Waste Water Treatment Infrastructure and Pipes
  - Proposed Water Areas
  - Proposed Water Feature
- Business development area
  - Proposed Secondary School
  - Proposed Primary School
  - Framework Masterplan Boundary
  - Proposed Housing Density Low
  - Proposed Housing Density Low to Medium Transition
  - Proposed Housing Density Medium
  - Proposed Housing Density Medium to High Transition
  - Proposed Housing Density High
  - High Density Mixed Use Areas

CLIENT	REVISIONS	DATE	STATUS	SCALE	PROJECT	DRAWING NAME	DRAWING NUMBER
Folkstone & Hythe District Council and Cozumel Estates	Rev No: 001/18 Rev D: 12/08/18 Rev C: 08/08/18 Rev B: 05/08/18 Rev A: 02/08/18	04-05-18	IN SUPPORT	1:10,000 @ A1	OTTERPOOL PARK	FRAMEWORK MASTERPLAN DEVELOPMENT ZONES	OPM(P)3017J

**FARRELLS**

**Appendix B – Illustrative Masterplan**

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**Appendix C – LPA Initial Response Summary Report (July 2019)**



## **Otterpool Park Y19/0257/FH – Post Consultation Planning Summary Report**

**PLEASE NOTE – THIS IS AN INITIAL INFORMAL OFFICER–LEVEL RESPONSE TO THE APPLICANT AS PART OF STAGED FEEDBACK ON A RANGE OF KEY ISSUES AND AS PART OF ONGOING DISCUSSIONS WITH THE APPLICANT. IT SHOULD NOT BE READ OR INTERPRETED AS A PLANNING REPORT OF ALL MATERIAL CONSIDERATIONS FOR DETERMINATION PURPOSES AND IS WITHOUT PREJUDICE TO ANY FUTURE DECISION THE LOCAL PLANNING AUTHORITY MAY MAKE.**

### **Contents**

1. Vision for Otterpool Park, masterplanning & spatial issues
2. Delivery of Otterpool Park
3. Transport & movement
4. Green infrastructure, biodiversity, landscape and visual impacts
5. Review of ES / Phasing / Parameter Plans
6. Securing Design Quality / Three Tier Approach
7. Governance and long-term stewardship
8. Cultural Heritage and archaeology
9. Housing
10. Economic development, town/local centres and retail
11. Sustainability (waste, water and energy)
12. Community Infrastructure and development
13. Air quality, noise & contaminated land
14. Implementation and monitoring

### **1. The Vision for Otterpool Park**

A unifying vision of the place that Otterpool Park will become does not emerge strongly in the outline planning application. This is an overarching point made repeatedly by the LPA and the Place Panel during pre-application discussions. There remains a need to define the new garden town's identity. Once defined, a clear narrative – or 'bigger picture' – should permeate through to the various neighbourhoods making up Otterpool Park.

As identified by the Place Panel, the masterplan area designated for Otterpool Park provides exceptional potential for a strong and distinctive character and identity but this does not come through strongly enough in the planning application. Further work is recommended to expand on the aspirations for design quality by defining more clearly what this means locally and uniquely to Otterpool Park. The overarching themes of creativity, countryside and connectivity could provide a potential framework but what these labels might mean in spatial terms is not clearly demonstrated in the application and the overarching spatial concept for the new settlement remains unclear.

The semblance of an identity is evident in some documentation, such as the Cultural and Creativity Strategy, but a great deal of the relevant information is fragmented through many other documents. There is the potential for Otterpool Park to be an exemplar in terms of green infrastructure, natural capital, heritage and culture. The

proposal recognises the importance of green infrastructure but lacks the coherent narrative and overall ambition that would benefit its aim of being an exemplar garden community. Currently the environmental statement, impact assessments, analysis and concepts are detailed, but the rationale between existing and proposed and how these elements are brought together to forge an identity needs to be more clearly articulated at this stage.

The LPA makes specific suggestions about how the distinct elements of green infrastructure, heritage and culture could be interwoven and articulated more forcefully. The LPA also makes suggestions below about how this work could be progressed to address the issues raised by the Panel to provide a thread from the outline planning application, to Tier 2 design and technical work, Tier 3 reserved matters applications and then to delivery.

### *Masterplanning and spatial issues*

We think a stronger spatial concept based on a green infrastructure grid sitting within a clear hierarchy such as a town centre supported by distinct villages/neighbourhoods stitched into the countryside, would make for a more viable and compelling long-term proposition. Once identified, the spatial narrative needs to be more clearly conveyed through appropriate graphics and diagrams. We think this clarity will help to achieve a more cohesive masterplan against which future details can be judged and guard against fragmentation.

More specifically, this report raises a number of cross-cutting issues which will require spatial changes to the masterplan. The rationale for these changes is explained elsewhere in the report but specific attention is drawn to the following:

- The need for a reappraisal of the bifurcation of the A20 to move towards one-through route in the context of a wider design strategy for the A20 showing how communities north and south will be connected;
- Development of a clear spatial concept for the town centre (within a site-wide concept); bringing forward Tier 2 work to clarify and justify the location of the town centre and its relationship to the A20 and the setting of the castle; integrating the park, town centre and A20 (see town/local centre & heritage sections);
- In preparing a fresh and visionary Green Infrastructure Strategy that brings together green infrastructure, culture and heritage proposals, set out a clear rationale with tiers and typologies of open space acting as focal points for each community, neighbourhood or village; clarifying the role of Westenhanger Park within this context; re-imagining the landscape typology along the railway as a linear park incorporating active design principles and linked to a wider network of running/walking trails;
- In describing the overarching spatial concept, clarifying the rationale for the heights strategy together with landmarks, legibility, key views, gateways into and the 'experience' of moving towards and through the Garden Town; preparing a design strategy for the A20 that helps integrate communities and character areas;

- Develop a 21<sup>st</sup> Century transport vision based on a network of mobility hubs connected via green infrastructure to the rail station, focussing on convenience and experience;
- Strengthened east-west cycle/pedestrian links including additional pedestrian/cycle links from Barrow Hill neighbourhood to the northern section of Harringe Lane to better connect with Sellindge and improved cycle connections to Folkestone via the A20; strengthened links to identified north-south 'quietways';
- Demonstrating how water could play a much stronger role in animating open space and help to structure a more climate-resilient masterplan; we encourage a more naturalistic approach to the east-west watercourse in particular so that it crosses the threshold into the town centre, helping to integrate the town centre and park;
- In clarifying the spatial concept and preparing a green infrastructure strategy, combining the local centres in the south of the masterplan area so that they intersect at Otterpool Lane to form a single more viable local centre for the wider masterplan area, centred on multi-functional open space and linked to a wider green infrastructure network; amending the plans to ensure zones Z3A and Z3B connect via primary roads;
- Local open spaces and sports provision acting as 'event spaces' for individual neighbourhoods – we think the open space shown in the Barrow area should play a much stronger place making role that helps define the Barrow neighbourhood;
- A review of the structuring principles of the triangle of land in phase 2C in response to the landscape, transport, heritage and green infrastructure issues raised – we think the need for dualling of the A20 in this location should also be reviewed in this context.

## 2. Delivery of Otterpool Park

The identification of a delivery vehicle for Otterpool Park remains a major concern for the planning authority, an issue repeated by the LPA throughout pre-application discussions. We refer again to our pre-application letter dated 19 June 2018 (see Appendix J) for an indication of the LPA's expectations in relation to the role of the master developer and the request for an Overarching Delivery Management Strategy as part of the planning application submission which has not been provided. This is evident throughout the strategy documents, particularly the Planning and Delivery Statement, which does not contain any outline of the approach to delivery as requested. There are loose references to a 'master developer' approach but the approach is not defined. The LPA has previously shared examples from elsewhere about how this can be demonstrated and secured in the application if progress is to be made on a range of fundamental matters at Outline stage, such as long-term stewardship and the structure of any s.106 agreement or planning conditions.

A clearly identified route to delivery is essential to give confidence regarding housing delivery. This will help to inspire confidence that Otterpool Park can be delivered. A supportive planning policy framework is essential if progress is to be made in the successful determination of the application. The LPA suggests that the parties work together to develop a joint Delivery Statement submitted as part of the evidence base to support the Core Strategy Review. This should address all the key elements of

delivery and the issue of housing delivery rates, as they relate to the unique circumstances at Otterpool Park.

### **3. Transport and movement**

We are particularly disappointed by the overall ‘predict and provide’ approach to transport and movement and require a fundamental rethink of the Transport Strategy befitting of a 21<sup>st</sup> century Garden Town. Since it is not possible to predict all aspects of future movement and transport flexibility must be built into the transport strategy at this stage to allow swift and effective adaptation as development progresses. A dynamic ‘monitor and manage’ approach is needed. The Transport Strategy submitted repeats planning policies but fails to set out an ambitious and forward looking transport strategy for a 21<sup>st</sup> Century Garden Town to underpin the Transport Assessment and Travel Plan. We refer to the detailed comments from Kent County Council in relation to transport and movement – the LPA’s comments here reinforce the key transport issues.

Travel behaviour is changing and working patterns evolving. The desire for on-demand mobility and shared mobility services is changing with evidence car ownership and driving licence ownership is falling amongst younger generations. Technology is accelerating this shift and therefore a 30-year project of this nature should not merely attempt to ‘predict and provide’ transport infrastructure based on historic trends. There is too much reliance on motor vehicle user needs before considering the wider transport user hierarchy. A fundamental rethink of the Transport Strategy is required starting with revisiting the transport user hierarchy and exploiting opportunities to reduce travel demand and the need to travel as part of a mixed-use new settlement.

#### *Sustainable transport*

A package of sustainable transport measures beyond a first phase will need to be timed to ensure that transport impacts are agreed and carefully managed with a range of stakeholders, including Kent County Council and public transport operators. Much greater conviction and prioritisation is needed for softer cycling and walking measures, particularly in early years.

Clear and costed early proposals for improvements should be clearly set out at this stage along with commitments to fund improvements to existing walking and cycling routes. This should draw more heavily from the Mott Macdonald work on walking and cycling routes and the response from KCC (PROW) on existing heavily used walking routes. The key priorities and mitigation measures from this study are appended to this report (see Appendix C). The use of e-bikes, as part of a wider approach to mobility hubs, should also be exploited so that cycling is an inclusive option for all residents and visitors.

#### *Westenhanger Station*

We feel the role Westenhanger station could play as a major transport hub, how it connects to the neighbourhoods that make up Otterpool Park and overall potential for significant modal shift has not yet been fully grasped. An enhanced role for Westenhanger Station and the promotion of a High Speed stop is crucial if a sense of excitement and arrival to Otterpool Park, the promotion of sustainable transport and a

'Place Premium' is to be achieved. We feel the station could play a much stronger and more integrated role in the everyday life of the town if recast as a multi-modal mobility hub connected to a network of smaller mobility hubs within the town. A clearer demonstration of the interface with high quality public realm as part of a wider network of 'event' spaces will need to be demonstrated through the Tier 2 design work and principles identified through the Green Infrastructure Strategy. The principles that will guide this need to be agreed at this stage through the Strategic Design Principles.

A revised transport strategy should give further consideration to a mobility hub at the station which could combine with workspace, cycle facilities and other complementary commercial uses as part of a mixed funding model of delivery. The central mobility hub should be clearly connected to smaller neighbourhood hubs through technology and wayfinding; smaller supporting mobility hubs within local centres should combine facilities for car clubs, bike sharing and electric charging points – acting as feeder 'first/last mile' facilities. The strategy for mobility hubs should focus on experience and convenience to influence travel behaviours - common branding and attractive walking and cycling routes to and from can help with this. We consider the heavy reliance on bus stops to be inadequate and unlikely to shift travel behaviour. This is critical for early phases of development, as travel routines are established and can be difficult to undo later.

We refer to the comments submitted by HS1, Dartford Council and others in relation to rail journeys and agree that further analysis is required. Line and Rolling Stock capacity should be assessed against the Rail Utilisation data and forecasts. Station Infrastructure Capacity of the existing expanded station also needs to be analysed and timings for the delivery of improvements confirmed. We need to better understand the potential impact of the longer-term strategic measures for public transport. An overall mitigation package should be set out with a strong suite of non-car improvement measures, the results of which should show particular mode share increases for rail and other modes. We recommend further assessment as part of a wider review of the Transport Strategy, focussing more on sustainable movement patterns and appropriate mitigation secured via s.106 agreement.

### *Road network & Newingreen junction*

Policy SS7 Place Shaping Principles states that "*Road infrastructure should be designed for a low speed environment, with priority given to pedestrians and cyclists through the use of shared space in ultra-low speed environments and dedicated cycle routes and separate pedestrian walkways where appropriate. The use of grade separations, roundabouts, highway furniture and highway signage should be minimised*". We agree that an optimum solution to Newingreen junction that balances capacity, safety, placemaking and landscape objectives needs to be agreed. Whilst we acknowledge the specific technical challenge of accommodating HGV movements resulting from Link Park we feel the current approach to transport planning is too reliant on distributor road planning, lacks a sense of place and has generally resulted in overly dominant roads.

The dimensions of roads are heavily prescribed with no limits of deviation and too little understanding of the character and feel of streets - the parameter plans and development specification should be stripped back to allow for further design work.

The bifurcation of the A20 is an example of this and a resulting 'island' effect compromises development area as well as resulting in potentially hostile public realm. We strongly urge a rethink of this arrangement and re-commit to working jointly to find a solution based on one-through route.

We repeat our concerns expressed at pre-application stage relating to highway design which remain unresolved. In particular it is still not clear what measures will be taken to prevent the A20 becoming a barrier between the north and south sides of the settlement, how it will interact with identified character areas or when these measures will be delivered. The LPA would like to see more detail on how the A20 will be redesigned to reduce road speeds to 30 MPH maximum and how priority for crossing the A20 will be given to cyclists and pedestrians. This work should form part of a wider design strategy for the A20.

We would encourage more analysis of movement in and around the town centre as part of the Tier 2 work. As requested at pre-application stage, this should also involve a heat map type analysis including an assessment of existing walking patterns to existing large employers such as Holiday Extras. We feel a route between Holiday Extras and the proposed town centre could be more prominent and attractive. This business area could usefully be expanded to include an education campus which would have the effect of maximising activity and bringing the schools closer to the town centre. We are concerned about the current position of the primary school in close proximity to a busy through route. The current proposed walking route from the secondary school to the station is not an attractive or direct one as it appears to involve crossing two roads and two pedestrian islands.

We agree that Stone Street should have restricted vehicle access for residents only but also be a pedestrian and cycle link to the station. This should be linked to a wider network of 'quiet ways' suitable for walking and cycling such as Harringe Lane. We also draw attention to the lack of footpaths along Otterpool Lane which also needs to be addressed.

#### **4. Green Infrastructure, biodiversity, landscape and visual impact**

There is the potential for Otterpool Park to be an exemplar in terms of green infrastructure and natural capital. The proposal recognises the importance of green infrastructure but lacks the coherent narrative and overall ambition that would befit its aim of being an exemplar garden community.

Although the DAS deals with green infrastructure in part, it is too generic and a great deal of the relevant information is spread through many other documents. Currently the environmental statement, impact assessments, analysis and concepts are minutely detailed, but the rationale between existing and proposed, its distinctiveness and how the existing landscape and views will be protected, exploited and enhanced, does not seem to be fully articulated. The reader is required to piece together information from many sources and infer the rationale behind the proposals. We agree with Natural England regarding the need for an overarching green infrastructure strategy document which brings together the green infrastructure proposals and rationale, which then references the many evidence documents where appropriate.

The green infrastructure strategy could also better articulate the ecosystem services, green infrastructure functions and natural capital provided in the development and how these meet identified need, both in the new settlement overall and in the green spaces (as recommended by Natural England).<sup>1</sup> An overarching green infrastructure strategy would also make it easier to understand how the existing green infrastructure has influenced the proposed masterplan and how the proposals are going to mitigate and enhance green infrastructure.

In this scenario the tiers and typologies of open space would help to act as focal points for each community, neighbourhood or village. We recommend this is revisited as part of the Green Infrastructure Strategy to demonstrate complementary strategies for public open space, sports and play. We wish to see public open spaces acting as much stronger focal points and meeting places for each village or neighbourhood together with smaller open spaces providing opportunities for outdoor recreation and socialising closer to home. This will help to define each neighbourhood's identity. The key principles should be encapsulated in the Strategic Design Principles and subsequent more detailed Strategic Design Code.

In particular, we think the housing to the south, west and east of Upper Otterpool lacks cohesion and a focal point – allied to our comments on local centres we think the spatial arrangement needs to be revisited to provide a consolidated local centre centred on public open space to form a heart and soul of the emerging community.

Appendix C provides an evaluation of the green infrastructure approach and proposals contained within the Outline Planning Application. The report primarily contains comments relating to areas of the green infrastructure proposals where improvements could be made or where further attention is required and these are summarised below:

- Overarching green infrastructure strategy - evidence and rationale are fragmented – need for a comprehensive document to bring green infrastructure strategy proposals together and fully explain rationale to reader.
- Greater integration of green infrastructure into the Cultural and Creative Strategy - further development of this to fully capture wider culture of landscape and historic significance and how the unique setting is captured in the green infrastructure strategy. Embedding green infrastructure, wildlife and the uniqueness of place in the Cultural and Creative Strategy more fully. We also request a copy of the Otterpool Park Cultural Visioning Study that has informed the strategy submitted;
- Greater detail on connections beyond the application boundary - some elements explored in masterplan, but not clear that concepts explored are delivered in proposals and how green infrastructure links beyond the 'red line'.
- Biodiversity net gain based on built development units - achievement of net gain through including developed area may carry risks – see biodiversity comments below.
- More ambition and greater community engagement possible in urban wildlife provision - scope for improvements to built environment for a wider range of species. Community engagement, understanding and adoption of 'wildlife friendly' ethos essential to success of urban wildlife provision and some of the mitigation approaches.

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<sup>1</sup> Environmental Statement Vol 4 p69

- Better connectivity improvements, access management and buffering to Harringe Brooks Wood - further detail required on access management, improved buffering and connectivity would improve the proposals.
- Improved connectivity - further detail is required on wildlife corridors and species used to assess permeability. Improved connections between woodlands and consideration of woodlands beyond application boundary. More detail on pollinator network.
- More detail on tree and plant species - greater clarity on species, how these reflect local habitats, species and landscape. Further rationale required on choice of soft landscaping palette.
- Assessment of risks on tree and plant species – climate change and ash dieback - assessment of climate change on choice of species and on existing retained green infrastructure. Assessment of impact of ash dieback on retained green infrastructure and landscape.
- Management of recreation with dogs and recreational impacts on habitats - credible strategy for management of dog exercise required, including limiting access to biodiversity areas within and outside the application boundary.
- Assessment of potential recreation impact on Dungeness Complex - review assessment using most recent data and assess whether SARMS fully mitigates impact.
- Greater clarity around access and recreation provision - connections, surface treatments, signage and how shared use will be accommodated, including those with more limited mobility. Clarity on access connections beyond the site. Further detail on how access to green infrastructure will support health and wellbeing.
- Development of design principles and rationale for key open spaces. What functions are they providing and why? Could allotments and community orchards be combined as community gardens (or why are they separated)?

### *Play space, sports provision and active design*

Page 87 of the Design and Access Statement provides an indicative table of sports pitches by quantum. The plot locations referred to in the table are unclear but the overall quantum appears to meet global requirements. We welcome the idea of doorstep to countryside but we think the overall approach to play space and sports provision would be more compelling if it related to an overall spatial concept (see earlier comments). This would help to 'anchor' sports and play provision within each 'place' and community.

We refer to Sport England's comments on sports provision and in particular the suggestion relating to a community tennis facility and specific need for floodlit provision. We would like to discuss how this suggestion can be taken forward.

On a related point we support the principles of Active Design cited by Sport England and note the inclusion of the Brooklands example in the guidance. We refer to our earlier request for consideration to be given to incorporating a linear park alongside the railway as part of the Green Infrastructure Strategy. We also think this linear park should link to the existing green space sandwiched between the railway line and the motorway which could also form an attractive loop trail route for walkers/runners and



would encourage sustainable movement between the station and Sellindge. Improvements should be secured via s.106.

### *Landscape and Visual Impact*

New settlements can form part of a strategic approach to meeting a wider range of social, environmental and economic goals, particularly in order to make optimal use of the capacity of sites with higher levels of public transport accessibility and make a significant contribution towards housing supply. However, we recognise strategic scale development will always give rise to some adverse landscape and visual effects; a new settlement of this scale should always be of the highest standards of design and planning.

We think there are compelling reasons for the decision to locate a new settlement in this location but recognise the location of taller elements, their alignment, spacing, height, bulk, massing and design quality should form part of a cohesive new Garden Town. Otterpool Park will be viewed and experienced from a range of static and kinetic perspectives and angles; on foot, cycle, from cars, public transport, as well as important viewpoints.

We note the concerns expressed by both Natural England and the AONB Unit in their response relating to the overall quantum, heights and densities proposed in the development in this location in addition to the concerns regarding the methodology. In relation to the overall quantum of development, reference is made to the quantum of development proposed within the plan-period i.e. 6,375 homes up to 2036/7. However, we also note the support in the NPPF for accommodating a supply of large numbers of new homes through planning for larger-scale development, such as new settlements. There is also explicit recognition within the NPPF that the delivery of large-scale developments may need to extend beyond an individual plan period (see footnote 35) and we think planning beyond plan periods for new settlements represents good strategic planning.

We refer to the comments on the methodology outlined in the Environmental Statement Review by Temple Group and agree with the comments from Natural England that the methodology and assessment have not been undertaken in accordance with best practice and should be improved to provide a robust and realistic assessment. In particular, the quality and scale of the viewpoint images is insufficient to provide a good representation of the existing view - the field of view being too great for a single image to make the viewpoint worthwhile.

In respect of heights and densities we feel that the optimum density for a site should be determined by a range of factors and a design-led approach rather than a numerical calculation or derived from a single constraint, such as a particular viewpoint or land ownership. In this approach, the appropriate form and scale of new development is established through an iterative design process that takes account of the site context in terms of the surrounding landscape, townscape, proximity and access to services and capacity of supporting existing and planned infrastructure, particularly public transport. We recognise that an overall envelope of development is required at this stage against which 'reasonable worst case' environmental impacts need to be fully tested.

A parameter plan is included and associated heights and densities shown. However, we think the rationale for the approach to heights should be clearer at this Outline stage, with flexibility for sculpting and shaping of building heights through the detailed design process and controlled through the three tier approach. We underscore our earlier comments about the need for an overarching spatial concept to help inform the approach to heights and establish a clear hierarchy for town. This will help to improve the legibility of the area, identify potential landmarks (such as a water tower), contributing to a rich built form that also contributes positively to the way in which Otterpool Park is viewed and experienced from a wide range of spatial viewpoints.

We view the current location of linear employment space alongside the railway line to be inaccessible, visually intrusive from a landscape impact point of view and risks detracting from first impressions of Otterpool Park as an attractive place to live. We think a reappraisal of the approach to Green Infrastructure alongside the entire length of the railway line is required with displaced employment space west of the castle being incorporated into the town centre and potentially additional live/work space.

In addition, parts of the site exhibit similar landscape characteristics to the adjacent AONB, in particular the triangle of land between the A20 and Stone Street at the eastern end of the application site, where the landscape is more undulating in character than much of the application site area, increasing its importance as forming the setting to the adjacent AONB. Its landscape importance is recognised with its inclusion within the locally designated Special Landscape Area (SLA). We agree with AONB Unit in specific respect of the need for an improved green infrastructure structure in this area and greater need for a filtering of the view through informal layouts. A reappraisal of the approach to green infrastructure structural planting in this area is required taken together with comments elsewhere in this report regarding the need to retain the informality of the existing Hillhurst Farm courtyard, review the need for dualling of the A20 and ensuring there is sufficient capacity for SuDS and water storage. We refer to pre-application advice from AONB Unit in respect of the Colour in the Landscape work (as reported under Character shaping principles and Actions). We would support the applicant in commissioning this work to inform the preparation of a Strategic Design Code.

Furthermore, the sloping nature of sections of this part of the site are likely to result in a need for the formation of development platforms that could further negatively impact on landscape character. The application also proposes the realignment of the existing A20 into this area and it being increased in width to a dual carriageway. Given the landscape sensitivities of this part of this site and our wider reservations about the approach to transport we think this intervention should be reconsidered. In addition, we think the Green Infrastructure Strategy should reassess the approach and experience of arrival to the Garden Town more generally and more structural planting introduced in this area to address the concerns raised by Natural England.

### *Appropriate Assessment*

We refer to the advice of Natural England in respect of Habitats Regulations Assessment and the request for further information in order to fully assess the proposals. Specifically, attention is drawn to the advice regarding air quality impact pathway which needs to follow the approach adopted through the Core Strategy Review to ensure in-combination effects are considered for likely significant effect at screening stage in line with the recent Wealden judgment<sup>2</sup>.

### *Sites of Special Scientific Interest (SSSI)*

We support the assessment and recommendations presented by Natural England in respect of Otterpool Quarry SSSI. We welcome the biodiversity enhancements within a Country Park setting but would like to see how this typology is linked to other open spaces through the Green Infrastructure Strategy. We particularly draw attention to the comments regarding long-term stewardship and management and want to see this addressed in the long-term stewardship model as a 'locked asset'.

### *Biodiversity*

We refer to the detailed comments provided by KCC Ecology Unit and Natural England. In relation to biodiversity net gain we strongly welcome the potential 20% net gain, but seek clarifications in relation to the methodology deployed in questions raised in our review and by Natural England. We also agree with the points made regarding the lack of biodiversity credits in the triangle of land east of Stone Street and underscore our requirement for a review of the Green Infrastructure structure in this location. In addition to the Ecological Management Plan we will seek to impose requirements to monitor net gain in a phased manner.

We support the suggestions made by Natural England in relation to community-led efforts to encourage and look after local wildlife and habitats. We think there should be a role for the stewardship vehicle here and also the community development officer, particularly in early years of development.

## **5. Review of Environmental Statement / Phasing / Fixes**

The LPA has provided feedback from an initial review (IRR) of the Environmental Statement (Appendix D). The review identifies whether the ES meets the requirements set out in Schedule 4, (at least the information referred to in Part 2, and information referred to in Part 1 as is reasonably required) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (hereafter referred to as the EIA Regulations).

The report constitutes the IRR which collates the findings of the review of the ES. Each section of the report provides a list of clarifications and potential Regulation 25 request information requests required from the Applicant. Importantly, these are only potential Regulation 25s at this stage – this is to reflect the importance of these points, but also provides the Applicant with an opportunity to contest / respond.

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<sup>2</sup> Wealden District Council v. (1) Secretary of State for Communities and Local Government; (2) Lewes District Council; (3) South Downs National Park Authority and Natural England

The EIA Regulations require in particular that an ES includes the information referred to in Reg 18(3) and, pursuant to Reg 18(4)(b), it must “include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment, taking into account current knowledge and methods of assessment”.

Once the changes envisaged in this report have been accommodated it is likely the IRR stage will need to be repeated in order to assess the ES as revised project. Once this has been completed the applicant will be invited to provide a response to the IRR addressing the clarifications and potential Regulation 25 request information requests raised. Any response provided by the Applicant will then be reviewed by the Local Planning Authority.

### *Phasing and EIA*

As a general comment, the application takes an approach to EIA and phasing which is more prescriptive than is required by law, and which is likely to give rise to future issues regarding flexibility and the need to tackle future variations to an outline planning permission.

The parameter plans, the Development Specification and the phasing plans prescribe more detail at this stage than is supported by detailed analysis. This is particularly marked in the case of the Development Specification and the phasing plans. The LPA recommends a restructuring of the application to ensure the right level of detail at the right stage in the process. The assumptions made as to phasing and other details at the outline stage should not be so prescriptive that they “over prescribe” for no good reason, as the unnecessary fixing of detail at this stage is likely to lead to the need for s73 variations as the build out progresses. Such variations have cost and time implications for the local planning authority. Any resulting change to the proposals may also require further EIA – which process would need to assess the project as amended, not just the amendment itself.

Flexibility regarding phasing (and otherwise) is acceptable for EIA purposes provided:

- 1 the Environmental Statement is clearly based on that level of flexibility so that chapter authors have reflected it in their reports; and
- 2 a form of condition is developed and imposed on the permission which provides a clear mechanism for phases to come forward.

In assessing further amendments to the scheme the applicant should make clear in the front end of the Environmental Statement what assumptions are being made as to phasing.

The first phase of development will set the tone and shape of future phases – the scale and design quality of the first phase should therefore be a priority. In spatial terms, the LPA continues to have concerns about the arrangement shown in the first five years and its ability to meet planning policy requirements around connectivity, community development and self-sufficiency. The three-tier approach to the outline planning application will assist in managing the detail of phasing - identification of a phasing strategy and Delivery Strategy will also be required by planning condition. The principles that will guide the sequencing at each phase should be established clearly at this outline stage and be incorporated into the Development Specification. The first

phase / phases of development must create places that are successful in their own right if the increased land values required for subsequent phases are to be secured.

## **6. Securing Design Quality / Three Tier Approach**

With a large scale project such as Otterpool Park, it is inevitable that there will be some change in the legal, political and/or physical environment between the preparation of the planning application and the completion of the development, resulting in any planning consent gradually becoming incompatible with these changing factors and with market demands. It is highly unlikely that a large development project such as this will ever be delivered precisely as originally considered.

As per pre-application advice, the LPA recommends restructuring the application to provide for long term flexibility and moving towards a “three-tiered” approach. This would allow the detail that is “fixed” at this stage, and the corresponding assumptions underpinning the EIA, to be reviewed. A mechanism will be introduced by the LPA through the conditions on any OPP to define and provide for a Tier 2 of submission documents that seek to identify/define further detail in relation to a smaller number of larger phases/development zones, which would provide the framework for the eventual (“tier 3”) reserved matters submissions within those phases/zones.

Adopting the above approach would involve the following:

- the removal of the phasing plans to allow for longer term flexibility;
- stripping various elements of the detail from the Development Specification or at least converting quanta into minimum/maximum ranges;
- in lieu of this detail incorporating a ‘bridging’ document to provide context within which later detail can be developed and conditioning them both (see below).

In our view, aspects of the Development Specification and Parameter Plans are overly prescriptive. We question the purpose of development zones, and the benefits of this approach are not clear to us for a project of this scale. The plans are not sufficiently supported by urban design analysis in the Design and Access Statement to explain and justify how the proposals have been arrived at.

We recommend a recalibration of the parameter plans to remove unnecessary prescription whilst bringing forward Tier 2 work in order to provide a design feedback loop into the Tier one work. This will allow more time for in-depth urban design and movement analysis as detailed design is worked up in a structured way. It should therefore also be possible to strip back some elements of fixed detail in the parameter plans at this stage and to reserve them for more detailed Tier 2 style submissions.

### *Securing Design Quality*

In adopting the three-tiered approach an appropriate design cascade can be followed featuring: an overarching vision and site-wide strategies/principles at Outline stage leading to detailed masterplanning and Design Codes and then to further design detail at Reserved Matters Stage.

The Design and Access Statement includes a section called 'Towards a Design Code' (although in other places the term 'Masterplan Principles' is used). This chapter is deemed to be too generic and therefore not capable of being secured by planning condition. The LPA recommends revisiting and revising metrics and drawing out spatial principles into a separate document to form part of the Tier 1 work – Strategic Design Principles.

These principles will need to evolve from the work recommended elsewhere in this report, particularly the Green Infrastructure Strategy, but also needs to draw together the relevant spatial principles identified across a range of documents. There are a number of examples of this across a range of disciplines including:

- **Heritage** sections of the Environmental Statement (p.35 Appendix 9.2 Cultural Heritage Desk-Based Assessment) e.g. the visual connection between the Castle and Upper Otterpool is described but is not mentioned anywhere within the Design and Access Statement.
- **Biodiversity** - a number of principles are mentioned for dark corridors and lighting principles such as minimum 50metre buffer for Harringe Woods and minimum 25m either side of hedgerows – see comments from KCC Ecology and Natural England – these need to be secured as a principles at this stage.
- **Noise** – 'agent of change' principles between existing industry and introduction of new residential uses.

These principles are not intended to fix a specific design outcome at this stage but instead establish the principles for a site-wide Strategic Design Code and Tier 2 design work. We recognise that this document will need to secure principles that respond directly to discussions with a range of parties, including local residents. It will also need to directly address specific (spatial) issues raised by a range of statutory agencies and other organisations particularly Natural England, AONB Unit and KCC Ecology/Archaeology. The document should distil principles from the extensive technical work to date to guide the future design of individual parts of the site. The following list provides a minimum for what should be included in this document:

- Station/square hub, other mobility hubs and key open spaces such as a market square
- Town and local centres
- Green Infrastructure principles for the strategic open spaces, edges, thresholds, key arrival/exit points into the Garden Town, smaller GI spaces within residential areas, interface/boundaries with AONB and SLA
- SuDS, biodiversity and play spaces
- Castle setting and other heritage assets
- Employment areas
- Heritage assets, including settings for listed buildings, the Castle and Roman Villa
- Interface with established industry or other non-residential uses and adoption of 'agent of change' principle

## 7. Community Development / Long Term Stewardship & Governance

### *Long-term stewardship*

A central plank of the Garden Towns legacy is the creation of an asset base that supports initiatives, activities and facilities that the community governs. We want to make sure that the stewardship and governance arrangements we put in place for Otterpool Park will be equally effective in the future; benefitting the existing communities as well as the new residents. The Governance strategy presents a useful summary of the options and the likely list of community assets but we are concerned that no preferred option is identified or route to delivery identified. The applicant, working jointly with the Councils, will need to identify a clear option for further development before any progress can be made in this area or in relation to any prospective s.106 agreement.

This Strategy should show how a governance structure will be put in place to ensure communities are involved in all stages of the development process and that facilities and infrastructure will be funded, managed and maintained and that they continue to provide a service and an asset to the community in perpetuity. The agreed option needs resources and legal commitments guaranteed at this outline stage but flexibility so that partners still have choices about the longer-term arrangements.

We require commitments to 'locked' assets which require timely delivery and early restrictions on non-developed land alongside resources for maintenance, combined with a phased approach which allows assets to be legally transferred to Community Bodies as the development proceeds and neighbourhoods or phases are completed. Clarity will also be needed in respect of heritage assets (see comments from Historic England and Natural England) - the Geological SSSI and the Roman Villa are examples of this.

We welcome the commitment to culture and the identification of a long-term artistic and cultural strategy. This will need to be secured via the s106 agreement and reviewed on a regular basis with robust monitoring arrangements in place. It will also need funding in place to make it a success and will need to be aligned with the proposed approach to long-term stewardship, once clarified.

The delivery of the Green Infrastructure package will necessitate the employment of full-time rangers – we would like to explore details of the scope of the ranger roles (see pre-application advice for letter for the Welborne example). Further exploration of funding models that could be used to secure a funding stream for on-going management will be required; this could include adoption of a hybrid comprising an initial endowment with service charges and secured through the s106 agreement

Green Infrastructure stewardship measures will also need to include:

- Implementation or supervision of the works set out in the management plan including setting out and installation of infrastructure, implementation of planting proposals and on-going management of existing and new habitats.
- How green infrastructure will be established in line with an agreed sequencing and delivery plan (this should form part of the agreed sequencing principles

referred to earlier in this report). Following the completion of establishment works when the significant areas will be accessible to new residents.

- Landscape monitoring of newly planted areas, particularly for the first five years after planting.
- Support for community-led efforts to encourage and look after local wildlife and habitats of Otterpool Park, particularly through use of educational interpretation and guides, setting up of local environmental groups, and residents information packages (see comments from Natural England).
- Commitment to early provision of a farm shop/cafe and/or other community meeting space to help foster a strong sense of community early on.

Governance arrangements need to be secured at the time of planning permission and implemented from the outset of the development. They will need to ensure that both current and future residents can shape and influence the development and that long-term arrangements are put in place for the stewardship of assets on the site.

### *Community development*

The development of a new garden town settlement at Otterpool Park must go beyond the management of green space, spaces and buildings; putting local people at the heart of this process can generate increased local support, creativity and entrepreneurialism. Provision for a vibrant social life is one of the leading characteristics of historic garden city/town developments and Otterpool Park should also be characterised by its social and cultural vibrancy.

The LPA is concerned to secure firm and tangible commitments to community development within the application, particularly in the early stages of development. We stress the importance of ensuring that early ‘pioneers’ at Otterpool Park feel a genuine affinity to the place and its long-term success.

The community engagement strategy thoroughly documents historic community engagement activity. The applicant’s commitment to community engagement over a number of years is strongly supported. Given the longevity of the development we think it is essential this commitment continues and is carried through into delivery and embedded in the long-term stewardship vehicle as a specific objective.

There are a range of measures we think should be explored and secured at this stage to foster greater community development. We refer back to our comments at pre-application stage and repeat our request for these elements to be embedded within the Delivery Management Strategy. The elements to be included:

- The delivery of the Green Infrastructure package will necessitate the employment of full-time rangers – see governance section; the suitable partner identified (see governance section) to manage and maintain the green infrastructure at Otterpool Park will need to engage with residents as properties are occupied and the new community develops;
- Explore the option of a future ‘Discovery or Community Day’ – allowing existing and prospective residents to fully explore the area, community archaeology and other historic assets to generate interest and ownership, hosting sporting events or 10k running events;



- Community development officer tasked with coordinating activities and fostering community spirit;
- Commitment to early provision of a farm shop/cafe or other community meeting space within the first phase, to help foster a strong sense of community early on.

## 8. Cultural Heritage and Archaeology

The 1990 Planning (listed Buildings and Conservation Areas) Act creates at Section 66(1) a statutory duty to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. This applies to the Grade 1 listed parts of the castle. The NPPF states at paragraph 193 that great weight should be given to the conservation of designated heritage assets. This also applies to non-designated archaeological remains that are demonstrably of equivalent significance to scheduled monuments. This weight applies irrespective of whether that harm is substantial or less than substantial.

Otterpool Park has a powerful heritage of great historical significance with buildings, structures and features of national importance and a distinct sense of place. The development of a Heritage Strategy affords a significant opportunity in terms of establishing a cultural identity to generate economic, social and environmental value. Historic buildings are a valuable material resource and can contribute directly to the prosperity of the economy. The proposals should therefore build on the sense of place afforded by the historic environment. Successful redevelopment will generate economic value as well as valuing and protecting physical survival of buildings for their own sake. Successful conservation can also secure the economic vitality of associated new buildings.

The LPA welcomes the commitment to prepare a Heritage Strategy. This should be worked up as a priority, working jointly with KCC and Historic England and making clear links across to the Cultural and Creativity Strategy and Green Infrastructure Strategy. In common with other strategy documents, it must establish a clear strategy as to how heritage will play an on-going role in shaping the identity of Otterpool Park and contribute to the overarching place-making objectives. We make specific suggestions regarding the potential content of the Heritage Strategy in Appendix E.

In general, existing buildings across Otterpool Park have tremendous potential for reuse within their existing envelopes; we accept that retaining and accommodating heritage buildings to provide for new economically viable uses may, however, mean some sensitive intervention. In making judgements about retention, adaptation and reuse we should aim to identify viable uses that are compatible with the special interest of the historic buildings, their fabric, interior and setting. We would encourage a contemporary, bold and imaginative design approach that complements and enhances existing features ensuring the old and new are fully respected and integrated into the masterplan. We think these aims should be clearly spelt out in the Heritage Strategy, working together with Historic England and KCC Heritage and commit to working jointly with the relevant parties to develop a viable long-term strategy for the Castle in particular.

### *Westenhanger Park and the Castle*

In relation to the Castle itself we appreciate the time and effort that has gone into integrating this nationally important feature as a focal point. We reiterate our preference for the Castle to be incorporated within the red line but accept this is not essential so long as a suitable alternative legal mechanism can be demonstrated that secures the long-term future of the Castle, addresses its setting and the implementation of a Conservation Management Plan.

We agree with Historic England that proposals should reflect and benefit from the proper assessment of the historic buildings – one that evaluates and understands their character, value and significance, together with the potential for their integration within development proposals. As recognised by the Otterpool Park Charter (2017) Westenhanger Castle should become a focal point that helps define the character of the wider settlement – retained buildings and features should observe important spatial relationships and allow important views to survive. However, we do not favour the artificial creation of a ‘heritage park’ with old buildings set apart, disconnected from each other – historic buildings should be interwoven within the fabric of a clear physical, landscape and historical framework for development of the area. We must balance the need to conserve the historic environment with the economic, social and environmental benefits of development.

Views to and from the castle contribute to the way the asset is understood and experienced. We recognise the historic importance of the approach to the castle from the south and also the longer views from Stanford. However, we note these historic views have been severely eroded over time by the severance of the M20 and railway lines, the imposition of inappropriate tree screening which severely restricts views to and from the castle and the now redundant racecourse buildings. There is a significant opportunity to reverse some of these recent interventions and fully reveal the castle and we would encourage this as an early ‘win’. However, it must also be acknowledged that the full surviving extent of the deer park will never be restored owing to the severance of the transport infrastructure. We note Historic England’s references to other examples, such as Greenwich Park, but also note the circumstances are very different and also note other examples of extraordinary heritage resources being given a new lease of life within a new, contemporary, context.

We caution against attaching too much weight to views from a single static viewpoint looking north from the (current) position of the A20 to the detriment of other spatial viewpoints which also contribute towards the understanding and appreciation of historic assets. We fear this could lead to an artificial and contrived ‘viewing corridor’ experience which fails to marry old and new. We do not preclude the potential for high quality development in this location but encourage a wider analysis of how the Castle, and its setting within the park, will be experienced and its relationship to buildings. We think this should be firmly placed within the context of a clear vision for the park as part of the Green Infrastructure Strategy.

In order to present a full consideration of cumulative effects across the site as a whole, it is recommended that the applicant collect LiDAR data for the visual envelope around Westenhanger Castle, and use this to generate a Zone of Theoretical Visibility (ZTV)

from ground level and the upper levels of the castle. The ZTV could be compared to relevant viewpoints from and to the castle, with reference to the way in which the castle was built, developed and used, to produce wirelines and photomontages from significant viewpoints from and to the castle in order to demonstrate the overall effect of the development as proposed in the masterplan. This analysis should respond, and speak to, to the outputs of the Green Infrastructure Strategy which defines the role of the park sub-regionally and informs spatial principles for the future detailed design of the park.

We share a specific concern about unbroken development shown along the south side of the A20 and how the return view from the castle (through the causeway) towards the A20 will be experienced and would like to see further analysis of this. We see a much wider range of spatial viewpoints as important to the 'experience' of the setting of the castle within its historic deer park setting and do not feel these have as yet been fully exploited. This will include movements towards and away from the Castle, edges and thresholds in and around the park, views from within the Park towards the North Downs (and broadcast tower), views from higher ground such as Upper Otterpool to which it has a visual, if not historic, connection.

It is important that proposed housing does not obscure key views of the castle and its associated barns. Where housing encloses the boundaries of the park the buildings should be of a suitable scale and provide a mixture of formal and informal edges to the park. Housing in these buildings will be offered superb views of the castle and the park adding value to the development and a finer grain approach to the town centre could offer glimpsed views of the castle. Plots surrounding the park should also be capable of accommodating a range of different, and potentially innovative, housing typologies. It is important that principles to guide enclosure, edges and scale are all clarified so that groups of buildings in and around the setting of the castle form a unified 'backdrop' to the castle rather than collections of individual and unrelated objects.

The strategic open space between new housing and the Castle needs to be a transition zone - the planting and design of the spaces should complement and strengthen this transition. Imaginative design proposals are encouraged and we feel the Green Infrastructure Strategy should establish clear parameters and principles to guide future detailed design and define the role of the park within the context of the wider Green Infrastructure Strategy. We think the proposed canals could appear artificial and suggest a more naturalistic approach to the treatment of the water courses across the park so that it crosses thresholds into built development and helps bring together the town centre and the park into an integrated whole.

The introduction of appropriate, and innovative, housing typologies surrounding the park could create a rich historic environment for the future but this needs to be demonstrated more clearly. The parameter plan relating to the setting of the castle is too large a scale to fulfil its intended function and we think there is a case for a specific parameter plan which incorporates the findings of Tier 2 town centre work and the Green Infrastructure strategy. We think the bringing forward of elements of Tier 2 work (particularly urban design and movement analysis) together with additional views analysis and the Green Infrastructure Strategy will help to evolve and refine the arrival experience and setting of the castle from a wider range of places so that it can realise

its full economic, social and environmental potential. The drama and interest generated by the castle could also be further exploited by the undulating topography and unexpected views from places such as the train station, walking east from Sellindge and up the hill at Upper Otterpool.

In order to address these issues the LPA believes key elements of the tier 2 work, namely the development of design concepts for the town centre, integration of, and relationship to, the A20 should all be brought forward at this outline application stage, in order to further assess and test the setting and views of the castle. The outputs of this work should then be brought together with the Heritage/Green Infrastructure Strategies and additional views analysis and used to feedback into the parameter plans. Specifically, a dedicated and better scaled plan is required for the setting of the castle itself in response to these comments.

*Non-designated built heritage assets, including grade II listed buildings*

There are 33 Grade II listed buildings and 84 non-designated built heritage assets within or adjacent to the redline boundary and considered for assessment. A baseline for relevant structures is presented in a Cultural Heritage Desk-Based Assessment (DBA), a Historic Landscape Characterisation and Farmsteads Analysis, and a Historic Buildings and Structures Appraisal (referred to as a 'listing screening report'). Likely significant effects are presented in the Environmental Statement Chapter 9, Cultural Heritage. Each of these documents have been reviewed by officers and RSK, and a site visit undertaken. The full review and draft advice note is presented at Appendix E.

There are no instances apparent in the proposals where significant heritage assets would be lost. In many ways the proposal can be cited as an example of best-practice, demonstrably adhering to relevant and current heritage guidance. Further work lies ahead with regard to detailed mitigation commitments, and in the provision of detailed design parameters (colour palette and architectural materials), where the appearance (rather than the layout) has the potential to affect the significance and appreciation of retained built heritage assets in and surrounding the site boundary. This will need to be addressed through the Strategic Design Code and Tier 2 detailed masterplanning. In sum:

- Eight built heritage assets are considered likely to meet Historic England's criteria for listing. A further group of non-designated built assets would be deemed to be protected as they lie within the curtilage of existing listed buildings. We agree with the listing screening exercise and it is our opinion that the report is detailed and accords with best-practice, and should be used as the first step in the process towards listing.
- We have reviewed the listing screening report and ES and generally agree with the conclusions and recommendations for mitigation. It would be expected that the Heritage Strategy outlines a methodology for making the preserved military assets safe, whilst still enabling the public to visit, experience and understand them.
- We recommend that the applicant makes a commitment in the Heritage Strategy that any built military heritage asset that lies within open space in the masterplan

(as opposed to just those of listable quality), are preserved, made safe, and incorporated into the development, rather than implementing demolition.

- Where it is not possible to preserve and incorporate historic buildings and structures within the proposed development, the remaining military buildings assessed could be demolished, subject to a suitable programme of mitigation, comprising where relevant detailed documentary research / air photo analysis for RAF Lympne as a whole, to place impacted buildings and structures into context, to be presented in a grey literature report and summarised in an illustrated pamphlet and made readily available to the public.
- The pamphlet would describe a specific military heritage trail through the site between interpretation boards which would allow the reading of the historic military landscape within the site and beyond. It is recommended that the research and pamphlet is peer-reviewed by a military history or local specialist.

Historic England recommend that buildings should be listed, and this is agreed. Historic England should confirm whether these works are programmed to be carried out as soon as possible, and if the listing screening report provided by the applicant is not suitable to provide the information needed, outline its deficiencies. Based on the applicant's submitted listing screening report, Historic England should be able to recommend where any buildings and structures need to be inspected on the inside in order to make their decision, and this may result in the provision of an addendum to the report.

The buildings considered to be of listable quality have been assessed as such in the Environmental Statement, taking their significance and special character into account and applying mitigation commitments as if they were listed buildings; as such the listing process could be carried out post-consent without a need for reassessment. Whilst effects are acknowledged, it is agreed that harm has been minimised in the masterplan proportionately and as far as reasonably possible.

The buildings and structures located within the site boundary that do not meet Historic England's criteria for listing can justifiably be demolished in order to allow for a cohesive masterplan to be more fully realised without the constraint of incorporating low-value existing buildings. We see no value or precedent in the construction of new buildings on the footprint of buildings for which demolition has been agreed as acceptable. A 'Level 1' photographic survey of low-value assets to be demolished, carried out as part of a Historic Building Recording exercise, would be proportionate to their significance and loss, and we would expect that the appropriate recording level (in accordance with Historic England's *Understanding Historic Buildings, A Guide to Good Recording Practice*, 2016) for other buildings and structures to be demolished would be presented and justified in the forthcoming Heritage Strategy.

### *Farms and outfarms*

Of nine farms considered, four are identified as likely to meet Historic England's criteria for listing and are physically preserved due to their exclusion from the redline boundary.

We have reviewed the listing screening report and Environmental Statement and agree with the conclusions other than that the red brick barn at Hillhurst Farm could be demolished. It is our opinion that this is an historically and aesthetically positive element of the farm's setting and should be preserved in the masterplan, potentially given a viable use as a public space. Otherwise, it is agreed that the remainder of the structures at Hillhurst farm could be demolished subject to building recording mitigation.

### *Archaeology*

Across the wider masterplan area the LPA agrees with Kent County Council that priorities for early archaeological investigation should be agreed by overlaying the areas for investigation against the key structuring elements of the masterplan.

We also agree with Kent County Council that it is essential that there is sufficient and genuine flexibility in the masterplan to allow for the preservation in situ of as yet unknown, but potentially important archaeology. We do not think sufficient detailed assessment, such as trial trenching, has been undertaken to prescribe the level of detail shown on the parameter plans with any degree of confidence. This is particularly evident in and around parts of the site with high possibility of nationally important archaeology such as around Barrow Hill. We refer back to our comments on the three-tier approach and the ability to accommodate evolving detailed design by working through detail in a structured way. This will mean introducing more flexibility into the parameter plans, particularly the form and nature of green infrastructure in and around the barrow group at Barrow Hill, the spaces around the newly discovered Roman Villa and the single Barrow located just north of the former racecourse straight.

We also agree that there is an exciting opportunity for people to become actively involved in the site's heritage, linked to our comments on community development, and the employment of a community archaeologist/clerk of works.

## **9. Housing**

The emerging Local Plan sets a requirement for a minimum of 6,375 new homes in a phased manner (to 2036/37) with potential for future growth to 8,000 – 10,000 beyond the plan period. We support the overall quantum of development which supports these objectives and is aligned with the scale of development envisaged in the NPPF for large scale new residential development, including new settlements. We accept that these numbers must be subject to an ongoing iterative masterplanning process which balances a range of constraints and opportunities.

We agree with the vision for homes that will be designed to be spacious, flexible and adaptable over time; to meet changing needs of their occupants. At the same time ensuring the homes are accessible to as many people as possible by offering a broader range of tenures than many smaller developments could deliver. A development of this scale has the ability to keep delivering through a number of economic cycles, in line with the Letwin Review. As noted elsewhere in this report, we also think home working will play an increasingly important role, and the potential to reduce the need to travel with it.

Overall, whilst we support the overall objectives of the Housing Strategy we feel it could go much further in assessing the evidence from the Local Plan, the local and wider housing market, the local economy, anticipated business growth, as well as age profile and demographic information. This evidence is detailed in the Housing Strategy and Montague Evans Report to some extent but we make further suggestions below.

### *Affordable housing*

Policy CSD1 requires all housing development to include a broad range of tenures and a minimum of 22% affordable dwellings on-site. In addition, the starting point is a tenure split of 30% affordable housing shared equity and 70% affordable rent/social rent.

We welcome a commitment to achieving a global affordable housing outturn of 22% as stated in the Development Specification but caution that the policy wording requires a minimum of 22%. We note the reference to flexibility to achieving a site-wide target across the phases. A review process is proposed that will seek to maximise the provision of affordable housing through the lifetime of the development with the objective of achieving policy compliance as a minimum. The review would be undertaken on an 'open book' basis and will result in an approved project appraisal for each phase together with a phase affordable housing delivery plan.

The LPA will introduce, via condition, a requirement to submit a reconciliation statement, to demonstrate how each phase is consistent with, and will not prejudice, the delivery of site-wide targets. We note the Housing Strategy is silent in relation to affordable housing tenure split which is a concern for the planning authority; we require clarification on this point.

### *Local Housing Needs*

As part of defining the housing mix a concerted effort is needed to ensure the evolving housing needs of local people will be met. This is a strong theme in resident responses to the application. We suggest jointly commissioning a local housing needs survey at Parish-level. This will help to understand how the needs of the established community could be better met. It will establish an evidence base for refining the scheme mix so that more opportunities are available for local people to remain local, given their current and future household circumstances. The survey would be updated every five years or in line with each phase, ensuring changing needs of local people continue to be addressed. A Local Allocations Plan could then evolve from this survey. This will ensure local allocations are approached using up-to-date surveys of housing needs.

### *Housing mix, type and tenures*

We think it is important a diverse range of homes and tenures is secured, offering homes for rent, intermediate and retirement housing, to ensure consistent delivery and still provide balanced and mixed communities. It is important that the proposed housing mix included in the planning application responds to the targets set out in draft policy CSD2 of the Local Plan Review regarding the tenure and sizes of the proposed

dwellings that need to be provided in each phase of the development. Addressing the undersupply of affordable homes at all unit sizes is critical.

The Strategic Housing Market Assessment (SHMA) is the starting point for housing need and the size mix should be disaggregated by tenure – the market mix should be separated out. Provision for 2 & 3-bedroom units should also be disaggregated in line with the SHMA. We recognise that new settlements need flexibility but must also take account of identified housing need amongst other factors. We recommend flexibility in the range of + / -10% is appropriate in the circumstances. The agreed range will need to be properly assessed in the Environmental Statement (particularly socio-economic chapter).

On 26 June the Government released new guidance on housing for older persons; the Housing Strategy will need to be reviewed in the light of this. The health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support. These differences are acknowledged in the Housing Strategy but we are concerned by the narrow commitment to extra care units only in the Housing Mix Table. Other intermediate forms of key worker housing should also be incorporated and the applicant is asked to confirm commitments to the requirements of Policy SS6, including 10% homes for the elderly within each phase.

Additionally, the provision of self-build and custom-build homes needs to meet the requirements of policy SS6 of the LPR.<sup>3</sup> All neighbourhoods are expected to provide a mix of home typologies; but the principles that will guide the approach to typologies and mix across the site remains unclear.

We understand further work is underway to develop an Action Plan / Work Programme to deliver custom and self-build. This should illustrate how the work will be prepared, by whom, and the overall strategy for distribution - how will locations be determined? Attention is drawn to Policy SS6 a. which states *“a proportion of proposed dwellings shall be provided as self-build or custom-build plots...with each substantial phase contributing a proportion of self-build and custom-build housing”*.

We are also keen to ensure that the types of homes offered continue to meet those needs and aspirations. As part of this, we would encourage exploration of how in the governance proposals we can introduce and support elements of community-led housing or alternative models such as co-living.

## **10. Economic development, town/local centres and retail**

### *Town and Local Centres*

Pre-application discussions relating to the town centre centred on the relationship between the station, ‘high street’, castle and the pond. Officers continue to view this as the logical heart to the development; the place to which most people are likely to gravitate and where people are most likely to want to dwell. We agree with the Place

<sup>3</sup> [https://www.folkestone-hythe.gov.uk/media/4892/Core-Strategy-Review-Consultation-Draft-Plan---March-2018/pdf/Consultation\\_Draft\\_Plan\\_March\\_2018.pdf](https://www.folkestone-hythe.gov.uk/media/4892/Core-Strategy-Review-Consultation-Draft-Plan---March-2018/pdf/Consultation_Draft_Plan_March_2018.pdf)



Panel that a clear, overarching concept for the town centre has yet to emerge and we support the proposal to run a targeted design competition to develop the town centre's identity, function and movement. We think this will need to address the configuration of the A20 which will have a major impact on the town centre and has yet to be successfully resolved. We are concerned the planning application presents a contradictory picture about the role and location of the town centre. In some parts of the application it is referred to as the area running south from the station but in supporting plans it has been expanded to include the local centre and employment-led area in the north east corner of the site. This has the effect of fragmenting the town centre and risks the creation of two competing centres with ill-defined roles. A clear hierarchy is needed for the town with the town centre offering high quality public spaces and a range of reasons to be there: leisure, culture, music, education, history, food & drink, workspaces and retail.

We continue to have serious reservations about the number, location and deliverability of local centres in the south of the masterplan area. Whilst walking distances should be an important factor in determining the location of local neighbourhoods it is not the only factor and the location of two segregated local centres either side of Otterpool Lane is unconvincing. There must be a clear spatial logic so that it results in distinctive and deliverable new neighbourhoods. We think there is a clear opportunity to integrate the neighbourhood centres located within zones Z2B and Z3A so that they intersect where movement networks meet at Otterpool Lane and centred around multi-functional open space. The level of uncertainty surrounding archaeological constraints and the relationship to Link Park Industrial Estate, further underscores the need for changes to this arrangement. We refer to our earlier comments regarding the need for these centres and neighbourhoods to sit within an overarching spatial concept; we think a review of these centres based on a strategic Green Infrastructure concept which threads together key open spaces within an overall settlement hierarchy i.e. a town centre and two villages, stitched into the existing countryside, would make for a more viable and compelling long-term proposition.

### *Economic Development and Retail*

A summary of the review of economic development and retail evidence by Lichfields is provided below (see Appendix F). The planning application's expected phasing significantly exceeds the indicative policy figure. The potential implications of this over-supply should be considered. The alignment of employment and population growth as required by Policy SS6 is not fully evidenced, which is interrelated with potential positive or negative impacts in the wider area. The Economic Statement does not fully address potential disbenefits that could occur in the wider area.

The strategic employment function within the District should be more clearly demonstrated. The quantitative assessments set out in Lichfields' ELR (2017) and ELNA provide an appropriate basis for assessing these wider implications.

The quantitative retail assessment is broad brush and no analysis of food/beverage provision has been provided. The assessment fails to comply with NPPF paragraph 89 (b), and the step-by-step approach set out in the PPG has not been followed.

The applicants should provide a more detailed impact assessment for comparison, convenience goods retail and food/beverage. The RNLA 2018 is up to date and provides an appropriate basis for assessing expenditure patterns and likely levels of trade diversion for comparison and convenience good retail and food/beverage uses.

The RIA should be based on realistic assumptions regarding expenditure retention and trade draw from beyond the new settlement, which should underpin estimates of trade diversion from the main affected centres. The RIA should provide commentary on the likely implications of trade diversion for each centre's vitality and viability, drawing on the findings of the centre health checks. The RIA should adopt an appropriate design and horizon year and should take account forecast population and expenditure projections, as set out in the RNLA 2018 (updated or refined if necessary), and the degree to which growth will offset impact.

The applicant should provide more information on what planning conditions will be required to ensure a traditional town centre, with a broad mix of uses to serve local needs is delivered. These planning conditions should help to provide robust justification of the particular market and locational requirement for the scale and nature of the proposed town centre. The proposed condition should be linked to a clearly defined town centre including the proposed location west of Stone Street. The development of the town centre should be appropriately tied to the parameter plans by being clearly demarcated on a plan.

Parameters for the mix of Class B floorspace and distribution between the hubs and business park should also be included and the proposed location within the settlement.

The rationale and spatial distribution of town centre and employment uses needs to be fully explained. These uses should be located to adequately serve the new settlement and in line with the overall strategy that is proposed.

## **11. Sustainability (including waste, water and energy)**

### *Energy strategy*

A range of energy efficiency and low carbon and renewable energy supply options have been appraised against the energy strategy targets for a number of typical housing typologies that are representative of the range of densities and forms that are likely to be accommodated at Otterpool Park. The energy and carbon savings have also been aggregated for an illustrative mix of homes at full build out. The general approach to the energy hierarchy is supported and the submission of a comprehensive energy strategy, with supporting assessment of heat network feasibility is welcomed. However, there are a number of important outstanding issues.

### *Be Lean*

It is proposed to set a target of 5% improvement on Building Regulations. We note that the targets for demand reduction measures at the earliest stage of development are not as challenging as previously proposed. We are particularly disappointed that pre-application advice in relation to the application of targets for Part L Fabric Energy Efficiency Standard (FEES) for the development as a whole has not been taken

forward. The need to secure ambitious energy efficiency targets for improvements at this Outline stage is reflected in a number of consultee comments and we agree with comments from Hythe Town Council in this respect. The LPA repeats its earlier advice on this matter which will need to be addressed at this stage. We recommend homes are built to high standards of fabric energy efficiency and that the energy savings achieved for an improved fabric specification are based on specifications proposed for meeting efficiency standards recommended for use in relation to Government policy.

This will be critical to securing a fabric first approach as required by Policy SS8 (d) before assessing other technology-based demand reduction measures. Given the long-term nature of the project the legal agreement will need to establish contemporaneous standards to keep pace with changing regulations in a quick moving field.

### *Be Clean*

We note that since submission of the application the Government has announced a Future Homes Standard <https://www.theccc.org.uk/2019/03/13/ccc-welcomes-government-commitments-to-new-low-carbon-homes-and-green-gas/> which will ensure that new UK homes will be built without fossil fuel heating from 2025. We think this underlines the need for the strategy to be ready for no fossil fuel inputs and for this direction of travel to be clearly set out at this Outline stage. This would set a long-term, site-wide framework for the development whilst ensuring flexibility for the deployment of a range of appropriate technologies to be deployed at each phase. We therefore question the statement in the Energy Strategy that natural gas should be specified for first phases of homes and have reservations about the sustainability of this approach. The strategy also concludes that reusing site food waste would not be viable and that a collection facility would be required. We refer back to our earlier comments regarding the loss of an existing waste site (with permission for Anaerobic Digestion) at Otterpool Quarry. We support the conclusions regarding the potential to exploit waste heat from the sewer mains and would like to see a firm commitment to these measures. Changes are required to align this with an integrated solution to water management. This is consistent with the LPAs clear preference, expressed elsewhere in this report, that a site-wide approach to water incorporating an on-site water recycling treatment centre represents the most sustainable and integrated long-term option.

It is clear from the analysis of heat network options that it would be hard to finance the required heat network infrastructure, carbon savings from any initially installed gas CHP engines are likely to fall rapidly, and that alternative heat generation plant is relatively expensive and risky. Further study and effort to implement a heat network might be warranted if it offered significantly greater or longer lasting carbon savings than other alternatives. However, comparison with dwelling based solutions suggests that packages of measures combining high fabric energy efficiency standards and renewable energy technologies offer equivalent carbon savings that are more robust in the medium to long term, and at lower up-front capital costs than a solution based on district heating. We question the way in which the counter-factual heat network options presented assume no grant funding as a number of public funding opportunities are available which could transform the projected IRR. We would support further

exploration of more innovative models. We highlight the idea of a hydrogen fuelled network for this development and existing communities and note that SGN are interested in partnering with interested parties for hydrogen trials, which could be class-leading example. We think this is worthy of further exploration. Notwithstanding this option, we concur with the overall conclusions.

### *Be Green*

The projected reduction in grid electricity emission factors underlines the need to maintain flexibility to allow each phase of development to adopt the most effective package of technologies at the time it comes forward. In the early phases, good fabric energy efficiency standards, air sourced heat pumps, PV and solar water heating represent a cost effective approach to meeting the proposed carbon targets. The Strategic Design Code should seek to ensure that suitable amounts of unshaded roof area for PV will be available, either in banks on flat roofs or on roofs with an orientation within 45 degrees of south and inclination close to 30 degrees.

The potential role of solar thermal appears to have been downplayed but could work well in combination with Air Sourced Heat Pumps. We think the application of this technology should continue to form part of the deployment of technologies at a phase level to achieve the most sustainable and deliverable solution. This is particularly the case where suitable roof space remains available. We support the suggestion of trials within a first phase.

If the grid decarbonises as projected, an excellent standard of fabric energy efficiency along with air source heat pumps will become an increasingly attractive solution. In that scenario, design guidelines should also seek to ensure that there is space for heat rejection equipment to be fitted outside the treated dwelling space and in locations that avoid visual impacts on the public realm.

The SAP emission factor for supplied grid electricity is currently 0.213 kgCO<sub>2</sub>/kWh; grid carbon intensity is projected to fall to ~0.114 kgCO<sub>2</sub>/kWh by around 2030. Savings from applying PV will fall as the electricity grid decarbonises, but there is scope to offset this by scaling up PV installation, i.e. using more of the available roof area up to the established practical limits. Savings from heat pumps are expected to rise markedly, and carbon savings from cheaper air source heat pumps start to outstrip those of gas CHP when grid carbon intensity drops.

The summary shows that the application of ASHP technology could meet the energy strategy targets proposed for Otterpool Park: 20% reduction in against Building Regulations (2013) on a site-wide basis and an aspiration towards zero carbon (regulated energy).

### *Be Smart*

We welcome the recognition that smart technology could play a part in reducing energy and carbon emissions. We think this should be incorporated into the wider approach to monitoring and underline our view that a site-wide integrated water management approach offers the potential for existing and new residents to view the

usage of water incorporating the internet of things, smart meters and latterly blockchain technology.

Overall, whilst there is a thorough discussion of possible options and related policies, the strategy lacks a clear direction of travel and the conclusions need to further narrow down to a preferred option. It is acknowledged that this is a very fast changing field in technology but revisions are required to ensure development will be ready for no fossil fuels and is fully integrated with a site-wide water management approach. Once the techno-economic model is clarified this will help to provide a clear pathway for the development in terms of an energy preference whilst retaining flexibility for the deployment of a range of renewable technologies at a phase level.

### *Integrated water management*

The scale of a new settlement creates a unique opportunity for a step change in the provision of water supply, wastewater treatment and water infrastructure. Water issues in general are a common theme in consultee responses and we concur with the call for a holistic approach to water management by Hythe Town Council. We welcome the applicant's commitment to extensive pre-application discussions with a wide range of partners involved in the design, delivery and management of water and would like to see this continue.

We think Otterpool Park could become, subject to decisions at this Outline Stage, one of the country's leading examples of integrated water management, responding directly to consultation comments regarding water management. We think there is a clear synergy with long-term stewardship and an opportunity to build-in a philosophy and culture of sustainable water management from the outset, involving local schools and educating new residents on water conservation measures.

We also support the commitment to early progression of a detailed Water Cycle Strategy and think there is an opportunity to broaden this to a more holistic Integrated Water Management Strategy which sets a framework for how water and wastewater will be managed in the long-term.

The draft Water Resources Management Plan 2019 (dWRMP19), to which Affinity Water refer in their response to the application, was published in March 2018. This document sets out how the company intend to manage the balance between supply and demand for water over the next 25-year period (2020-2045) and beyond. Affinity Water encourage an adaptive planning approach which allows management of the available water resources more efficiently and enhances the ability to flexibly plan for a range of different possible futures. The plan endorses an approach that focuses on demand management and long-term regional strategic solutions. Innovative demand management options including supporting wide scale water efficiency through collaboration, behavioural change initiatives and media campaigns are specifically encouraged. We firmly agree with pursuing an innovative approach and believe Otterpool Park offers the ideal opportunity to pioneer this on a site-wide basis.

The application submission contains a 'basket' of potential water management options to meet the requirements of Policy SS8 of the Local Plan and the specific requirement to achieve a maximum use of 90 litres per person per day of potable water (including

external water use). The LPA welcomes the inclusion of land in the north-west corner of the masterplan area for a proposed water recycling centre but notes that three potential wastewater options remain with no preferred option identified. The expectation of the LPA is that a highly sustainable and innovative approach to water supply and water recycling will be secured at this Outline stage.

The LPA does not support a conventional approach, and strongly supports the provision of a new Onsite Treatment Works (Option 2). We see clear disadvantages in adopting a conventional approach by taking forward option 1 which would represent a missed opportunity. We think Option 2 should be taken forward now as a preferred option with a commitment to a work programme and exploration of funding opportunities. The LPA commits to working jointly with KCC, EA, Homes England and other partners to exploring forward funding opportunities to deliver the optimum solution.

### *Drainage and flood risk*

In relation to the Flood Risk Assessment, Drainage Strategy and relevant chapters of the Environmental Statement we refer to the detailed comments provided by Herringtons (please see Appendix G).

The assessment makes a number of recommendations, summarised below:

- Details should be submitted to demonstrate how the proposals can meet the requirements of the Sequential Test.
- The FRA should include a review of groundwater emergence and the potential impacts on the proposed development and surrounding area, suggesting any appropriate mitigation measures required.
- The FRA should include a review of climate change with respect to the watercourses crossing the site. The additional information provided should include an assessment of the impact associated with an increase in peak river flow and the report should reference any appropriate mitigation measures required.
- The flood extent should be re-defined using the results of the additional analysis discussed in the two points above. The revised flood extent should be used to refine the proposed layout of the site, ideally locating more vulnerable development in the areas at lowest risk of flooding.
- A full set of drainage calculations to support the submitted drainage strategy should be provided for review.
- A detailed drainage layout plan and accompanying drawings should be submitted in support of the proposed drainage strategy. The information provided should include an appropriate level of detail with respect to the proposed discharge points and an assessment of the localised drainage sub-catchments across the study site, based on the topography.

- Considering the extent of development and the potential impact with respect to surface water flooding, it is recommended that the Lead Local Flood Authority are consulted to discuss the preferred options for draining the development.
- The ES assessment should account for future changes in the water environment, taking in to consideration the increased risk of fluvial flooding attributed to climate change.
- Additional, more detailed analysis will be expected to be submitted once a masterplan has been prepared.

### *Waste management*

The LPA wish to see a Waste Strategy that includes initiatives to reduce household waste and increase recycling rates to a standard that is significantly better than established towns in Kent. Overall, we feel the strategy could be more ambitious in its response to Policy SS8 (f). We feel the current strategy targets current rates of recycling rather than pushing beyond 60%. The bring sites provision would need to be reviewed as this replicates the domestic household collection scheme rather than offering alternatives. We would support innovations such underground bins for flats although it would be a question of scale of properties served and at what stage they would be built.

We recognise that waste infrastructure and additional capacity for waste management is an issue for Otterpool Park and across Kent more widely. We refer to Kent County Council's response in respect of this issue.

The application includes proposed redevelopment of the existing waste site at Otterpool Quarry and therefore Policy DM8 of the Waste and Minerals Local Plan: *Safeguarding Minerals Management, Transportation & Waste Management facilities* is engaged. This sets out the only circumstances where non-minerals and waste development proposed within or in proximity to (within 250m) safeguarded minerals management, transportation or waste management facilities would be considered acceptable.

Proposals applicable under this policy will need to provide assessment information, as appropriate to the nature and scale of the proposed development, in a Minerals and Waste Infrastructure Assessment. This is not addressed in the Planning and Delivery Statement and the LPA repeats the requirement for this to be completed.

## **12. Community Facilities & Infrastructure**

We refer to KCC's comments relating to infrastructure delivery. The LPA agrees with KCC that it is important to adopt a monitor and manage approach to education provision. This will allow flexibility and additional land to meet unexpectedly high demand. This land would be safeguarded using s.106 obligations until such time as it is shown that it will not be needed. We refer to the requirements set out by KCC and the agree that this should include provision within the masterplan (and therefore parameter plans) for a second secondary school as modelling produced by KCC suggests this could be required over the course of the build out. In these

circumstances it is better to 'over-provide' and monitor over the course of the development.

### *Health and education*

We refer to KCC for specific requirements in respect of education. It will be necessary to establish an Education Review Group through the s.106 agreement. We also refer back to earlier comments regarding the need for flexibility in site sizes (subject to minimum sizes provided by KCC) which should be reflected in the parameter plans. In addition, we have concerns about the current location of the secondary school relative to the proposed realignment of the A20. In reviewing the overall relationship between the town centre, A20 and other land uses we recommend a closer and more direct relationship between the schools and the town centre. This could be accommodated in a larger education and business campus close to the existing office space in Newingreen.

A wide range of consultee comments from the general public and other organisations underscored the importance of healthcare provision and the nationwide, and local, shortage of GPs. We support the applicant's ambition for health and wellbeing to be embedded into the design and delivery and particularly welcome the pursuance of a new model of healthcare that seeks to break down traditional partitions between services. We strongly support the Treatment Centre or Multispeciality Community Provider (MCP) model to provide a more integrated service outside of hospitals. We see the need for this to be delivered earlier than is currently proposed, or for temporary provision to be agreed with the CCG, and will seek to secure this through the legal agreement. We would like to discuss further potential locations.

## **13. Air Quality and Noise**

Please refer to detailed comments in the Temple Group report and comments from F&HDC Environmental Health (see Appendix H). We reinforce our view expressed at pre-application stage that the application needs to demonstrate compliance with the 'agent of change' principle introduced to NPPF2 which provides greater support for existing land use. Existing waste and employment sites enjoy policy support as existing /permitted land uses and specific attention is drawn to the NPPF requirement that 'unreasonable restrictions' should not be placed on existing businesses as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed. Further safeguards are needed on this point through the Spatial Principles document requested elsewhere in this report. This also needs to address the noise issues raised by Temple Group in its review and incorporate other ES mitigation measures.

## **14. Contaminated Land**

We refer to the advice note provided by Idom (please see Appendix I). The report supports the conclusions of the technical reports relating to land contamination and recommends a series of planning conditions detailed in the report. These should be



implemented on a phased basis, with each phase only required should a potential risk be identified by the preceding phase.

### **15. S106, Implementation and Monitoring**

We reiterate our previous request for a note outlining the applicant's proposed approach to the s.106. One of the factors relevant here will be the Council's dual role as LPA and owner of part. The Local Planning Authority will also need to understand the likely direction of travel for the arrangements between the landowners before we can advise on the best way of structuring the obligations. There are different ways of approaching this but the LPA is clear that a robust mechanism is required that avoids the Council covenanting with itself. We refer again to our earlier comments regarding the need for urgent clarity on the overall approach to delivery before any progress can be made in this area.

Subject to the above matters being resolved, progress on the s.106 will need to align with a revised timescale for determination of application and reflect identified mitigation and the overall planning balance. A range of factors will influence what can be addressed via S.106 and any parameters/limitations (beyond standard test of reasonableness. A full review of all potential s.106 'asks' resulting from consultation responses will need to be undertaken. The Temple Group EIA mitigation list also provides a useful starting point for matters to be agreed through condition and/or legal agreement but this will need to be reviewed again following any revisions to the application. We wish to draw specific attention to the 'legacy' arrangements and management, maintenance and governance arrangements. The approach to long-term stewardship will need to be clarified and work towards a preferred option front-loaded in order to make progress on s.106 matters.

#### *Conditions and monitoring*

We appreciate the likely desire to streamline conditions in accordance with the national policy direction and support the general aim for minimal 'hurdles' by avoiding unnecessary conditions to get investment underway. However, we also underline the need for technical details to be worked up in a structured and efficient way to avoid abortive work. We propose a broad approach to planning conditions that we believe will secure the right level of detail at the right stage whilst minimising the potential for continuous review and amendment, particularly the need for future S.73A applications which could be onerous for the Local Planning Authority and challenging to monitor.

The OPA will be subject to detailed conditions and obligations to ensure that the development is built and managed in accordance with the policy requirements and commitments made by the applicants through the planning process. This will be supplemented by the Tier 2 work and design codes, which will be required by enforceable planning conditions and with which the detailed proposals for plots and buildings will need to be consistent. There will also be bespoke review groups including key stakeholders (for example of Transport and Education) which will monitor the delivery of the development and triggering and delivery of mitigation measures.

The LPA recognises the monitoring and enforcement of these conditions and obligations are of major importance to both current and future residents who will want

to be sure that all developers deliver what they have committed to. In normal circumstances, the developer pays a charge to the Local Planning Authority (LPA) which then monitors the discharge of conditions and Section 106 obligations. We think there is scope to explore a more transparent model of monitoring in an open source format that it capable of being made digital to make it easier for residents to understand and monitor the timing and delivery of critical infrastructure. This could involve the establishment of a website, or online platform which identifies the status of all conditions, and reports from review groups, and presents all the information submitted to the LPA. There is also the potential for conditions to be regularly reported on to a Steering Group, or successor body and/or the Community Bodies. This transparency would help ensure that standards are adhered to and where necessary enforced.

11 July 2019  
Case Officer - James Farrar

## Appendix D – Employment Opportunities Study

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**LICHFIELDS**



# Otterpool Park Garden Town Employment Opportunities Study

Shepway District Council

**Stage 1 Draft Report**

July 2017



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# Structure

## **1 Introduction**

2 Context

3 Economic drivers

4 Location factors and site attributes

5 Strategy and action plan

6 Conclusions

# 1. Introduction

## Lichfields was appointed by Shepway District Council to assess the potential employment opportunities that could be delivered at Otterpool Park

### Introduction

Shepway District Council (SDC, “the Council”) commissioned Nathaniel Lichfield & Partners (“Lichfields”) to prepare an assessment of the potential employment opportunities that could be available from the development of the Otterpool Park garden town in the vicinity of Junction 11 of the M20 motorway.

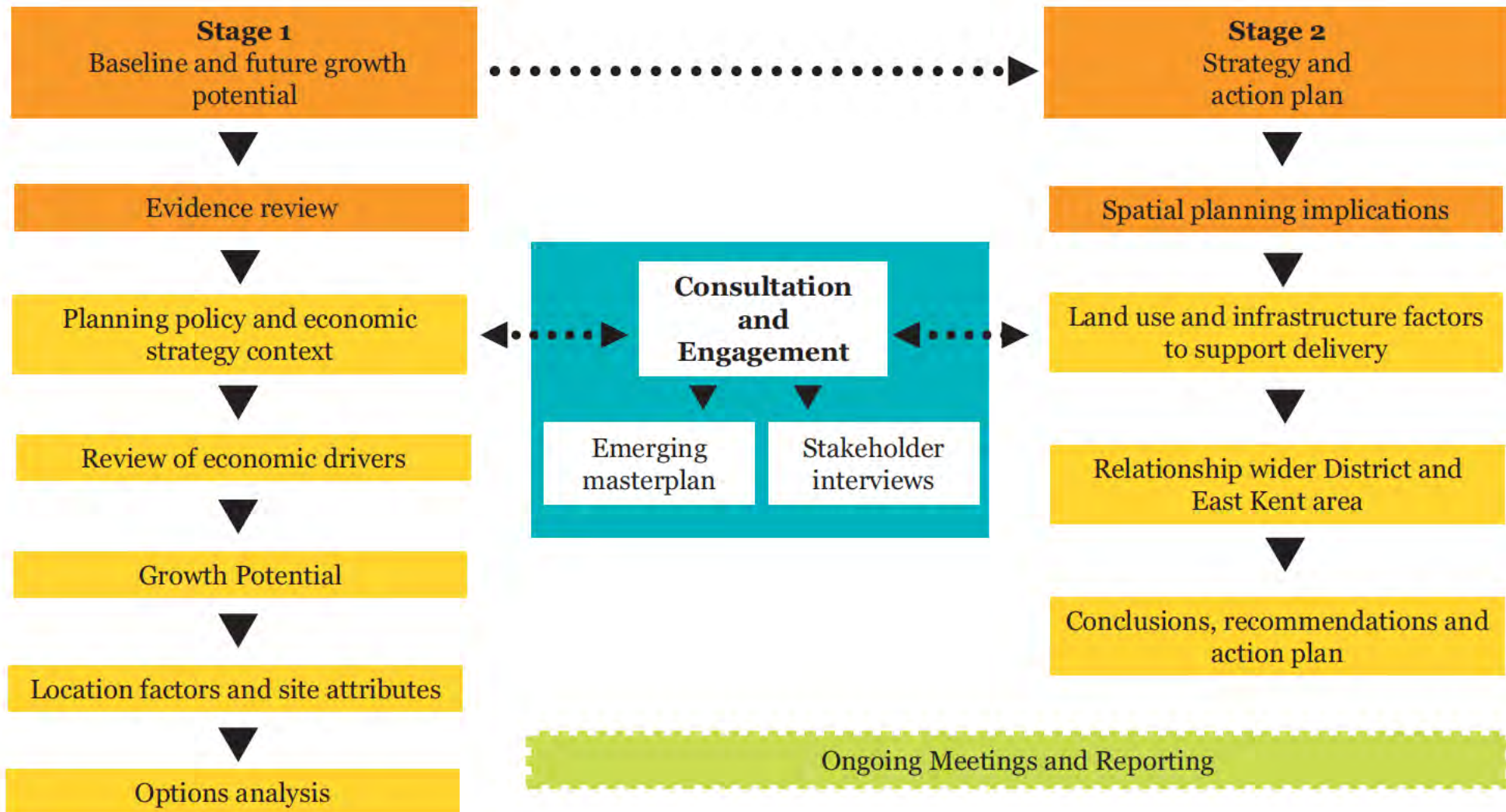
Specific requirements of the brief include:

1. Identifying the scope for employment provision within the area identified for strategic level growth associated with:
  - Growth of at least 6,500 new homes by 2037
  - Future growth beyond the Local Plan period of 2037
  - The potential to attract significant new inward investment to the area which will support the aspirations for economic growth set out in the Shepway Economic Development Strategy, as well as what other potential exists for growth in the area around Junction 11 and Westenhanger station associated with a new settlement
2. Considering the type, nature and sectors of the employment opportunities, including those associated with new and emerging markets, which could be attracted to the area. This should include the potential to attract institutional and public sector service uses.
3. Identifying the features that would make the area more attractive to inward investors, the sectors with particular potential to attract and how these opportunities might translate into Otterpool Park’s USP.
4. Considering the spatial planning implications of the employment opportunities identified and how these should be dealt with in the context of developing the masterplan, including the scale, nature and location of employment provision.
5. Considering the relationship between housing type and employment to ensure the homes meet the needs of prospective employers.
6. Setting out the implications for the following to realise the employment opportunities identified:
  - Infrastructure requirements
  - Public sector interventions
  - Private investment
  - Training and education provision
  - Planning policies for the new settlement
  - Approach towards ad hoc emerging proposals
7. Provide guidance on activities, next steps and a time plan to realise the employment opportunities identified.
8. Consider the impact of realising these opportunities on the rest of Shepway District and wider East Kent area and what actions and measures should be undertaken to mitigate any potentially negative impacts.

The overall methodology for the study is shown overleaf. This draft report presents the findings of the Stage 1 analysis only (up to item 3 above), which at this time has not included any external consultation and engagement, but has had regard to ongoing masterplanning work being prepared by a wider consultant team.

# 1. Introduction

The study follows a two-stage approach to define the employment opportunities associated with Otterpool Park and the potential strategy for delivery





# 1. Introduction

## The Expression of Interest document sets out the

### Basis of assessment

The purpose of the study is to provide a long-term strategic perspective on policy, economic growth and market demand factors that could support the basis for developing new employment opportunities at Otterpool Park. It is prepared in the context that detailed masterplanning and other technical work is currently in progress, including staged public consultation on the emerging proposals.

Definitive locations and site boundaries are yet to be confirmed, and therefore references in this report to 'study area' refer to the general location parameters as set out in the SDC Expression of Interest document submitted to Government.

The assessment draws on a review of existing policy and related evidence base reports, a range of economic and property market data including:

- Office for National Statistics
- Valuation Office Agency
- Experian proprietary employment and GVA datasets (2016 base)
- Locate in Kent inward investment data.

An important consideration for any work of this type is that it is inevitably a point in time assessment. The work has incorporated the latest data, assumptions and other available evidence at the time of preparation. The accuracy of data derived from third party sources have not been checked or verified by Lichfields.

It should be noted that the findings of this assessment do not represent formal policy of Shepway District Council and are subject to due statutory processes, including relevant planning and other factors.

### Structure of report

This report is structured as follows:

- Section 2.0 sets out the **context** for the Otterpool Park Garden Town;
- Section 3.0 reviews the **economic drivers** that will influence the future economic role of Otterpool Park;
- Section 4.0 considers specific **location factors and site attributes** relevant to the economic planning of Otterpool Park;
- Section 5.0 sets out a **strategy and action plan** to help frame the future delivery of employment opportunities at Otterpool Park; and
- Overall **conclusions** are set out in Section 6.0.

# Structure

1 Introduction

**2 Context**

3 Economic drivers

4 Location factors and site attributes

5 Strategy and action plan

6 Conclusions

Appendix 1

## 2. Context

### Otterpool Park is a proposed new settlement comprising of 12,000 new dwellings and jobs close to Junction 11 of the M20 located in Shepway District, Kent

#### Expression of Interest

In response to the Government's prospectus for [Locally-Led Garden Villages, Towns and Cities](#), in June 2016 SDC submitted an [Expression of Interest](#) for a new garden town referred to as Otterpool Park. The proposal is for a completely new settlement comprising up to 12,000 dwellings and new jobs close to Junction 11 of the M20 and Westenhanger railway station. The Minister for Housing and Planning announced on 11 November 2016 that Otterpool Park would be included in the new settlements programme.

The Expression of Interest was made without prejudice to any future decisions by the Council in its capacity as local planning authority. The Council is a landowner in the area and is working with another major landowner, Cozumel Estates (owners of Folkestone Racecourse) to prepare a comprehensive masterplan.

The [Core Strategy](#) for Shepway District was adopted in 2013. The Places and Policies Local Plan, which identifies specific sites for employment and houses in the District is currently subject to consultation. This proposes an additional 2,500 new homes and it is envisaged that the final version will be adopted in 2018.

Alongside the completion of the Places and Policies Local Plan, SDC is undertaking a partial review of the Core Strategy. The [Strategic Housing Market Assessment](#) (SHMA) identifies an objectively assessed need for additional dwellings. Therefore a strategic review of the opportunities and constraints for growth in the District was commissioned having regard to the need to accommodate additional housing.

Accordingly, the Council published the [Shepway Growth Options Study \(Phase 2\)](#) in April 2017. This study identified possible options for future growth to inform a high-level spatial strategy that can provide the basis for new planning policies that will be a central element of the partial review of the 2013 Core Strategy. The study confirmed the suitability of the proposed Otterpool Park garden town location (referred to as 'Area B') for strategic development, including economic development uses, subject to landscape and other mitigation measures.

#### General Location

The Otterpool Park study area comprises c.700 ha of land located to the west of Shepway District. The towns of Folkestone and Hythe are located to the south east with Ashford to the north west. The site adjoins the M20 and railway line to the north. Four settlements are within the study area. Westenhanger to the north where, aside from the castle and station, existing buildings are primarily residential use. Lympe is a residential settlement which lies to the south east of the site and is partially included within the area of search. Barrow Hill and Newingreen are small residential settlements to the north west and east of the site respectively.



Source: SDC Expression of Interest

## 2. Context

**Otterpool Park is highly accessible to existing infrastructure with connections to the wider south east and continental Europe, and established commercial centres**

Otterpool Park is located adjacent to **Junction 11** of the M20, and is currently served by rail services via **Westenhanger** station. The potential for High Speed 1 services to stop at Westenhanger is currently being investigated.

There is an existing commercial space at **Lympe Industrial Estate** which accommodates a range of light industrial and warehousing activities. Local road access to link this site to Junction 11 was completed in 2010. Planning permission also exists for this site to be expanded.

**Hythe** is the closest existing settlement to Otterpool Park and functions as a small service centre. It has a current population of about 20,200 people.



Source: Google Earth /  
Lichfields analysis

The entrance to the **Channel Tunnel** is located at Folkestone, just along the M20 from Otterpool Park. The UK's busiest ferry terminal at the **Port of Dover** is also located about 14 miles along the M20 to the east.

**Folkestone** is the largest urban centre close to Otterpool Park, and is the primary commercial centre within Shepway District with a range of existing industrial estates and some town centre office provision. Major regeneration of the harbour area is now underway.

## 2. Context

# The 'Guiding Principles' for Otterpool Park provide a framework for how economic sustainability will be achieved within the Garden Town

### Guiding Principles

The Council's Expression of Interest sets out a number of 'Guiding Principles' for Otterpool Park which capture the three aspects of sustainability. These principles represent the starting point for designing a high quality, sustainable new community.

In relation to economic sustainability, the key principles are:

- Maximising the opportunities for strategic new employment space in close proximity to junction 11 of the M20, and to provide a range of modern employment types and spaces within the new settlement to support a mixed-use community.
- Provision of an ultra-fast IT enabled community, which includes adaptable homes with dedicated space for home-working, as well as modern business space.
- Maximising investment in and the use of infrastructure assets already available in, or in close proximity to the site (i.e. HS1, Junction 11 M20, Channel Tunnel, Dover Ports), which provide excellent road and rail access to London and to mainland Europe, including the upgrade of Westenhanger Railway Station to be a high quality transport interchange.
- Creating an attractive village centre, offering a new high street as a core feature and heart for the garden settlement.



Source: SDC Expression of Interest

## 2. Context

### Existing policy and evidence supports the need to grow and diversify Shepway's economy, and improve the quality of the District's employment land offer

#### Shepway Economic Development Strategy

The Council published an [Economic Development Strategy](#) in 2015 which set out ambitions for economic growth in the District for the period to 2020. The key priority is to boost the local economy and increase local job opportunities through a number of actions including increasing the supply and quality of employment land within the District:

1. **Building on existing economic strengths** – promoting key sectors such as financial services, creative industries, business and professional services, transport and logistics, energy, tourism and culture, and advanced manufacturing.
2. **Boosting productivity and supporting business growth** – encouraging more business start-ups, supporting businesses to grow, attracting new businesses and providing infrastructure such as high-speed broadband.
3. **Promoting further investment** – identify and bring forward appropriate sites for commercial development, particularly around the three M20 junctions and within Folkestone Town Centre, encourage new and higher quality employment space, maximising use of the Council's property and other resources as well as scope for public sector intervention to help bring forward development sites.
4. **Improving education and skills attainment** – extend the Council's apprenticeship scheme and work with education and training providers to meet employers' needs.

These actions reflect the vision set out in the SDC [Corporate Plan 2013-18](#) which specifically includes an objective to boost the local economy and increase job opportunities. This includes commitments to increasing the supply of office and industrial land within the District, alongside initiatives relating to business support and skills development.

#### Shepway Employment Land Review

The latest Shepway Employment Land Review was produced by Lichfields on behalf of the Council in 2017. This included an assessment of the economic growth needs of the District to 2033 (i.e. the current Core Strategy period), a review of commercial market factors and appraisal of the existing portfolio of sites. Relevant key findings can be summarised as follows:

1. The Shepway economy has recorded relatively strong employment growth over recent years when benchmarked against the regional and national growth levels. This includes buoyant job creation in the District between 2006 and 2016, which represents the first half of the Core Strategy Local Plan period.
2. One of the main strengths of Shepway as a business location relates to its lower business and rental costs compared to other locations in Kent and the wider South East, which brands the District a cost competitive location for occupiers. However, the lower rental values in Shepway also have the opposite effect on speculative developments due to viability issues.
3. Identified weaknesses of the local economy include a lack of good quality commercial space that meet modern occupier needs. This means the District is generally self-contained in terms of local businesses operating in mostly local markets, with few inward investments.
4. A key challenge relates to the delivery of new, modern office space in Shepway that meets the needs of both existing and prospective occupiers in the local market. In the absence of modern office space coming forward in the local market, the risk remains that Folkestone, and the District more widely, would be unable to retain or attract new firms to the District.
5. It will be important to ensure a good range of industrial sites and premises are provided across the District to better support the requirements of local businesses. In the absence of this, there is the risk of the District losing businesses to other locations in Kent due to the existing industrial space not being of the type or quality to meet modern requirements.

# Structure

- 1 Introduction
- 2 Context
- 3 Economic drivers**
- 4 Location factors and site attributes
- 5 Strategy and action plan
- 6 Conclusions

### 3. Economic drivers: overview

We have identified four key economic drivers that will influence the potential economic role of Otterpool Park

#### Economic drivers

We have identified four key economic drivers that will influence the potential economic role of Otterpool Park, as follows:

- 1. Garden town opportunities** – as a new planned settlement with high sustainability credentials, Otterpool Park represents a unique opportunity to develop a new high-value employment base with specialisms in industries which can benefit from a garden town location.
- 2. Local economy and property market** – the local economy and commercial market within which Otterpool Park could operate and the key trends that will influence the type and scale of employment space that might be delivered.
- 3. Inward investment potential** – as a new location, sources of inward investment are highly relevant to how Otterpool Park may grow and evolve as a location, including the extent to which it may compete with other locations for investment.
- 4. Sector growth opportunities** – as a long term project, Otterpool Park has the opportunity to frame a strategy that is future-facing in terms of advances in technology, research and innovation. It is important to understand how Otterpool Park might be able to capitalise on these opportunities.

The remainder of this section provides analysis for each of these four drivers, with an overall synthesis set out at the end of the section.



Source: Lichfields analysis



### 3. Economic drivers: garden town growth opportunities

## Access to a range of employment opportunities was a founding feature of the garden city movement and successive generations of new towns

#### Garden Cities and New Towns

The origins and evolutions of garden towns and cities is set out elsewhere (see for example [New Towns and Garden Cities – Lessons for Tomorrow](#)) and so is not repeated here. Good connectivity and access to employment opportunities has been a guiding principle since Ebenezer Howard's famous 'three magnets' diagram was published in 1909.

The Garden City pioneers aimed to separate housing and industrial areas, but excellent pedestrian and transport links would allow people to walk to work or take public transport. This approach very much shaped the way in which Letchworth Garden City (1903) and Welwyn Garden City (1919) were developed.

Similar principles were applied in the post-war programme of 'New Towns'. The terms 'Garden City' and 'New Town' are often used interchangeably. However, there are significant distinctions. Garden Cities were delivered by private, limited-profit development companies with start-up funds at philanthropically low rates of interest; the New Towns by government using Development Corporations devised for the purpose, funded by Treasury loans repayable in due course with interest. The New Towns applied many of the principles of Garden Cities, such as land value capture (with receipts to HM Treasury), comprehensive green infrastructure, a commitment to community development, an emphasis on arts and culture, and employment opportunities for all within easy reach of home. However, the New Towns were developed at a larger scale and a faster rate of delivery.

The New Towns were also designed to be well connected, but the objective of also being 'self-contained' in terms of employment and economic life was laid upon many of them. This was a reaction to the possibility of commuter towns or dormitory suburbs being developed, but, in reality, every town has a daily flow of people in and out for various purposes. Many new settlement concepts have failed to fulfil their original economic ambitions, which often draw upon unrealistic assumptions about 'self-containment'. They also assumed that the offer of plentiful land for industry would support relocations and that the future of work lay in out-of-centre, low density business parks.

Location is therefore critical to the economic role of a garden town. If it is close to a town with an existing economic base and clear economic rationale to grow its stock of businesses (which many locations will choose to do given the ability to retain local business rates), it may not be economically coherent for the garden town to plan for extensive new employment areas. Rather, it should be expected that many economically active residents will be commuting outwards to work - the garden town therefore has a crucial role in supporting growth in the nearby large towns and across the wider functional economic and market area.

However, it is entirely realistic to expect that any garden town will have an employment base consistent with the local 'consumption-led' economy of its residents - jobs in schools, local services, retail, leisure - as well as an assumption that it will accommodate other businesses seeking a relevant location, and home-working. The latter depends on scale, proactive planning to attract new investment and ensuring complementary with the wider spatial strategy for a given location.

The economic strategy for garden towns is therefore likely to have four elements:

1. Using construction to provide opportunities for jobs and training for those who will most benefit from the sector's role providing a gateway to employment.
2. Creating a local employment base, in shops, services, and local business employment to help maximise local sustainability.
3. Developing a clear strategy to attract investment, and support start-up and scale-up business opportunities.
4. Providing good access to other established centres of employment through public transport and good highway access, particularly with a complementary function.

The following pages summarises the economic planning experience at a number of developed and emerging new settlement and urban extension locations.

### 3. Economic drivers: garden town growth opportunities

A review of existing garden towns and new settlements provide some indications for the type of economic strategy that could be pursued at Otterpool Park



#### Alconbury Weald

Alconbury Weald comprises a 575 ha former airfield, with 5,000 dwellings and 8,000 jobs proposed. It is located north-east of Cambridge, at the junction of the A1(M) and A14.

The site will provide 290,000 sq.m of employment floorspace, with 80,000 sq.m in the first phase. Part of the site is a designated Enterprise Zone. The Alconbury Enterprise Campus (see overleaf) provides high quality and flexible business space, with a focus on life sciences, high value manufacturing and advanced engineering. The economic strategy is to focus on the existing sector strengths of the area, including the Cambridge Cluster. The 'EDGE' local business and skills initiative was introduced in 2017 to help businesses recruit and train staff.



#### Bicester

The North West Bicester eco-town received planning permission in 2012, and comprises 6,000 dwellings on the edge of Bicester.

The Masterplan makes provision for circa 4,000 jobs to be created on site. 2,000 at the proposed business park in the South West corner of the site, to be designed in-keeping with the wider eco-development principles. This site was chosen as the most accessible location. 1,000 local service jobs will be generated within the proposed community and business hubs including schools, retail, the health centre and eco-business centre. A further 1,000 home-based jobs with space to enable home working and access to 100mbps broadband will be supported.



#### Cambourne

Cambourne is a new settlement located 9 miles to the east of Cambridge. Outline planning permission was granted in 1996 for 4,250 dwellings, and a further 2,350 dwellings were approved in 2017.

Employment provision comprises Cambourne Business Park where c. 28,000sq m of office (B1a) space has been developed to date out of the total 70,000sq m proposed in the original masterplan. No B1 floorspace has been built at Cambourne since 2007. There is also some 3,000sq m of office space currently vacant on the business park. The prospects of Cambourne securing large scale B1a or B1b development now appear to be limited given the general lack of demand in this location.



#### Poundbury

Poundbury is an urban extension to the Dorset county town of Dorchester, built on the principles of architecture and urban planning as advocated by The Prince of Wales in 'A Vision of Britain'. Construction commenced in 1993, and is expected to reach 2,200 dwellings by 2025 when the site is fully built out.

The original masterplan was the creation of a mixed-use community. A buffer of B1 office space is designed to ensure no B2 space adjoins residential areas. There are currently 180 businesses based at Poundbury employing 2,000 people. The quality of premises and accommodation ranks highly amongst the reason why businesses have moved or set up within Poundbury (see overleaf).

### 3. Economic drivers: garden town growth opportunities

Existing garden towns and new settlements typically focus on achieving a higher quality type of employment development, but with range and flexibility of uses

#### Case study: Alconbury Enterprise Campus

Alconbury Enterprise Campus lies at the heart of the high quality low carbon development of Alconbury Weald, with Urban&Civic as master-developer. It offers flexible, bespoke business space between 12 – 46,450 sq.m.

The award-winning *Incubator* is the flagship building of the Campus. Designed by international architects Allford Hall Monaghan Morris, it provides flexible inspiring space for small and start-up businesses at the heart of the Alconbury Weald development. The building provides flexible space from 60–350 sq.m for research and development, production and office accommodation. It has been designed with a range of sustainable features to reflect the low carbon aspirations for the whole development.

#### Incubator building, Alconbury Enterprise Campus



Source: Urban&Civic

#### Case study: Poundbury commercial portfolio

Commercial premises are built to meet modern standards, with high BREEAM ratings, plentiful car parking and regular bus service connections to Dorchester town centre. There is a BT fibre optic connection to the site to accelerate IT connectivity. The mixed-use nature of the site supports a variety of everyday facilities close to the commercial premises, including restaurants, cafés, food and wine merchants, hairdressers, medical and other facilities.

Commercial occupiers have the opportunity to procure purpose built premises which conform to the Poundbury Design Guidance. Other premises are built by the major developers and are available to shell or fitted completion. Units vary between 50 sq.m –3,500 sq.m and extend from small workshops, offices and factories.

#### B2 Industrial Unit at Poundbury



Source: Duchy of Cornwall / RS Conibear

### 3. Economic drivers: local economy and property market

The Shepway economy has grown strongly since 1997 compared to the Kent and regional average, driven mainly in service sector activities

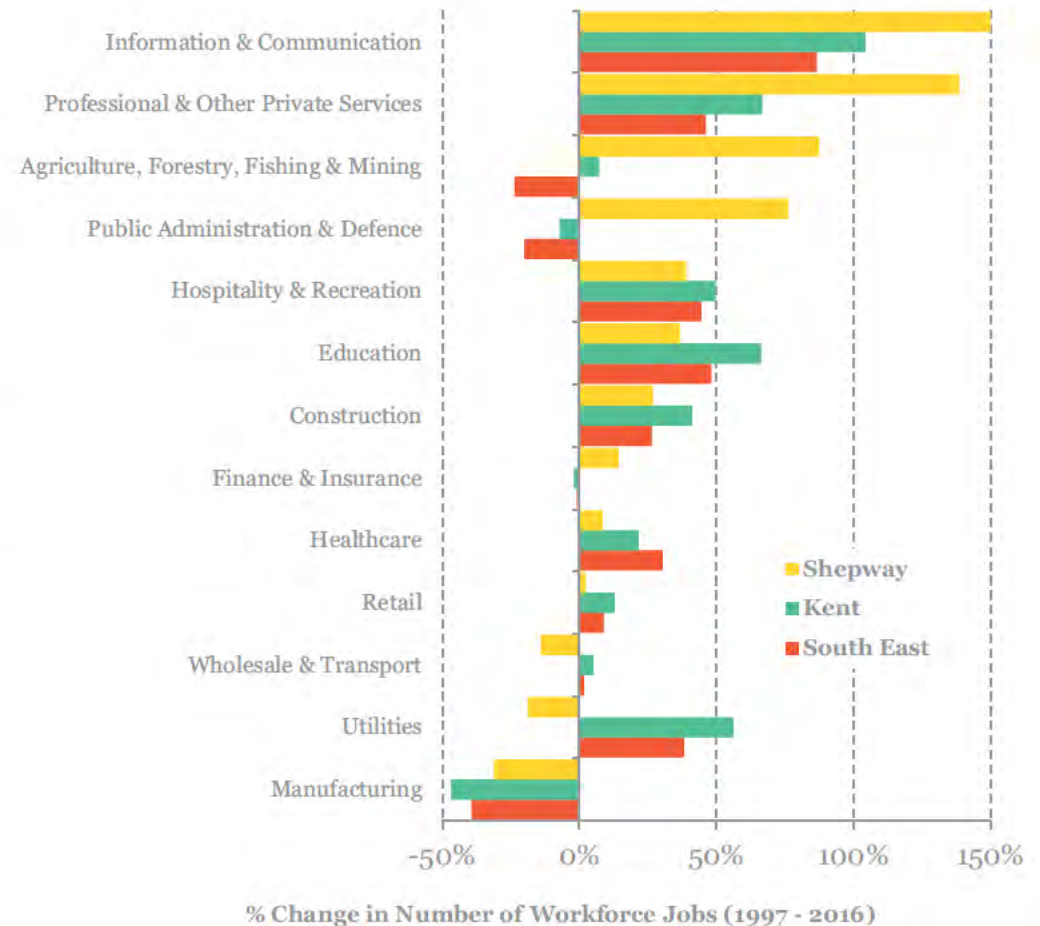
#### Job growth trends

Based on Experian data, Shepway supported around 48,200 jobs in 2016, which represented an employment growth of 27% over the period from 1997. This employment growth was much higher than the growth recorded in Kent (22%), the South East (19%) and the UK (19%).

The current largest employment sectors in Shepway are professional and other private services (22% share of total), healthcare (11%), hospitality and recreation (10%), retail (10%) and whole and transport (9%). The education (9%) and public administration and defence sectors (8%) are also important employers.

Employment growth in the District between 1997 and 2016 was mainly driven by professional & other private services (representing growth of 6,100 jobs), public administration & defence (1,600 jobs), hospitality & recreation (1,400 jobs) and education (1,100 jobs). It should be noted that about 67% of the employment growth registered in the professional & other private services sector in Shepway during this period related to the administrative & supportive services sub-sector. The information and communications sector has increased significantly in proportionate terms albeit from a relatively low base, registering growth of 300 jobs over this period.

At the same time, employment losses were recorded in wholesale & transport (representing a loss of 700 jobs), manufacturing (500 jobs) and utilities (300 jobs). However, the decline in manufacturing jobs in Shepway has been proportionately less than Kent and the wider South East over the same period.



Source: Experian (2016) / Lichfields analysis

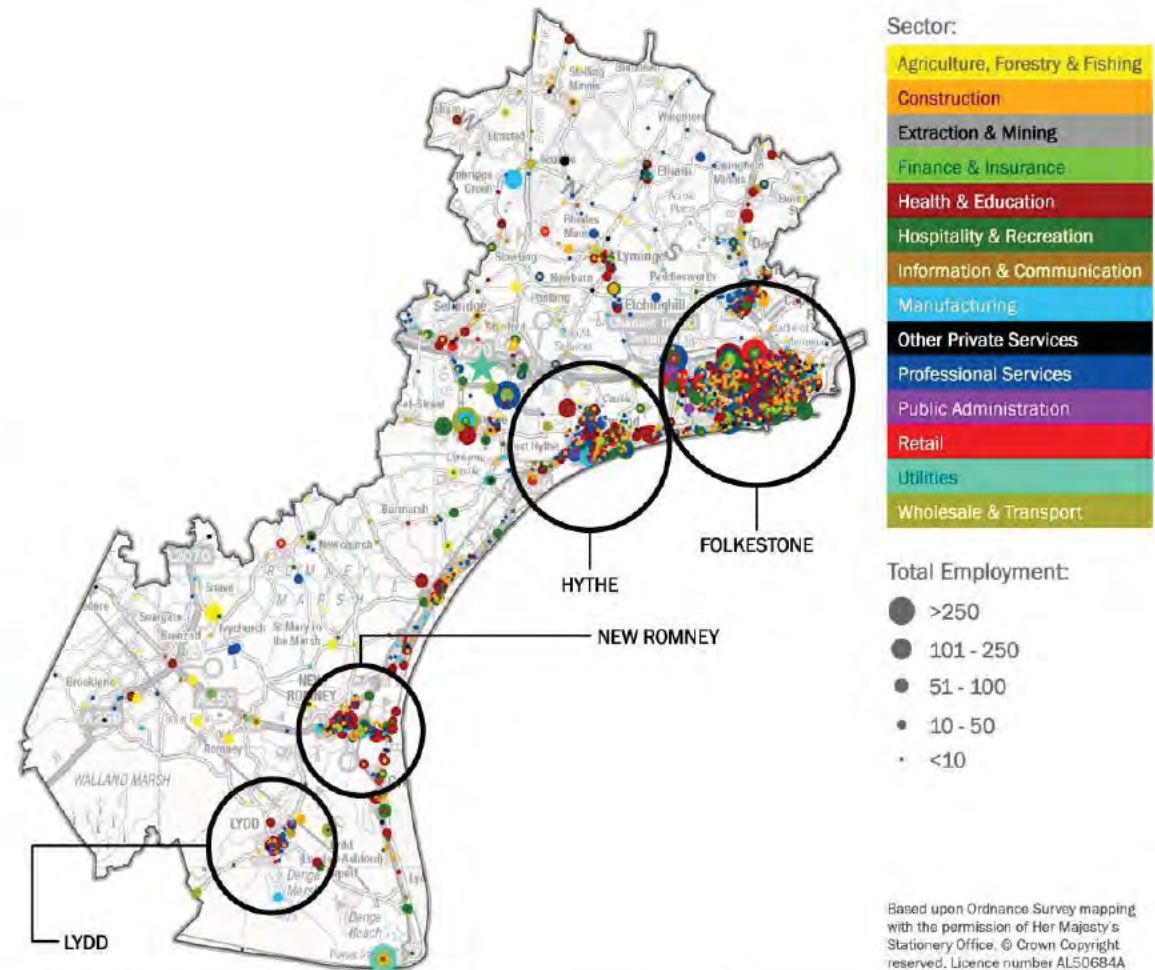
### 3. Economic drivers: local economy and property market

Shepway is dominated by a small-scale business base, mainly concentrated around Folkestone and Hythe and key transport routes including the M20

#### Business base

The local business base in Shepway is characterised as having a similar share of micro firms (0 to 9 workers) and a slightly higher share of small-sized firms (10 to 49) compared to regional and national levels. Shepway also supports a much lower rate of business start-up compared to the regional and national average, while the share of working-age persons in Shepway that are self-employed is slightly higher than in Kent, the South East and Great Britain

Analysis of the District’s business base underlines the significant concentration of business activity in Folkestone, with only smaller business clusters situated outside the town in Hythe, New Romney and Lydd. Folkestone town centre supports a concentration of retail and hospitality & recreation businesses, while also supporting a range of office-based sectors (e.g. professional services, finance & insurance, and public administration & defence). Other large business premises are also found in the main out-of-centre employment areas in Folkestone, including in Park Farm, Shearway Business Park and Cheriton Parc, amongst others. These significant employment areas, for the most part, are strategically located in close proximity to the M20, which makes them attractive to businesses requiring larger sites with good road access.



Source: Inter Departmental Business Register / Lichfields analysis

★ Otterpool Park location

Metric	Shepway	Kent	South East	Great Britain	
Business Size (2015)	Micro (0 to 9)	88.5%	89.1%	89.4%	88.7%
	Small (10 to 49)	9.9%	9.0%	8.7%	9.3%
	Medium (50 to 249)	1.5%	1.5%	1.5%	1.6%
	Large (More than 250)	0.3%	0.4%	0.4%	0.4%
Business Births per 10,000 Working-Age Persons (2014)	69	83	93	87	
Self-Employment (2015)	13%	11%	12%	10%	

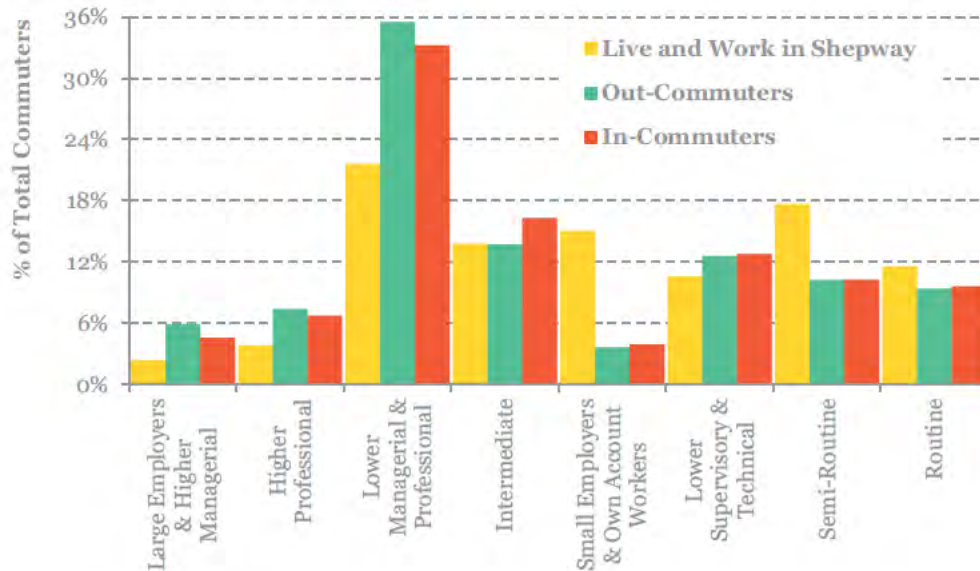
### 3. Economic drivers: local economy and property market

Shepway is a net exporter of labour with commuting linkages to surrounding parts of Kent and also London, however it has a relatively high self-containment rate

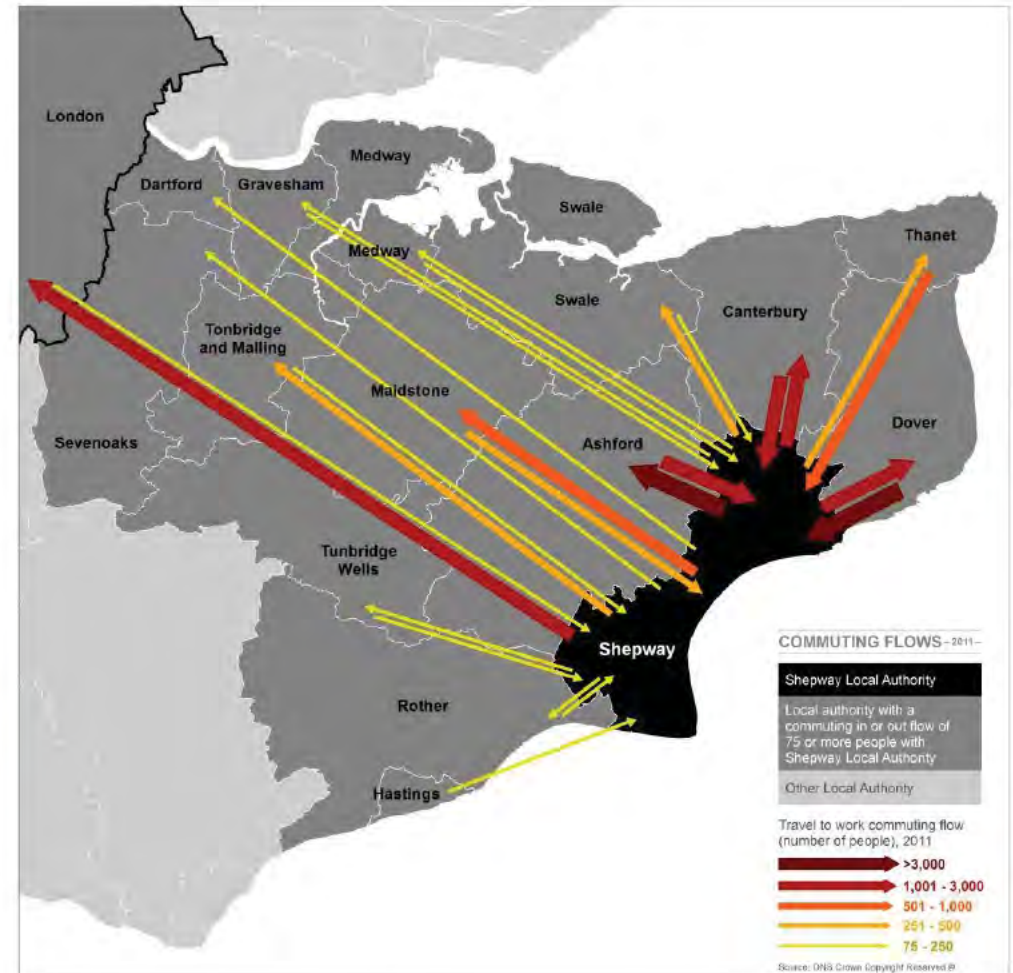
#### Commuting patterns

In 2011, around 31% of working residents in Shepway travelled outside the District for their work. The self-containment rate for Shepway (i.e. the share of residents who also work in the District) was therefore equivalent to about 69% in 2011, which is similar to the rate of 70% for the District at the time of the 2001 Census.

Shepway's workforce predominately live in the District (68%), Dover (13%), Ashford (8%) and Canterbury (3%). Shepway's residents are mostly employed in the District (69%), Ashford (10%), Dover (5%), Canterbury (4%) and London (4%). Overall, Shepway has a net commuting outflow of 3,920 workers. There was a slightly larger share of residents travelling outside the District for work in higher skilled roles, as shown below.



Source: 2011 Census / Lichfields analysis



Source: 2011 Census / Lichfields analysis

### 3. Economic drivers: local economy and property market

The current stock of employment space in Shepway mainly comprises industrial and warehousing premises, whilst Folkestone is the District's largest office centre

#### Stock of employment space

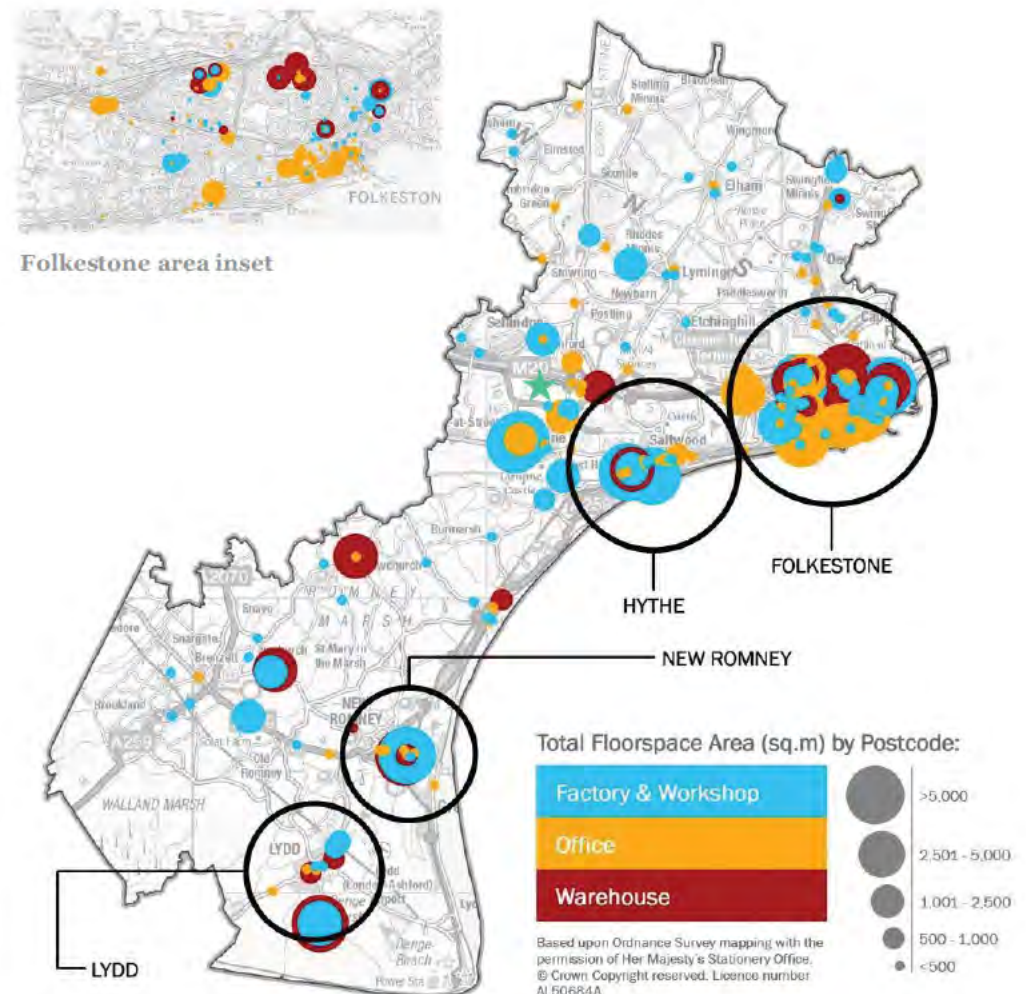
About 80% of employment space in Shepway comprises industrial uses (i.e. manufacturing and distribution), with long term trends indicating a gradual erosion of office space in the District and a gradual growth in industrial space. These recent development trends have resulted in the stock of B class employment space in Shepway remaining relatively static over recent years.

The stock of industrial space in Shepway is evenly split across factories and warehouses, with the District containing the second smallest stock of factories and the fourth smallest stock of warehouses in the sub-region. Shepway also supports the third largest stock of offices in the sub-region, with Ashford, Canterbury and Dover supporting the largest stock of office and industrial space, reflecting their profile as more established commercial office centres.

Available monitoring data confirms that the net completion of B class employment space in the District has been positive during recent periods, including a net gain of industrial space and a net loss of office space. The level of new development in Shepway was at its highest over the period 2002/03 to 2008/09 with the level of new development falling significantly after this period, which appears to coincide with the onset of the economic recession.

The existing employment space in Shepway is overwhelmingly focused in Folkestone. Based on the latest available VOA data, it is estimated that around half of all B class employment space in Shepway is supported in and around Folkestone. This includes around 76% of offices, 31% of factories and 60% of warehouses.

Outside Folkestone, approximately 26% of employment space in the District is found in the Hythe area, 17% in the Romney Marsh area and 3% in the North Downs area. Lympne Industrial Estate which forms part of the Otterpool Park study area stands out as a particular focus for larger warehousing uses given the proximity to the M20 corridor.



Source: Valuation Office Agency / Lichfields analysis

★ Otterpool Park location

### 3. Economic drivers: local economy and property market

Shepway currently has a relatively localised market reflecting indigenous demand, but with potential to diversify its offer and promote its business credentials

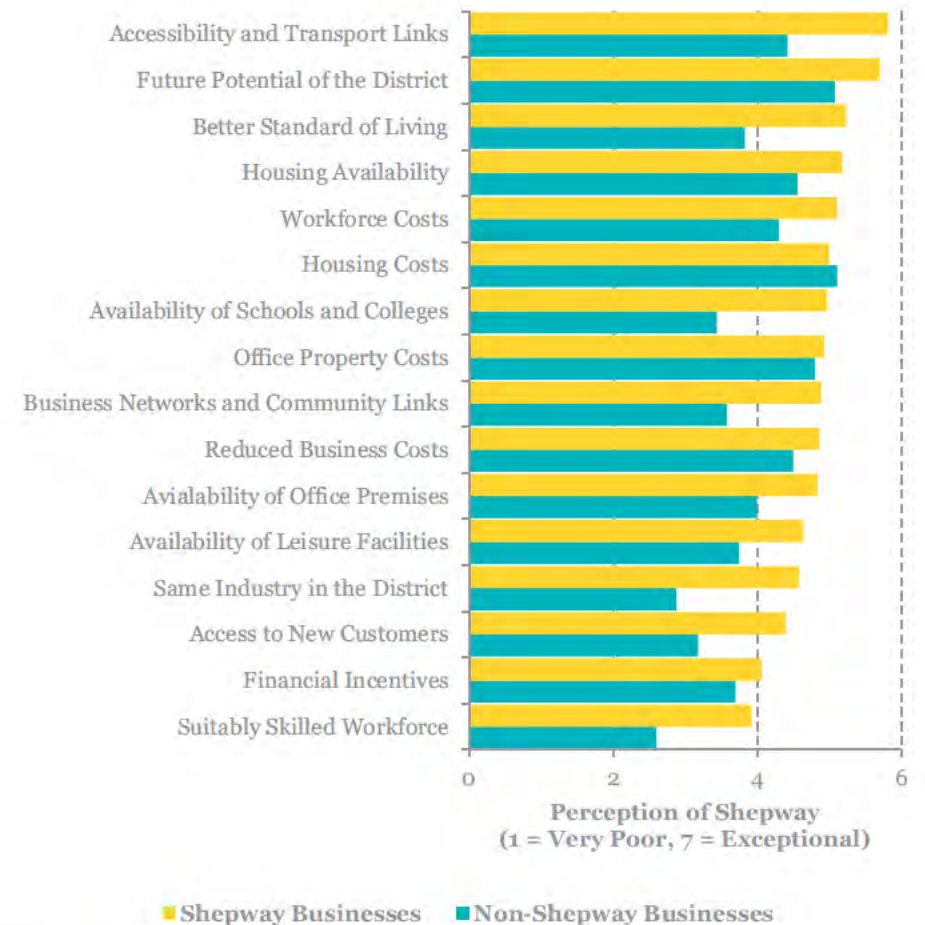
#### Commercial market demand and business perception

Shepway can be characterised as being fairly self-contained in commercial property market terms, with the District comprising three relatively distinct sub-market areas: Folkestone and Hythe, Romney Marsh, and the North Downs. The principal focus for economic activity in the District is in the main settlement of Folkestone, which benefits from its strategic location adjacent to the M20 motorway and Channel Tunnel terminal, as well as high-speed domestic rail services.

The majority of demand for office and industrial space in Shepway currently comes from local businesses looking for smaller commercial premises, with relatively few enquiries received from potential new entrants to the District. The Creative Quarter in Folkestone has been an important recent stimulus to demand for small workspace and increasing the profile of Folkestone more widely. Beyond this, a lack of new higher quality office and industrial premises has constrained levels of market demand.

Given the presence of Shepway within the M20 corridor, the town has some commercial property market overlap with Ashford to the west and Dover to the north. In particular, the feedback from agents consulted as part of the 2017 Employment Land Review indicates that Ashford plays a dominant role in the sub-region in regards to capturing footloose enquires for office and industrial space, which tends to draw many prospective occupiers away from Folkestone. The competitive advantages of Ashford were generally seen to be its good provision of high quality commercial space that meets the requirements of modern firms, as well as its excellent transport links and market perception as the principal commercial centre in Kent. However, these are attributes that high quality new employment provision at Otterpool Park could seek to emulate.

Recent surveys by Locate in Kent indicate that Shepway is more highly rated as a business location by existing Shepway businesses compared to non-Shepway businesses. Generally, businesses in Shepway rated the District highest on accessibility & transport links, future potential of the District, a good standard of living, housing availability and low labour costs.



Source: Locate in Kent / Lichfields analysis

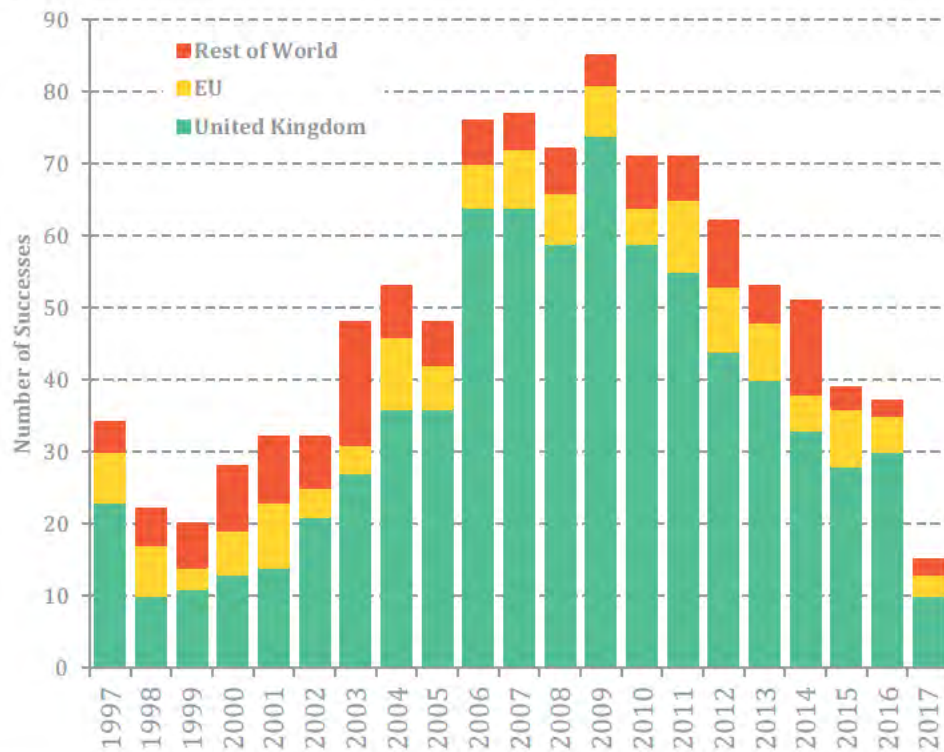


### 3. Economic drivers: inward investment potential

UK domestic investments are the main driver of inward investment in Kent, and generally locations with strategic site supply have attracted most investment

#### Inward investment successes by origin

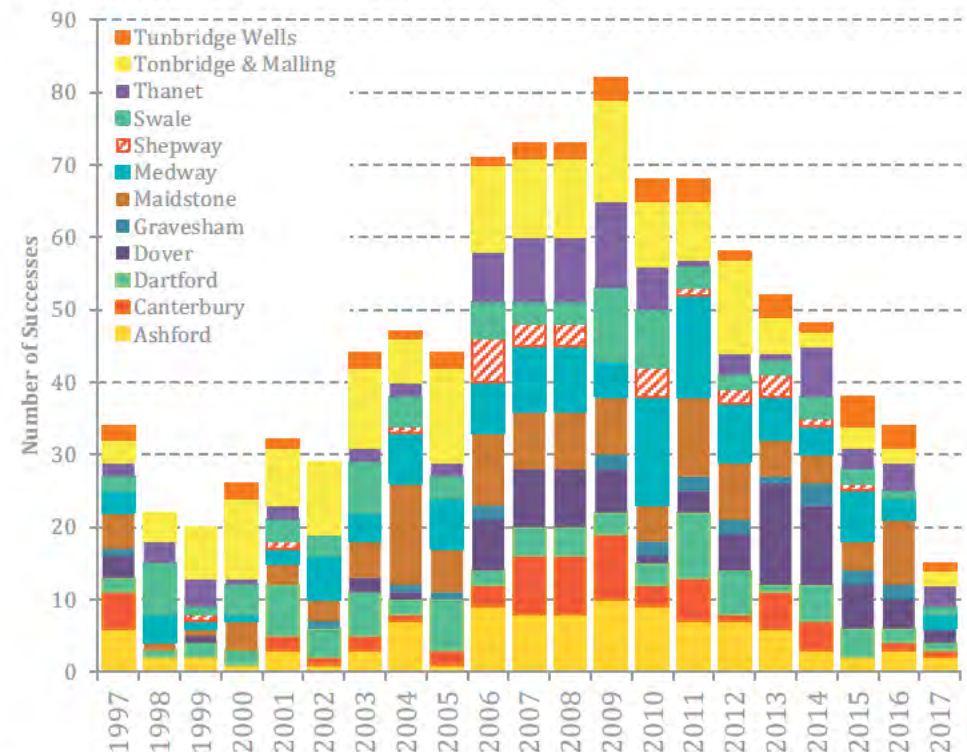
The volume of inward investment successes within Kent has increased significantly over the past twenty years, peaking during the 2006-2011 period. Over the total 1,026 successful investments in the County since 1997, the majority of these have been based on UK domestic investment which has accounted for 73% of all successful investments, followed by Rest of World (13%) and the European Union (13%).



Source: Locate in Kent / Lichfields analysis

#### Inward investment successes by destination

The leading destination for successful inward investment in Kent since 1997 has been Tonbridge & Malling, accounting for 17% of placements. This is followed by Medway (13%), Maidstone (12%) and Ashford (10%). These districts generally have greater availability of large scale employment land. Shepway recorded 3% of total successes (27 investments), the second lowest after Gravesham. This reflects the gap in the Shepway employment site portfolio noted previously.



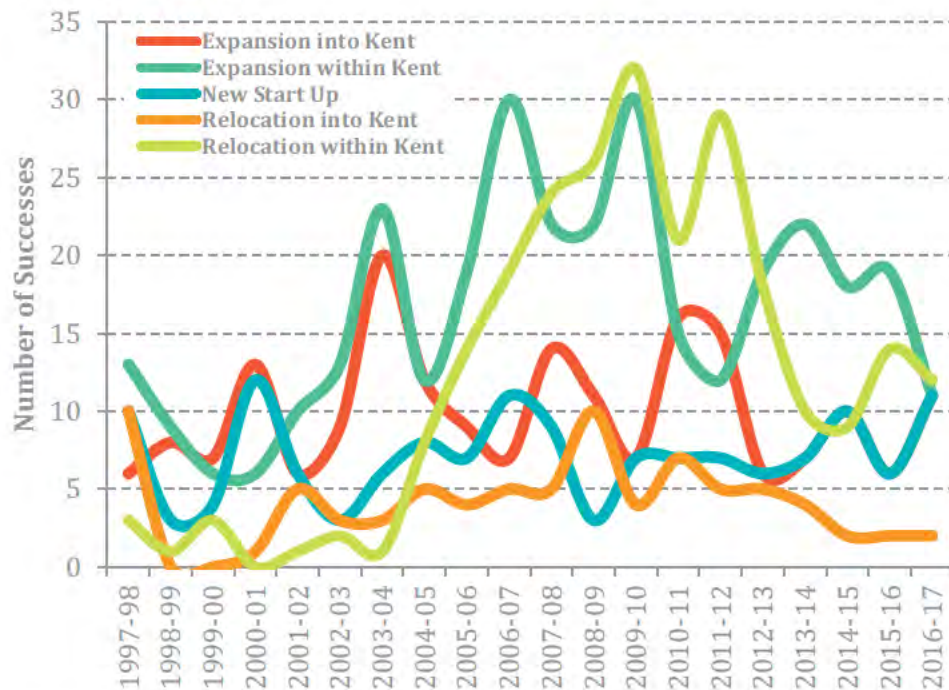
Source: Locate in Kent / Lichfields analysis

### 3. Economic drivers: inward investment potential

## Most recent inward investments in Kent reflect expansion or relocation of existing businesses, mainly business services, ICT and manufacturing

#### Inward investment successes by type

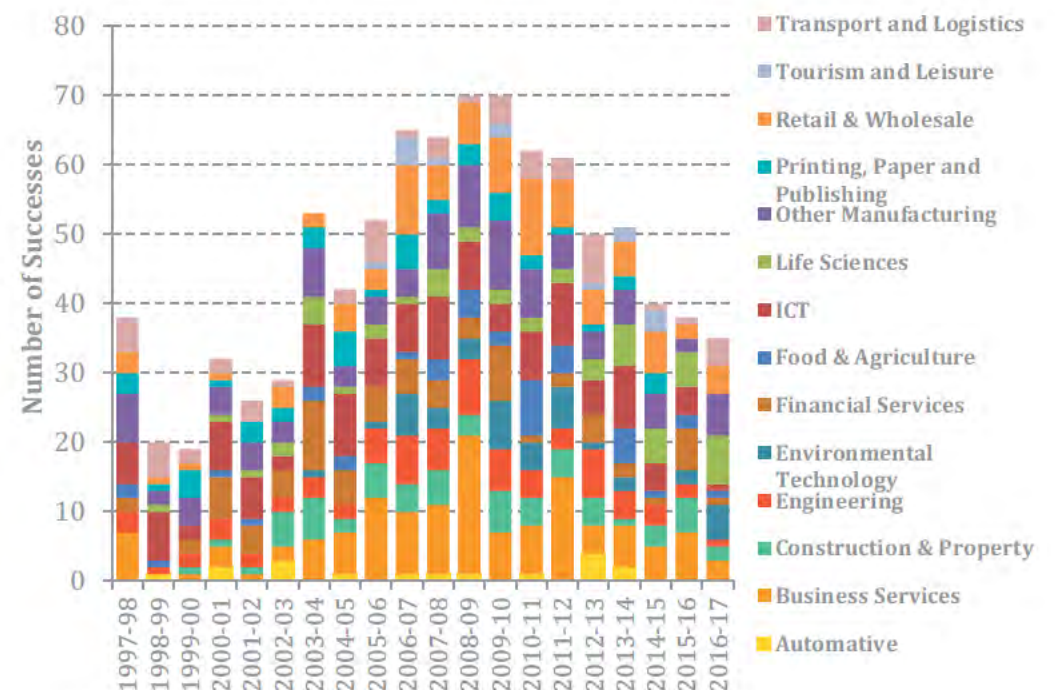
Reflecting the majority UK domestic origin of successful investments, the main drivers of investment have been the expansion of existing businesses within Kent (32%), and since the 2003-04, the relocation of businesses within Kent (24%). The former was the main driver of investments in Shepway over this period. This indicates that meeting the expansion needs of existing Kent-based businesses is an important potential source of investment for Otterpool Park, and particularly providing relocation opportunities for businesses currently occupying sub-optimal or constrained sites.



Source: Locate in Kent / Lichfields analysis

#### Inward investment successes by sector

The main sectors driving investments in Kent since 1997 have been business services (14%), information and communications technologies (ICT) (13%) and manufacturing (11%). In Shepway more specifically, the main source of investments have been business services (23%), engineering (19%), ICT (12%) and manufacturing (12%). This indicates a broad mix of both service and industrial activities, as well as more specialised sectors such as ICT, environmental technologies and printing and publishing.



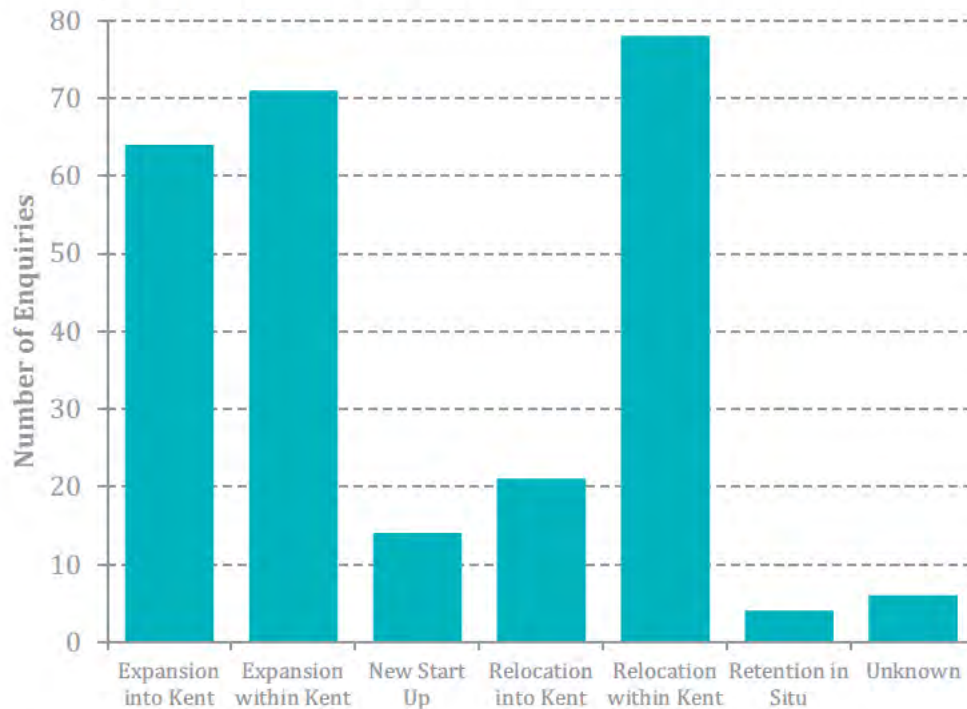
Source: Locate in Kent / Lichfields analysis

### 3. Economic drivers: inward investment potential

Pipeline enquiries reflect relocation and expansion opportunities from within the County and from the rest of the UK, across a range of sectors

#### Pipeline enquiries by type

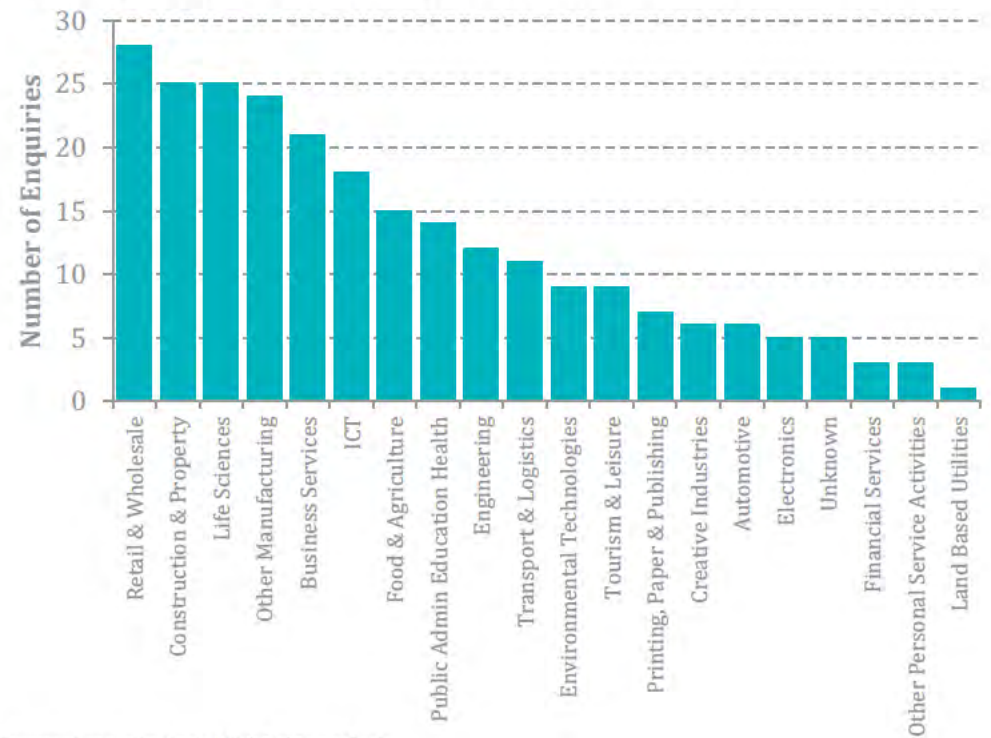
The graph below shows the current pipeline of enquiries held by Locate in Kent by type. It should be noted that this represents a current 'snapshot' and will clearly change over time. Reflecting past trends, this indicates that the majority of enquiries reflect relocations within Kent (30%), expansion within Kent (28%) and expansion into Kent (25%). New business start-ups account for 5% of current enquiries. The total pipeline of over 250 enquiries indicates significant latent potential in the marketplace for sites and premises in Kent.



Source: Locate in Kent / Lichfields analysis

#### Pipeline enquiries by sector

The graph below shows the current pipeline of enquiries held by Locate in Kent by sector. It should be noted that this represents a current 'snapshot' and will clearly change over time. This indicates that the main sectors with current requirements are retail and wholesale (11%), construction and property (10%), life sciences (10%), other manufacturing (10%) and business services (9%). Beyond these, there are however significant numbers of enquiries in more specialist sectors such as ICT, engineering, environmental technologies and creative industries.



Source: Locate in Kent / Lichfields analysis

### 3. Economic drivers: sector growth opportunities

## Five high value growth sectors have been selected as having potential at Otterpool Park reflecting a combination of market, policy and economic drivers

#### Selection criteria for target sectors

As a long term project, Otterpool Park has the opportunity to frame a strategy that is future-facing in terms of responding to advances in technology, research and innovation. It is important to understand how Otterpool Park might be able to capitalise on particular sector opportunities. Sector 'deals' identified through the Government's future industrial strategy may also become an increasingly important consideration. The following criteria have been applied to identify potential target sectors for more detailed consideration at Otterpool Park:

1. **Potential to service growing regional, national and international markets** in order to capitalise on the potential of a new garden town and to maximise the widest range of opportunities available.
2. **Capacity to contribute to employment and Gross Value Added growth** in order to boost the Shepway local economy as envisaged in the Council's Corporate Plan and Economic Development Strategy.
3. **Align with national policy and financial support**, for example in terms of the Government's emerging Industrial Strategy and associated funding mechanisms such as the National Productivity Investment Fund.
4. **Evidence of inward investment track record and/or enquiries** (as reviewed earlier in this section) that provide a potential platform for future growth.
5. **Build on existing strengths within the Shepway local economy** as identified within the Council's Economic Development Strategy.

The above criteria are not applied with the intention of excluding other sectors with growth potential, but are intended to help identify sectors where the employment strategy at Otterpool Park might be particularly focused to attract and grow business activity.

#### Potential target sectors

On the basis of these criteria, the following target sectors have been identified and are analysed in more detail on the following pages.

1. Green construction.
2. Low carbon environmental goods and services.
3. Advanced manufacturing.
4. Creative, digital and media.
5. Business, financial and professional services.

A number of these sectors are specifically promoted within the SDC Economic Development Strategy reflecting existing local strengths, including:

- Financial services (including insurance and pensions);
- Creative industries (including media and IT);
- Business and professional services (including engineering-related scientific consultancy and R&D);
- Energy; and
- Advanced manufacturing.

It should also be noted that the Government's [\*Industrial Strategy Green Paper\*](#) seeks to build on existing sector strengths, improve productivity and increase competitiveness which are typically features of high-growth, high-value sectors.

### 3. Economic drivers: sector growth opportunities

**Green construction is a fast-growing sector for the design and construction of buildings to high environmental standards to minimise energy use and waste**

#### Sector overview

The green construction sector (also referred to as 'eco', 'low-' and 'zero-carbon') describes the use of latest technologies and processes to reduce the environmental footprint of construction and building lifetime impacts. This can apply to both retrofitting of the existing building stock as well as design and build of new homes.

The Government has targeted an 80 per cent reduction in carbon dioxide emissions in the UK by 2050. With 45 per cent of the UK's total carbon emissions coming from buildings, building and running low carbon buildings is becoming a growing strategic priority. A major driver of this sector during the past decade years has been the commitment by subsequent governments to achieving 'Zero Carbon' new homes by 2016 and new non-domestic buildings by 2019. Whilst the specific target was cancelled in 2015, this catalysed innovation in the construction sector which has seen new homes being built to increasingly high environmental standards, and costs falling.

More broadly, the [Construction 2025](#) industrial strategy sets out the vision for UK construction and defines the skills needed to drive change, including for low carbon. The UK is now competing with countries like Germany and Sweden to produce some of the best quality, most efficient, innovative and well-designed new homes in Europe. The most entrepreneurial companies in the industry are in the process of rethinking and re-engineering their business, to become enablers of high-quality, low-cost and low-carbon living. Industry bodies such as the [UK Green Building Council](#) which has over 400 members have been established to promote sustainability across the construction supply chain as well as within the planning of the built environment itself.

#### Opportunities for Otterpool Park

As a garden town, Otterpool Park has the potential to generate significant and long term demand for green construction skills, which should both attract new investment into the area and encourage local construction firms to adapt and develop their expertise and products to meet this demand. The design, build and operation of the garden town provides the opportunity to implement and showcase green construction approaches as a fundamental part of achieving high sustainability credentials.

The scale of delivery gives critical mass to support new investment, whilst the phasing of development over time provides the opportunity to build skills and expertise. This could include on-site construction and application of latest technologies to establish a 'first mover' advantage would then be exported to other parts of the UK, thereby ensuring long-term opportunities for firms once Otterpool Park is completed. A major determining factor will be access to the requisite skills base.

#### Green construction definition

There are no fixed statistical definitions of the green construction sector because it forms part of the wider construction sector, albeit there are some overlaps with the Low Carbon and Environmental Goods and Services sector (see overleaf).

The [Construction Leadership Council](#) defines green buildings as those designed and constructed to high environmental standards to minimise energy requirements, reduce water consumption, use materials which are resource efficient and of low environmental impact (e.g. low embodied energy or carbon), reduce wastage, conserve and enhance the natural environment, and safeguard human health and wellbeing. The construction industry has a role to play in consistently designing, constructing and maintaining buildings that deliver these outcomes, providing healthy places for people to live and work.

### 3. Economic drivers: sector growth opportunities

**Low carbon environmental goods and services refer to economic activity across all sectors and supply chains that help address environmental issues**

#### Sector overview

There are many drivers in the move towards a lower carbon economy, primarily climate change but also energy security including the forecast 'peak' in oil production and resource scarcity. Measures will need to be taken to reduce emissions of greenhouse gases and action will need to be taken to adapt to the climate changes which are already unavoidable. The management of the transition to a low carbon, and eventually zero carbon society, while maintaining and improving living standards, is one of the biggest challenges facing the economy and society.

The Low Carbon and Environmental Goods and Services (LCEGS) sector, also known as green or clean-tech industries, captures economic activity across all sectors and supply chains that deal with environmental issues, ranging from traditional pollution clean-up to renewable energy to complex, emerging low carbon and environmental solutions.

The sector as a whole is growing rapidly, placing it in a strong position to access the over £3.4 trillion global market opportunity which exists. [Research](#) conducted for BIS indicates that the sector comprises 11,550 firms, and employs 460,600 people. The direct low carbon economy generated £26.2bn in GVA in the UK in 2013, making it five times larger than Aerospace, two and a half times the size of Pharmaceuticals, almost twice as big as Chemicals and equivalent to Food and Drink in GVA terms.

Drivers of future growth in the sector include the scale of construction required for new housebuilding, the 'smart cities' agenda which can form the catalyst for activity particularly for smart energy systems, and opportunities within materials and reprocessing and waste management.

#### Opportunities for Otterpool Park

The LCEGS sector is a major growth sector reflecting Government support and consumer choice. The high sustainability credentials of a garden town could provide a significant focus for these activities.

There is scope for 'smart city' principles relating to energy and waste management to be incorporated within the design of Otterpool Park to test-bed and establish exemplar technologies. This could provide the starting point for small-scale industries which can then grow and export goods and services to other parts of the country.

Shepway has an existing cluster within this sector associated with the Dungeness nuclear power station, but beyond this there is limited existing representation locally. However, there have been over 40 investments in this sector across Kent since 1997 indicating that there is growth potential and with further enquiries in the pipeline.

#### Low carbon, renewable energy and environmental sub sectors

- **Low Carbon:** includes additional energy sources; alternative fuel vehicles; alternative fuels; building technologies; carbon capture and storage; carbon finance; energy management; nuclear power.
- **Renewable Energy:** includes biomass; geothermal; hydro; photovoltaic; wave and tidal; wind; renewable consulting.
- **Environmental:** includes air pollution; contaminated land; environmental consultancy; environmental monitoring; marine pollution control; noise and vibration control; recovery and recycling; waste management; water supply and treatment.

### 3. Economic drivers: sector growth opportunities

**Advanced manufacturing includes high-research intensive subsectors such as pharmaceuticals, computer and electrical equipment, and engineering activities**

#### Sector overview

The UK's manufacturing sector has undergone a huge transformation over recent decades as the global economy has been remodelled by the rapid rise of emerging economies across the world. The sector has seen the closure of many large firms and a shift towards smaller SME and micro size firms. An increasingly globalised supply chain and rapid technological advancements has led to significant competition from low-cost producers in the last 30 years. This has required UK-based manufacturers to focus on their strengths and taking a more strategic view of their supply chains.

Companies have restructured their operations towards a much greater emphasis on product quality, knowledge, customer collaboration and brand. In many cases this has required a focus on specific areas of the value chain in which companies hold a competitive advantage. The sector's capital intensive nature, international outlook and innovative focus means it has the potential to be a major driver of future economic activity. Deeper automation together with new technologies including new composites, nanotechnologies, 3D printing, sensor technologies, and robotics are acting as a catalyst for the creation of new products, processes and services.

The UK government clearly recognises the importance of Manufacturing to its goal of rebalancing the economy. The Government's Foresight [Future of Manufacturing](#) report reported that manufacturing contributed 10% of GDP in 2012 and has grown in productivity faster than the UK as a whole. Manufacturing businesses are more likely to engage in R&D and are more likely to innovate than other sectors, leading to future growth. The sector is responsible for over half (53%) of all UK exports.

#### Opportunities for Otterpool Park

Shepway already has an established industrial sector, albeit one which has been declining over recent years and has lacked significant new investment.

There is a general shortage of high quality industrial premises across Kent, and particularly design and build opportunities for specific businesses wanting to invest in bespoke facilities (more common for advanced manufacturing operations). In addition, there is general trend of some industrial activities being displaced from more constrained or expensive locations such as Greater London. There have been over 100 investments in this sector across Kent since 1997 indicating that there is growth potential and with further enquiries in the pipeline.

Otterpool Park could be well positioned to respond to these requirements, and there are potential links with the District's existing industrial base. Incentives could be provided by fiscal incentives such as business rates relief to attract occupiers in what is a competitive market which is also being targeted by other locations in East Kent. Availability of a sufficient skills base is also likely to be a pre-requisite and will require investment.

#### Advanced manufacturing SIC codes

20. Manufacture of chemicals and chemical products; 21. Manufacture of basic pharmaceutical products and pharmaceutical preparations; 26. Manufacture of computer, electronic and optical products; 27. Manufacture of electrical equipment (electronics); 28. Manufacture of machinery and equipment not elsewhere classified (automotive); 29. Manufacture of motor vehicles, trailers and semi-trailers (automotive); 30. Manufacture of other transport equipment (aerospace etc.); 33. Repair and installation of machinery and equipment; 325. Manufacture of medical and dental instruments and supplies; 7112. Engineering activities and related technical consultancy.

### 3. Economic drivers: sector growth opportunities

**Creative, digital and media sectors are characterised by wealth and job creation through the generation and exploitation of intellectual property**

#### Sector overview

The creative, digital and media sector is high-value, knowledge-intensive, employs highly-skilled people and drives growth and demand across a wide range of sectors. It also plays a critical role in driving forward knowledge-intensive economic growth and many linkages exist between digital and creative sectors and other sectors of the economy, for example advanced manufacturing. The sector is characterised wealth and job creation through the generation and exploitation of intellectual property.

One of the key features of the digital sub-sector is its ability to disrupt traditional business models give an opportunity to scale up and accelerate business growth across other sectors of the economy. This includes new applications for digital technologies including health, business services, financial services and advanced manufacturing providing significant opportunities for existing and future entrepreneurs. [InnovateUK](#) identified convergence of different media platforms, the capturing and managing of value transactions and new approaches to data, as factors which will significantly affect the sector at a global and UK-wide scale.

All of these trends make digital industries one of the fastest growing sectors in the global economy. For creative industries, increasing demand for content in gaming, film, TV and advertising will lead to increased opportunities for creative production including film, drama and music

Creative and digital sectors are built upon the talent and innovation of their workforce, and many companies involved in the development of creative content and new forms of media place an emphasis on a young and high-skilled workforce.

#### Opportunities for Otterpool Park

Shepway already has existing strengths in creative industries following the establishment of the Creative Quarter in Folkestone. This is mainly focused on arts, media and design companies, but has also now started to see growth of digital companies given the cross-sector linkages.

To sustain the sector, Shepway needs to continue to attract highly mobile and sought after young workers and entrepreneurs, in the face of competition from London and, to a lesser degree, other major UK cities. This target market is influenced by the quality of place and the combination of employment opportunities and lifestyle offer. Otterpool Park could make a significant contribution to this, by combining a high quality location and high-specification broadband connectivity.

Flexible business accommodation, with well-designed shared space to promote idea sharing and collaboration, will prove attractive to creative and digital businesses. Otterpool Park could complement the existing offer within Shepway by providing larger accommodation for creative and digital scale-ups and maximising the good connectivity to Folkestone and London.

#### Creative, media and digital sub sectors

- Digital industries: Communications Equipment, Communications Services, Computing and Peripherals, Film/TV Broadcasting, ICT Equipment, Information Processing, Multimedia Communications, Multimedia Publishing, Multimedia Services, Software, Systems Integration, and Vision and Sound Equipment.
- Creative industries: Printing and Publishing, Film and Television Broadcasting, Advertising and Marketing, Creative Arts & Entertainment, Architectural Design, and Photography.



### 3. Economic drivers: sector growth opportunities

**Business, financial and professional services is a broad sector, and one of the largest and fastest growing within the UK economy**

#### Sector overview

Business, finance and professional services is a broad sector encompassing banking and fund management, pensions and insurance, legal and accounting, management consultancy, architectural and engineering consultancy and real estate. It is cross-cutting in nature, providing technical and support services for direct consumption by businesses operating within other sectors.

This comprises one of the largest sectors in the UK economy and is forecast to experience significant future growth. The City of London is one of a handful of financial and professional services powerhouses in the world, along with New York and Tokyo, and London employs nearly half of the total UK workforce in the sector. Whilst London is the driving force, there are significant wider markets, particularly in the South East, which tend to serve local/regional demand rather than necessarily being of national/international importance.

A combination of technology, market trends and competitive forces change the nature of many sector activities in the future. Technology is driving growth in the sector by improving productivity and taking over routine tasks to allow employees to focus on higher value activities. While there are expected to be significant job losses in clerical and administrative positions, forecasts suggest these will be replaced with an emphasis on new higher-skilled occupations. Outsourcing of support services will also be a key market driver, as companies look to reduce costs. There is likely to be a continuing trends of relocations from more expensive regions such as London where back office functions are currently located at a cost premium.

#### Opportunities for Otterpool Park

As noted earlier, business services is the largest sector in the Shepway economy accounting for nearly a quarter of all jobs and has been one of the main generators of jobs over the past two decades. This provides a good base to capitalise upon, albeit there should be an aspiration for representation in higher value segments within the sector. Many of the product and process innovations in the industry are generated through client contracts and within the main centres of large firms, which are typically within London, therefore good rail connectivity is an advantage. In terms of infrastructure requirements, the quality of the transport network alongside sufficient high quality office stock, and ensuring an appropriate housing offer is available to attract and retain professional talent and firms, are all essential in creating the conditions for growth.

#### Business, financial and professional service sub sectors

- **Business Services:** includes the provision of a range of day-to-day office administrative services, as well as ongoing routine business support functions for others, on a contract or fee basis. It includes Rental and Leasing Activities, Security Services, Office Administration and IT Services, and the activities of other Business Support and Membership Organisations.
- **Financial Services:** includes financial service activities such as insurance, reinsurance and pension funding activities, and activities to support Financial Services. This subsector also includes the activities of holding assets, such as activities of holding companies and the activities of trusts and funds.
- **Professional Services:** includes specialised professional, scientific and technical activities. It includes the activities of legal representation, provision of advice and assistance to businesses and other organisations on management issues, the activities of head offices and management consultancy services.

### 3. Economic drivers: sector growth opportunities scorecard

The identified growth sectors blend together those already well established in the local area, with others not well established locally but are growing nationally

Growth sector	Potential to serve growing markets	Capacity to contribute to employment and GVA	Alignment with Govt. policy and funding	Inward investment track record	Builds on existing Shepway strengths
Green construction					
Low carbon environmental goods and services					
Advanced manufacturing					
Creative, digital and media					
Business, finance and professional					

Source: Lichfields analysis

### 3. Economic drivers: synthesis

## The economic potential and function of Otterpool Park will reflect the interface between a number of economic drivers as set out in this section

#### Synthesis

The economic potential and function of Otterpool Park will, to varying degrees, reflect the interface between a number of economic drivers as considered in this section. It is important to note that other factors will also be relevant, and also that the economic role of Otterpool Park will develop over time as the garden town is built out and becomes established.

In this context, the key pointers from the preceding analysis in this section can be summarised as follows:

- 1 Access to employment opportunities as part of the overall sustainability mix was a feature of the original garden cities and successive generations of new towns. These typically reflected jobs generated to support the functioning of the settlement, but also the ambition to attract and grow new industries. The implication is that the economic strategy for Otterpool Park will reflect a number of indigenous and exogenous factors, that both serve the consumption needs of the settlement as well as value-generating uses that serve wider markets. Evidence from existing garden towns and new settlements is that they focus on achieving a higher quality type of employment development, but with range and flexibility of uses.
- 2 The Shepway economy has grown relatively strongly during the past two decades, mainly in service sectors. The District has a sizeable and varied business base although start-up rates are lower than average. The majority of working residents work locally, although some more highly qualified residents commute elsewhere. The District's economic performance and ability to diversify has been constrained to some extent by the lack of good quality, deliverable employment sites in accessible locations as well as availability of high quality premises. This is clearly a market gap that Otterpool Park can aim to respond to, and in doing so, help Shepway better compete with other parts of Kent and the wider South East in terms of attracting investment. Suveys underscore accessibility, quality of life and housing costs are key attractors of businesses to Shepway.
- 3 The inward investment market in Kent is generally characterised by the expansion and relocation of existing companies within the County as well as from other parts of the UK. This indicates that meeting the expansion needs of existing Kent-based businesses is an important potential source of investment for Otterpool Park, and particularly providing relocation opportunities for businesses currently occupying sub-optimal or constrained sites. Shepway has attracted investments in business services, engineering, ICT and manufacturing. With a more competitive site and premises offer, the District should be able to more effectively capture enquiries and potentially diversify the sectors that it is able to accommodate.
- 4 A range of high-value, high growth sectors have been identified as having potential at Otterpool Park. These focus on sectors which are growing nationally, have support in the form of government policy and funding, and in some cases where Shepway already has established strengths. In addition, some respond to the particular credentials offered by the guiding principles of creating a garden town at Otterpool Park. These could provide a range of potential employment and business opportunities, but some will require specific investments or interventions as part of the strategy if these are to be realised.
- 5 Taken overall, Otterpool Park provides an opportunity to help deliver a step-change within the economic growth trajectory of Shepway District. To maximise the opportunities, the role must combine both local functions that support the garden town itself but also delivery of a more strategic employment offer which the District currently lacks. The profile and ethos of the garden town will act as a key attractor to investment in some sectors. A strategy which seeks a blend of employment opportunities that responds to the evolution and growth of Otterpool Park is likely to be most effective. This means a focus on economic outcomes must underpin the design and construction of Otterpool Park alongside a longer-term perspective on the types of jobs that can be created for both new and existing residents.

# Structure

- 1 Introduction
- 2 Context
- 3 Economic drivers
- 4 Location factors and site attributes**
- 5 Strategy and action plan
- 6 Conclusions

## 4. Location parameters and site attributes

This section builds on the earlier analysis to translate the assessment of economic and market potential into indicative site requirements for Otterpool Park

### Location

As highlighted in Section 3.0, a gap in the market exists for new strategic employment provision in Shepway that can accommodate high quality new development.

The location of Otterpool Park close to M20 Junction 11, and relatively close to Folkestone, provides good access to the strategic road network thereby giving efficient access to London/M25 and also to the Port of Dover. It also ensures good connectivity to other parts of Kent in order to service regional markets. This connectivity is generally absent from the existing employment on the site (Lympne Industrial Estate) which has poor local road connections, and the closest current equivalent are existing sites on the edge of Folkestone such as Cheriton Parc and Park Farm which are smaller in scale and more mixed in character.

At present, Westenhanger station is serviced by rail services to London and Folkestone/Dover via South Eastern. The potential for High Speed 1 services to stop at Westenhanger is being investigated which would mean significantly reduced journey times to London St Pancras. This would enhance the attractiveness of the location, particularly for office-based sectors.

These strategic accessibility factors give Otterpool Park a strong basis for attracting employment uses.

### Sector mix and profile

A mix of sectors should be encouraged to support the District's existing strengths but also to support growth and diversification of the local economy. To be viable and attractive to occupiers, Otterpool Park should provide a range of flexible, mixed B class uses (see overleaf) including:

- Light/high tech industrial units
- Small-scale office/business park space, with capacity for a range of floorplates
- Plots for bespoke design and build (including temporary facilities during the construction phase)
- Flexible workspace hubs within residential areas and close to local centres.

Whilst occupiers may be attracted by the highly accessible location, a more targeted site proposition is required for Otterpool Park in order to fully capitalise on the garden town concept and ethos. In particular, this may include developing linkages with university or R&D facilities particularly in those sectors where Shepway does not have established strengths. This type of initiative will also help provide capacity for skills development and training which will be necessary to both attract higher-value uses to the site, but also to ensure that local residents are able to access new job opportunities.

### Catchment area

The existing commercial market in Shepway is relatively localised, and the District has recorded a relatively low share of inward investments compared to other parts of Kent over the past two decades. This partly reflects the nature of the employment site offer that has been available and/or delivery barriers to land coming forward for development in locations of greatest market demand.

The scale, type and profile of new employment space that could be provided at Otterpool Park gives potential to broaden Shepway's current catchment area. As a starting point it should give the District a stronger basis for capturing inward investment enquiries that cannot currently be accommodated due to a restricted supply of quality land available for development.

These factors are likely to bring the District into competition with other locations in Kent, and potentially, further afield in the wider South East. This includes locations in relative proximity, for example Ashford, but also other more established sites such as Kings Hill (Tonbridge and Malling) and Discovery Park (Dover). Other than Shearway Business Park in Folkestone (developed out with support from SEEDA during the 2000s), and to a lesser extent Cheriton Parc, Shepway currently does not have availability of strategic employment land of this type which significantly reduces the extent of its commercial property market catchment area.

## 4. Location parameters and site attributes

A number of different site/premises typologies can be identified to reflect the potential range of growth sectors that could be accommodated at Otterpool Park

### Site/premises typologies

The previous section identified a range of potential growth sectors that could be targeted to support employment growth at Otterpool Park. Alongside this, property market feedback indicates that Shepway requires high quality strategic new employment land to diversify its portfolio, particularly in an accessible location. These factors are critical if Otterpool Park is to develop a competitive advantage over other locations and in order to provide the boost to the Shepway economy advocated by Council plans and strategies.

In order to bridge the gap between demand and supply, it will be essential that the right type of site and business accommodation is made available to the market. The table to the right summarises how these growth sector requirements might translate into specific types of employment site requirements.

The types of premises required could potentially vary significantly. However, there are certain typologies of sites and premises with a specific scale, form and environment, which can accommodate many of the needs of these sectors. These include an office/business park, industrial/advanced manufacturing park, mixed employment area and flexible workspace hubs.

Growth sector	Sector needs	Indicative space requirements	Site/premises typology
Green construction	Reasonable links to R&D centres/ institutions Availability of skilled engineering labour Proximity to suppliers	Range of premises - from offices to B2/B8 units with large sites and ancillary office accommodation	<ul style="list-style-type: none"> <li>Industrial/advanced manufacturing park</li> <li>Mixed employment area</li> </ul>
Low carbon environmental goods and services	Reasonable links to R&D centres/ institutions Availability of skilled engineering labour Proximity to suppliers	Range of premises - from offices to B2/B8 units with large sites and ancillary office accommodation	<ul style="list-style-type: none"> <li>Industrial/advanced manufacturing park</li> <li>Mixed employment area</li> </ul>
Advanced manufacturing	Workshops for research and design Testing facilities	Wide range of premises – from small industrial flexible units to high specification B1/B2 units with high office content	<ul style="list-style-type: none"> <li>Science/R&amp;D park</li> <li>Industrial/advanced manufacturing park</li> <li>Mixed employment area</li> </ul>
Creative, digital and media	Skilled workers Fast links to London (HS1) Fast broadband access Quality of life/image of location/housing offer	Wide range of premises – high quality offices to small-scale studios, industrial and incubator units	<ul style="list-style-type: none"> <li>Office/business park</li> <li>Mixed employment area</li> <li>Flexible workspace hubs</li> </ul>
Business, financial and professional services	Access to clients/markets Availability of skilled labour High quality transport links and telecommunications Quality of life/housing offer	High quality office space at range of unit / floorspace sizes, requiring large footplates	<ul style="list-style-type: none"> <li>Office/business park</li> <li>Mixed employment area</li> <li>Flexible workspace hubs</li> </ul>

Source: Lichfields analysis

# Structure

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- 6 Conclusions

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## Appendix E – Soft Market Testing

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[REDACTED]  
Programme Officer Core Strategy Review)  
Folkestone & Hythe District Council Civic Centre  
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Folkestone  
Kent CT20 2QY

3 July 2020

Dear Sir/ Madam

**Core Strategy Review Examination – Homes England Response  
Main Matter 7 Garden Settlement Session.**

Homes England is the government's housing accelerator, with the influence, expertise and resources to drive positive market change. The Agency's mission is to intervene in the market to ensure more homes are built in areas of greatest need, to improve affordability.

The Agency is committed to working with the Otterpool Park LLP to realise the aspirations and aims of the new garden town. Homes England fully supports the proposed policy allocation as set out in the draft Core Strategy, and the ambitions as set out in the vision for Otterpool Park.

Securing the allocation of Otterpool Park garden town in the Folkestone and Hythe Core Strategy is a vital step required to deliver on the careful and considered progress made to date. In partnership with the Otterpool Park LLP and its advisors, Homes England will collaborate to optimise the delivery of much-needed homes, jobs, facilities and infrastructure as part of the garden town vision. The Agency will challenge traditional norms in the process to build better homes faster as the project moves into the important delivery phase.

As set out in representations dated 20<sup>th</sup> January 2020, Homes England acquired a large element of the Otterpool Park site in March 2018, comprising approximately 62 hectares of land between Lympe and the Lympe Industrial Estate. This was always included in the area that is the subject of the draft New Garden Settlement allocation as part of the draft Core Strategy. It is included in the application boundary for the outline planning application ref. Y19/0257/ FH.

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@HomesEngland  
[www.gov.uk/homes-england](http://www.gov.uk/homes-england)

#MakingHomesHappen

Homes England's acquisition represented a significant milestone for the delivery of the new garden town settlement. It has brought major investment in terms of land; and the ability to deliver infrastructure and wider benefits within the application proposals. The Agency is committed to making sure that housing delivery is accelerated, and land is not held longer than necessary. Homes England is also supporting the project, and the Council's ambitions for quality placemaking including zero carbon, via the government's Garden Communities Programme.

The sustainable location is consistent with the National Planning Policy Framework (NPPF) which requires local authorities' planning policies to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of specific, deliverable sites and the land between Lymyne and Lymyne Business Park meets these criteria. Its inclusion will assist Folkestone & Hythe District Council to meet the test of soundness defined in the NPPF; being positively prepared, justified, effective and consistent with national policy.

Unlocking land is one of Homes England's core objectives as defined in the 2018-2023 Strategic Plan<sup>1</sup>. Homes England is able to draw on expertise and professional skills within its Development; Investment; and Markets, Partners & Places directorates to devise and test innovative delivery models and financing options. For example, the following Homes England priorities support the accelerated delivery of large settlements:

- Infrastructure investment - Homes England has the ability to invest upfront in the land and enabling infrastructure that is necessary to unlock sites. In this way, serviced development plots can be made available to the market at pace.
- Methods of Modern Construction (MMC) – Offsite and modular building techniques have the potential to be significantly more productive than traditional building methods, encouraging low carbon technology and minimising environmental impacts. MMC allows homes to be built more quickly, addressing labour and skills shortages and improving the quality, consistency and energy efficiency of newly built homes. As part of the Agency's strategic objective to improve construction productivity, innovation, quality and sustainability, Homes England is encouraging the uptake of ambitious levels of MMC which are higher than the market norm.
- Diversification – Homes England is providing support for smaller builders and new entrants to create a more diverse, resilient and competitive market. Diversification is being encouraged by providing access to land and short-term development finance through the Home Building Fund.

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<sup>1</sup> [Homes England \(2018\) Strategic Plan 2018-2023](#)

Taken together, these initiatives will assist to create the conditions necessary to accelerate housing delivery at Otterpool Park. This aligns broadly to findings of the Letwin Review<sup>2</sup> which recommended more diversity of the type and tenure of new homes, to accelerate market absorption and the build out rate of large developments.

In its role as the government's housing accelerator, Homes England will add experience and endeavour working with partners in the delivery of the new garden community at Otterpool Park. The Agency will use its land, powers and influence to increase the pace, scale and quality of delivery across a range of tenures, typologies and sizes. Homes England will work closely with Otterpool Park LLP to show leadership on design, modernisation and diversity of new homes; alongside supporting the vision for jobs, facilities and infrastructure necessary to create a great place and deliver on the ambitions as set out in the vision for Otterpool Park.

Yours faithfully,

[Redacted signature]

[Redacted name]


[Redacted title]

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<sup>2</sup> [Letwin 2018. Independent Review of Build Out, Final Report. Rt Hon Sir Oliver Letwin MP, October 2018](#)

DC/vd

23rd June 2020



Folkestone and Hythe District Council  
Civic Centre  
Castle Hill Avenue  
Folkestone  
Kent  
CT20 2QY



#### **OTTERPOOL PARK GARDEN COMMUNITY**

We are writing this note in support of Folkestone & Hythe District Council's proposed new Garden Community at Otterpool in Kent.

Places for People is a national property development and management organisation. Our mission is to build sustainable communities that are for everyone; whatever their background and whatever their needs.

Originating in the Housing Association sector, we are still one of the largest Registered Provider groups in the country. However, our activities now cover the full spectrum of development from buying land, to planning new places, to building homes and facilities, and to managing those places for the long term. We own and/or manage over 198,000 homes, and provide homes and services for every stage of their lives and to rent or to buy.

We remain a 'not-for-dividend' organisation so all of the profits we make from our commercial activities are invested back into delivering social value. We have an asset base in excess of £4.5 billion and are a Strategic Partner of Homes England. We delivered over 2,500 new homes in 2019/20.

We operate in every geography and tenure within the market; from social housing through to luxury high value homes; from first time entrants to the housing market through to retirement housing with care. Whilst we operate at scale across the UK, including major infrastructure led developments in Hertfordshire, Milton Keynes and Tyneside, we have also undertaken a variety of developments in the area over recent years including Ramsgate, Canterbury, Broadstairs and Biddenden.

We have worked closely with the Council as they have developed their proposals for Otterpool Park and believe that this planned investment into infrastructure, jobs and homes will have a significant impact on meeting the identified local housing needs over the Plan period as well as supporting economic growth and regeneration.

The proposed development is well located and we are confident will appeal to a wide variety of potential residents. To succeed, it is essential that the key physical and social infrastructure is delivered in parallel with the new homes to minimise impacts on existing communities and to support new residents. It has the potential to appeal to both new entrants to the housing market looking for a more affordable location that is well connected to employment, through to growing families seeking a bigger home located in a vibrant and family friendly community. A range of high quality housing types, sizes and tenures will underpin its appeal

However, delivering large scale new settlements or urban extensions requires more than a reliance on the traditional housebuilder model of housing for sale. To drive the necessary critical mass of development to underpin the infrastructure investment, the Council is rightly considering the key role that homes for rent, affordable homes to rent and buy and specialist housing may play in achieving the necessary absorption rates. The 'Independent Review of Build out Rates' led by the Rt Hon Sir Oliver Letwin MP considered how the delivery of housing can be accelerated. It identified the need to build out large sites more quickly as a critical part of this stating that:

*"I conclude that if either the major house builders themselves, or others, were to offer much more housing of varying types, designs and tenures (and, indeed, more distinct settings, landscapes and street-scapes) on the large sites and if the resulting variety matched appropriately the desires of the people wanting to live in each particular part of the country, then the overall absorption rates – and hence the overall build out rates – could be substantially accelerated." (para 4.26)*

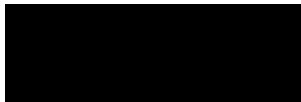
Our approach on large scale developments tend to be that of "Master Developer"; planning the place, delivering infrastructure, developing out c.35-50% ourselves and selling serviced land to third party developers/housebuilders including SME's. In addition, through our subsidiary companies Millwood Designer Homes and Zero C, we have our own private housebuilding capability including self/custom build models.

Given that even at pace many of these sites will take 7-10+ years to deliver, we accept that we will encounter different economic cycles and turbulence on the way through; unlike most housebuilders who plan for a rising market only. Our resilience comes from being able to swiftly diversify tenure and by adopting an IRR investment model rather than solely a residual valuation approach. Whilst not entirely counter-cyclical, it did enable us to continue to deliver much needed homes even during the last recession. Whilst we accept the present unprecedented economic uncertainty, we believe that an opportunity of this scale represents a sound long term placemaking investment and enables future challenges in terms of an ageing population, zero carbon, technology, skills shortages and changing nature of employment to be embraced and planned for positively and comprehensively.

Our approach is also consistent with the 'Stewardship' Model advocated in the 'Building with Beauty' report by the Government's Building Better Building Beautiful Commission and reflects the Council's own patient investment in enabling the site to come forward. It is also in line with the original Garden City principles that, as advocated in the NPPF, are key considerations for ensuring sustainable development.

We believe that Otterpool Park represents a truly sustainable and transformational development opportunity; the chance to create a vibrant new community just an hour's train ride from London and within a 15 minute walk of the Kent Downs that will offer an outstanding quality of life and we support the Council's ambition and vision for it.

Yours faithfully,

A large black rectangular redaction box covering the signature area.Two black rectangular redaction boxes covering contact information, one above the other.





# Pentland Properties



[REDACTED]  
Folkestone and Hythe District Council  
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Castle Hill Avenue  
Folkestone  
Kent CT20 2QY

26 MAY 2020

21<sup>st</sup> May 2020

[REDACTED]

Further to our meeting, I wanted to write to you regarding the Otterpool Park Garden Town and how Pentland would like to be a part of this new venture as a partner with Folkestone and Hythe District Council.

As you know Pentland Homes has a deserved reputation for constructing contemporary, high-quality homes in Folkestone. With roots stretching back to the 1960s in Folkestone, the company has seen exceptional growth in the last few years as more and more of the County and District residents discover the unique homes that Pentland has delivered.

Pentland Homes is a private limited company and, unlike some of the national PLC housebuilders, we answer to our customers, not to shareholders. We are proud of our roots as a Folkestone based business and are passionate about building quality homes in the county.

We are mainly funded from working capital and we have a substantial landholding which allows efficient development of multiple sites.

We have had a long-standing relationship with both Lloyds and NatWest, both of whom provide additional funds for the development of new sites if required. The company has also worked with Homes England for infrastructure and other investments.

Once the economic challenges of the current pandemic are resolved, we remain confident that Pentland Homes will be delivering homes at similar volumes. The recent Covid-19 emergency has been managed well within the company's facilities and the company has not needed to request extra financial assistance apart from Job Retention grants.

Our business plan at the beginning of this year was to deliver around 150 homes with a 5-year plan to grow the business to almost double this amount. We have anchor sites of 750 homes and 500 homes in Canterbury and Ashford to enable us to do this. We are also working on two of the largest schemes in the District including our Terlingham Retirement Village and 200 plus homes at Mulberry Place in New Romney. In addition to this we are underway on an exciting new scheme at Stelling Minnis which we expect to take first completions off very soon. In recent years we have also built and sold 122 contemporary award-winning new build homes at Scholars Field in Folkestone, Kent. We were one of the main promoters of the Ashford Garden Village scheme at Chilmington plus numerous other schemes in neighbouring Boroughs and Districts.

✉ Pentland Properties Ltd, The Estate Office, Etchinghill Golf, Etchinghill, Folkestone, Kent CT18 8FA

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We see that at its heart Otterpool's prime location opens the district – for residents seeking an improved quality of life, for business relocations and the visitor economy to Folkestone and all it has to offer. This will make it attractive to all sectors of the development industry from starter homes through to the executive market. At its peak, we believe Otterpool could easily accommodate 3 developers working together to deliver 200 to 300 completions a year. Pentland Homes are ideally placed to be part of that team alongside Folkestone and Hythe District Council, our main office is in Folkestone, our labour and most staff are based in and around our office as are our supply chains. We understand the local need and have the right products to be an important partner in the Otterpool Park vision.

Our view is that the best deal for everyone, District Council, developers, new and existing homeowners alike would be where the Council deliver the infrastructure required to service housing parcels of different sizes.

This would allow more SME to join in the development alongside the majors and Pentland Homes. Also, it would ensure that the existing local people who will undoubtedly be affected by the changes could have a say in how the development was provided and would be an important stakeholder in the delivery in the development.

Pentland Homes marketing will be very well placed for the Otterpool development. Locally we have a strong brand presence and are renowned for delivering quality homes throughout Kent.

We envisage delivering a mix of property types to fulfil the local demand and to attract buyers from out of the area who may commute into London and other parts of Kent.

Our marketing will incorporate promoting the excellent transport links through into London by both road and train. At the moment, the Westenhanger train station is under-utilised. We would explore the opportunity to transfer the High Speed train link from Folkestone to the local Westenhanger station making the Otterpool development even more desirable to prospective purchasers and the existing community.

For Otterpool, we would create a comprehensive bespoke Sales and Marketing plan that includes a dedicated Sales complex to demonstrate our show homes and local and national media campaigns including PR, radio, and signage. We would look to ensure our product is well placed against competitors and regularly review our marketing elements to adapt to the ever-changing environment. It would be vital that we have a joint marketing strategy agreed with Folkestone and Hythe DC to jointly promote the scheme and raise its profile both locally and nationally.

Finally, Otterpool Park is a once in a generation opportunity for Folkestone and Hythe. It should have local businesses and knowhow at its heart, Pentland Homes are ideally placed to assist in its delivery

Yours sincerely

A large black rectangular redaction box covering the signature area.

PP.



**CLARION**  
HOUSING GROUP

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Tooley Street  
London SE1 2DA

[REDACTED]  
Folkestone Hythe District Council  
Civic Centre  
Castle Hill Avenue  
Folkestone  
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United Kingdom  
CT20 2QY

14<sup>th</sup> April 2020

[REDACTED]  
Re: Proposed New Garden Community – Otterpool

Further to our ongoing discussions I am writing to confirm Clarion's firm interest in becoming a Development Partner in respect of the proposed new Garden Community to be known as Otterpool. In particular we are keen to assist in the design and delivery of the first town centre phase in order to ensure the delivery of a quality sense of Place. We would be delighted to work with the Council as through discussions it is clear we share the same aims and aspirations for the future of the proposed community. We also, clearly understand that a different development model is required if such aims and aspirations are to be achieved.

Clarion Housing Group is Britain's largest housing association to ensure the delivery of the affordable housing across the site. Clarion owns 125,000 homes and builds around 2,100 new homes each year. Clarion are also market leaders of zero and low carbon affordable housing, for example through our award winning Graylingwell Park development in Chichester, a Joint Venture with Linden Homes. Clarion have also developed one of the largest affordable housing schemes to obtain "Passivhaus" certification at Passive Close, Rainham in Essex. We are also expanding our delivery of market housing after being encouraged by the Government to expand into the private sector to widen choice in the housing market.

Clarion is committed to the delivery of exemplary new mixed-use settlements and will invest £13 billion into delivering this aim. Two thirds of the programme will be affordable housing developed by Clarion, with the private element being delivered by Clarion's market housing arm, Latimer Developments Limited.

Latimer is a development company delivering and marketing homes for private sale. It also leads on land acquisition. Latimer plays a key role in contributing to Clarion's social purpose activities. Latimer shares the same ambition: to make housing better across the country. It provides scale and ambition, as well as the partnership required to unlock the biggest opportunities. Clarion is developing at the Ebbsfleet Garden Community and is therefore accustomed to working within multi-developer schemes and is promoting a separate Garden Community called Mayfields within Horsham District. Our commitment and experience of schemes of this size and complexity is therefore apparent.

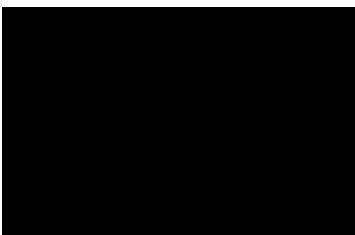
Clarion also has a wealth of experience in helping to deliver long term physical and social stewardship of schemes, with Graylingwell being a prime example. In this case, a Community Concierge was put in place on day one to foster the development of Community Groups, access to on site facilities and the management of car clubs, public open spaces etc.

In addition to the benefits Clarion brings in pure development terms, our involvement will also introduce the work of our charitable foundation, Clarion Futures. Clarion Futures will invest £150 million across the nation over the next ten years to deliver one of the largest social investment programmes in the country. This will provide support to tens of thousands of people. Clarion Futures' mission is to provide people with the tools and support they need to transform their lives and communities for the better and has set some very ambitious targets, including:

- To support 4,000 people a year into work
- To provide 250 apprenticeship opportunities every year
- To make a positive difference to the lives of 15,000 young people
- To support 3,000 residents with budgeting and money management
- To deliver social impact worth £1 billion over the next decade

We hope this letter is helpful and confirm that it can be submitted as part of any evidence base in respect of the both the planning application and the emerging Local Plan, I would also confirm that we are ready to provide further assistance with the masterplanning and viability testing of the scheme moving forward.

Yours sincerely



30 June 2020

[REDACTED]  
Folkestone and Hythe District Council  
Civic Centre  
Castle Hill Avenue  
Folkestone  
CT20 2QY

[REDACTED]  
[REDACTED]  
[REDACTED]

## Otterpool Park New Garden Settlement

### *Introduction*

I am writing in support of the allocation of the Otterpool Park New Garden Settlement in FHDC's Regulation 19 Core Strategy Review Submission Document. I consider Otterpool Park to be a medium to long term sustainable solution in helping to meet the housing needs in Folkestone and Hythe District.

### *Taylor Wimpey South East*

Taylor Wimpey South East (TWSE) is one of 26 Taylor Wimpey Regional Offices operating from Hildenborough in Kent, building around 750 homes per year in Kent and East Sussex.

TWSE is a division of Taylor Wimpey UK and our significant covenant is such that we have available cash reserves to complete transactions at any given time, with no reliance upon outside lenders. The way in which TWSE is financed is a potential advantage in considering the medium to long term impacts of the current Covid 19 situation in terms of access to finance.

### *Our Experience in Folkestone and Hythe District*

Whilst TWSE's patch is relatively extensive, a significant proportion of our housing delivery is concentrated in a handful of Local Planning Authorities. As you know, we have been particularly active in Folkestone and Hythe District over the last few years.

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At Sellindge (the central portion and first phase of Site CSD9 in the Core Strategy Review) TWSE secured hybrid planning permission for up to 250 homes in January 2016. Sellindge is in very close proximity to the Otterpool Park allocation.

The scheme involved significant community engagement and will deliver a number of community benefits, including a large Village Green, traffic calming to the A20 that bisects the Village – which is now in place, an extension to Sellindge Primary School as well as a local Centre that will deliver mixed use units as well as an Office for Sellindge Parish Council.

Our first phase of 50 homes is now complete and occupied and we have begun our second Phase. Interest and sales have been strong at Sellindge, exceeding our expectations.

TWSE's largest ongoing strategic development is at Shorncliffe Barracks, Folkestone (Policy SS11 in the Core Strategy Review). TWSE purchased the site from the MOD in 2014, securing a hybrid planning permission for up to 1,200 homes and associated uses in December 2015. The site is being released to TWSE in parcels as the MOD stages a phased withdrawal from the land at Shorncliffe which it has sold. TWSE has now completed circa 300 homes with two phases currently under construction. We received our last parcel (Napier Barracks) from the MOD in 2026 and will therefore complete the construction of the site in around 2030. Again, interest and sales at Shorncliffe have been strong, which has meant we can build multiple phases at the same time.

Across both sites, TWSE has been delivering circa 100 homes per year, which accounts for over 13% of TWSE's total housing delivery. Once Sellindge Phase 2 starts delivering homes, the total is going to increase to circa 175 dwellings per annum (over 23% of TWSE's total housing delivery) across both sites until Phase 2 Sellindge is completed in 2023. This demonstrates the ongoing importance of Folkestone and Hythe District to the TWSE Business and our confidence in the local market.

#### *Our interest in Otterpool Park*

Given the above, and as discussed in our meetings with FHDC on the emerging proposals, our interest in developing at Otterpool Park is not surprising. As well as being in an area we are familiar with and have confidence in, the timescales for development would work well for the TWSE business, allowing us a continued presence within the District.

The model of FHDC acting as master developer is one that TWSE are confident we can positively operate within. We are currently developing over 500 homes at Castle Hill, an integral part of the Ebbsfleet Garden City. At that site, Henley Camland is acting as master developer providing serviced land parcels on which TWSE build. We have worked closely with all stakeholders: Henley Camland, other Developers and the Ebbsfleet Development Corporation, to gain our own Reserved Matters approvals pursuant to an Outline planning permission.



Based on our experience at Sellindge and Shorncliffe, TWSE has a good understanding of the local housing market. Whilst responding to housing need and working within a final housing mix, TWSE would be looking to develop primarily family housing focussing on 2, 3 and 4 bed family houses.

The rate of housing delivery is dependent on the size of site/s acquired and whether parcels were also sold directly to Affordable Housing providers (as they have been in Castle Hill, Ebbsfleet) or private developers build both private and affordable homes.

Based on delivery rates at Sellindge and Shorncliffe, TWSE would be confident of delivering circa 50 private homes a year initially (circa 75 homes in total if TWSE also delivered affordable homes) rising to 100 private homes per year (circa 150 in total if TWSE also delivered affordable homes) if the site/s were large enough (approx. 500 homes or more) to accommodate two site teams.

TWSE are committed to using companies and labour local to where we are building. Alongside our established supply chain, with whom we've developed strong working relationships, we also have an established apprentice programme, which will ultimately form a strong direct labour force. This has been a significant investment for us, and we believe has multiple advantages; in addition to being a significant investment in local labour skills, we also feel it will ensure a consistent availability of labour, and enable us to maintain a high quality products for the future. For example, at our strategic site at Howe Barracks (Canterbury) we have trained bricklayers on site and now they are directly employed by TWSE working on the houses we are building. Depending on the profile of the site, TWSE would look to use apprentices and our direct trade teams at Otterpool Park, provided a parcel of circa 500 homes or above was obtained.

TWSE is used to working with a master developer a role that FHDC envisage undertaking at Otterpool Park and we would expect the following roles to be undertaken:

- Outline planning permission established with clear parameters set for the submission and approval of Reserved Matters;
- Serviced parcels with main roads to parcels constructed (roads within parcels to be the Developer's responsibility);
- Infrastructure (drainage and utilities) provided to parcel boundaries with sufficient capacity;
- High quality strategic open space to be delivered by the master developer early in the build programme;
- Coordination of site wide branding and parameters for sales and marketing applied to all Developers;
- Regular Developer meetings hosted by the master developer.

In conclusion, TWSE remain very interested in the proposed Otterpool Park New Garden Settlement and has funding available without reliance on external lenders. An appropriate parcel at this development would provide TWSE with a medium to long term opportunity to continue to deliver housing in an area in which TWSE is demonstrating delivery, achieving sales and is positively worked with FHDC.

# Taylor Wimpey

The opportunity to be part of a large-scale development with the sustainability and placemaking aims of Otterpool Park fits well with TWSE's aspiration of building high quality homes in great places that new and existing communities can be proud of.

Therefore, TWSE fully supports the proposed allocation of Otterpool Park New Garden Settlement as an integral part of the strategy set out in FHDC's Regulation 19 Core Strategy Review Submission Document.

Yours sincerely

