

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.

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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 befit 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 21st 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 21st 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 21st 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).¹ 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.

¹ 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 judgment².

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.

² 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.³ 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

³ <https://www.folkestone-hythe.gov.uk/downloads/file/1759/folkestone-hythe-district-core-strategy-review-submission-draft-consultation-statement-eb-01-90->

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 kgCO₂/kWh; grid carbon intensity is projected to fall to ~0.114 kgCO₂/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