



OTTERPOOL PARK

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ENVIRONMENTAL STATEMENT

OP5 CHAPTER 14 – **SOCIOECONOMIC EFFECTS
AND COMMUNITY**

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March 2022



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APPLICATION CONTENTS

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Environmental Statement

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OTTERPOOL PARK

Environmental Statement Volume 2: Main ES

Chapter 14: Socio-Economic Effects and Community

MARCH 2022

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Appendix 14.1 – Economic Strategy

14 Socio-Economics and Community

14.1 Introduction

- 14.1.1 This chapter of the ES assesses the impact of construction and operation of the proposed Development with respect to socio-economics and community.
- 14.1.2 This chapter should be read in conjunction with Chapters 1-4, the introductory chapters).
- 14.1.3 It has also been prepared alongside and informed by ES Appendix 14.1: Economic Strategy.

Relevant Aspects of the Proposed Development

- 14.1.4 A full description of the proposed Development is given in ES Chapter 4 (Table 4-2): The site and the Proposed Development Specific aspects that relate to the socio-economics and community topic include the impacts of the delivery of up to 8,500 homes along with retail, commercial, leisure, education, health and community facilities, green infrastructure and public open space.

14.2 Assessment Methodology

Legislation, Policy and Guidance

Legislation

- 14.2.1 There is no legislation which specifically governs how socio-economic assessments are undertaken; the Planning Acts (which include the Town and Country Planning Act 1990 (Ref 14.1) provide the framework within which planning applications are made in England. Other legislation of relevance to the topic of socio-economics includes the Localism Act 2011 (Ref 14.2) which introduced legal provisions for local communities to develop neighbourhood plans; and the Housing and Regeneration Act 2016 (Ref 14.3), written with the objectives of improving the supply and quality of housing, securing the regeneration or development of land and supporting the creation, regeneration and development of communities in England (for example through neighbourhood planning).

National Policy

- 14.2.2 The revised NPPF (Ref 14.4) was updated on 20 July 2021 and sets out the Government's planning policies for England and how these are expected to be applied. This revised Framework replaces the previous NPPF published in March 2012 and revised in July 2018 and 2019. The 2019 National Planning Policy Framework update includes around 85 reforms arising from the Housing White Paper (Ref 14.5), the Planning for the Right Homes in the Right Places consultation proposals which supplemented the White Paper (Ref 14.6). The 2021 update includes changes to the social objective of the planning system to help enable 'well-designed and safe built environment' (para. 8b) and a greater emphasis on the planting of trees in new developments (para. 131). It also reinforces the importance of sustainability in planning by formally enshrining the UN Climate Change goals (para. 7).
- 14.2.3 The NPPF has three overarching objectives (para. 8), which are interdependent and need to be pursued in mutually supportive ways:
- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

- **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
 - **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 14.2.4 In addition to the overarching objectives of the NPPF set out above, the NPPF also provides detailed requirements for the planning system. For example, Paragraph 59 of the NPPF emphasises the Government objective of significantly boosting the supply of homes. It also explains that it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with planning permission is developed without unnecessary delay.
- 14.2.5 Paragraph 63 of the NPPF addresses planning policy for affordable housing. Where there is a need for affordable housing, planning policy should seek to ensure:
- off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
 - the agreed approach contributes to the objective of creating mixed and balanced communities.
- 14.2.6 Paragraphs 81 to 83 of the NPPF highlight the required emphasis needed to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Planning policies should seek to encourage sustainable economic growth, identify strategic sites and increase local and inward investment, address barriers to investment such as infrastructure or services and be flexible enough to accommodate needs not anticipated.
- 14.2.7 Paragraph 83 of the NPPF states that planning policies and decisions should recognise and address the specific locational requirements of different sectors.
- 14.2.8 A Green Future: Our 25 Year Plan to Improve the Environment (2018) (Ref 14.7) covers connecting people with the environment to improve health and wellbeing, focusing particularly on promoting health and wellbeing through the natural environment and encouraging children to be close to nature, in and out of school. Other sections relate to greening our towns and cities.

Local Policy

14.2.9 A summary of relevant local policy to the topic of socio-economics and community is provided in Table 14-1.

Table 14-1 Local Policy Summary

Policy Document	Summary of Relevant Policy	Project Response
<p>Folkestone and Hythe Council Places and Policies Local Plan (Adopted 16 September 2020) (Ref 14.10)</p>	<p>The internal and external space standards for all dwelling sizes are set in policy HB3. Policy HB6 emphasises the importance of meeting housing need in rural areas. The development must be designed and available at a cost capable of meeting the identified local need. The development of new residential institutions need to be designed to national standards, in a sustainable location, has surrounding complimentary land uses and has sufficient open space and provision of services and access to public transport.</p> <p>Policy C1 seeks to ensure new development creates a sense of place. As a larger development, community cohesion methods and procedures such as landscaping, public art and water features can be phased into the proposal so that they impact a critical mass population.</p> <p>Health policies HW2, HW3 and HW4 seek to improve health and wellbeing of the local residents and reduce inequalities as part of any proposed Development in the district. This includes encouraging active lifestyles and promoting active travel. This will be achieved through the implementation of landscape features, good design and layout of buildings and preventing the loss of agriculture land where possible. The protection and/or creation of cycle and walking routes surrounding and through the site will help improve accessibility.</p>	<p>New housing will be compliant with Policy HB3 (internal and external space standards) where relevant in addition to compliance with self-build policies as set out.</p> <p>The proposed Development will foster a sense of place through community led projects.</p>
<p>Folkestone & Hythe District Council Core Strategy Review Submission (2022) (Ref 14.11)</p>	<p>The document focusses on the spatial and delivery elements of the strategy. Policies SS2 and SS4 promote economic growth and priority areas for activity within Folkestone and Hythe. The housing policies fall within the core strategy delivery, addressing district residential needs (Policy CSD2). The wider community policies include SS3 on place shaping and CSD1 on balanced neighbourhoods. From a health perspective, green infrastructure is identified as a key driver for improving health and wellbeing in the district. The district seeks to maintain the Healthy New Town principles in Policy SS8. The policy sets out the criteria for 'A sustainable new town' and 'A healthy new town'.</p>	<p>The proposed Development is compliant with Policies SS2 and SS4 in terms of the employment opportunities to be provided, together with the creation of a vibrant town centre.</p> <p>In terms of housing, the proposed Development is compliant with Policy CSD1 in terms of local distinctiveness, the presentation of a broad range of tenues, and the provision of affordable housing / balanced neighbourhoods.</p> <p>The proposed Development has been developed on garden town principles in relation to new homes, self-build / custom build houses, employment development and community / educational facilities.</p>

Guidance

- 14.2.10 There are no specific guidelines or requirements for assessing socio-economic impacts as part of an Environmental Impact Assessment (EIA),
- 14.2.11 Planning Practice Guidance provides some guidance on aspects relevant to this chapter, such as ‘Open Space, Sports and Recreation Facilities, Public Rights of Way and Local Green Space’ (Ref. 14.45).
- 14.2.12 The methodology used has also been informed by the fourth edition of the ‘Additionality Guide’ (Homes and Communities Agency, 2014) (Ref 14.14). The guide explains how to assess the additional impact of local economic growth and housing interventions and has been updated to include new information, research and guidance. The guide states that ‘central to good appraisal is the need to assess whether the intervention concerned will bring additional benefits over and above what would have happened anyway in its absence’. The HCA provide particular guidance in relation to issues such as extent of study area and broad approach.
- 14.2.13 Detailed guidance relating to methodologies for the assessment of impacts on specific topics (for example employment and education) is provided within the Methodology section of this Chapter.

Consultation and Scoping

Consultation

- 14.2.14 Table 14-2 provides a summary of the consultation undertaken for this chapter prior to and following the submission of the 2019 application (Y19/0257/ FH). The table summarises how the comments have been addressed in this chapter, where relevant.

Table 14-2 Summary of Consultation

Consultee/ Contact/Date	Summary of Consultee Issue	Outcome
<i>Consultations since 2019</i>	<i>This mainly includes addressing the following LPA and key consultee comments to the previously submitted Outline Planning Application Otterpool Park (Y19/2057/FH)</i>	
Natural England / Kent Downs AONB 2019	Need for an assessment of recreational impacts of the proposed Development on the Kent Downs AONB.	Baseline data regarding recreational use included, together with an assessment focusing on agreed areas where there may be relevant issues (Section 14.4 and 14.5)
Temple on behalf of FHDC, Interim Report Review, April 2019	Provision of missing crime and anti-social assessment or rationale for not needing to include.	Consideration of the potential effects of crime and anti-social behaviour is included in the assessment of residual and cumulative effects section (Section 14.5)
Temple on behalf of FHDC, Interim Report Review, April 2019	Assessment of amenity effects on AONB during construction is required.	Consideration of the potential effects of amenity effects on AONB during construction is included in the assessment of residual and cumulative effects section (Section 14.5)

Consultee/ Contact/Date	Summary of Consultee Issue	Outcome
Temple on behalf of FHDC, Interim Report Review, April 2019	Details of how sensitivity is assessed and the part it plays in determining significance of effect	Sensitivity of receptors are assessed in the appropriate ES assessment of residual and cumulative effects section (Section 14.5)
Temple on behalf of FHDC, Interim Report Review, April 2019	Clarification of the local authority used for the baseline given that there have been changes to local authorities.	Baseline data has been updated to reflect the change to local authorities (Section 14.4)
Temple on behalf of FHDC, Interim Report Review, April 2019	Clarification on the school place capacity where there are deficits for the primary and secondary schools included.	School capacity figures included in the assessment of education impacts (Section 14.5)
Temple on behalf of FHDC, Interim Report Review, April 2019	Information about whether the population projections reflect a reasonable worst case scenario (alongside sensitivity testing of the population projections).	The impacts of the proposed Development on social infrastructure e.g. schools, healthcare etc. reflect the needs generated by new population (Section 14.5). The assumptions on new population are based on an appropriate and proportionate level of population modelling performed by Quod and contained in the Community Development and Facilities Strategy (ES Appendix 4.10).
Temple on behalf of FHDC, Interim Report Review, April 2019	Information on whether the job figures are net or gross and if gross, whether Additionality Factors would significantly alter the conclusions reached in relation to the number of net additional jobs at operational phase	Employment generated by the proposed Development is set out in the assessment section and includes analysis of additionality factors (Section 14.5).
Temple on behalf of FHDC, Interim Report Review, April 2019	Information about whether floorspace figures used are reflecting a reasonable worst case scenario of the job figures.	Employment floorspace used in the assessment is provided by the Applicant and represents a reasonable or likely scenario estimate of the potential future floorspace. (Section 14.5)
Temple on behalf of FHDC, Interim Report Review, April 2019	Information on the number of GPs that would be employed at the incorporated healthcare centre and information on school capacity of the proposed new schools so that conclusions that there is sufficient capacity can be followed.	The need for additional GPs and school capacity are factored into the assessment of residual and cumulative effects section (Section 14.5)
Temple on behalf of FHDC, Interim Report Review, April 2019	Assessment of impacts on nearby open spaces and play spaces should be included, including baseline information on local open spaces.	Included in assessment of residual and cumulative effects section (Section 14.5)

Consultee/ Contact/Date	Summary of Consultee Issue	Outcome
Temple on behalf of FHDC, Interim Report Review, April 2019	A cumulative assessment which considers the impact of this development combined with the committed development surrounding the development, including quantification of population and consideration of the combined impact on education, healthcare, open space and community facilities.	Included in assessment of residual and cumulative effects section (Section 14.5)
Temple on behalf of FHDC, Interim Report Review, April 2019	Clarification on the population generated by the cumulative schemes.	The potential impacts of cumulative development are assessed in a proportionate way in the assessment of residual and cumulative effects section (Section 14.5)
Temple on behalf of FHDC, Interim Report Review, April 2019	Include identification of significant effects in the NTS.	Included in NTS
Temple on behalf of FHDC, Interim Report Review, April 2019	A cumulative assessment which considers the impact of this development combined with the committed development surrounding the development, including quantification of population and consideration of the combined impact on education, healthcare, open space and community facilities.	Included in assessment of residual and cumulative effects section (Section 14.5)
Kent County Council/2019	Methodology to assess of level of demand for new education provision.	Assessment follows appropriate methodology as agreed by Kent County Council education team. (Section 14.5)

Scoping

- 14.2.15 A previous EIA Scoping Opinion was undertaken for the 2019 application, where relevant, the comments from this process have been incorporated within Table 14-2. For this amended application, a request for a Scoping Opinion was submitted to F&HDC in June 2020. This outlined the work that had been undertaken to date and sets out the proposed approach to the EIA. A Scoping Opinion was issued by F&HDC in July 2020. Table 14-3 provides a summary of the scoping opinion comments relevant to this chapter, and how they have been addressed.
- 14.2.16 Additionally, a Scoping Addendum was submitted on 5 October 2021 to outline key changes to the application. These comprised additional land in the north-west corner of the site for provision of the waste water treatment works (WWTW), additional land for highway junction works at Newingreen Junction, minor amendments to clarify land ownership boundaries and a change in the assessment approach in relation to the future uses of Westenhanger Castle. A response was received from F&HDC on this Scoping Addendum as set out in Chapter 2: EIA Approach and Methodology. All relevant changes since the submission of the scoping report have been assessed in this ES.

Table 14-3 Summary of EIA Scoping Opinion

Consultee	Summary Scoping Opinion Response	Location in the ES
Natural England	Need for assessment of recreational impacts on the Kent Downs AONB, including potential impacts on access land, Public Rights of Way, and other routes in the vicinity of the proposed Development (for example the nearby North Downs Way National Trail).	Assessment of recreational impacts on the Kent Downs AONB and other areas is provided within the assessment of residual and cumulative effects section for the operation phase.(Section 14.5)
Canterbury City Council	Delivery of employment development should be considered.	Consideration of the delivery of employment development is provided within the assessment of residual and cumulative effects section for both constructional operation phases. (Section 14.5)
Kent County Council	<p>Development should be served by fibre broadband infrastructure.</p> <p>Consideration of nursing / dementia care home for older people and/or extra care housing land uses within the proposed Development to cater for social care needs. Consideration also to the incorporation of smaller units rather than an institutional care home for people with specific health needs.</p> <p>Level of demand for education within the development would need to be based on the forecast requirements of the Local Education Authority.</p>	<p>Consideration of the need for appropriate housing and care facilities has been factored into the development of the Framework Masterplan for Otterpool Park.</p> <p>The assessment of residual and cumulative effects section considers the level of demand for education, based on forecast requirements of the Kent County Council education team. (Section 14.5)</p>
Kent Downs AONB	Necessary to assess the impacts of increased visitor pressure on the Kent Downs AONB.	The impacts of increased visitor pressure on the Kent Downs AONB is considered in the assessment of residual and cumulative effects section, as well as in the Habitats Regulation Assessment which forms Appendix 7.19 to this ES. (Section 14.5)
Temple on behalf of F&HDC, July 2020	The construction phase assessment will consider land-take; direct, indirect and induced employment; access to leisure and recreation, particularly through public rights of way (PRoW) severance; and nuisance from the construction activities. The assessment of nuisance from construction activities will look at the interactive effects of noise, air quality and transport	Consideration of the factors suggested are included in the assessment of residual and cumulative effects section. (Section 14.5)
Temple on behalf of F&HDC, July 2020	The ES should explain the extent to which the construction workforce is expected to derive from the local area. If are large proportion of the construction workforce is to be recruited from outside the local area, the ES should assess the effect of the increased demand for temporary accommodation, including effects on tourism.	Consideration of the factors suggested are included in the assessment of residual and cumulative effects section.(Section 14.5)
Temple on behalf of	The 2020 Scoping Report acknowledges that due to the long duration of the construction period and the likely necessity for a phased	Consideration of the factors suggested are included in the assessment of residual and cumulative effects section (Section 14.5).

Consultee	Summary Scoping Opinion Response	Location in the ES
F&HDC, July 2020	<p>approach, the construction assessment will reflect construction phases. However, it does not acknowledge the effects of part-occupation of the proposed Development. An interim assessment may be necessary, particularly if any education or community facilities are to be delivered in the latter phases of construction of the site, substantially after the provision of housing. Presentation of any embedded mitigation should make it as clear as possible when this mitigation is expected to be delivered, and whether there would be temporary adverse effects until that point. Where phasing is unknown a reasonable worst-case scenario should be presented, noting that this is subject to being updated at the reserved matters stage.</p>	<p>In addition, the phasing of new school places so that they correspond appropriately to the new population arising from the proposed Development, is set out in detail the Community Development and Facilities Strategy (ES Appendix 4.10).</p>
Temple on behalf of F&HDC, July 2020	<p>The operational phase assessment will address population change, housing supply, direct and indirect employment effects, education, healthcare, community facilities and open space, and crime and anti-social behaviour. The assessment should also consider effects on pre-school childcare and play space.</p>	<p>Consideration of the factors suggested are included in the assessment of residual and cumulative effects section. (Section 14.5). Operational employment is taken from the Employment Opportunities Study for Otterpool Park (Ref 14.24). A comprehensive assessment of indirect employment is not made but reference is made to indicative levels of indirect employment.</p>
Temple on behalf of F&HDC, July 2020	<p>The ES will need to be clear on scope and methodology for each resource and receptor A qualitative approach to crime and anti-social behaviour and to construction phase severance will be taken; this is considered acceptable. All other assessments should be quantitative wherever possible. The approach to determining the sensitivity of each receptor (including vulnerability to change) should be made clear, and it should be clear how this has contributed (alongside magnitude of impact) to significance criteria.</p>	<p>Consideration of the factors suggested are included in the assessment of residual and cumulative effects section. (Section 14.5)</p>
Temple on behalf of F&HDC, July 2020	<p>The ES should demonstrate how the socio-economic assessment has considered a reasonable worst case scenario, considering the outline nature of the scheme. The number of units, unit mix and tenure, and the flexible mix of non-commercial floorspace may all vary from the maximum parameters given for the scheme, with ramifications for housing provision, employment, and predicted population and child yields.</p>	<p>The likely impacts of the proposed Development on social infrastructure e.g. schools, healthcare etc. reflect the needs generated by new population. This is based on an appropriate and proportionate level of population modelling performed by Quod and contained in the Community Development and Facilities Strategy (ES Appendix 4.10). (Section 14.5)</p>
Temple on behalf of F&HDC, July 2020	<p>Employment and economic assessments should follow the Additionality Guide, 4th Edition, (Homes and Communities Agency, 2014).</p>	<p>Consideration of additionality factors are included in the assessment of residual and cumulative effects section.(Section 14.5)</p>

Consultee	Summary Scoping Opinion Response	Location in the ES
Temple on behalf of F&HDC, July 2020	Section 14.3.16 of the 2020 Scoping Report makes no mention of cumulative housing effects, however these should be considered in the ES. The selection criteria and proposed schemes for inclusion in cumulative assessments for socio-economics are considered acceptable.	Consideration of the factors suggested are included in the assessment of residual and cumulative effects section. (Section 14.5)
Temple on behalf of F&HDC, July 2020	Education: It is acknowledged that the ES scoping identifies the need to consider the provision of education facilities, based upon the forecast requirements of the Local Education Authority. Consideration should be given to whether these impacts have the potential to be cross boundary and we would appreciate further clarification on this point, as set out in our previous consultation response.	Kent County Council are responsible for school place planning within their jurisdiction and education effects have been assessed in that context. Given the location of the proposed Development and distance from other counties, there are unlikely to be significant cross-boundary issues. KCC will in its role in planning school places will routinely engage with neighbouring authorities in discharging their duties. (Section 14.5)
Temple on behalf of F&HDC, July 2020	As this is an outline application, there will be flexibility in the parameters presented. The Scoping Report commits to assessing the worst case scenario in line with 'Rochdale Envelope' principles. The parameters for assessment of the outline scheme elements should be clearly set out and should consider flexibility in size, massing, unit mix, tenure mix, provision of community facilities such as healthcare and education, and flexibility in commercial/retail use classes.	The impacts of the proposed Development on social infrastructure e.g. schools, healthcare etc. and employment generation reflect the needs generated by new population. To estimate the new population and workforce a reasonable and proportionate approach has been followed, in line with 'Rochdale Envelope' principles. (Section 14.5). It should be noted that size and tenure are not fixed at the outline stage.
Temple on behalf of F&HDC, July 2020	The 2020 Scoping Report notes that there is a relatively long construction timeframe (25 years <i>(albeit this has now shortened slightly)</i>) and phasing is not known. A reasonable worst case scenario approach should be taken to construction phasing, taking into account early phase occupation as well as the order in which retail and community infrastructure is delivered, which will have implications particularly for noise, air quality, traffic, socioeconomics, health, and landscape and visual impact. We recommend a section or broader commentary explaining how reasonable worst case assessments have been derived and whether any sensitivity testing has been applied to allow for flexibility within any future uses. Specific comments relating to phasing are provided in the topic sections below.	A proportionate approach has been followed in assessing the potential socio-economic impacts of the proposed Development following a likely or worst case scenario as appropriate. The delivery of key infrastructure such as education and healthcare provision will be based on a monitor and manage approach up to agreed "worst case" caps. Because of this approach a range of likely outcomes with respect to demand for social infrastructure can be accommodated and sensitivity testing is not necessary.
Temple on behalf of F&HDC, July 2020	Baseline data used for the previous 2019 Application should be 'in date' and updated, if required.	Baseline updated to reflect latest available data (Section 14.4)

14.2.17 Temple, on behalf of F&HDC, undertook a review of the Draft ES in December 2021. The topic specific comments and the response are provided in Table 14-4.

Table 14-4 Temple (on behalf F&HDC) Draft ES Comments

Consultee	Comment	Response
<p>Temple on behalf of F&HDC, 1 December 2021 Draft ES</p>	<p>Paragraph 14.5.2 includes some assumptions that are accounted for in the assessment of the loss of existing land use. They refer to the “retention of employment uses in some locations (for example employment space will remain at Westenhanger Castle as a wedding venue and at Hillhurst Farm)”, although this is not in line with the approach agreed that states that activities at Westenhanger Castle are not considered part of the ES.</p> <p>The ES also refers to the “phasing of the proposed Development (such that not all employment uses would be impacted simultaneously and land-take of employment areas comprising part of the longer-term phasing plan)”, which does not seem to reflect the current approach in which the applicant intends to bring it forward in phases which are not yet identified (the three Tiers) and will require further justification</p>	<p>Following receipt of the high level review the approach has been amended to reflect the ongoing use of retained buildings (see Chapter 4: The Site and the proposed Development). This ongoing use of retained buildings is accounted for within this assessment.</p> <p>The construction of the proposed Development will be phased, as set out in Chapter 4. It is acknowledged that the phasing sequence is not determined at this Outline Planning Application Stage. Therefore, it is considered that phasing of the construction can be relied on as a principle to inform the assessment, albeit the exact details are unknown at this stage.</p>

The Study Area

14.2.18 The Additionality Guide (Ref 14.14) provides information relating to the scale at which assessment can be undertaken most appropriately. The guidance notes that very few proposals should be assessed only at site level (i.e. in the immediate vicinity of a proposal) given that socio-economic costs and benefits are very rarely concentrated in the actual area of physical activity. The importance of assessing impacts at local/sub-regional levels is therefore stressed, relating to an approximate 10 to 15-mile radius from the site concerned. Precise delineation is acknowledged to depend on other factors including density of settlement patterns as well as the type and scale of the proposal.

14.2.19 The consideration of socio-economic and community effects for the proposed Development have therefore been concentrated on three spatial areas as follows:

- The Development site boundary for the project has been used to identify specific impacts relating for example to land-take and direct effects on receptors (for example loss of existing employment or effects on existing Public Rights of Way (PRoW) during construction;
- Folkestone & Hythe District has been used to consider effects relating to population, the local economy, housing and community infrastructure (the ‘local study area’);
- Kent and the wider south-east region have been used to consider wider socio-economic effects such as employment arising from the proposed Development (the ‘wider study area’).

Methodology for Establishing Baseline Conditions

14.2.20 A range of data sources has been used to inform the assessment, including:

- Data available from the Office for National Statistics, including 2011 Census data (Ref 14.15) and annually produced population estimates (Ref 14.16);

- Labour force activity information and data regarding the local economy accessed via Nomisweb and the Business Register and Employment Survey (BRES) (Ref 14.17);
- In relation to education, school capacity data has been reviewed using Annual Schools Census data (2021) and Kent County Council published admissions numbers (Ref 14.18);
- The Otterpool Park Garden Town Community Development and Facilities Strategy (ES Appendix 4.10) was reviewed. This includes information on key community facilities and infrastructure within the study area and has been reviewed to help identify potential activity changes resulting from the proposed Development.

Forecasting the Future Baseline

14.2.21 The future baseline has utilised data sources including ONS population forecasts and the Strategic Housing Market Assessment (Shepway District Council 2017 – now F&HDC) (Ref 14.19).

Defining the Sensitivity of resource

14.2.22 Resources are the assets and facilities which may be affected by the proposed Development; receptors are the users or beneficiaries of those resources. Table 14-5 summarises the resources and corresponding receptors that have been considered as part of this assessment.

Table 14-5 Resources and Receptors

Resource	Corresponding Receptor
Residential properties	Existing and Future Residents
Commercial properties	Existing and Future Local businesses
Employment land and property	Local and wider economy
Community infrastructure (for example education, healthcare, community facilities)	Users of community services and infrastructure
Areas of open space, play areas, recreational routes	Users of community services and infrastructure
Tourism Facility	Existing and future residents and visitors

14.2.23 The sensitivity of receptors or resources have been categorised as either 'High', 'Medium', or 'Low' using professional judgment. The broad criteria are shown in Table 14-6.

Table 14-6 Criteria for Determining Value (sensitivity) for socio-economics and community

Sensitivity	Criteria
High	Where a receptor has limited ability to respond to change
Medium	Where a receptor has some ability to respond to change
Low	Where a receptor is particularly responsive to change in that it is able to cope with change without substantial effects on its existing status or viability.

14.2.24 The sensitivity of relevant receptors is set out with a justification in the appropriate assessment section below.

Methodology for Assessing Impacts

Impact Characterisation

14.2.25 The approach uses a combination of quantitative assessment where established formulae are available and professional judgement where a qualitative assessment of impacts has been required.

14.2.26 Sources of information that define the proposed Development have been reviewed, including information submitted to support the planning application. Study areas for the assessment of potential impacts have been defined and a baseline developed to provide a description of the current economic and social context for the area, including population, housing, economy and employment, community services and infrastructure, open space and recreation. Baseline information has been described quantitatively where possible, but also making use of qualitative information where necessary. The socio-economic conditions are assessed by comparing the baseline conditions within local, regional and national area levels. Following this, the Chapter analyses those impacts likely to result from the construction and operational phases of the proposed Development.

14.2.27 Impact magnitude has been assessed by consideration of the following factors:

- The magnitude of the predicted impact;
- The geographic extent of the impact;
- The duration and reversibility of the impact; and
- The capacity of the local economy or area to absorb or adjust to the impact.

14.2.28 The complexity of interactions between the above factors when impacting on socio-economic receptors means that it is difficult to set out precise quantitative measures to assess impact magnitude. However, based on professional judgement the criteria presented in Table 14-7 are considered in this assessment.

Table 14-7 Impact magnitude table

Impact Magnitude	Criteria
High	An impact that will be very severe/beneficial or likely to affect large numbers of people, businesses or groups usually anticipated at a local-wide or subregional level. And/or will continue beyond the project life and effectively constitutes a permanent, long term impact.
Medium	An impact that will be likely to affect a moderate number of people, businesses or groups in the wider local area. And/or will continue beyond the project life so that there is an effect on the base case experienced for a medium to long term duration.
Low	An impact that may affect a small number of people, businesses or groups in the local authority area and does not extend beyond the life of the project so that the base case is not affected beyond a short- or medium-term duration.
Negligible or Neutral	An impact that is temporary in nature and is unlikely to measurably affect the wellbeing of people or a lower value resource so that the existing base case remains constant. Neutral impacts could include impacts that are fully mitigated so in effect are not experienced by the receptor

14.2.29 Specific methodologies for assessing the functional effects of the proposed Development are as follows:

- **Employment** – employment generated during the construction phase is assessed using data provided by the Office for National Statistics (ONS) and Annual Business Survey data. Analysis of proposed land use and floor space provision to determine employment generation potential from the proposed Development, coupled with an assessment of the likely effect on the employment availability for the existing economically active population;
- **Population** – the new population generated as a result of the proposed Development will be estimated based on housing density figures identified in the 2011 Census;
- **Community facilities** – The Otterpool Park Garden Town Community Development and Facilities Strategy (ES Appendix 4.10) provides baseline information such as existing community facilities (including education, healthcare and open space). Potential level of demand arising from the proposed Development for community infrastructure is assessed as follows:
 - **Education.** Child yield has been estimated for pre-school, primary and secondary school-aged children arising from the proposed Development based on guidance presented in the Community Development and Facilities Strategy (ES Appendix 4.10);
 - **Healthcare.** Current waiting list information has been accessed using available NHS data and information from specific GP surgeries relating to waiting lists. The Healthy Urban Development Unit (HUDU) (Ref 14.20) benchmark of 1,800 registered patients per NHS GP has been used as part of the assessment of demand for healthcare facilities arising from the proposed Development;
 - **Open space.** Existing open space, play areas and sports facilities have been identified as part of baseline assessment.

14.2.30 Mitigation measures are set out where appropriate, following which an assessment of residual effects following implementation of such measures is undertaken.

Assessing Significance of Effect

14.2.31 There are generally no accepted criteria for assessing the significance of socio-economic and community effects. The terms used to define the significance of effects are as follows:

- **Adverse:** detrimental or negative impacts to a socio-economic resource or receptor.
- **Negligible:** imperceptible impacts to a socio-economic resource or receptor.
- **Beneficial:** advantageous or positive impact to a socio-economic resource or receptor.

14.2.32 Where beneficial or adverse effect have been identified, these have been assessed against the following scales:

- **Minor:** slight, very short or highly localised impact – may be considered not significant.
- **Moderate:** limited impact (by extent, duration or magnitude) which may be considered significant.
- **Major:** considerable impact (by extent, duration or magnitude) of more than local significance (for example a sizeable change in relation to the baseline or affecting a wide geographic area). Major is considered significant.

14.2.33 The assessment of significance has been informed by the sensitivity of the receptor and the magnitude of impact as set out in Table 14-8. For the purposes of this assessment, only moderate and major effects are considered ‘significant’.

Table 14-8 Significance Criteria

Value/ Sensitivity	Magnitude of Impact			
	High	Medium	Low	Negligible/Neutral
High	Major	Moderate negative / positive	Moderate negative / positive	Minor negative / positive
Medium	Moderate/Major	Moderate negative / positive	Minor negative / positive	Negligible/Neutral/No Effect
Low	Moderate negative / positive	Minor negative / positive	Negligible/Neutral/No Effect	Negligible/Neutral/No Effect

Limitations and Assumptions

Limitations

14.2.34 Limitations of the assessment, together with assumptions used are summarised as follows:

- baseline conditions have been established using data that is currently available.
- professional judgement and expertise have been used to assess impacts where quantitative information or appropriate guidance is not available.
- the full implications of the Covid-19 pandemic are not fully known at this stage so this assessment does not make specific assumptions related to its impact.

Assumptions

14.2.35 In terms of population and related assessments based on a maximum figure of 8,500 dwellings, assumptions have included:

- an average dwelling density of 2.4 people per unit (as derived from the 2011 Census and agreed as a reasonable assumption by Kent County Council).
- 22% of the dwellings would be for affordable housing.

14.3 Baseline

Existing Baseline

Existing Land-Uses

14.3.1 Land-uses within the application site boundary include agricultural, commercial and residential uses and 101 existing buildings. A large proportion of the site area is occupied by farmsteads and associated agricultural land for a mixture of arable and livestock farming purposes (the effects on agriculture and soils are described in ES Chapter 5: Agriculture and Soils), in addition to the site of the former Folkestone Racecourse (which closed in 2012). Other commercial uses located and currently operational within the application site boundary are identified in Table 14-9, including offices, workshops, a café and recording studio. These uses currently have the potential to employ in the region of 70 Full Time Equivalent (FTE) staff.

Table 14-9 Commercial Uses within application site boundary

Business Name and Location	Description
Airport Café, Ashford Road, Sellindge	Café
Unit 1, Benham Water Farm, Ashford Road, Newingreen	Workshop
Unit 2b, Benham Water Farm, Ashford Road, Newingreen	Office
Unit 3, Benham Water Farm, Ashford Road, Newingreen	Workshop
Station House, Westenhanger Railway Station	Auction house
Euro Cosmetics Ltd, Hillhurst Farm, Saltwood	Office
Office 1, Hillhurst Farm, Saltwood	Office
Office 2, Hillhurst Farm, Saltwood	Office
Office 3, Hillhurst Farm, Saltwood	Office
Hillhurst Farm, Stone Street, Saltwood	Recording studio
Otterpool Park LLP, Jockey Club, Folkestone Racecourse	Office
Westenhanger Castle, leased to Glow events (wedding and events management)	Events

14.3.2 There are a number of commercial enterprises located immediately adjacent to the application site boundary. These include:

- Holiday Extras, providers of online holiday support services (premises has recently expanded)

- A motorway service station adjacent to junction 11 of the M20 and including a Channel Ports Truck Park
- Nearby small businesses including those located on Barrow Hill and a marquee hire company on Harringe Lane
- Port Lympne Wildlife Park
- Lympne Industrial Estate, which accommodates a range of light industrial and warehousing businesses and which has planning permission for expansion.

14.3.3 Residential properties located within the application site boundary include several farmsteads as well as isolated properties located to the south of Ashford Road (A20) in the vicinity of Newingreen.

Population

14.3.4 Table 14-10 shows the population profile for the local and wider areas, with Table 14-11 setting out data relating to the age profile of those residents.

Table 14-10 Population Levels and Changes (%)

Study Area	2001	2011	Population Growth 2001-2011 (%)	2020 Population Estimate	Population Growth 2011-2020 (%)
Folkestone & Hythe District	96,238	107,969	12.2	113,320	5.0
Kent County	1,329,718	1,463,740	10.08	1,589,057	8.6
South East	8,000,645	8,634,750	7.93	9,217,265	6.8
England	49,138,831	53,012,456	7.88	56,550,138	6.7

Source: Office for National Statistics Census Data 2001, 2011, Population Estimates Mid-2020

14.3.5 The most recent population data at Lower Super Output Area (LSOA) level is from the 2020 Mid Year Estimates. There are three LSOAs that cover the application site boundary (Shepway 008D, Shepway 009C and Shepway 009D); 2020 Mid-year population estimates data shows that the three LSOAs had a total population of 5,916 people. Population density for each of these three LSOAs is 0.7, 1.3 and 2.5 persons per hectare respectively, compared to a district-wide population density of 3.2.

14.3.6 Table 14-11 shows there is a slightly higher proportion of young people (0-15) in the county of Kent and the South-East region than is the case for Folkestone & Hythe District and England as a whole. There is also a lower number of young adults aged 16-24 than in the South East and England than at local and county level. Folkestone and Hythe District has a higher proportion of residents aged 45-64 and retired population than is the case for other areas.

Table 14-11 Age Profile (%)

Age Group	Folkestone & Hythe District	Kent	South East	England
0-15	16.8	19.5	19.3	19.2
16-24	8.4	9.8	10.2	10.5
25-44	28.1	30.4	31.2	32.6
45-64	21.7	19.9	19.7	19.2
65+	25.0	20.3	19.7	18.5

Source: Mid-Year Population Estimates, 2020

14.3.7 Table 14-12 outlines data relating to ethnicity, identifying that the district of Folkestone and Hythe and the County of Kent have a higher proportion of people from a white ethnic background than the South East or England as a whole.

Table 14-12 Ethnicity (%)

Ethnicity	Folkestone & Hythe District	Kent	South East	England
White	98.1	93.7	90.7	85.4
Mixed	0.9	1.5	1.9	2.3
Asian/Asian British	0.8	3.3	5.2	7.8
Black/African/Caribbean/Black British	0.2	1.1	1.6	3.5
Other ethnic group	0.1	0.5	0.6	1.0

Source: Census Data 2011

Housing

14.3.8 Average earnings and property prices can be contributing factors to types of housing tenure in an area. This is demonstrated by the 2011 census housing tenure data in Table 14-13. Over half of the population of both Folkestone and Hythe and Kent are property owners. Folkestone and Hythe District has slightly more privately rented properties, whereas Kent has a higher percentage of social rents. In terms of property prices, Folkestone and Hythe was one of only two districts in Kent that saw an increase in property sales in 2017 compared to 2016 (Ref 14.19).

Table 14-13 Housing Tenure (%)

Housing Tenure	Folkestone & Hythe District	Kent	South East	England
Owned	64.8	67.3	67.6	63.3
Shared ownership	0.5	1.0	1.1	0.8
Private rented	22.2	16.5	16.3	16.8
Social rented	11.2	13.9	13.7	17.7

Source: Census Data 2011

14.3.9 The Strategic Housing Market Assessment (SHMA) (Ref 14.19) produced in March 2017 shows that net housing completions in the district between 2001 and 2015 averaged 333 dwellings per annum. The SHMA sets out self-containment values for F&HDC, stating that F&HDC migration flows are positive and natural change is negative – i.e. people move from elsewhere to live in the district and then remain there, without having further children, for the rest of their lives - a pattern which is common along the south coast.

Economy and Employment

14.3.10 Headline economic data taken from the document ‘Shepway in Context’ is summarised as follows:

14.3.11 Between October 2016 and September 2017, 79.7% of F&HDC’s working age population (16-64) was economically active, which is lower than the South East (81.2%) but higher than Great Britain (78.1%) as a whole (Nomis, 2017).

14.3.12 The proportion of economically active people who were unemployed in F&HDC was 3.7%, which is higher than regional (3.4%) but lower than national levels (4.5%) (Nomis, 2017).

14.3.13 At a local scale, there is a greater proportion of males in employment (85.2%) than females (72.3%). This difference in employment statistics between men and women is similar at regional and national level.

14.3.14 The most significant contributing factors to economic inactivity at regional and national level are studying and looking after family or home. Dominant employment sectors are professional elementary occupations (20.0%) and caring, leisure and other service occupations (14.1%).

14.3.15 Table 14-14 shows the economic activity and inactivity rates for the Folkestone and Hythe District compared with Kent and the South East. The proportion of people economically active in Folkestone and Hythe District is greater than for the other two geographical areas. A proportion of economically inactive residents within Kent are classified as long-term sick.

Table 14-14 Economic Activity and Inactivity (%)

Economic Activity	Folkestone & Hythe District	Kent	South East
Economically Active	84.5	81.1	82.3
In employment	83.4	78.0	79.4
Employees	62.2	64.3	67.3
Self-employed	20.4	13.4	11.8
Unemployed	3.6	3.8	3.5
Economically Inactive	15.5	18.9	17.7
Looking after family / home	-	22.0	20.8
Long-term sick	-	20.7	19.6

Source: Nomis July 2019-Jun 2020

14.3.16 Table 14-15 provides details of employment by occupation. The table shows that there is a higher proportion of residents in the associate professional and technical group in Folkestone and Hythe compared to Kent and the South East, as well as higher proportions of residents in Administerial and secretarial and skilled trades occupations.

Table 14-15 Employment by Occupation

Soc 2010 Group	Folkestone & Hythe District	Kent	South East
Managers, directors and senior officials	15.0%	11.1%	12.8%
Professional occupations	14.7%	21.2%	23.8%
Associate professional & technical	23.9%	15.8%	16.8%
Administerial & secretarial	14.9%	11.4%	10.6%
Skilled trades occupations	10.6%	10.5%	8.9%
Caring, leisure & other service occupations	n/a	8.7%	8.7%
Sales and customer service occupations	n/a	6.0%	6.2%
Process plant & machine operatives	n/a	4.5%	4.2%
Elementary occupations	n/a	10.6%	7.8%

Source: Nomis Jan 2020-Dec 2020

14.3.17 With regard to qualifications, statistics for Folkestone and Hythe District show that a higher proportion of residents have no or lower level qualifications than is the case at county level or for the South East (Table 14-16).

Table 14-16 Qualifications

Qualifications	Folkestone & Hythe District	Kent	South East
NVQ4 and above	38.4%	39.9%	44.9%
NVQ3 and above	59.6%	58.1%	63.5%
NVQ2 and above	76.3%	78.2%	80.6%
NVQ1 and above	85.7%	88.9%	90.3%
Other qualifications	n/a	4.2%	4.8%
No formal qualifications	9.6%	6.8%	4.9%

Source: ONS Population Survey Jan 2020 – Dec 2020

14.3.18 Average gross weekly pay for full-time workers in 2020 was £519.70 for residents of Folkestone and Hythe District, compared to £607.10 for Kent and £631.80 for the South East (ONS Annual survey of hours and earnings 2020).

14.3.19 The Employment Land Review (ELR) for Shepway (Now F&HDC) (2017) (Ref 14.21) summarises information about the local economy. The Review notes that F&HDC supported around 48,200 jobs in 2016, representing an employment growth of 27% over the period from 1997 which was much higher than the growth recorded in Kent (22%), the South East (19%) and the UK (19%) over the same period. The district is over-represented in a number of employment sectors including public administration and defence, agriculture and finance and insurance, whilst under-represented in manufacturing, professional and other private services, and information / communication. Analysis on relevant economic sectors is also provided in the Economic Strategy (ES Appendix 14.1). Productivity (as measured by Gross Value Added) was lower in F&HDC in 2016 than the average for Kent or the South East, reflecting the over-representation of lower value sectors in the district. Finally, the Review highlights that the district has a much lower rate of business start-ups compared to regional and national averages (69 business births per 10,000 working-age persons in 2014 compared to 83 for Kent and 93 for the South East).

14.3.20 In terms of business counts by size, Table 14-17 shows the proportions of businesses within each size category in Folkestone and Hythe District and for the South East.

Table 14-17 Employment by Occupation

Business Size	Folkestone & Hythe District	Kent	South East
Micro (0 to 9)	89.6%	90.2%	90.3%
Small (10 to 49)	8.9%	8.1%	7.9%
Medium (50 to 249)	1.2%	1.4%	1.4%
Large (250+)	0.3%	0.3%	0.4%

Source: Nomis 2020

- 14.3.21 The Otterpool Park Employment Land Needs Assessment (OPLNA) 2018 (Ref 14.22) provides a partial update of the 2017 Shepway Employment Land Review (ELR). The report updates District wide growth projections and associated employment land requirements over the period to 2037 (i.e. to align with the Core Strategy Local Plan review period) by drawing on the latest population projections and economic forecasts. It also provides estimates of employment land needs for the District and Otterpool Park specifically, based on different assumptions of growth and demand.
- 14.3.22 The OPLNA considers Experian projections used to inform the 2017 ELR (taken from Experian's March 2016 release). The latest forecasts imply a much lower level of job growth in Folkestone and Hythe District on an 'average per annum' basis, albeit covering different periods of time and a different end year to the forecast. The latest forecasts imply growth of 237 jobs per annum (between 2018 and 2037) compared with 445 jobs per annum (between 2006 and 2026) in the 2017 ELR.
- 14.3.23 The Shepway Economic Development Strategy (2015-2020) (Ref 14.23) identifies four priorities for the area including building on economic strengths; boosting productivity and supporting business growth; promoting further investment; and improving education and skills attainment. Within these priorities there is a focus on promoting key sectors which are well represented in the district already and which have potential for future growth. These include financial services, creative industries, business and professional services, transport and logistics, energy, tourism, culture, retail and recreation, and advanced manufacturing. Key activities identified include encouraging more business start-ups, supporting businesses to grow and improving survival rates of businesses.
- 14.3.24 Travel to work data for the former Shepway District (now F&HDC) identifies it to be a net exporter of labour, with key commuting destinations being Ashford, Dover, Canterbury, Maidstone and London city centre. The self-containment rate for F&HDC was 69% in 2011 (this refers to the share of residents who also work in the district). Travel to Work Areas (TTWAs) defined in 2015 by the Office for National Statistics (ONS) identify best fit boundaries within which commuting is as self-contained as possible. The 2015 data shows Folkestone and Dover as part of a combined TTWA (in previous assessments, Folkestone and Dover formed separate TTWAs).
- 14.3.25 The Employment Opportunities Study prepared for the Otterpool Park Garden Town by Lichfields in March 2018 (Ref 14.24) identifies that the existing commercial market in F&HDC is relatively localised, with the District recording a relatively low share of inward investments compared to other parts of Kent over the last two decades. Reasons for this include the nature of the employment site offer coupled with delivery barriers to land coming forward for development. F&HDC does not have availability of strategic employment land which in turn reduces the extent of its commercial property market catchment area. The Folkestone and Hythe Retail and Leisure Needs Assessment Update 2018 (Ref 14.41) suggests that the provision of retail and leisure floorspace at the proposed Development would be more than sufficient to meet local needs.

Deprivation

- 14.3.26 The English Indices of Deprivation 2019 provide a relative measure of deprivation at small area levels (Lower Super Output Areas (LSOA's)) across England, based on information relating to income, employment, health and disability, education, crime, barriers to housing and services and living environment, which can be combined into an overall Index of Multiple Deprivation (IMD) (Ref 14.25).
- 14.3.27 Deprivation is measured across seven different areas or domains – income, employment, health, education, living environment, crime and barriers to services

using a wide range of indicators. These measures are aggregated to create the index of multiple deprivation (IMD), which gives an indication of overall deprivation.

- 14.3.28 According to the 2019 Indices of Deprivation, relative levels of deprivation in Folkestone and Hythe District as a whole have remained consistent between 2015 and 2019. Four LSOAs within Folkestone and Hythe remain in the top 10% most deprived communities in England in 2015 and 2019, namely Folkestone Harbour, Folkestone Harvey Central, Folkestone East and Folkestone South.

Crime

- 14.3.29 As shown at Table 14-11, Folkestone & Hythe District has a higher proportion of residents aged 45-64 and retired population than is the case for other areas; older population groups can feel a greater sense of vulnerability in relation to community safety and fear of crime. Rates of crime in the Police areas close to the proposed Development are relatively low. For example, according to Kent Police, Hythe, Hythe West and North Downs East police areas have crime rates as recorded in May 2021 per 1,000 residents of 6,6 and 5 respectively against a Kent Police area rate of 8. Folkestone Central has a higher rate at 16 per 1,000 residents.

Community Services and Infrastructure

- 14.3.30 Community services and infrastructure relate to education and healthcare facilities, in addition to other community facilities such as post offices, community centres and places of worship. Community facilities are a means of stimulating social inclusion and provide an important resource to existing and future communities. Existing community services and infrastructure are described below.

Education

- 14.3.31 In terms of education provision, the Community Development and Facilities Strategy (ES Appendix 4.10) which has been prepared to support the Outline Planning Application (OPA), identifies 15 childcare providers and 12 primary schools within 5km of the application site boundary. Information on school capacity can be compared to child yield information (i.e. the number of children of each age expected to be living in each home) to assess the likely impact of the proposed Development on education provision. In terms of early years provision, the nearest childcare providers are Little Learners Pre-School in Sellindge and the Punch and Judy Play Group in Lympne.
- 14.3.32 Primary schools located within 5km of the site are listed in Table 14-17. The nearest schools to the site are Lympne Church of England Primary School and Sellindge Primary School.
- 14.3.33 Table 14-17 also shows the current pupil numbers and capacity for each school (the majority of which have only one or one-half forms of entry (FE)) together with an indication of surplus spaces as relevant.

Table 14-17 Primary School Capacity

School	Pupil Application Numbers (PAN)	Capacity	Number on Roll (NOR)	Surplus
Aldington Primary School	30	210	198	12 (6%)
Brabourne Church of England Primary School	15	105	96	9 (9%)
Hythe Bay Church of England Primary School	60	420	355	65 (15%)
Lyminge Church of England Primary School	30	210	190	20 (10%)
Lympne Church of England Primary School	30	210	202	8 (4%)
Mersham Primary School	30	210	194	16 (8%)
Palmarsh Primary School	20	140	155	0 (0%)
Saltwood Church of England Primary School	30	210	222	0 (0%)
Sellindge Primary School	15	105	103	2 (2%)
Smeeth Community Primary School	20	140	127	13 (9%)
St Augustine's Catholic Primary School	30	210	208	2 (1%)
Stowting Church of England Primary School	15	105	98	7 (7%)

Source: Community Development and Facilities Strategy, (ES Appendix 4.10)

14.3.34 The table shows that schools in the surrounding area to the site tend to be small and have limited capacity. Overall, 154 places or 7% of all places across all years are unfilled in these schools. The Community Development and Facilities Strategy (ES Appendix 4.10) identifies that according to the latest Kent County Council School Place Planning document (2020), within FHDC, birth rates have fallen drastically over the past few years, therefore a significant surplus (up to 20%) of primary school places is expected across the district throughout the plan period. For example, in respect of falling numbers of primary school pupils across the district, the planned expansion of Palmarsh Primary School in Hythe has been put on hold. In summary, the baseline indicates that while there is moderate surplus capacity in the local area, most local schools are small and are unlikely to have capacity to significantly expand. It is unlikely that existing local schools will have the capacity to cater for demand for primary school places from Otterpool Park, except in a relatively limited way.

14.3.35 There are currently 13 secondary schools within both Ashford Borough Council (ABC) and Folkestone & Hythe District Council (FHDC). Both ABC and FHDC are within Kent County Council, which has responsibility for school place planning. The closest school to the site is Brockhill Park Performing Arts College on the outskirts of Hythe. It is noted that the Pent Valley Technology College closed in 2016 for various financial reasons.

14.3.36 The capacity of secondary schools in both ABC and FHDC for Years 7-11 is shown below in Table 14-18, including the total capacity for each district.

Table 14-18 Secondary School Capacity

Name	District	PAN	Capacity	NOR	Surplus (%)
Brockhill Park Performing Arts College	FHDC	235	1,175	1,219	0 (0%)
Folkestone Academy	FHDC	270	1,350	1,170	180 (13%)
Highworth Grammar School	ADC	184	920	1,068	0 (0%)
Homewood School and Sixth Form Centre	ADC	390	1,950	1,683	267 (14%)
The Folkestone School for Girls	FHDC	180	900	916	0 (0%)
The Harvey Grammar School	FHDC	150	750	778	0 (0%)
The John Wallis Church of England Academy	ADC	210	1,050	1,040	10 (1%)
The Marsh Academy	FHDC	180	900	874	26 (3%)
The North School	ADC	215	1,075	917	158 (15%)
The Norton Knatchbull School	ADC	149	745	938	0 (0%)
Towers School and Sixth Form Centre	ADC	243	1,215	1,010	205 (17%)
Turner Free School*	FHDC	180	300	299	1 (0%)
Wye School	ADC	90	450	500	0 (0%)
Total FHDC			5,375	5,256	207 (4%)
Total ADC			7,405	7,156	640 (9%)
Total all			12,780	12,412	847 (7%)

Source: Community Development and Facilities Strategy (ES Appendix 4.10)

- 14.3.37 Over both authority areas there is some secondary school capacity, with some 7% of spaces (847 in total) across Years 7-11 currently unfilled. Surplus capacity is currently greater in ABC (9%) than in FHDC (4%), which partly reflects a period of transition following the closure of Pent Valley Technology College in Folkestone.
- 14.3.38 The Turner Free School opened on the former Pent Valley site in 2018 with a Year 7 intake of 120 and at full capacity will provide 600 additional places at Years 7-11 in 2022 when it is expected to be fully occupied (Community Development and Facilities Strategy, ES Appendix 4.10). There are four selective grammar schools within the two districts (two boys' schools and two girls' schools); places at these schools would not necessarily be available to all local pupils who apply as at least a proportion of places will be allocated on merit rather than distance from the school gate.
- 14.3.39 There are currently 207 surplus places in the four non-selective schools closest to Otterpool Park (Brockhill Park, Folkestone Academy, Marsh Academy and Turner Free School). However, the latest KCC School Place Planning document (2020) indicates that a deficit is forecast across the plan period for the non-selective schools in F&HDC. It is suggested that the deficit will be managed with the support of existing schools (Kent County Council 2016) (Ref 14.27).
- 14.3.40 Further education is typically provided in a sixth-form college, a further education college or a higher education institution; higher education generally relates to degree level or above.
- 14.3.41 All of the secondary schools listed in the Chapter above also have sixth form provision. These schools offer a range of options including A levels and BTEC qualifications. The nearest sixth form to the Development site is Brockhill Park Performing Arts College. This provides A/AS level courses and vocational qualifications including BTEC

diplomas, including courses in performing arts such as drama, dance and music. It currently has 163 sixth form students. The nearest further education college is East Kent College's campus in Folkestone, which also has campuses in Dover and Broadstairs and provides a range of professional, vocational and technical further education courses. Ashford College, now part of the EKC (East Kent College) Group, provides a combination of further and higher education courses and is the only further education college in Ashford Borough.

Healthcare

- 14.3.42 This section examines existing healthcare provision near to the Otterpool Park site. This includes primary healthcare facilities within five kilometres, including General Practitioners (GPs), dentists and pharmacies. It also examines hospital provision at district levels. This analysis is based on publicly available NHS data.
- 14.3.43 There are currently five GP surgeries within 5km of the Otterpool Park Outline Planning Application Area. However only three of these have contractual boundaries which cover (or partially cover) the Otterpool Park Outline Planning Application Area. New Lyminge and Dr Thike do not currently cover this area, although contracts could be revised as agreed as part of the commissioning process.
- 14.3.44 To inform the Otterpool Park Community Development and Facilities Strategy (ES Appendix 4.10, F&HDC consulted with the NHS Kent and Medway Clinical Commissioning Group). Based on this consultation it is assumed there is no surplus capacity for new residents in existing surgeries in the local area.
- 14.3.45 There are currently four pharmacies located within 5km of the site (three in Hythe and one in Lyminge), together with two dentist surgeries (both of which are in Hythe).
- 14.3.46 The nearest hospitals are the William Harvey Hospital, Ashford and the Royal Victoria Hospital, Folkestone. The former operates an Accident and Emergency department (A&E) as well as a range of specialist care departments. The latter has a minor injuries unit as well as some specialist services including diagnostic services, mental health care, children's and adolescent services and other outpatient services.
- 14.3.47 The East Kent Hospitals University NHS Foundation Trust (which is responsible for operating both hospitals) is currently examining ways of reorganising hospital care in East Kent and a number of options are being considered.

Community Centres and Facilities

- 14.3.48 There are several local community halls located in nearby areas. The two nearest halls are the Sellindge Village Hall and the Lympe Village Hall, run by Sellindge and Lympe Parish Councils respectively and available to hire for community uses. Sellindge Sports and Social club also hosts local activities. There are also places of worship belonging to multiple congregations, including several historic parish churches. Evidence from community consultation has demonstrated that the existing community halls are successful and popular.

Open Space and Recreation

- 14.3.49 The Shepway Open Space Strategy (Ref 14.28) published in 2017 identifies existing open space provision. The Strategy identified that the quality and value of publicly accessible open space across the former Shepway District (now F&HDC) is relatively good, with a greater quantity of open space than surrounding local authorities. Green corridors are a key component of the open space network, providing opportunities for recreation, sustainable travel and nature conservation.
- 14.3.50 The Shepway Play Area Review (June 2017) (Ref 14.29) was prepared to help define the desired level of play provision across the District in terms of quantity, quality and accessibility. The review highlights that the western half of the District away from the

more densely populated coastal towns experiences some lack of play provision. Ten wards within the District fail to meet the Fields in Trust (FiT) quantity benchmark, with regard to the provision of play areas, including Hythe and North Downs West (wards within which the proposed Development sits). However, it should be recognised that the FiT benchmark is recognised as being very aspirational and a benchmark that very few places meet.

Existing Walking and Cycling Routes

- 14.3.51 There are 11 PRoW that cross the site. A PRoW survey was undertaken in April 2018 to determine condition of these routes and from that to identify likely level of recreational usage. The survey identified a relatively low level of usage of these routes, and primarily for local uses such as dog walking / fitness purposes.
- 14.3.52 The Travel Plan which accompanies the OPA identifies that there are various on-road and off-road walking routes within the site, with footways provided on many of the roads including Ashford Road, Aldington Road and Barrow Hill. Walking accessibility is lacking in east-west connections, with the exception of the footpath along the railway to the north of the site and the narrow footway along the A20 Ashford Road.
- 14.3.53 There are no dedicated cycle routes in the immediate vicinity of the site. The coastal National Cycle Network Route 2 lies approximately 1km to the south of the application site boundary and is a popular long distance recreational route following the English Channel coastline. The section closest to Otterpool Park is traffic free and runs between West Hythe and Folkestone to the east and towards Romney Marsh in the west. The route runs along the towpath of the Royal Military Canal through West Hythe, Hythe and Folkestone. Cyclists can access the route via Royal Military Road which is located at the southern point of Lympne Hill. Regional on-road cycle route 17, runs to the east of Otterpool Park providing connections to Canterbury and Dover.
- 14.3.54 A Walking and Cycling Study prepared for Kent County Council in April 2018 (Ref 14.30) undertook a detailed assessment of the walking environment and found that existing provision was not of a sufficient width or separation from high speed traffic to enable pedestrians and cyclists to comfortably travel without conflict. Outside built-up areas the footway provision is described as negligible, typically limited to farmstead access points.
- 14.3.55 The Royal Military Canal stretches in an east-west direction between the western edge of Folkestone and the northern edge of Rye and is approximately 3km to the south of the site. The footpath along the canal has been upgraded at West Hythe to enable use by cyclists and equestrians in addition to pedestrians; over 61,000 visits were recorded along the new route in a thirteen-month period. The West Hythe carpark, from which the canal can be accessed by pedestrians, is often at capacity. The Saxon Shore Way follows the route of the Royal Military Canal in this location.
- 14.3.56 Kent County Council produced an Active Travel Strategy including an Action Plan 2018/19 (Ref 14.37). The Strategy identifies that barriers to active travel in Kent include a perceived lack of suitable continuous routes between homes and community services, workplaces or schools, and not enough promotion of existing routes. Other issues include a lack of facilities such as lockers and secure bicycle parking, obstacles in cycle lanes and in footways, and perception of safety when walking and cycling. Another barrier to active travel is the convenience of using a car, especially to carry heavy or bulky loads, and the need to make linked trips such as a school drop-off on the way to work.

Tourism and Recreation

- 14.3.57 To the south of the site is the Kent Downs Area of Outstanding Natural Beauty (AONB). Described in the AONB Management Plan 2021-2026 (Ref 14.31) as a 'living, working

landscape shaped and managed by people', over one million people already live within a kilometre of the AONB boundary and there is considerable demand for access and recreation. Whilst rural leisure and tourism are important ways of supporting the local economy and community well-being, tourism and recreation needs to be sustainable. A visitor survey undertaken by the AONB Unit identified that the main motivations for visiting the Kent Downs are for its beauty and tranquillity, with walking being the main activity.

14.3.58 The AONB Management Plan identifies that some areas within the Kent Downs suffer from overuse, with a consequent detrimental impact on landscapes and communities. A range of locations within the AONB are considered to be potentially vulnerable to increases in recreational pressure as a result of their environmental sensitivity.

14.3.59 Visitor surveys in the Kent Downs AONB were undertaken by a team of four Arcadis employees during August and September 2017 to determine level of use, principal recreational uses (e.g. walking, fitness, dog walking), likely catchment areas for visitors and principal mode of travel used to reach each destination. Key findings from the survey included that:

- Visitor numbers were understandably higher at the weekend than on a weekday;
- The majority of people interviewed were day visitors rather than people visiting as part of a wider holiday;
- The majority of visitors on both weekdays and weekends were from within a twenty minute drive time (the majority of visitors to the Folkestone to Etchinghill Escarpment were primarily from Folkestone and surrounding settlements, whilst the majority of visitors to the Wye and Crundale Downs were from the towns of Ashford and Wye);
- Reasons for people choosing these locations to visit included proximity to home, the variety of footpaths and tracks available, and the quality of the scenery; and
- Walking and dog walking formed the principal activities undertaken at both locations.

14.3.60 Key routes within the AONB include the North Downs Way National Trail, a long-distance footpath extending through Surrey to Dover and which is 156 miles in length. Sections of the route nearest to the proposed Development extend from the town of Wye to Dover, passing along the Etchinghill Escarpment. Other walks and trails in the vicinity of the site include the Tolsford Trek, which links the Elham Valley Way, Saxon Shore Way and North Downs Way.

14.3.61 Further afield from the site is the Dungeness complex (including Romney Marsh and Rye Bay). The area receives a high number of visitors, approximately 550,000 visits are made per annum, with the RSPB reserve receiving approximately 30,000 visitors (Ref 14.32). A visitor survey undertaken in 2006 identified that Dungeness has a large and dispersed catchment, with approximately 33% of visitors living more than 80km distant (i.e. outside Kent and East Sussex altogether with the largest single source in this zone being London, responsible for 5% of all visits) (Ref 14.38). The remaining 66% of visitors were dispersed across an area of up to 50 miles/80km covering virtually all of Kent and East Sussex. Less than 10% of surveyed visitors to Dungeness actually came from the 'local' area (i.e. within 10 miles / 16km). The survey also indicated that Dungeness has a relatively small proportion of 'regular' visitors - the survey identified that 87% of visitors surveyed were either on their first visit or only visited Dungeness 'rarely'. Only 13% of visitors visited regularly (i.e. at least once a month). More recent survey work was undertaken in 2014/15 to inform a sustainable access strategy for the Romney Marsh and Rye Bay area (Ref 14.39). Similarly, this survey identified Dungeness Point and the Dungeness RSPB reserve as locations that attracted visitors

from further afield (more than 15km), whereas Greatstone and Lade areas tended to be more popular amongst local residents.

14.3.62 Finally, Westenhanger Castle is a Grade I listed building located on the northern edge of the site, between the CTRL (also known as HS1) and former Folkestone Racecourse. Two Grade I listed barns occupy the outer courtyard to the west of the castle. At present, Westenhanger Castle, which is owned by FHDC and now within the application site boundary of the proposed Development, functions primarily as a wedding and events venue. During normal times i.e. pre Covid-19 pandemic, the castle holds between 30-35 weddings per year (each attended by between 40-250 people), in addition to events such as concerts, conferences, car shows and historic tours. The grounds of the castle include a temporary marquee to increase capacity for wedding events. Operation of Westenhanger Castle as a wedding and events venue has led to the formation of arrangements and linkages with a range of local businesses (for example florists and caterers) as well as links with local accommodation providers.

14.3.63 In terms of tourism accommodation, the Folkestone & Hythe Core Strategy Review (Ref 14.11) states at paragraph 5.92 that Folkestone 'retains a significant stock of hotel accommodation'. Booking.com (Ref 14.40) provides an up to date picture on tourism accommodation. It shows that there are 93 properties providing tourism accommodation in Folkestone and Hythe including 26 holiday homes, 21 hotels, 27 holiday apartments and 21 Guest houses and Bed and Breakfasts. There are also 266 properties listed on Airbnb, although some of these may also be included on Booking.com.

Future Baseline

14.3.64 The future baseline is the situation that would prevail should a proposed Development not proceed. The future baseline is further defined by the assessment scenario that the topic adheres to. The future baseline for socioeconomic and community has identified the following.

- The SHMA (2017) (Ref 14.19) uses population projections to show F&HDC's population increasing over the period 2014-2037 from 109,500 people to 126,500; this is equivalent to an average growth in households of 538.
- The Core Strategy Review 2020 (with 2021 Main Modifications) applies the Government's standard method for calculating housing need. It identifies a need for 738 new homes a year on average over the period 2019/20 to 2036/37 (18 years) or some 13,284 additional homes in total.
- The Otterpool Park Employment Lands Needs Assessment (Lichfields) 2018 (Ref 14.43) sets out a projection of future employment in 2037. This suggests the labour force in Folkestone and Hythe will increase by 4,500 jobs between 2018 and 2037. This represents a 9.7% increase in 19 years.

14.4 Design and Mitigation

14.4.1 The following section sets out:

- The embedded design measures, including good practice approaches, relied on in this assessment; and
- The potential significant effects remaining after the application of embedded design measures and good practice approaches, and any additional mitigation required to address these potential significant effects.
- The potential significant effects prior to additional mitigation are identified in the Assessment Summary table.

14.4.2 The potential significant effects prior to additional mitigation are identified in the Assessment Summary table.

14.4.3 Environmental considerations have influenced the proposed Development throughout the design development process, from early options assessment through to refinement of the Project design. An iterative process has facilitated design updates and improvements, informed by environmental assessment and input from the Project design teams, stakeholders and public consultation.

14.4.4 Impacts would be reduced by measures embedded into the design of the development, as well as by additional mitigation, and together these measures would act to avoid, reduce and mitigate effects. The measures have been summarised by whether they are embedded design measures, which are secured through the documents for approval, or additional mitigation secured, for example, by planning condition or legal agreement. Embedded measures are described as measures that form part of the design, developed through the iterative design process and good practice standard approaches and actions commonly used on development projects to avoid or reduce environmental impacts, typically applicable across the whole Development. Additional mitigation is described as any additional Development-specific measures needed to avoid, reduce or offset potential impacts that could otherwise result in effects considered significant in the context of the EIA Regulations.

14.4.5 Mitigation measures relating to air quality, noise and vibration, landscape and transport (which may impact upon residential amenity) are described in more detail in Sections 6.4, 12.4, 13.4, and 16.4 respectively.

Embedded Design Measures

Construction

14.4.6 To safeguard the quality of the receptors, an Outline Code of Construction Practice has been developed to form part of the application (ES Appendix 4.17). This document details best practice construction techniques and methodologies and describes the management of environmental impacts during construction. It is expected that a planning condition would be established requiring the outline CoCP be further developed into a detailed CoCP.

14.4.7 The following best practice measures are included in the CoCP:

- controls of working hours to address impacts on residential amenity and public safety;
- natural surveillance, i.e. the ability to see into public areas and routes during construction, appropriate fencing, signage and safety precautions;
- details on the proposed routes for construction traffic and how information about construction activities will be communicated to existing residents;
- Measures associated with the design of construction compounds. Where practical, construction compounds would be located to avoid or minimise environmental and

community impacts, provide the best access for personnel and deliveries in relation to major structures and worksites, and meet other construction requirements for the Project;

- Construction compounds would be located away from PRowS, National Trails and cycle routes where practicable. Landscaping would be strategically used in order to reduce the visual impact of construction compounds on neighbouring land uses (such as residential properties) as well as for users of PRow, in addition to reducing noise impacts; and
- Other embedded mitigation during construction of relevance to population and human health relates to measures to mitigate noise, air quality and visual impacts. These measures are described in Section 12.5 of Chapter 12: Noise and Vibration, Section 5.5 of Chapter 5: Air Quality, and Section 7.5 of Chapter 7: Landscape and Visual.

Operation

14.4.8 The following elements have been embedded in the design of the proposed Development:

- Provision of range of housing types as secured through the Development Specification (ES Appendix 4.1) and Housing Strategy (ES Appendix 4.14);
- Ensuring provision of education and healthcare facilities within the site to accommodate the anticipated demands of the resident population and positively contribute to the range of facilities within KCC as secured through the Development Specification (ES Appendix 4.1) and the Community Delivery and Facilities Strategy;
- Including provision of sufficient space to accommodate a range of community facilities in order to promote community interaction, empowerment and community development as secured through the Development Specification (ES Appendix 4.1) and Community Development and Facilities Strategy (ES Appendix 4.10);
- Ensuring the provision of open space, sports and play provision to meet the needs of the population of Otterpool Park as secured through the Development Specification (ES Appendix 4.1), Parameter Plans (ES Appendix 4.2) and Green Infrastructure Strategy (ES Appendix 4.11);
- Providing opportunities for employment growth within the site, including enabling greater home-working through the provision of elements such as fast and effective broadband speeds as secured through the Development Specification (ES Appendix 4.1) and Utility Strategy; and
- Well-lit public realm and the positioning of buildings to ensure the natural surveillance of public areas and routes as secured through the Strategic Design Principles (ES Appendix 4.3).

Additional Mitigation

14.4.9 An iterative appraisal of the proposed Development taking into account the embedded design measures and good practice was undertaken to identify any potentially significant effects that would require additional mitigation. The proposed Development, during both construction and operation, is not considered to have the potential to cause significant adverse effects in relation to socio-economic effects. Therefore, no additional mitigation has been identified as being required.

14.5 Assessment of Residual and Cumulative Effects

14.5.1 The following section sets out the residual effects following the implementation of the embedded measures and additional mitigation set out above.

Residual Effects from Construction

Existing Land-Uses

14.5.2 There are a number of existing employment uses within the application site boundary, including offices and workshops, in addition to a café and a recording studio. These uses would need to relocate when the proposed Development is constructed. If all uses were lost the displacement would equate to approximately 70 jobs across a range of occupation types and levels. However, factors to be weighed in the consideration of the impact of potential loss of existing employment within the application site include the following:

- Ongoing use of retained buildings as set out in Chapter 4: the Site and the proposed Development;
- Some of these employment uses relocating to nearby premises (for example there is an arrangement to offer relocated premises within the site to employment uses lost at Benham Farm);
- There are no plans to close the Airport café and the Westenhanger Station premises remain privately owned with no foreseeable change to employment uses here);
- The phasing of the proposed Development (such that not all employment uses would be impacted simultaneously);
- The contribution that the proposed Development makes to employment in the area once operational (i.e. that there will be a net gain overall in terms of employment creation).

14.5.3 Taking the above into account, the impact magnitude is considered to be negligible. The sensitivity of the receptor (local economy) is considered to be medium because while employment opportunities are important for people's livelihood there are a range of alternative opportunities available in the local economy. Therefore, on balance the effect of the proposed Development in terms of loss of existing employment is considered to be **negligible** and **not significant**.

Residential Amenity

14.5.4 The construction phase would likely lead to some temporary disruption for local communities and potential effects on residential amenity by virtue of noise, disturbance, construction traffic, potential air quality changes (for example construction dust) as well as changes to the visual landscape. Residents in the adjoining settlements of Lympe, Westenhanger, Barrow Hill, Sellindge and Newingreen would be particularly vulnerable to changes in residential amenity by virtue of their proximity to the proposed Development.

14.5.5 With respect to potential noise effects on nearby residential properties, ES Chapter 13: Noise and Vibration identifies that there will be temporary adverse noise from demolition and construction works and ground borne vibrations.

14.5.6 For existing settlements and individual properties, a detailed visual amenity impact assessment ES Chapter 12: Landscape identifies that although the proposals would be found to be noticeable, due to the distances involved, the degree of conserved intervening vegetation, the proposed buffer zones, coupled with the proposed

embedded design and mitigation measures, the effect on existing residents is considered to be **not significant**.

- 14.5.7 ES Chapter 6: Air Quality identifies a number of sensitive receptors (e.g. residential properties) within 350m of the application site boundary. The Chapter notes that the potential for impacts depends significantly on the distance between the dust generating activity and receptor location. The air quality assessment states that the risk of dust impacts during the construction phase was evaluated by assessing the dust emissions magnitude of the planned construction activities and took into account the existing sensitivity of area.. However, with the application of the relevant mitigation measures summarised in ES Appendix 6.3, it is concluded that the residual effect would be negligible.
- 14.5.8 ES Chapter 16: Transport has identified that there are likely to be minor adverse effects for residents relating to the increase in construction vehicles on the local highway network. Potential delays to journey times for pedestrians and drivers may be experienced due to the volume of traffic and potential need to introduce temporary traffic management controls on route to the proposed Development site. The safety of road users may also be affected by the increase of large type construction vehicles. As such, a Construction Traffic Management Plan (CTMP) would be produced to mitigate these effects, effectively routing construction vehicles away from sensitive residential areas where possible.
- 14.5.9 The sensitivity of the receptor (existing and future residents) to construction related disruption is considered to be low. In general, people have a capacity to tolerate some temporary disturbance related to the construction process. Also, although there is a long total construction period, the new homes will be built over a large area and so the disruption will be localised over a relatively shorter time. The impact magnitude is considered to be medium as there would be some residual adverse impacts after the proposed mitigation measures outlined in Sections 6.4, 12.4, 13.4, and 16.4. Therefore, the effects on residential amenity are expected to be **minor adverse** and so **not significant**.

Public Safety

- 14.5.10 Construction works have the potential to affect public safety. Construction areas and public highway and footpaths would need to be appropriately cordoned off and appropriate signage provided to prevent inappropriate access and to indicate the necessary safety precautions that should be taken on entering the site.
- 14.5.11 The impact of the proposed Development on public safety of local residents, businesses and visitors is considered to be of negligible magnitude because of the low risk and likelihood of incidents occurring and as it is likely to only affect a relatively small geographic area at any one time and will be temporary in nature. The sensitivity of the receptor (existing and future residents) is high and so on balance the effect is considered to be **minor adverse** and therefore **not significant**.

Economy and Employment

- 14.5.12 The principal socio-economic impact arising from the construction of the proposed Development relates to the creation of construction employment and opportunities for training and skills development over the short and longer term. These effects are also addressed in the Economic Strategy (ES Appendix 14.1)
- 14.5.13 Construction employment has been calculated using regional data for employment and turnover within the construction sector based on Standard Industrial Classification 2007 subclasses and using the latest available data from the 2019 Annual Business Survey (Office for National Statistics) and Output in the Construction Industry Sub-national and sub-sector data 2019 (Office for National Statistics). This analysis has

identified a turnover per employee within the construction sector for the South East of £108,795.45. This figure has been applied to the capital expenditure estimates of approximately £2.02 billion for the proposed Development, resulting in 18,567 gross direct construction job years and thereby 1,857 FTE direct construction jobs (where one FTE is equivalent to ten annual job years).

14.5.14 Leakage and displacement factors then need to be applied – the Additionality Guide (HCA fourth edition) defines ‘leakage’ as being where benefits go outside of the area under consideration, and displacement as being where a proportion of outputs are accounted for by reduced outputs elsewhere in the area under consideration. The Additionality Guide provides ‘ready reckoners’ to help quantify likely levels of leakage and displacement. Given the nature of the construction industry (for example the workforce is characterised by relatively high levels of mobility – workers moving from place to place with new construction projects), leakage and displacement factors of 50% and 25% have been applied. Finally, there are likely to be indirect employment effects arising from the proposed Development – these may relate for example to supply chain linkages or from employment in businesses arising or expanding to service the construction workforce. The Additionality Guide provides guidance as to composite multipliers that can be applied to quantify benefits arising from these more indirect sources; at the local level (local authority wide) a composite multiplier of 1.15 has been applied, extending to 1.7 for the wider region, recognising the strong local supply linkages and income or induced effects likely to arise as a result of the proposed Development. A summary of the construction employment impacts calculations is provided in Table 14-19.

Table 14-19 Construction Employment Summary

	Construction Employment (FTE)
FTE direct construction jobs	1,857
Leakage (50%)	929
Displacement (25%)	696
Composite multiplier (1.15 local study area)	800 (net FTE construction jobs – local area)
Composite multiplier (1.7 wider region)	1,183 (net FTE construction jobs – wider region)

14.5.15 The proposed Development is estimated to generate 800 net FTE jobs in the local study area and net 925 FTE jobs at the wider regional level in total during the construction period. This is considered to be of medium impact magnitude and medium receptor sensitivity (local economy) taking into account the scale of the local and regional employment market and the importance of employment for local residents.

14.5.16 Although there is no detailed information available at present relating to skills and training requirements, the phased approach to the proposed Development does offer long-term opportunities (i.e. during the approximately 19 year period of construction) and could facilitate career development through apprenticeships and training in construction trades. The proposed Development also presents an opportunity for growth in new and developing construction trades, such as sustainable techniques and the green construction sector. The Employment Opportunities Study produced for Otterpool Park by Lichfields in March 2018 identified the potential to generate significant and long-term demand for green construction skills and to showcase green construction approaches, with the scale of delivery at Otterpool Park giving critical mass; opportunities cited here include establishing links with local education and

training providers such as the construction skills centre at the Folkestone Campus of East Kent College which has recently expanded.

- 14.5.17 The impact magnitude is considered to be medium, and the receptor (local economy) sensitivity is also medium. Therefore, the effect of the proposed Development on creation of employment opportunities, construction skills and training development is considered to be **moderate beneficial** and **significant**.

Tourism

- 14.5.18 This section assesses the potential impact on the availability of hotel rooms for the local tourism market as a result of the non-local construction workforce.

- 14.5.19 It is not possible at this stage of the proposed Development to quantify the numbers of construction workforce deriving from the local area and accordingly workers from outside the local area that might seek to stay in temporary accommodation i.e. rented rooms, Bed and Breakfasts or hotels while they work on the project. Taking a worst case scenario, the estimate of 50% leakage, as shown at the construction employment effects section above, would suggest that around 929 FTE workers could derive from outside the study area. The current national trend of relative shortages of construction labour caused by Brexit and other structural labour force issues, if extending into the future, could suggest that a significant amount of construction labour would derive from outside the area. Approximately, 50% is considered a reasonable assumption to apply at this stage in the absence of more detailed information. However, this does not mean that all these workers would require accommodation. Many will commute to the site and not require local accommodation. Also, the approximately 19 year construction period means these workers will be spread out over a long time period. As shown at the baseline section, Folkestone and Hythe has a large stock of tourism accommodation (e.g. an estimated 93 properties), that are likely to be able to accommodate construction workers seeking to stay in the area for temporary periods while they work.

- 14.5.20 Taking these factors into account it is considered that the proposed Development would be likely to have a low impact magnitude. The sensitivity of the receptor (existing and future residents and visitors) is considered to be medium as there are some alternative hotel rooms available. In summary, the effect is considered to be **minor adverse** and **not significant**.

Residual Effects from Operation

- 14.5.21 The proposed Development creates new housing, employment, community and leisure space which will have a range of effects in terms of the population and associated services and facilities. The proposed Development is for the creation of 8,500 new homes at Otterpool Park. A household density of 2.4 persons per dwelling has been assumed to inform the OPA; the proposed Development in its entirety therefore would result in an estimated total population of 20,400 people, with construction taking place up to 2042.

Housing

- 14.5.22 The proposed Development comprises 8,500 new homes. The Housing Strategy (ES Appendix 4.14) prepared to accompany the OPA refers to market evidence suggesting significant demand for homes in Kent, and issues relating to housing supply not keeping pace with demand. The SHMA for the former Shepway District (Now F&HDC) points to net housing completions averaging 333 dwellings per annum between 2001 and 2015.

- 14.5.23 The majority of new homes within the application site boundary (92%) comprise residential development under Use Class C3; the remaining 8% comprise extra care

housing under Use Class C2. The Housing Strategy (ES Appendix 4.14) summarises key features of residential development, which will:

- Be phased to maintain a steady rate of delivery on site, with the scale of delivery informed by market demand;
- Ensure a variety of house types are provided in each Development Zone to offer a range of choice to suit a variety of lifestyles (i.e. homes are built in a range of styles, sizes and tenures to suit different requirements and preferences, and also in order to create quality of place) and;
- Be planned in accordance with minimum space standards for all homes.

14.5.24 Otterpool Park has the potential to deliver a significant amount of self-build housing. According to the Housing Strategy (ES Appendix 4.14) Table 9.1, the proposed Development will facilitate the delivery of around 3.7% self and custom build housing.

14.5.25 The proposed Development aims to achieve provision of 22% affordable housing in line with emerging policy requirements. A phasing plan for affordable provision overall and within the various affordable housing types will be developed with the overall end target of 22% clearly established.

14.5.26 The former Shepway district (now F&HDC) is home to a higher proportion of retired and elderly people than is the case for Kent as a whole. The proposed Development provides a mix of options for older people to meet a range of care needs, including large flats to appeal to 'down-sizers', a retirement housing in close proximity to the new town centre, extra care housing with a range of levels of support from independent living to care packages, and a nursing home for those with higher care needs.

14.5.27 The Vision for Kent (Ref 14.33) describes the challenges facing Kent and the priorities for the County for the next ten years. The strategy promises to ensure there is choice of high-quality and accessible services that will tackle disadvantage particularly through housing that supports strong communities, provides a good quality of life and reduces household costs. Kent County Council's Strategic Statement (Ref 14.34) links the vision and priorities of the council to a series of strategic and supporting outcomes that will drive service delivery across the County. The statement supports well planned housing, seeking to 'increase resident satisfaction with community facilities and amenities in new housing developments'.

14.5.28 The proposed Development provides almost 70% of the housing required in the District for the entire Plan period. Taking into account this contribution to housing supply, together with the beneficial effect of the proposed Development in terms of meeting the need for housing of different tenures and sizes, it is considered to be a high impact magnitude. The sensitivity of receptor (existing and future residents) have a **major beneficial** and therefore **significant** effect in terms of housing availability and type.

Economy and Employment

14.5.29 The Otterpool Park Economic Strategy (ES Appendix 14.1) and the Employment Opportunities Study for Otterpool Park (Ref 14.24) identify that whilst the FHDC economy has grown relatively strongly during the past two decades, there are a number of gaps and issues which ultimately constrain the ability of the district to compete with other parts of Kent and the wider South-East. These include lower than average business start-up rates, out-commuting of more highly qualified residents, a lack of good quality and deliverable employment sites in accessible locations of greatest market demand (which in turn constrains economic performance and ability to diversify the local economy), and availability of high quality premises.

14.5.30 Impacts on employment and economic growth in the area as a result of the proposed Development relate principally to the potential for employment generation, which can

take a number of forms – for example on-site jobs (resulting from allocated land uses), population-derived jobs (resulting from estimated population increase) and additional potential employment (for example from home working).

14.5.31 Table 14-20 sets out employment generation resulting from commercial floorspace and other uses planned within the proposed Development. The total employment floorspace includes commercial business space in hubs, a commercial business and industrial space and light industrial business park), as well as hotel, leisure, mixed retail and related uses (shops, professional services, retail services, cafes, restaurants, drinking establishments, hot food takeaways, and community / non-residential facilities that may have an employment element (for example schools, sports and healthcare centres). The total proposed employment generating floorspace is up to 87,500 sqm (See Chapter 4 The Site and the Proposed Development Table 4-2 Proposed Development Schedule).

14.5.32 Employment generation has been calculated using the HCA Employment Densities Guidance (2015) (Ref 14.35) applied to net internal floorspace areas unless otherwise stated. Table 14-20 shows that the proposed Development would generate 6,860 FTE across a range of sectors which, when taking into account part-time workers, could equate to 8,605 jobs. The number of home-workers has been estimated using the ratio of home-workers to dwellings in Folkestone and Hythe based on 2011 Census data and applying that ratio to the number of dwellings at the proposed Development. This is anticipated to increase due to the changing work patterns since 2011.

Table 14-20 Employment Generation by Floorspace

Use Class	Description	FTE	% Part Time	Jobs
Employment (Use Class E and B2)	Commercial business in hubs	810	30%	955
	Commercial business parks	2,690	30%	3,165
	Light industrial business park	230	30%	270
Mixed retail and related uses (Use Class E and Sui Generis drinking establishments and hot food takeaway)	Business, Café / restaurant, Pub / takeaway	480	64%	705
	Retail	720	63%	1,045
Education and Community Facilities (Use Class E and F)	Primary schools	230	71%	360
	Secondary school (including sixth form)	185	31%	220
	Nursery provision	90	55%	125
	Primary care provision	55	40%	70
	Community centre	65	50%	85
	Sports pavilion	15	50%	20
	Indoor sports hall	55	50%	70
C2	Extra care housing	215	40%	270
C1	c.120-bed hotel	40	64%	55
C3	Home-working	980	35%	1,190
	TOTAL	6,860		8,605

Source: Otterpool Park Economic Strategy (ES Appendix 14.1)

- 14.5.33 The Employment Opportunities Study points to the potential benefits to existing residents within Folkestone and Hythe District of employment creation, suggesting that a significant proportion of new jobs (75%) would likely be taken up by residents within the district based on current commuting patterns.
- 14.5.34 The employment generated within the proposed Development has the potential to create a range of jobs across different occupational groups with varying skills requirements. Given the mix of commercial floorspace proposed, the majority of jobs are expected to come forward in high value sectors such as professional, scientific and technical activities and manufacturing (61.8% and 3.4% respectively), with an estimated 64.6% of jobs in Otterpool Park requiring high-skilled workers (Employment Opportunities Study, 2018) (Ref 14.24).
- 14.5.35 In addition to on-site jobs described in Table 14-20, the proposed Development has the potential to create off-site jobs in the wider area (new settlements elsewhere in the UK, such as Bicester Eco-Town for example, have been estimated to generate an additional 200 jobs in the wider area for every 1,000 additional population). Otterpool Park presents an opportunity to provide a strategic employment function within Folkestone and Hythe District and potentially act as a key attractor for some growth sectors.
- 14.5.36 The proposed Development includes up to 29,000 sqm (gross) mixed retail and related uses (Class E and Sui Generis uses) such as shops, professional services, restaurants and cafes. The Retail Impact Assessment (ES Appendix 11.2) which accompanies the OPA suggests that retail centres within a ten-minute drive time of Otterpool Park (i.e. Folkestone, Hythe, Cheriton, Lyminge and Sellindge) are currently in good health with vacancy rates improving in Folkestone, Hythe and Cheriton. It should be noted that this assessment was made pre-Covid-19 pandemic and during the pandemic abnormally high vacancy rates have occurred in line with all retail areas across the country. Although it is currently not possible to conclude with any certainty how the retail market will function following the ending of the pandemic, at the time of writing the retail market is improving from the very low position it suffered at the height of the pandemic.
- 14.5.37 The Retail Impact Assessment (ES Appendix 11.2) concludes that there would be no appreciable trade diversion from existing retail centres and that the proposed Development would not give rise to significant adverse impacts, accords with the sequential approach and should therefore be considered to be acceptable and consistent with planning policy guidance at all levels.
- 14.5.38 Benefits of the proposed retail floorspace within the proposed Development identified in the Retail Impact Assessment (ES Appendix 11.2) include:
- Increased consumer choice;
 - Creation of local job opportunities;
 - A retail expenditure generated by the future population of Otterpool Park on comparison and convenience goods in the region of £121.90 million per annum;
 - That its scale and distribution will promote highly sustainable patterns of development with retail needs associated with the new residential community being met in close proximity, often within easy walking distance.
- 14.5.39 As a result of the increased employment opportunities, including higher quality and more accessible employment locations, together with opportunities presented by increased employment floorspace, business stock, and scope for bringing forward more highly skilled jobs, the proposed Development is considered to have a high impact magnitude. The sensitivity of the receptor (local economy) is medium and so

the effect on the local and wider economy is considered to be **major beneficial** and **significant**.

Community Services and Infrastructure

14.5.40 The new population for Otterpool Park will generate a requirement for community infrastructure (notably education, healthcare and community facilities). This section considers the impact of the proposed Development on each of these areas in turn, taking into account existing and planned provision. The Community Development and Facilities Strategy (ES Appendix 4.10) prepared to support the OPA, is referred to within the following sections.

Education

14.5.41 The potential effect on education facilities (early years learning, primary and secondary schools, and further education) is dependent on the potential child yield arising from the proposed Development and the current capacity within existing schools.

14.5.42 The baseline analysis for education highlighted that existing primary schools in the vicinity of the proposed Development tend to be small and with limited capacity and are unlikely to have capacity to significantly expand (aside from Palmarsh Primary and Sellindge Primary which are likely to expand in the future to meet demand from recent housing developments in Sellindge and Hythe). There is therefore unlikely to be capacity to cater for demand for primary school places from Otterpool Park in existing local schools except in a very limited way for the first homes to be occupied in 2024 (Community Delivery and Facilities Strategy, ES Appendix 4.10).

14.5.43 In terms of secondary school provision, there are currently 207 surplus places in the four schools closest to the proposed Development. However, demand for secondary school places as a result of population growth (including from other planned housing development elsewhere in the two authority areas) is expected to fill most of this surplus in the short term. It is therefore expected that a majority of secondary school places for Otterpool Park residents will be met on-site. However, considering that primary demand has now started levelling off i.e. is not growing and even potentially falling, it is possible that the secondary school surplus will increase in the medium term as the levels of children coming through to Secondary School starts to flatten and then reduce. Therefore, it is possible that off-site solutions may be possible in the early phases of the development.

14.5.44 Kent County Council has informed the Applicant that they intend to meet some of the demand created by Otterpool Park through an (at least) 2FE (Forms of Entry) expansion of The Harvey Grammar School (a selective, boys' school) (Community Delivery and Facilities Strategy, ES Appendix 4.10).

14.5.45 The Community Development and Facilities Strategy (ES Appendix 4.10) sets out the methodology by which this has been calculated, based on information provided by Kent County Council and confirmed through population modelling undertaken by Quod; the assumptions are summarised as:

- Early years: 0.08 children per home
- Primary School: 0.28 children per home
- Secondary School: 0.20 children per home
- Sixth form: 0.07 children per home (360 A level places and 180 FE places for 8,000 homes, only 250 of which would be on-site).

14.5.46 The Community Development and Facilities Strategy (ES Appendix 4.10) notes that these assumptions are sensitive to build-out rate, tenure, size of homes, demographic trends and government education policy.

14.5.47 Table 14-21 summarises child yield for each education age group and translates this into FE / provision required for the proposed Development. Older person’s housing has been excluded from the calculations.

Table 14-21 Child Yields and FE Requirements 8,500 homes

Age Group	Likely Forms of Entry (FE)/Settings	School Requirements
Early Years	8-10 settings	Up to 6x 2-3FE Primary Schools (including nurse/early years provision)
Primary School	10.6FE	
Secondary School	10.7FE	1 x 6-10FE secondary school with sixth form 1 x SEN school (60-80 places)
Sixth Form	Up to 530 places, including work-place based and apprenticeship places; likely to be 240-250 places in a full-time education setting	

Source: Community Development and Facilities Strategy, ES Appendix 4.10

14.5.48 The construction of primary schools may be phased, with 1 or 2 FE being built at the start (the first primary school will be in the first phase and 2FE is likely to be triggered the September after the first occupation of homes, subject to a funding agreement 28 being signed off by the Department for Education) and additional forms of entry added later. FEs may be brought forward one at a time, in 2FE or 3FE phases. For operational reasons, secondary schools would tend to be phased in blocks no smaller than 4FE. The first secondary school phase of 4FE will likely be triggered at between 2,000 and 3,000 homes and thereafter, secondary school expansions will take place in phases on 2-4FE. Again, this will be subject to a funding agreement (based on need) being agreed with the DfE.

14.5.49 The table demonstrates that sufficient school places will be delivered as part of the proposed Development to meet the needs of children on-site and to reduce the potential for children to travel on-site to school from elsewhere. Taking into account the range and scale of new education provision, set against the context of limited local alternatives and none at the scale required, the proposed Development is considered to have a high impact magnitude. The sensitivity of receptor (users of community infrastructure) is medium as access to education is important but there are some alternative options. On balance the effect is therefore considered to be **major beneficial and significant**.

Healthcare

14.5.50 The proposed Development incorporates, within the 67,000 sqm GEA Education and Community Facilities, a health centre. The Community Development and Facilities Strategy (ES Appendix 4.10) states that the likely need required as a minimum to provide primary care facilities is 1,500 to 1,750sqm GIA (for 10,000 homes), so the capacity for future healthcare provision is well in excess of what is required to mitigate the impacts of development and provides an opportunity for additional services.

14.5.51 The healthcare provision presented as part of the proposed Development is sufficient to both mitigate the impacts of development and provide an opportunity for additional healthcare services. As such, the effect of the proposed Development on healthcare provision is considered to be medium impact magnitude. The sensitivity of receptor (users of community infrastructure) is high as access to healthcare facilities is important and there is not spare capacity in existing provision. On balance the effect is therefore considered to be **major beneficial** and **significant** over the long-term.

Community Facilities

14.5.52 Community facilities play an important role in social networking and cohesion, particularly as part of the creation of a new community. Community facilities encompass not only traditional community centres but embrace other types of meeting places such as places of worship, and youth centres. Accordingly, the Development Specification (ES Appendix 4.1) for Otterpool Park includes nearly 21,000 sqm (Gross External Area) of flexible community use floorspace. The quantum has been calculated using a benchmark of 0.15-0.30 sqm per person (ES Appendix 4.10).

14.5.53 The two nearest community facilities to Otterpool Park are the Sellindge and Lympe Village Halls, both of which are well-used by the local communities they serve. The new provision of community facilities aim to complement rather than compete with these facilities.

14.5.54 The effect of the proposed Development on community facilities is considered to be medium impact magnitude given the potential scale and flexibility of type of facility that can be offered. The sensitivity of receptor (users of community infrastructure) is medium. Therefore, the overall effect is considered to be **moderate beneficial** and **significant**.

Open Space and Recreation

14.5.55 Under this heading, impacts of the proposed Development on existing walking and cycling routes are considered, as are impacts on sports and play provision. The section also considers the effect of the proposed Development on recreation in the wider area, notably on the Kent Downs AONB and other environmentally sensitive areas in the vicinity of the site.

Open Space and Play Areas

14.5.56 The population generated as a result of the proposed Development will create additional demand for play areas, recreational open space and sports facilities. Accordingly, a range of open space, sports and play area provision have been incorporated into the design, notably:

- Sports playing pitches (11.53 ha)
- Children's play space (6 ha)
- Strategic parks (15.71 ha)
- Allotments / orchards (9.75 ha)
- General amenity space (38.92 ha).

14.5.57 In addition to the above, there are opportunities to utilise shared provision of school playing fields (a further 17.92 ha). The precise configuration of open space is subject to detailed design at the reserved matters stage and will be consistent with the Green Infrastructure Strategy (ES Appendix 4.11) and Parameter Plans (ES Appendix 4.2) and Strategic Design Principles (ES Appendix 4.3).

14.5.58 The proposed Development is considered to have a medium impact magnitude given the scale of green space to meet needs. The sensitivity of the receptor (users of community infrastructure) is also medium as access to open space and play areas is important, but a number of alternatives exist nearby. In summary the effect is considered to be **moderate beneficial** and long-term **significant**.

Green Infrastructure

14.5.59 No walking or cycling routes will be lost as a result of the proposed Development, although inevitably there may be a change in their character in certain areas (i.e. routes that may have been very rural may now form part of links to urban areas). Walking and cycling links in the wider area (for example the Royal Military Canal) may experience an increase in usage levels due to an increase in population numbers.

14.5.60 The incorporation of green infrastructure, open space and a variety of habitats and landscapes forms an intrinsic part of the design of Otterpool Park, including:

- A variety of woodlands, wetlands, meadows, allotments, recreation areas all connected by green corridors with retained trees, hedgerows and water courses
- A landscaped green open space to create a setting for Westenhanger Castle
- Creation of a Woodland Country Park on the upper slopes of the site between Harringe Brook Woods, Otterpool Manor and Upper Otterpool Farm
- Use of the East Stour River corridor to incorporate both formal and informal walking and cycling routes connecting areas of open space and leisure / sports provision
- Creation of a landscape buffer between the proposed Development and the village of Lympne, with opportunities here for informal recreation, walking and horse-riding
- A Heritage Trail is also proposed within the site, linking features of interest including the World War II pill box, Lympne Airfield features, the Bronze Age barrows at Sellindge and Westenhanger Castle.

14.5.61 Given the wide range and scale of the above green infrastructure opportunities, the proposed Development is considered to have a medium impact magnitude and receptor sensitivity is also medium. On balance therefore, the proposed Development is considered to have a **moderate beneficial** and **significant** effect on green infrastructure provision in the local area.

Tourism and Recreation

14.5.62 This section primarily considers the effects of the proposed Development on the Kent Downs AONB and other environmentally sensitive areas in the vicinity of the site, principally in terms of how they affect the amenity value of existing and future local residents and tourists who may use the parts of the AONB close to the proposed Development for leisure and tourism purposes. It should be noted that the proposed Development is not within the AONB. The Landscape and Visual Impact Assessment (LVIA) (Chapter 12) provides greater and more specific detail on the spatial extent and nature of effects of the proposed Development on the AONB.

14.5.63 The estimated new population of Otterpool Park once the 8,500 new homes are built-out is in the region of 20,400 people; there are several points of relevance here. Firstly, not all the population is likely to use local tourism and recreation assets. Secondly, the proposed Development is planned to be delivered over a 19 year period and, as such, the population will increase on an incremental basis giving time to respond to any

potential effects as they may develop (for example to study recreation patterns of early occupiers and to make adjustments to necessary mitigation accordingly). The new population are likely to help support the local existing cultural and environmental tourism sector, for example visits to the coast. This factor could help local businesses.

14.5.64 Finally, the proposed Development differs from many other residential schemes in that it provides a much more holistic approach to the needs of the population it will generate; as a potential garden settlement community, the emphasis is clearly on creating an appropriate landscape and environment to support new housing and to incorporate a wide range of areas, landscapes and habitats for people to access within the site.

14.5.65 Taking these factors into account, together with the mitigation highlighted in the preceding section, it is considered that the proposed Development would be likely to have a low impact magnitude. The sensitivity of the receptor (existing and future residents and visitors) is considered to be medium as there are some alternatives. In summary, the effect is considered to be **minor adverse** and **not significant**.

Crime and Anti-social Behaviour

14.5.66 With the mitigation measures in place the effects of crime and antisocial behaviour are likely to be negligible. While there may be a total increase in crime and anti-social behaviour as would be expected with an increase in population, the crime rate per head is not likely to increase. As shown in the baseline section above, the rates of crime in the areas around the proposed Development are lower than the Kent average and most residents have an expectation and tolerance of low levels of crime and antisocial behaviour as this occurs in all places. The impact magnitude is therefore considered to be negligible, and the sensitivity of receptor (existing and future residents) is medium. Therefore, the overall effect is considered to be **negligible** and **not significant**.

Cumulative Effects

14.5.67 The proposed Development, together with committed schemes identified, would generate employment opportunities linked to construction activities. While there is not sufficient information to make a detailed quantitative assessment of the value of this activity, a high-level indicative extrapolation based on the construction employment generated by the proposed Development can be made. Assuming 21,450 homes will be built in total (i.e. 10,000 Otterpool Framework Masterplan and the additional cumulative 11,450 homes) and using the ratio of jobs to homes derived for the proposed Development (i.e. 0.139 jobs per homes) leads to an estimated indicative total of 2,985 FTE new jobs. This is likely to create a significant beneficial economic effect for the local area.

14.5.68 The cumulative effect of the significant levels of construction workers required from outside the study area is likely to generate additional needs for accommodation. However, as described above, there are significant levels of temporary accommodation in Folkestone linked to the tourism industry, and this is expected to be sufficient to meet the needs of these construction workers.

Cumulative effects with other developments

14.5.69 As previously noted, the proposed Development will be fully built out over a period of approximately 19 years for 8,500 homes. The duration of build-out is such that there will inevitably be a range of schemes and projects that, together with the proposed Development, may have a cumulative socio-economic effect. Due to the nature of the

Development, only potentially significant cumulative impacts relating to population, housing, employment and community infrastructure provision have been assessed.

- 14.5.70 Several applications are for significant levels of new residential development and associated infrastructure. Within F&HDC, these include Shorncliffe Garrison and the Folkestone Seafront proposals at Folkestone (1,200 units and 1,000 units respectively), the Nickolls Quarry proposal at Hythe (1,050 units) and the expansion at Sellindge (250 units). Within ABC, these include Chilmington Green (5,750 units), Court Lodge Farm (950 units) and the former Rowcroft and Templer Barracks in Ashford (1,250 units). These applications are generally supported with various social and community infrastructure. The Community Development and Facilities Strategy (ES Appendix 4.10) for Otterpool Park states that expanding schools as demand arises helps to ensure school places meet the needs of children living within Otterpool Park, rather than attracting children in from elsewhere.
- 14.5.71 Applications for significant levels of employment development include the extension to Lympne Industrial Estate (up to 52,000 sqm) and land adjacent to Enterprise Way at Lympne (30,668 sqm of employment land) within FHDC. If built, these employment uses will ultimately form part of the fabric of Otterpool Park and add diversity to the offer (though not necessarily in this location); the focus on specific growth sectors could complement wider initiatives underway in other parts of Kent (Employment Opportunities Study, 2018).

Cumulative effects with Framework Masterplan

- 14.5.72 Taking into account also the intention to deliver 10,000 homes at Otterpool Park as part of the Otterpool Framework Masterplan (OFM) project over a period of approximately 21 years, the cumulative effect on community infrastructure has been considered and additional provision made for a 2FE primary school, if required.

Cumulative effects with Permitted Waste Facility

- 14.5.73 There is potential for a waste facility with an extant permission, to be delivered within the application site boundary. Although it is currently uncertain whether the waste facility will be delivered, if it was, then there could be a reduction of approximately 800 homes and a school at the proposed Development. This would not have any additional cumulative impacts on community facilities or services because it would lead to reduced need for these services.

14.6 Monitoring

- 14.6.1 No specific monitoring requirements have been identified relevant to the socio-economic topic.

14.7 Assessment Summary of Effects

- 14.7.1 Table 14-22 provides an assessment summary with respect to socio-economics and community, including the potential significant effect with embedded design measures in place, and additional measures required to reach the residual significance of effect.

Table 14-22 Assessment Summary

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Effect Significance
Local economy (existing land-uses)	No specific measures identified	Loss of existing employment within the application site boundary = Not Significant	Construction	No additional mitigation required	N/A	Negligible; Not Significant
Existing and future residents	A range of potential mitigation measures outlined within relevant Chapters of this ES and taken forward in the Outline Code of Construction Practice	Impacts on residential amenity arising from environmental changes to air quality, noise, and changes to visual impacts = Not Significant	Construction	No additional mitigation required	N/A	Minor Adverse; Not Significant
Existing residents	Mitigation measures are outlined in the Outline Code of Construction Practice and include appropriate fencing, signage and safety precautions	Potential impacts on public safety as a result of construction activities = Not Significant	Construction	No additional mitigation required	N/A	Minor Adverse; Not significant
Local economy (economy and employment)	Construction of the proposed Development will generate employment.	Employment creation as a result of construction of the proposed Development = Significant (Beneficial)	Construction	No additional mitigation required	N/A	Moderate Beneficial; Significant
Existing and future residents and visitors (tourism)	No mitigation	Pressure on availability of hotel rooms from construction workforce = Not Significant	Construction	No additional mitigation required	N/A	Minor Adverse; Not significant
Existing and future residents	Provision of range of housing types as secured through the Development Specification	Meeting the need for a range of housing of different tenures, sizes	Operation	No additional mitigation required	N/A	Major Beneficial; Significant

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Effect Significance
	(ES Appendix 4.1) and Housing Strategy (ES Appendix 4.14)	and types = Significant (Beneficial)				
Local and wider economy	Provision of employment opportunities secured through the Development Specification (ES Appendix 4.1)	Increased employment opportunities, higher quality and more accessible employment locations and scope for more highly skilled jobs = Significant (Beneficial)	Operation	No additional mitigation required	N/A	Major Beneficial; Significant
Users of community services and infrastructure	Provision of school places as set out within the Community Development and Facilities Strategy (ES Appendix 4.10).	Sufficient school places delivered to meet the needs of children on-site and reduce potential for children to travel to school from elsewhere = Significant (Beneficial)	Operation	No additional mitigation required	N/A	Major Beneficial; Significant
Users of community services and infrastructure	Provision of health facilities as secured through the Development Specification (ES Appendix 4.1) and the Community Delivery and Facilities Strategy	Healthcare provision to meet the needs of the new population and to provide an opportunity for additional healthcare services = Significant (Beneficial)	Operation	No additional mitigation required	N/A	Major Beneficial; Significant
Users of community services and infrastructure	Provision of community infrastructure and services as secured through the Development Specification (ES Appendix 4.1) and the Community Delivery and Facilities Strategy	Scale and flexibility of community facilities provided within the proposed Development to meet the needs of future population = Significant (Beneficial)	Operation	No additional mitigation required	N/A	Moderate Beneficial; Significant

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation Delivery Mechanism	Residual Effect Significance
Users of community services and infrastructure	Provision of green space and recreation facilities as secured through the Development Specification (ES Appendix 4.1), Parameter Plans (ES Appendix 4.2) and Green Infrastructure Strategy (ES Appendix 4.11)	Provision of green infrastructure, open space, play areas and sports provision to meet the needs of the future population = Significant (Beneficial)	Operation	No additional mitigation required	N/A	Moderate Beneficial; Significant
Existing and future residents and visitors (tourism and recreation)	Ensuring the provision of open space, sports and play provision to meet the needs of the population of Otterpool Park as secured through the Development Specification (ES Appendix 4.1), Parameter Plans (ES Appendix 4.2) and Green Infrastructure Strategy (ES Appendix 4.11)	Increased recreational pressure on environmentally sensitive areas in the Kent Downs AONB = Not Significant	Operation	No additional mitigation required	N/A	Minor Adverse; Not significant
Existing and future residents and visitors	Well-lit public realm and the positioning of buildings to ensure the natural surveillance of public areas and routes as secured through the Strategic Design Principles (ES Appendix 4.3)	Crime and antisocial behaviour = Not Significant	Operation	No additional mitigation required	N/A	Negligible, Not significant

14.8 References

Reference	Title
Ref 14.1	Town and Country Planning Act 1990
Ref 14.2	Localism Act 2011
Ref 14.3	Housing and Regeneration Act 2016
Ref 14.4	National Planning Policy Framework 2021
Ref 14.5	Housing White Paper
Ref 14.6	Planning for the Right Homes in the Right Places
Ref 14.7	A Green Future: Our 25 Year Plan to Improve the Environment
Ref 14.9	Reference not used
Ref 14.10	Folkestone and Hythe Council Places and Policies Local Plan (Adopted 16 September 2020)
Ref 14.11	Folkestone and Hythe District Council Core Strategy (2022)
Ref 14.13	Reference not used
Ref 14.14	Additionality Guide, Homes and Communities Agency, 2014
Ref 14.15	Office for National Statistics, 2011 Census Data
Ref 14.16	Office for Population Statistics, Annual Population Survey 2019
Ref 14.17	Office for National Statistics, Business Registration and Employment Survey
Ref 14.18	Annual Schools Census data, 2020
Ref 14.19	Strategic Housing Market Assessment, Folkestone and Hythe District Council, March 2017
Ref 14.20	London Healthy Urban Development Unit
Ref 14.21	Shepway Employment Land Review, Lichfields, 2017
Ref 14.22	Economic Land Needs Assessment, Folkestone & Hythe District Council, 2018
Ref 14.23	Economic Development Strategy, Shepway District Council
Ref 14.24	Employment Opportunities Study, Lichfields, 2018
Ref 14.25	Index of Multiple Deprivation 2015
Ref 14.26	Reference not used
Ref 14.27	Commissioning Plan for Education Provision in Kent, Kent County Council 2021-2025
Ref 14.28	Shepway Open Space Strategy, Shepway District Council, 2017
Ref 14.29	Shepway Play Area Review, Shepway District Council, 2017
Ref 14.30	Kent Walking and Cycling Study, Mott Macdonald, 2018

Reference	Title
Ref 14.31	Kent Downs AONB Management Plan, AONB Unit, 2021-2026
Ref 14.32	An East Kent Approach to Green Infrastructure and Recreation, Val Hyland Consulting and Blackwood Bayne Consulting, 2014
Ref 14.33	Vision for Kent 2012-2022, Kent County Council
Ref 14.34	Increasing Opportunities, Improving Outcomes@ Kent County Council Strategic Statement 2015-20, Kent County Council
Ref 14.35	Homes and Communities Agency Employment Densities Guide, 2015
Ref 14.36	Reference not used
Ref 14.37	Kent County Council Active Travel Strategy Action Plan 2018/19; 2018
Ref 14.38	Visitor Numbers on Dungeness, Alex Fowler on behalf Dungeness National Reserve, 2006
Ref 14.39	Rye Harbour, Camber, Dungeness and Shepway Visitor Surveys 2014 – 2015 by S. Bayne and V. Hyland on behalf Rother and Shepway District Councils
Ref 14.40	www.booking.com (accessed 09/06/21)
Ref 14.41	The Folkestone and Hythe Retail and Leisure Needs Assessment Update 2018
Ref 14.42	Reference not used
Ref. 14.43	Otterpool Park Employment Land Needs Assessment, Lichfields, 2018
Ref. 14.44	Reference not used
Ref 14.45	Planning Practice Guidance 'Open Space, Sports and Recreation Facilities, Public Rights of Way and Local Green Space' Department for Levelling Up, Housing and Communities, 2021

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