

Our ref: Q80641
Your ref: Y19/0257/ FH
Email: poppy.carmody-morgan@quod.com
Date: 21 November 2022



James Farrar
Planning Department
Folkestone & Hythe District Council
Civic Centre
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Dear James,

Town and Country Planning Act 1990 (as amended)

Otterpool Park - Amended outline planning application submitted on behalf of Otterpool Park LLP (Y19/0257/ FH)

On behalf of Otterpool Park LLP (the Applicant), Quod is instructed to submit the enclosed further information in support of the determination of our client's application for outline planning permission for the Otterpool Park new garden settlement, originally submitted in February 2019 (planning application reference no. Y19/0257/ FH). Following submission of the outline planning application (OPA) a number of consultation comments have been received from statutory consultees and the public. Amendments to the OPA were submitted 30 March 2022 and 31 August 2022 to address the comments received on the submission and to assist with the delivery of the development across the long term. Since then, we have received further consultation comments. The following application responses are enclosed:

- Updated Development Specification (Ref OP5 Appendix 4.1) dated November 2022 to address comments raised by Historic England (17/10/22). This replaces the version dated August 2022. The updates made are specified on page 1 of the document.
- Updated Strategic Design Principles (Ref OP5 Appendix 4.3) dated November 2022 to address comments raised by Historic England (17/10/22). This replaces the version dated August 2022. The updates made are on page 87 document and comprise the addition of a further detailed design requirement for development near Barrow 44 and a correction to the barrow references in the 'Barrow Hill Green' heading.
- Transport Response Report (V2) from Otterpool Park LLP dated November 2022 in response to comments received from KCC (Transport) and National Highways. This replaces the version dated August 2022.
- Otterpool Park LLP correspondence dated November 2022 clarifying education matters.



- Updated HRA Report (Ref OP5 Appendix 7.19) to address comments raised by the LPA and Natural England. This replaces the version dated March 2022.
- Nutrient Budget Analysis Update Report dated October 2022 to address comments raised by the LPA and Natural England.
- Otterpool Park LLP response to the Environment Agency comments dated 28 October 2022.
- Otterpool Park LLP response to the Natural England comments dated 14 October 2022.

To assist the understanding of the material provided the Applicant wishes to clarify the following matters:

- **Sustainable Urban Drainage Systems:**

The Applicant clarifies that the proposed updates submitted in August 2022 and November 2022 have no material implications on the Flood Risk Assessment and Surface Water Drainage Strategy (FRA&SWDS) and therefore it remains valid.

The Applicant clarifies that the proposed positive drainage outfalls from the proposed SuDS features will be designed to match with the agreed greenfield runoff rates for the 1 in 1, 1 in 30 and 1 in 100 annual probability exceedance events with the Lead Local Flood Authority, whilst maximising any opportunities to reduce downstream flood risk through SuDS infiltration and long-term attenuation storage. Any small change to the baseflow conditions in the existing watercourses from the SUDS features will only have a positive impact on the low flow conditions, water quality and ecology health. The downstream features such as Aldington Reservoir will have no impact on its flood storage capacity to as any small baseflow increase will simply pass through the existing flood control features without ponding, and the existing river channels will also have sufficient flow capacity.

The Applicant has been working closely with the Environment Agency throughout the project to ensure that their requirements on the East Stour, as the main river have been met within the Outline Planning Application documents.

- **Internal Drainage Board Comments**

The Applicant's consultant has now consulted the IDB and will be in touch with them again to discuss this matter further. Otterpool Park encompasses a large site that primarily sits outside the IDB's district. It will be served by a comprehensive and integrated SuDS network, including large wetland features that will bring some flood risk reduction and wider environmental benefits. We understand that the current Surface Water Development Contribution (SWDC) scheme, as part of the Byelaw 3 is also a new requirement that was introduced by the IDB in late last year. Therefore, we will work closely with the IDB to reach a mutually agreeable solution to satisfy the requirements of the Byelaw 3.

- **Waste Strategy:**

Baseline position

With regards to the baseline position, the Applicant confirms that the Waste Strategy (OP5 Appendix 17.1) focusses on municipal waste as defined by the National Indicators (NIs) – which are reported to Government. The NIs act as the baseline and the Applicant’s methodology outlines this. The detailed quantities are those generated by households and measured through the NIs and associated targets. This is the area the Applicant wishes to impact.

The Waste Strategy details the NI metrics, current performance, and proposed targets – therefore it sets the picture of the strategy and outlines the baseline appropriately.

Whilst total overall waste is important, for the impact areas of the Waste Strategy it is not relevant. The Waste Strategy seeks to chiefly tackle residual waste and improve the quality of the recycle. In addition, it seeks to promote waste reduction and reuse.

The Waste Strategy focuses on municipal kerbside collected waste, and how the total quantity can be reduced and recycling improved. It focuses on changing mindset and practices around typical/repeat household waste items, not more ad hoc items.

Community and Stewardship initiatives

The community initiatives proposed focus on resident participation. They aim to drive a change in mindset and behaviour. The stewardship initiatives are to increase reuse/repurpose and remove materials from the waste stream entirely (see case study example in Norwich). This includes the community reuse/repurpose site and community composting project. Like other ‘pre-loved’ ‘pre-owned’ ‘vintage’ schemes, the aim is to remove the need for disposal through finding items a new home. These initiatives have worked very well in other projects/Local Authorities (for example Veolia at Hampton Court Garden Festival and the Re-use Drop Off centre, Norwich).

It is acknowledged that the above reuse/repurpose initiatives will not necessarily help with recycling targets directly but they will help with reducing total waste quantities and provide education and awareness with the aim of changing resident attitudes and decisions – opting for better waste management practices within the home – which will lead to cleaner segregation and higher recycling. The initiatives target the key focus areas of the Environment Act which include resource efficiency & waste reduction; increasing resource productivity; reducing volumes of residual waste; reusing products; and the quality of recycling.

Materials Recycling Facility

In Table 2 of Section 5 of the submitted Waste Strategy (OP5 Appendix 17.1) there is reference to securing contracts with a suitable Materials Recycling Facility (MRF) to sort recyclables collected through kerbside recycling collection. To clarify, a MRF it is not proposed by the Applicant. The Applicant is aware that KCC already has MRF contracts with capacity to deal with waste. The Applicant wishes to highlight that it will be important to ensure that when the

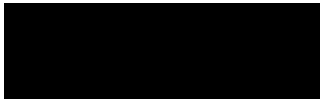
contract is renewed due consideration is given, in line with the Environment Act, to maximise segregation and recycling through any contracts.

Waste to landfill

In the August 2022 submission ('Response to KCC Comments') the Applicant stated that the aspiration should be zero waste to landfill and that Otterpool Park LLP is committed to assisting KCC achieve this. To clarify, as is standard around zero waste targets, this does not include hazardous waste. This is excluded as no alternative treatment is available (for example, certain materials such as asbestos can only be disposed to landfill). Otterpool Park LLP proposes to minimise hazardous materials from the outset through design and construction decisions.

If you have any queries regarding the enclosed, please do not hesitate to contact me.

Yours sincerely,



Poppy Carmody-Morgan
Associate Director