

ENVIRONMENTAL STATEMENT OP4 - NON-TECHNICAL SUMMARY

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August 2022



OTTERPOOL PARK ENVIRONMENTAL STATEMENT

ES Volume 1 - Non-Technical Summary

AUGUST 2022

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1 Introduction

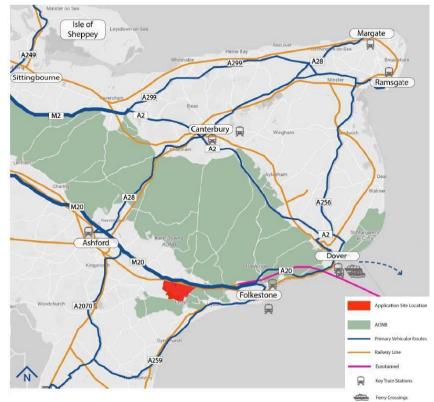
This document is the Non-Technical Summary of the Environmental Statement (ES) prepared to support an outline planning application for Otterpool Park, which is also referred to as 'the Development' in this report.

1.1 What is Otterpool Park?

Otterpool Park is a new garden settlement located in the Kent countryside, within the Folkestone and Hythe District. The new garden settlement will include 8,500 homes and other associated town centre uses. The area to be developed is located to the south-west of Junction 11 of the M20 motorway and south of the Channel Tunnel Rail Link, also known as HS1. The vision for Otterpool Park is for a place where a new community grows over several decades. It will be inspired by, integrate and bond with the natural landscape, character and heritage of this special place.

1.2 Why is the Development Needed?

There is a need to provide more housing in Kent as set out within the Folkestone & Hythe District Council adopted Core Strategy Review (2022). A number of studies undertaken by Folkestone & Hythe District Council found that the site selected is the most appropriate location to accommodate growth, because it is the least constrained and has good access routes.



The site is currently allocated for housing within the Folkestone & Hythe District Council adopted Core Strategy Review (2022). The Core Strategy Review states that the settlement '*shall provide for a minimum of 5,593 new homes within this plan period (2019/20 to 2036/37)*' and also recognises that Otterpool Park provides the potential for future growth to provide a total of 8000-10000 homes.

Creating a new community at Otterpool Park will offer opportunities for long-term housing growth and commercial development, thereby making a significant contribution towards employment within Kent. The UK Government announced its support for Otterpool Park in November 2016.

1.3 What is Environmental Impact Assessment?

As part of the outline planning application, an Environmental Impact Assessment has been undertaken. The relevant legislation which determines the requirement for EIA is the *Town and Country Planning (Environmental Impact Assessment) Regulations, 2017* referred to here as 'the EIA Regulations'.

EIA is a process through which the likely significant environmental effects of Otterpool Park are identified, assessed and, wherever possible, mitigated by avoiding impacts or reducing them to acceptable levels. This process and its outcomes are reported in the Environmental Statement and will be considered in full by the decision-making authority (in this instance Folkestone & Hythe District Council) prior to determining the planning application.

In summary, the EIA has involved:

- Gathering information on the existing environment through desk-based methods and field surveys. In this way environmental constraints to Otterpool Park have been identified;
- Designing Otterpool Park to avoid or minimise environmental impacts wherever possible, and seek opportunities for environmental enhancements;
- Proposing mitigation measures that need to be put in place to control 'significant' environmental effects during construction (for example dust and noise), and in terms of design to mitigate any negative operational effects (for example habitat management) to acceptable levels;
- Identifying and assessing potential environmental effects that may arise from the construction and operation of Otterpool Park, and whether the effects are considered to be 'significant' as set out in the EIA Regulations; and
- Identifying and assessing any potential significant cumulative effects arising from the construction and operation of Otterpool Park, taking into account other planned developments in the area that are not yet fully complete but likely to go ahead and exist at the same time as Otterpool Park. Cumulative effects can occur in two different ways: when different types of impacts from a proposed Development can affect a single environmental 'receptor' such as people or wildlife, or, when the effects of other planned developments have a cumulative effect with that of Otterpool on environmental receptors of a specific effect e.g. noise or air quality.

This report summarises the findings of the Environmental Statement in non-technical language, as required by the EIA Regulations. As explained above, it is provided to allow the general public an understanding of Otterpool Park and potential '**significant environmental effects**' (whether positive or negative) generated through construction or operational phases and is a term used in the EIA Regulations to determine whether mitigation measures are required or not. For ease of reading, the resultant environmental effects, following the implementation of mitigation measures, are described in bold as '**significant**' or '**not significant**'.

The full results of the EIA process are reported in Otterpool Park Environmental Statement. This can be viewed at Folkestone & Hythe Council website https://www.folkestone-hythe.gov.uk/planning.

1.4 How was the scope of the EIA decided?

The scope of the EIA was agreed with Folkestone & Hythe District Council through a formal process. The scope of the EIA reflects the environmental topics for which significant environmental effects, requiring some form of mitigation, are considered likely to occur. The scope was proposed by the applicant in a Scoping Report, submitted to Folkestone & Hythe District Council in June 2020, and confirmed in a Scoping Opinion issued by Folkestone & Hythe District Council in July 2020. A number of changes have occurred since the Scoping Opinion was received, these have been discussed with consultees where relevant, and considered in the EIA. The Scoping Opinion took into account the views of wide-ranging statutory consultees including the following:

- Natural England
- National Highways (formerly Highways England)
- Environment Agency
- Historic England
- Kent County Council

The environmental topics 'scoped in' to the EIA are the following:

- Agriculture and soils
- Air quality
- Biodiversity
- Climate change
- Cultural heritage
- Geology, hydrogeology and land quality

- Dover District Council
- Ashford Borough Council
- Canterbury City Council
- Kent Down AONB Unit
- Landscape and visual impact
- Noise and vibration
- Socioeconomic effects and community
- Surface water resources and flood risk
- Transport
- Waste and resource management

Human health

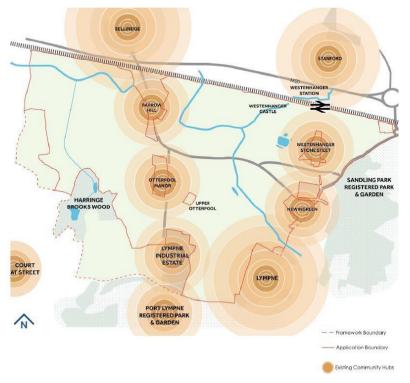
The EIA scope also considers the requirements of relevant EIA legislation with respect to considering alternative sites and different scheme layouts within the site, taking into account comparisons of environmental effects on each alternative.

1.5 How will Otterpool Park be given the go-ahead and developed over time?

Otterpool Park will generally be consented through three stages, referred to as the 'three-tier approach'. The conditions that would be attached to the Outline Planning Application stage (Tier 1), if granted, would require two further consents stages (Tiers 2 and 3) to control the design and delivery of Otterpool Park from outline to the detailed stage. It is anticipated that there will be 'triggers' that will inform the need to provide certain key infrastructure in advance of other development coming forward. For example, the need for schools to be constructed will be based on the number of homes built, subject to monitoring. These triggers will be established in order to demonstrate how Otterpool Park can be constructed without the need for fixed phasing of the development land parcels at the outline application stage. For critical infrastructure, such as the waste water treatment plant, the full tiered process may not be adopted. The three tiers are:

- Tier 1: Outline Planning Application (current stage)
- Tier 2: Detailed masterplan, design code and delivery plan for each geographical area or 'phase' within Otterpool Park
- Tier 3: Reserved matters (detailed) applications providing sufficient detail to inform the build out for each geographical area or 'phase'.

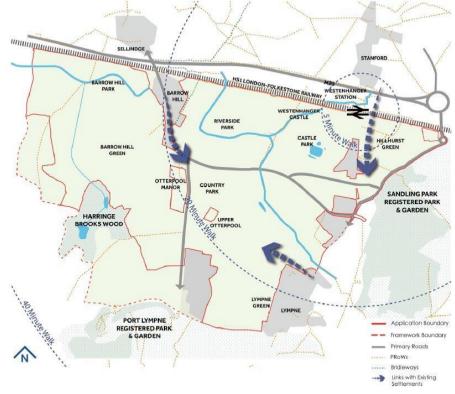
2 Where is the Site and what is the context?



A number of public rights of way are located within and near to the site. These provide connections between the villages of Sellindge, Newingreen, Lympne and Westenhanger. The communities located adjacent to the site boundary include Lympne, Newingreen and Westenhanger to the east of the site; Barrow Hill, Sellindge and Otterpool Manor in the northern and central parts of the site (outside the site boundary), and Sellindge and Stanford to the north of the site. There are 101 buildings located within the site, including farmsteads, residential buildings and business premises. The site is largely in agricultural usage with associated buildings present onsite and in the wider surrounding area.

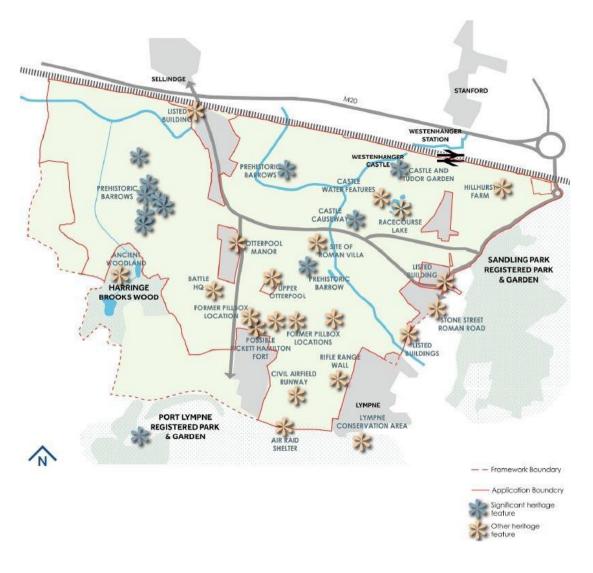
Otterpool Park is located in Kent, in Folkestone and Hythe District. The site occupies approximately 589 hectares. The M20 is located outside the site to the north, with Junction 11 near to the north-east of the site. The A20 (Barrow Hill) and B2067 (Otterpool Lane) passes through the site. The A20 (Stone Street) forms the north-eastern boundary of the site, and Harringe Lane forms the north-western boundary of the site. The Channel Tunnel Rail Link (also known as High Speed 1) is located to the north-eastern boundary. Westenhanger train station is located within the north-eastern boundary of the site.

The Kent Downs Area of Outstanding Natural Beauty is located directly next to the site to the south and east.



The site contains a number of cultural heritage features. These include the scheduled monuments of Westenhanger Castle and a number of prehistoric barrows.

The site is made up of largely arable fields and grazed pasture supporting improved grassland. Most of the field boundaries within the site are hedgerows. No legally designated ecology sites are located within Otterpool Park site, however Harringe Brooks Wood is designated as 'Ancient Woodland' and is present directly adjacent to the south-western boundary. The site is located within an area that has been formed from the geological development of the Kent North Downs. The site topography generally slopes from the south toward the north-west where the East Stour River crosses the site from west to east, with rolling landforms present across the central parts. The geology across the development varies with superficial deposits including Alluvium and Head deposits. The solid geology includes formations from the Lower Greensand Group and the Wealden Group. Some of the rock formations below the site contains groundwater.

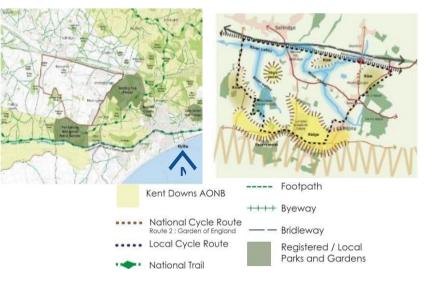


3 What reasonable alternatives have been considered?

In line with the EIA Regulations, a number of alternatives were considered before the final design was chosen, taking into account a comparison of the environmental effects. These include a 'no development' alternative, alternative sites, and alternative scheme masterplan layouts.

The 'no development' alternative would leave the site in its current state. This would result in a shortfall of homes from the requirements set out in the local plan, as well as a number of potential benefits that a healthy new town would bring to future occupiers of the site and to the environment. The option of doing nothing was therefore discounted on the basis that it would not achieve the Council's objectives for development of the site and area for much needed housing.

Folkestone & Hythe District Council undertook a detailed site selection study at a strategic level which took account of planning policy and local environmental factors. This process determined that the site at Otterpool Park represents an appropriate location for the delivery of the required development within Kent over the local plan period.



The consideration of alternative designs for is explained below. The design of Otterpool Park has evolved taking into consideration environmental constraints and opportunities from the outset including:

Site constraints

Landscape Designations

- Kent Downs Area of Outstanding Natural Beauty
- Special Landscape Area

Geological Designations

- Otterpool Quarry Site of Special Scientific Interest Ecology Designations
- Harringe Brooks Wood: Local Wildlife site and ancient woodland Water features
- East Stour River and its tributaries

Heritage assets

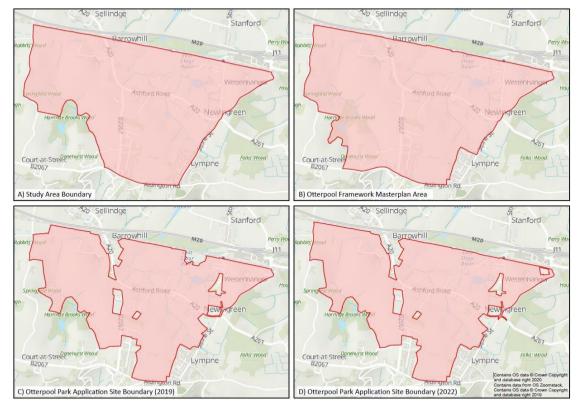
- Westenhanger Castle (scheduled monument and grade I listed building)
- Listed buildings
- Prehistoric Barrows (scheduled monument)
- Roman Villa (discovered later in the masterplanning process and which influenced the later designs).

Existing communities

• Westenhanger, Lympne, Newingreen and Barrow Hill, Sellindge

Site boundary evolution

Baseline studies of Otterpool Park project started with a Study Area that was used for the initial desktop studies, surveys and masterplanning. The site boundary was further amended to create an Otterpool 'Framework Masterplan Area' of approximately 765 hectares which was used for testing housing quantity studies and scheme layout options to further develop Otterpool Park from a 'Garden Settlement' to a Garden Town status (10,000 homes). Following this, the site boundary was further refined and reduced to 580ha for the proposed Otterpool Park outline planning application based on 8,500 homes and associated uses, and was submitted in 2019. The final site boundary, on which this ES is based, resulted from consultation undertaken for the 2019 outline planning application. The key changes were the inclusion of Westenhanger Castle and of additional land to the north-west of the site to accommodate water infrastructure, and the removal of land in the north-east following landowner discussions. The area of the final application site boundary shown below is approximately 589ha.



Site Opportunities

Opportunities identified for Otterpool Park include the following:

- Taking a landscape-led approach to the masterplan which uses the green space network as a framework for housing, influencing its location and form and creates attractive views from the Kent Downs AONB.
- Connecting Otterpool Park to existing communities and the wider landscape through a network of existing and new open spaces by creating a green framework where new and existing residents can meet, relax, exercise and play and can access the surrounding countryside.
- Providing a range of characterful homes which deliver adaptable, balanced and diverse communities and which meet local housing requirements.
- Creating a town centre which is attractive and easily accessible for all, and which provides a social and community hub.
- Creating a distinct place through celebrating the history of the landscape and the heritage assets of the place, including Westenhanger Castle, the site of a Roman Villa, barrows, and WWII remains as well as a SSSI.
- Connecting communities by opening up movement and access corridors and providing new infrastructure and facilities, such as schools, local centres and improved public transport links, that can be shared between the existing settlements and the new community at Otterpool Park.
- Maximising on the opportunity for creating a walkable community a 'Ten Minute Town' by promoting sustainable travel by ensuring
 that all homes have facilities within walking distance (particularly primary schools), and attractive walking and cycling routes to all key
 destinations to encourage people to be active rather than use a private car.
- Creating a place which is attractive to employers and will provide jobs local to where people live, reducing the need for having to travel or move outside the area for work.
- Helping the existing ecosystems to perform better and support the town's ability to be resilient to the future effects of climate change.

Taking into account the above environmental constraints and opportunities, and the policy requirement to provide up to 10,000 homes on the site, a series of masterplan options were developed and these considered different options using different layouts of built development area and green spaces and their relationship with the nearby towns and villages.

All design options sought to:

- Respect key views toward the site from the adjacent designated Area of Outstanding Natural Beauty which characterises the openness of the surrounding area, and
- Enhance the currently limited visual setting of Westenhanger Castle as a nationally significant monument in heritage terms.

Design layouts have also been largely influenced by the site's rich history of cultural heritage including archaeology, its ecologically valuable areas, and the known water scarcity in the south-east of England.

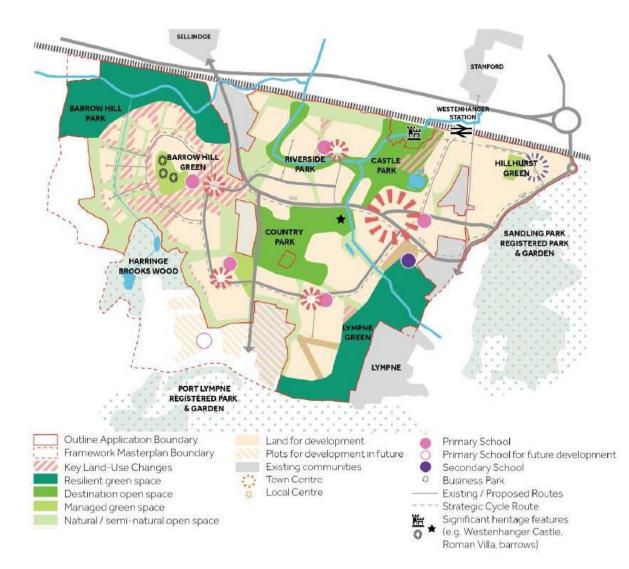
The Preferred Layout

A number of concept design layouts were created, the preferred option was chosen to create a landscape of connectivity providing buffers between new and existing settlements. The rationale behind other concepts in terms of ridges and valleys were also incorporated into the masterplan to create open spaces for parks and wooded areas that would enhance the area's distinct topography, heritage and water environment.

The overall benefits of the final choice of development compared with previous layouts were considered to be:

- It provides a connected landscape that will provide habitat mitigation.
- It has the potential to create parks and open spaces in upper and lower slopes of the development site.
- The landscaping in the north will assist in visually integrating the Development into important views from the Kent Downs Area of Outstanding Natural Beauty.
- The landscaping can be retained in areas required for flood risk mitigation and will have a dual use of providing blue-green infrastructure for biodiversity mitigation, as well as recreation.
- Appropriate open space could still be provided to respect the historic landscape setting of Westenhanger Castle.





February 2019 – Outline Planning Application Submission

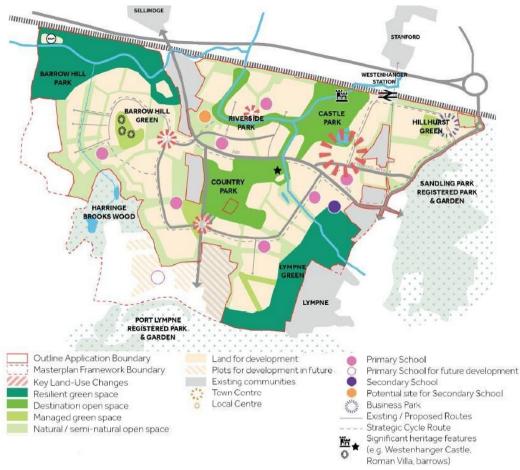
The chosen layout design for the Otterpool Framework Masterplan Area was then refined in site area from 765ha to 586ha to enable the delivery of up to 8,500 homes and associated town centre uses. The key features of the outline planning application submission in 2019 comprised:

- 8,500 homes;
- Approximately 50% green infrastructure;
- Five primary schools;
- One secondary school; and
- Five local centres.

2020 - 2022 - Current Masterplan

Following the Outline Application Submission in 2019, a number of adjustments were made to the masterplan to provide a clearer framework of mixed use spaces with better defined local centres, streets and open spaces, and better integration of Westenhanger Castle. Further stakeholder consultation was also taken into account. In summary the main areas of proposed design changes for the final design layout, with respect to environmental effects, were as follows:

- Clarifying the town centre as the main area of mixed use around the lake. The north south link across the A20 and the town centre street pattern will prioritise cycle links to the town centre, railway station and secondary school. The street layout provides a framework for pocket parks and paths linking to the schools.
- Reducing the number to two local centres by combining the south and west areas. These centres focus around two significant open spaces that link to the country park and Westenhanger Castle park to create a complete green spine. This will bring together heritage assets and create a distinct character for the masterplan vision.
- Barrow Hill Green realigned to retain the scheduled group of barrows.
- The triangle area of land east of Stone Street is replanned: retaining the Hillhurst farm buildings as a focal point within a triangular central green space which leaves regular shapes for development around the perimeter, also in response to feedback to mitigate sensitive views from the AONB.
- Amendment to the application site boundary to relocate a proposed waste water treatment works on site to the north of the East Stour River in the north-west corner (at 'Barrow Hill Park') of the site.



4 The Otterpool Park Development

An outline planning application for Otterpool Park has been submitted to Folkestone & Hythe District Council. An outline planning application seeks to gain permission for specific design layout and construction 'parameters' that, following the permission, then enable the submission of more detailed design elements of the project to be developed within those parameters over two subsequent consenting stages. This is referred to here as the 'Three Tier approach' to consents. The outline planning application ('Tier 1') is anticipated to allow development of the Garden Settlement to proceed, subject to the submission of further detailed masterplans ('Tier 2') which will need to confirm with the scheme parameters assessed at the Tier 1 stage. Following the planning approval of Tier 2 masterplan submissions, further detailed applications ('reserved matters') for specific buildings and other uses will be submitted ('Tier 3') for subsequent approval. This allows a flexible approach to the detailed design and any associated future technological advances can be incorporated within the design whilst maintaining an overall appropriate scale of development represented by the outline design parameters. The future use of Westenhanger Castle will be considered at a later date. Table 4 provides the maximum quantities of development to be delivered.

Land Use	Land Use details	Homes/ Floor Area
Residential	Homes including extra care accommodation	8,500 homes
Education and Community Facilities (Use Class E and F)	Schools, nurseries, crèches, reserve school floorspace and/or SEN, health centres, place of worship, community centres.	Up to 67,000
Hotel	Hotel	Up to 8,000 m ²
Leisure	Sports pavilion and indoor sports hall	Up to 8,500 m ²
Mixed retail and related uses	Shops, professional services, restaurants, cafes, drinking establishments, hot food takeaways, offices, businesses	Up to 29,000 m ²
Employment	Commercial business space in hubs, commercial business park, light industrial business park.	Up to 87,500 m ²
Car parking	To be provided in accordance with Council parking standards	-
Landscaping, play, sport and recreation	Landscaping including wildlife corridors and planting to help visual integration. Space for sports and recreation is also provided.	-

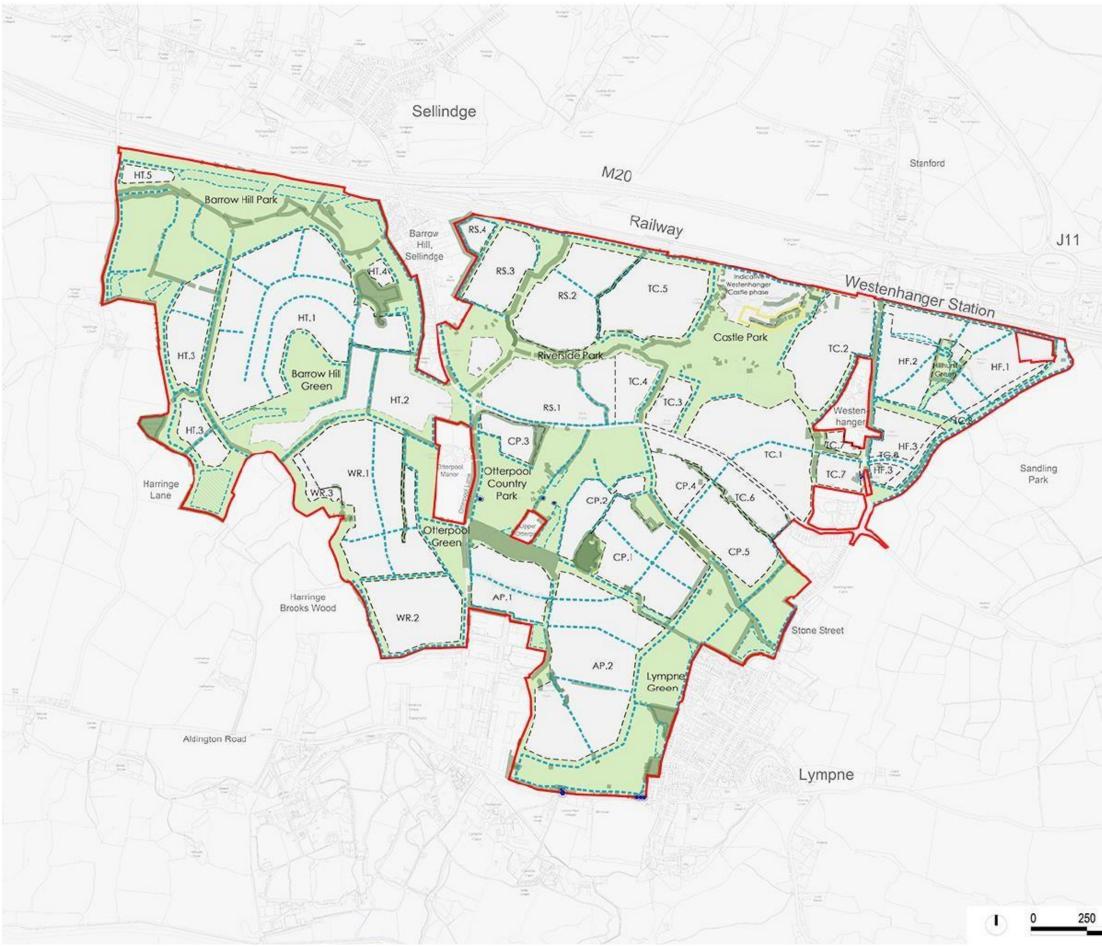
Table 4 Otterpool Park Proposed Uses

The key parameter plans that are being submitted to Folkestone & Hythe District Council for approval and that have been used as the basis of the Otterpool Park EIA are shown on the pages below. These plans show the following aspects of the proposed development:

- Location of open space and vegetation to be retained: This plan defines where the built form should not encroach into specific areas of open space. The open space on the plan provides much of the green infrastructure essential for the garden settlement. This plan shows indicatively where existing trees and hedgerows are proposed to be retained.
- The development areas and key movement corridors: This plan shows where built development areas and movement corridors in terms of roads, footpaths and cycleways are proposed on the site.
- The maximum height of buildings: The purpose of this plan is to show the maximum building heights that would be permitted within different built development areas of Otterpool Park.
- Illustrative Masterplan: The Illustrative Masterplan, provided below, shows how the proposed layout of the site could look, in accordance with parameter plan drawings shown above. However, this drawing is illustrative only, and some details could change as Otterpool Park moves forward.

There is an existing planning permission for a material recycling facility, waste transfer station and biological digestion plant that sits within the Otterpool Park site. Whilst it is not anticipated that the permitted waste facility will be built and operated, the implications of the facility were considered in the assessment of cumulative effects, in a scenario whereby fewer homes would be built to create sufficient space for it on the site.

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Existing

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Area in front of Vestenhanger Castle with vegetation to be removed subject to further sirvey and Conservation Management Plan

bisting trees with TPO retained

Propose

Proposed development areas L Numbered keyto reflect

n.n

development areas in illustrative phasing plan Proposed indicative Westenhanger

. . .

The indicative Westenhanger Castle phase relates to an area of development will be the subject of future consideration/approval

Proposed areas of structural planting

Proposed rows of structural planting

Structural planting must be provided in the general location indicated on this Parameter Plan. The precise location and type of structural planting is to be defined at Ter 2. To inform the Ter 2 structural planting proposals see the Green Infrastructure Strategy for details regarding planting type, location and the necessary advance planting required.

Proposed open space

Application Red Line Boundary



Client: Otterpool Park LLP

Masterplanner:

FARRELLS

Project: Otterpool Park

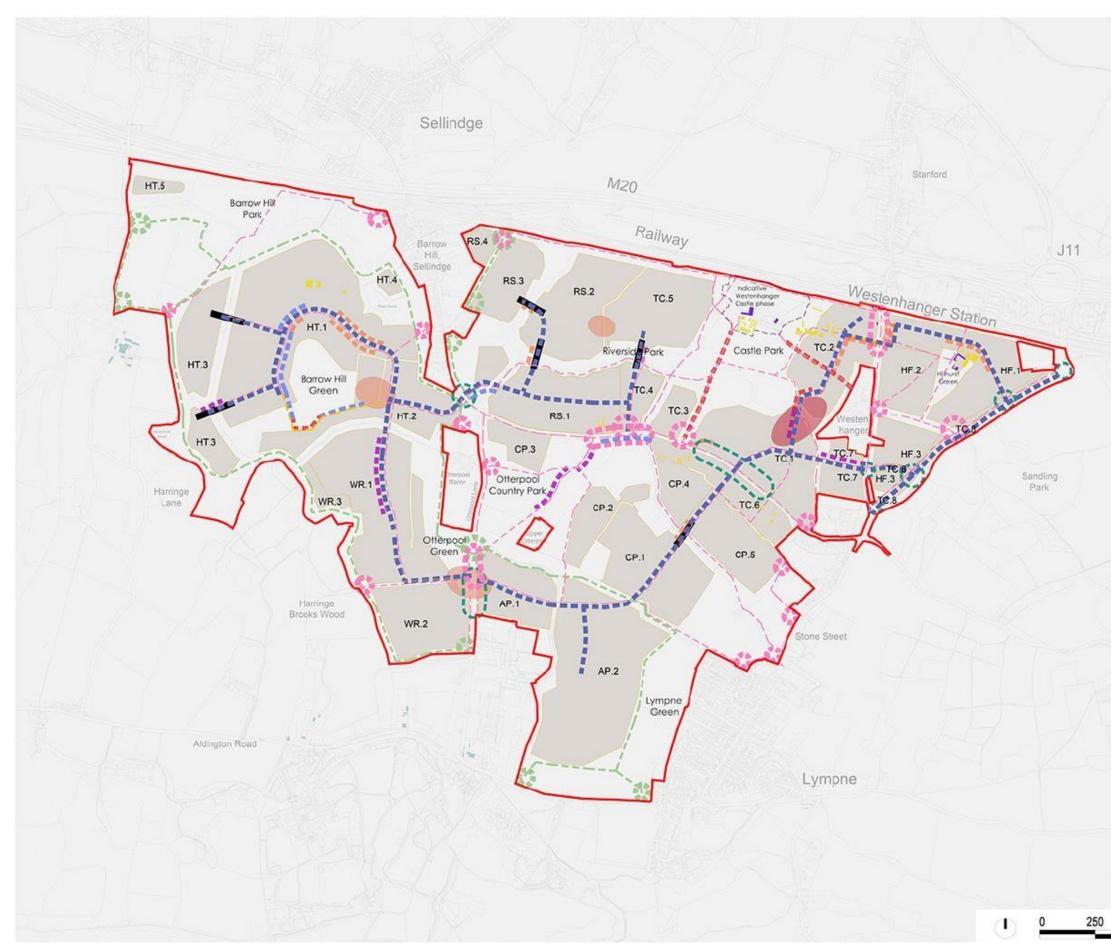
Drawing: Open Space & Vegetation

Scale: 1:7,500 @ A1, 1:15,000 @A3

Status: For Approval

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Drawing No. OPM(P)4002_rev YY



Ргороза	d
	Proposed development areas
n.n	Numbered key to reflect development areas in Bustrative phoing plan
	Proposed indicative Westenhanger Castle phase. The indicative Westenhanger Castle phase relates to an area of development in addition to the retention/demolition identified and will be the subject of future consideration/apprival
	Existing buildings to be retained within application boundary
-	Existing buildings to be demolished within application boundary
	Proposed fown Centre Focus Jone
	Proposed Local Centre Focus Jone
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51	Proposed indicative at movement condor connection to existing route
\$3	Proposed indicative cycleway & footpath connection to existing route
17	Proposed indicative bidieway connection to existing route
	Limits of deviation restricted only on side indicate
	Movement conidon deviation #3m
	Movement coniders deviation max ±0 to 5m
	Movement conidos deviation max ±20m
	Movement corridors deviation max #50m



Client: Otterpool Park LLP

Masterplanner:

FARRELLS

Project: Otterpool Park

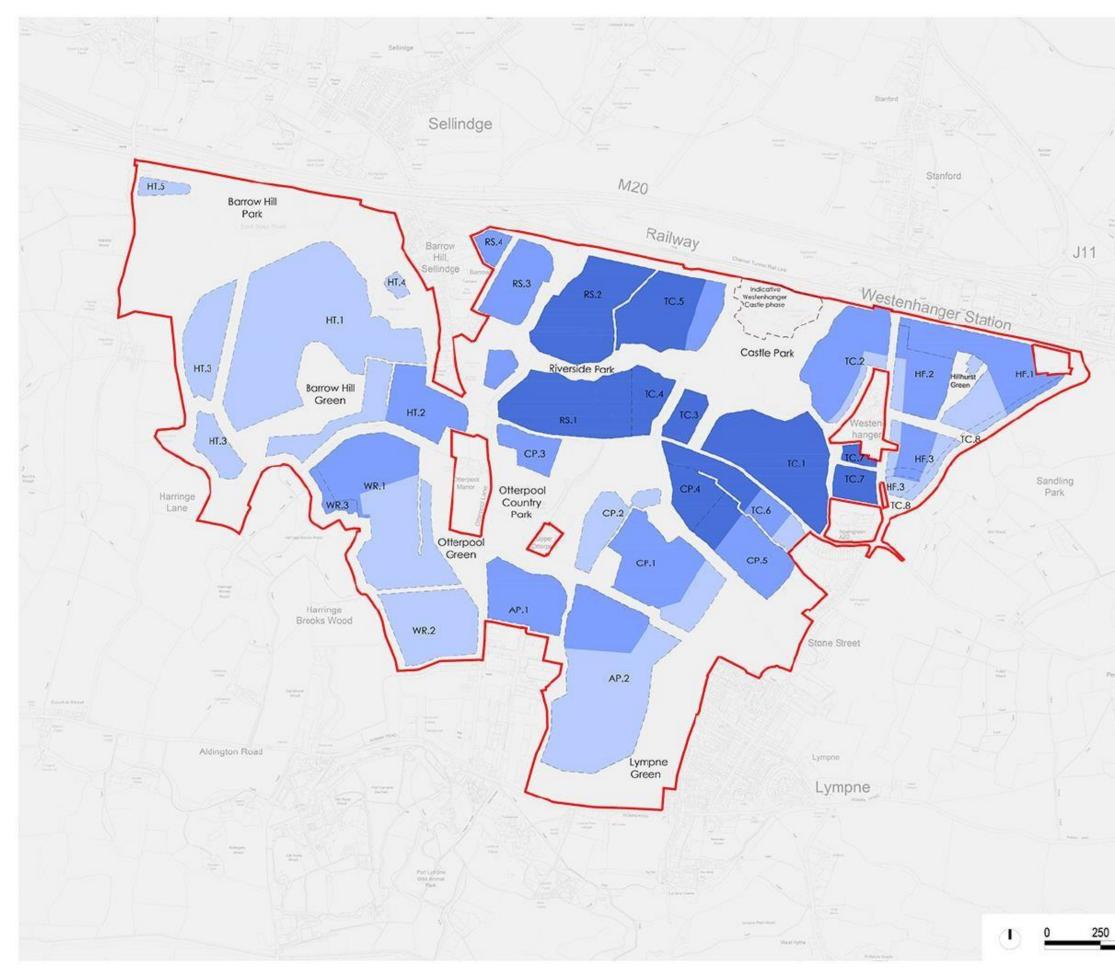
Drawing: Development Areas & Movement Corridors

Scale: 1:7,500 @ A1, 1:15,000 @A3

Status: For Approval

Drawing No: OPM(P)4001_rev YY

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-	Application Red Line Boundary
Propos	ed
n.n	Numbered key to reflect development areas in illustrative phasing plan
[Proposed indicative Westenhanger Castle phase
	The indicative Westenhanger Castle phase relates to an area of development that will be the subject of future consideration/approval
_	Proposed development low height up to 12m
	Proposed development medium height up to 15m
	Proposed development

high height up to 18m

Note: Proposed Height in metres above existing levels



Client: Otterpool Park LLP

Masterplanner:

FARRELLS

Project: Otterpool Park

Drawing: Heights

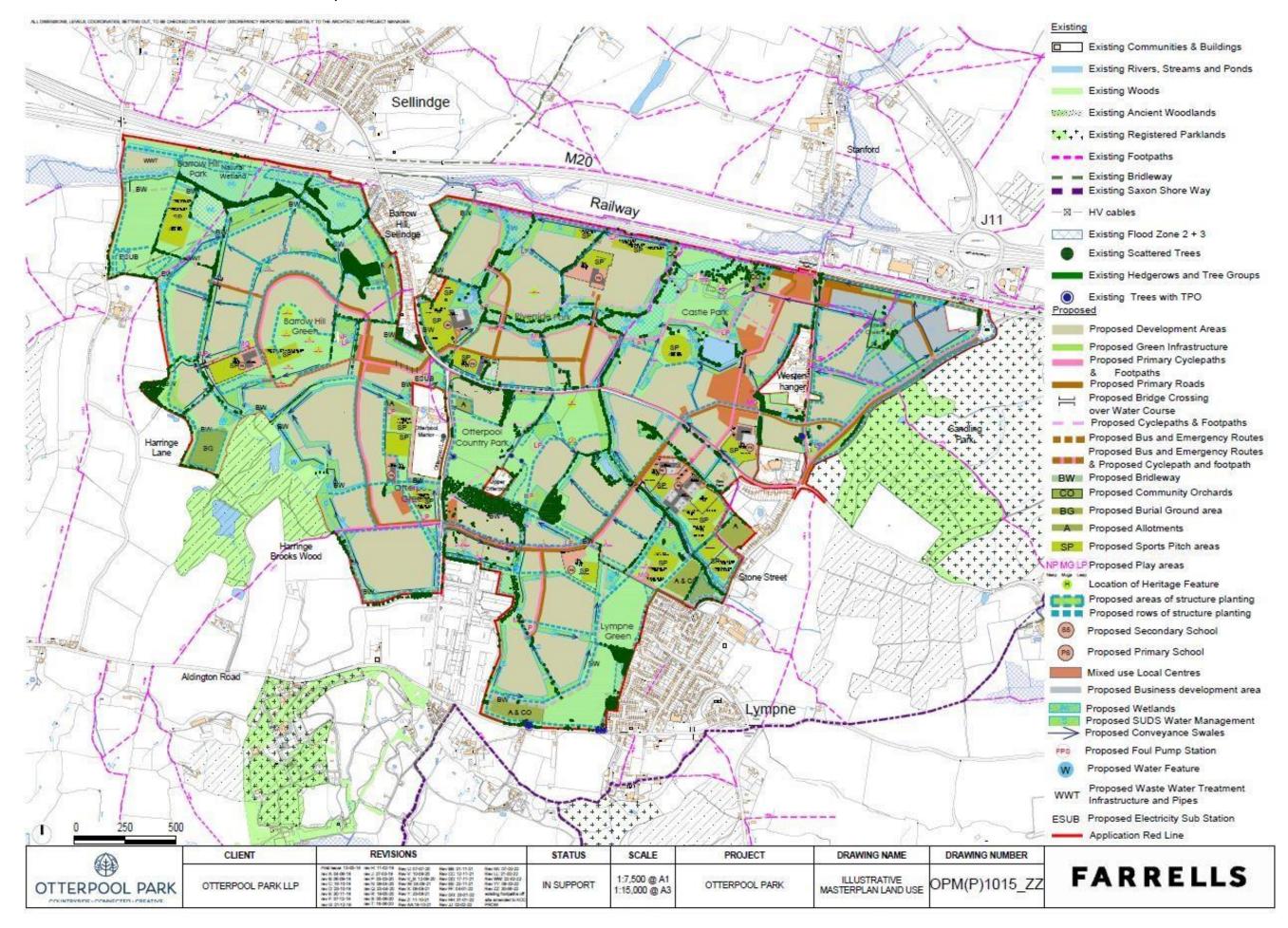
Scale: 1:7,500 @ A1, 1:15,000 @A3

Status: For Approval

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Drawing Number: OPM(P)4003_rev YY

Otterpool Park Environmental Statement Volume 1 – Non-Technical Summary



4.1 Construction

Otterpool Park will be built out over a period of approximately 19 years and assessments have been undertaken assuming that the Development will be complete by 2042. Demolition works will comprise the removal of 89 residential and commercial buildings over the development period, with some having the option of being retained. Each phase will provide the necessary mix and quantum of development to ensure the delivery of housing alongside the necessary social and physical infrastructure. Works during most phases will be preceded by advanced planting to assist in visually integrating views from the surrounding designated Area of Outstanding Natural Beauty.

An additional 1,500 homes and other uses are expected to be delivered as part of the wider Otterpool Framework Masterplan Area (referred to also as 'the Framework Masterplan') which would increase the total number of homes to 10,000. Additional commercial space and a primary school in addition to the extra 1,500 homes are anticipated to be constructed approximately 2 years after the completion of Otterpool Park.

Conservative assumptions of construction methods have been used to determine likely construction impacts. Demolition and construction is assumed to include the following mix of activities:

- Demolition and site clearance;
- Enabling works, including site preparation (excavation and grading);
- Provision of infrastructure, distributor and estate roads, footpath/cycleway links, mains drainage and other services;
- Diversion and under-grounding of utilities and installation of new services;
- · Completion of green infrastructure; and
- Construction of buildings/groups of buildings, parking and other hard surfaced areas followed by finishing and fitout;

Given the considerable length of time over which Otterpool Park will be constructed (approximately 19 years), uncertainties exist in terms of how and where construction will be phased across the site over time to meet local demand. Therefore, in the ES an assessment of the construction peak period has been completed based on anticipated annual housing numbers and the associated necessary supporting community infrastructure required, such as schools and education facilities. On this basis the peak period of construction is assumed to be approximately 2030 from an estimated start of 2023. The Otterpool Park development of 8,500 homes and supporting infrastructure is anticipated to be completed in 2042. A further 1,500 homes to complete build out of the Otterpool Framework Masterplan Area been assumed to be built by 2044.

Where the EIA has identified negative environmental effects during construction, appropriate mitigation measures have been identified. These mitigation measures are included with an outline Code of Construction Practice or 'CoCP', which will need to complied with by the works contractors to ensure that mitigation identified in the EIA is implemented effectively. The CoCP is currently at an outline stage given the lack of known specific construction works. At the later detailed stage (Tier 3) of the planning programme, the CoCP will become more detailed and will need approval from Folkestone & Hythe District Council before works can commence. Most of the EIA topics mentioned here will rely on the CoCP to deliver relevant mitigation measures during construction.

5 Agriculture and Soils

The Otterpool Park proposals have the potential to cause impacts to agricultural land and the agricultural businesses this supports. Consultation with Natural England raised a concern regarding the likely presence of high-quality agricultural land and how effects would be minimised. Information on the quality of the land and the nature of the agricultural businesses was gained by collating available information on soil types and their characteristics, the quality of agricultural land (according to the Agricultural Land Classification system), topography, climate and land use, including any land being farmed under an agrienvironment scheme. The soils present across the site and across adjacent areas do support high quality agricultural land. The proposals would result in the loss of this land from agricultural production. However, nearly 50% of the land would be set aside for playing fields, amenity, parks, allotments, orchards and habitats. The retention of a significant amount of green space will ensure the underlying soils continue to function and provide valuable services, for example by absorbing water and releasing it slowly to watercourses and supporting





the habitats and landscapes from which we get enjoyment. During construction the soils would be handled following published best practice guidelines to ensure they are suitable for their intended use. The phasing of the construction programme would take into account on-going farming activities and seek to minimise disruption, for example avoiding an undeveloped part of an enterprise becoming unviable for the period until it is brought into the Development. Impacts during the operational phase will be minimal. Whilst there could be increased disturbance, for example from dog walkers, to adjacent landowners, the design and layout of amenity areas and footpaths would seek to minimise this.

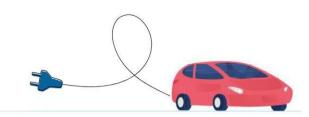
In conclusion, the effect of Otterpool Park on agricultural land is considered likely to be **significant negative**. No significant effects on agricultural businesses are expected. This effect is unavoidable if the Site is to be developed for housing to meet the apportioned housing need for this area. Effects from Otterpool Park cumulatively with other 'reasonably foreseeable' local developments are considered no worse than those of Otterpool Park alone.

6 Air Quality

The proposals have the potential to cause air quality impacts as a result of construction traffic fumes and dust during the construction phase. The road-traffic exhaust emissions associated with the additional vehicle trips generated when Otterpool Park is built and operational have the potential to impact on local air quality. Both existing receptors (adjacent to the existing road network in the vicinity of the application site) and future (on site) receptors may be affected by the additional vehicle journeys and have therefore been considered.

Otterpool Park design includes a number of features that promote good air quality and minimise exposure to pollutants such as provision for electric vehicles, wide streetscapes that allow effective dispersion of vehicle emissions and allow for public transport.

Potential construction phase air quality impacts from dust as a result of earthworks and other construction activities have been assessed and the site is considered to be a 'high risk' from these activities in the absence of mitigation. Good practice control



measures, which are included in the Code of Construction Practice, would provide effective mitigation for a development of this size and nature, and reduce potential impacts to human and ecological receptors to acceptable (**not significant**) levels for the duration of the construction phase. The effects of dust generated by other 'reasonably foreseeable' local developments cumulatively with Otterpool Park are likely to be **not significant** with the mitigation set out for Otterpool Park.

Potential operational phase impacts from vehicle exhaust emissions have been assessed by predicting air quality conditions at sensitive locations both within and outside Otterpool Park. Operational phase results were checked for accuracy against local air quality monitoring data following best practice guidance issued by the government. Further to this, atmospheric dispersion modelling was undertaken to predict pollutant concentrations across the site as a result of emissions from the highway network.

The first year assessed for the Development in operation is 2024, the year in which the first of the constructed residential units are expected to be occupied. This assessment was carried out to ensure that residents occupying the new housing, and those in the local area would not be subject to unacceptable air quality. The second year assessed was 2030 which represents the peak construction year when Otterpool Park will be partially built out, and when the number of construction vehicles accessing the site is expected to be the highest. The third year assessed as part of the operational phase assessment focussed on 2044, which represents the year that Otterpool Park would be fully built out and occupied. This year is inclusive of the additional 1,500 residential units associated with the Framework Masterplan and is therefore a 'worst-case' assessment.

It was found that on-site air pollutant levels were well below the health-based limits set by the government with Otterpool Park in place, indicating a good standard of future air quality in each assessment year. Cumulative effects of other 'reasonably foreseeable' local developments were included within the traffic flows assessed for Otterpool Park. The effect of the operation of Otterpool Park on the existing and future population in the vicinity of the site was **not significant** for each year assessed.

7 **Biodiversity**

An assessment has been undertaken of the potential impacts of Otterpool Park on biodiversity through desk and field-based studies. In addition, consultation with Natural England, Kent Council and Folkestone & Hythe District Council has been ongoing since 2016.

The key ecological features identified in relation to Otterpool Park can be broken down into four broad categories:

- Designated sites including Folkestone to Etchinghill Escarpment Special Area of Conservation; Dungeness, Romney Marsh and Rye Bay Special Protection Area and Ramsar Site, Lympne Escarpment Site of Special Scientific Interest and Harringe Brooks Wood Local Wildlife Site.
- Habitats including ponds, woodlands (both ancient woodland and broad-leaved woodland) riverine habitats, hedgerows, grasslands and arable field margins.
- Species including birds, dormouse, water vole, invertebrates, great crested newt, bats, badger and reptiles.
- Ecosystem services including food production, water provision and regulation, sense of place and history, biodiversity and soils.

Within the site, the design retains key ecological features creating a green grid for wildlife to move through the development. Key habitats and areas of importance for protected and notable species are also retained.

In many areas, linear corridors of vegetation, such as hedgerows, lines of trees and ditches, will be enhanced with additional planting to create wider corridors. The green spaces also buffer retained habitats and off-site features such as Harringe Brooks Woods. Green spaces within the site will offer recreation space, preventing recreational impacts upon designated sites. These green corridors link up key areas of biodiversity, including:

- The Folkestone Racecourse Lake
- Off-site Woodlands including Harringe Brooks Woods
- Off-site parts of the East Stour River, both upstream and downstream; and
- Smaller areas of woodland in the area.



The green corridors will also link up areas of:

- Retained areas of the former Lympne Airfield
- The Otterpool Quarry SSSI,
- A pond area to the south of the A20; and
- A number of smaller green spaces within the proposed development

The on site waste water treatment works will ensure nutrient neutrality for the site, preventing impacts to designated ecological sites away from the proposed development. No significant impacts from Otterpool Park upon designated sites are foreseen resulting from recreation or air quality changes. Potential effects on designated ecological sites are likely to be **not significant**

Habitat retention and creation on the site is extensive, with approximately 50% of the site being green space. Habitats of principal importance are safeguarded and created. An assessment of the proposals using the Biodiversity Metric 3.0 (an industryrecognised biodiversity calculator tool devised by the UK government) demonstrates that the development as secured in the parameter plans has the potential to deliver approximately 20% biodiversity net gain overall. There will also be removal of non-native invasive plant species within the site.

In summary, with regards to habitats, overall, the design of Otterpool Park has ensured that there is a demonstrable net gain to biodiversity. Overall, once the proposed mitigation is applied, there are **significant beneficial** effects upon habitats, including the reduction in the negative impact on local flora and fauna form invasive plants, and in increase in the overall biodiversity value of the site. Within the site, there will be habitat creation for species including areas specifically designed for species including water voles, reptiles, great crested newts and invertebrates. A number of safeguarded and enhanced corridors for wildlife will be identified as 'dark corridors'. Such areas will have lighting that should be kept low and the areas dark in order to allow light-sensitive animals such as bats, invertebrates and badgers to continue using the area.

Construction mitigation includes working measures to prevent disturbance and pollution impacts. Protection of species during construction will include species translocations and bespoke method statements, timing of works, ecological clerk of works input and safeguarding of key areas. Operational mitigation includes lighting strategies to avoid and reduce light falling onto sensitive areas, and proposals for monitoring and habitat management.

Once all of the proposed mitigation is applied, the only significant residual negative effects are associated with species which require large areas of open agricultural land (birds and brown hare). However, these significant negative effects will be addressed through offsite mitigation in the form of improvements in the management of farmland in the surrounding area reducing the effects to **not significant**. Overall, once mitigation is applied, there are no significant residual effects upon species.

Potential Ecosystem Service changes are difficult to quantify (and cannot be determined to a significance level as per the other aspects of the EIA). The ecosystem services assessments outlined that there would be a reduction in some provisioning services (including food production), but increases in the provision of some regulating services (including flood regulation and pollination) and cultural services (including recreation, interaction with nature and sense of place).

8 Climate Change

8.1 Effects on Climate (Greenhouse Gas Emissions)

The impact of Otterpool Park on the global climate and the UK commitments in terms of emissions of greenhouse gases (GHGs) has been assessed. Emissions arising from construction operations of Otterpool Park, operational use of its buildings, added transportation emissions during the whole design life of Otterpool Park, and end of life related emissions of structures have been considered.

Otterpool Park aspires to be a Net Zero Development, with construction emissions reduced to as low as possible through innovative and strict design guidelines, while operational emissions are expected to reach zero in the 2040's, aided by rapid national grid decarbonisation and transport electrification. These measures will be explored throughout the planning and construction of the proposed Development to reflect the latest available technology.

The Climate Change Act 2008 (as amended) requires at least a 100% reduction in the UK's greenhouse gas emissions as compared to 1990 levels by 2050. To ensure that regular progress is made towards the target, the Climate Change Act 2008 established a system of carbon budgets. The emissions significance has been measured against the UK Carbon Budgets and Kent County current emissions level.

It is found that Otterpool Park will constitute less than 0.1% of the UK national carbon budgets until 2035. The carbon calculations are based on worst-case common practice, in terms of construction materials, methods and operational energy use throughout the long construction phase and whole design life of operation use. It is very likely that the carbon impact of Otterpool Park will end up being lower than the estimate projected.

Otterpool Park currently commits to a 45% carbon reduction against current building regulations for new homes. For large non-

residential buildings Otterpool Park commits to a 10% carbon reduction against current building regulation requirements.

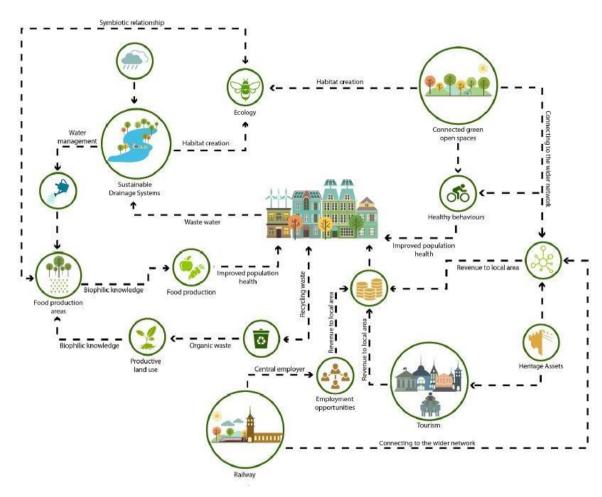
Mitigation measures have been embedded in the design of the Proposed Development to ensure it minimises the overall GHG emissions, where possible. For example, the proposed houses would be as energy efficient as possible through the use of energy efficient lighting, high levels of insulation and best practice construction techniques.

The development shall be underpinned by a movement strategy which prioritises walking, cycling and access to public transport. All homes shall be within 800 metres/10 minutes' walk of a local neighbourhood centre with an aspiration that all homes are within 400 metres/5 minutes' walk of such facilities. Rail services will be prioritised, and access to train stations made convenient with walking and cycling network.

Following the adoption of mitigation measures, comprising best practice measures outlined in the Code of Construction Practice, and operational mitigation reducing energy and transport related emissions, and exploring options to reduce maintenance related emissions, the construction and operational phases of Otterpool Park would not have a significant negative effect on the government's ability in achieving the carbon budgets and therefore are anticipated to be **not significant**.

The impact on climate change from Otterpool Park in combination with that of committed developments in the area are considered to be minimal, assessed against Kent current emissions and UK Carbon Budget, and the expected regional pathway to decarbonisation. Therefore, the cumulative effects of other developments with Otterpool Park related to climate change are likely to be **not significant**.

8.2 Climate Resilience



The UK Met Office Climate Change Projection (UKCP18) forecasts prolonged heatwaves and an increase in the frequency and intensity of extreme rainfall events in South-East England. The Climate Risk Assessment has considered these risks, which are associated with global climate change, on Otterpool Park.

The Climate Risk Assessment identifies the following sensitive receptors:

• Built elements in Otterpool Park such as pavements, buildings, and infrastructure including drainage.

• Ecological receptors such as water, air and ecological systems.

• Human health and wellbeing.

• The Proposed Development has been designed to be resilient to future increases in climate change.

It is concluded that the effects of climate change on the construction and operational phases of Otterpool Park are likely to be **not significant.**

The cumulative effects from climate conditions on climate change receptors are considered to be **not significant**.

9 Cultural Heritage

An assessment has been undertaken of the potential impacts of Otterpool Park on cultural heritage including archaeological remains, historic buildings and structures and the historic landscape.

The Cultural Heritage baseline data has been established through data collected from a series of desk-based reports and field-based surveys completed between 2016 and 2021.



Roman Villa hypocaust (ancient Roman heating system)

The landscape surrounding and within Otterpool Park has been shown to have been used from the Prehistoric through to the Modern period. Within the site this is evidenced by several key assets: Westenhanger Castle and associated barns and walled garden, Medieval and Post-Medieval farmsteads, Lympne Airfield, a newly discovered Roman villa and a number of Prehistoric barrows (burial mounds). In total, 288 heritage assets have been assessed - 7 Scheduled Monuments, 16 Listed Buildings, 1 Conservation Area, 1 Registered Park and Garden, four military crash sites and 259 other heritage assets. Other heritage assets such as historic hedgerows, woodland and landscapes have also been assessed.

Permanent direct physical impacts are anticipated during extensive groundworks required for new building foundations which will require the removal of any below ground archaeological remains present. The cultural heritage of the Site has informed the masterplan and has been key in designing Otterpool Park to help create a sense of place and links to the past.

Temporary indirect impacts are anticipated during construction to the setting of heritage assets due to construction traffic, increased noise and dust. Mitigation will include use of hoarding and bunding, damping down of the construction area and control of vehicle movement through site speed limits and defined routes

Several listed buildings will experience changes to their settings as a result of visual changes to the surrounding landscape. This will be mitigated by careful design of housing density and heights, landscaping, interface of green spaces and built areas and retention of key historic features in order to preserve and enhance the setting.

Following mitigation, most residual effects to heritage assets are not significant. However, a **significant negative** residual effects due to change to its setting was identified for a recently designated nationally significant prehistoric barrow located east of Barrow Hill, Sellindge and north of the racetrack, and marked on OS maps. The barrow will not be physically impacted but it will be closely surrounded by high built development and would lose its open setting.

Beneficial impacts are anticipated through preservation of open space (Westenhanger Castle, Roman villa, the Airfield's Battle Headquarters and the prehistoric barrows), bringing the Castle's southern causeway back into use and increased public access.

10 Geology, Hydrogeology and Land Quality

An assessment has been undertaken on the effects of the Proposed Development on ground conditions, contamination and underground water resources (hydrogeology) during both the construction and operational phases.

In the central part of the development site is the Otterpool Quarry Geological Site of Special Scientific Interest. The former quarry will be contained within a woodland country park, maintained and enhanced to expose the geology for educational purposes.

The development site is currently generally rural in nature. Developments include Folkestone Racecourse in the northeast, Otterpool Quarry, and a former World War II airfield in the south, later known as Lympne Airport. There is a historical landfill north of Lympne Industrial Park,



which accepted inert waste (materials that do not decompose) recorded in 1992. Soil samples obtained in a preliminary ground investigation and analysed for common contaminants in a laboratory suggest low risks to human health, surface water and groundwater. Further ground investigation will be undertaken at detailed design and, if unacceptable risks are identified, remediation will be completed. A watching brief to identify signs of contamination and other pollution prevention practices will be specified in the CoCP.

There is a high risk of unexploded ordnance near the former World War II airfield, and, in the north-west corner of the site, an abandoned bomb has been identified. Further unexploded ordnance assessment is required before excavation is commenced.

Once the mitigation outlined above has been implemented, there will be no significant negative effects in relation to geology, hydrogeology and land quality, either individually or cumulatively with other reasonably foreseeable committed development.

There will be a positive effect from the enhancement of the Otterpool Quarry Geological Site of Special Scientific Interest.

11 **Human Health**

This assessment considered the potential for effects on human health at the local, district and regional level during the construction, early occupation and operational phases of Otterpool Park. Consideration was given to children, older people, people with disabilities and people from low-income groups.

Construction phase

Otterpool Park would have a significant positive effect on the health of new residents through the creation of employment opportunities during construction.

Early occupation and operational phase

The following aspects of the design will have a significant positive effect on the physical and mental health of current and future residents during either or both early occupation and the operational phase:

- The range of housing types and tenures, which includes affordable and older people's housing.
- Crime reduction and community safety. •
- Employment and training opportunities, high-quality accessible places of employment and scope for more highly skilled jobs.



gardens and allotments stimulates social integration

health benefit from spaces

- Community infrastructure including education facilities (early years, primary and secondary), flexible floorspace for health and community services, Special Education Needs (SEN) facilities, open space, and provision for sports and play.
- Green space including community orchards and allotments, which will encourage healthy eating. Development phasing will ensure these are completed early to promote community interaction.
- Integrated public transport and opportunities for walking and cycling. This will encourage healthier lifestyles and reduce congestion with benefits to air quality.

Other factors considered, such as climate change, will not significantly affect health and wellbeing. This includes effects of the Otterpool Park development individually and cumulatively with other reasonably foreseeable committed developments.

12 Landscape and Visual Impact

A landscape and visual impact assessment has been undertaken to consider the potential effects on the landscape character and visual amenity of the site and the wider area.

The site and its surrounds are predominantly agricultural but also exhibit a wide variety of other land-use types from residential and industrial built-up areas to areas of informal recreation.

The most sensitive landscape receptors were identified as including:

- Character of the landscape within and surrounding the site, including a small part of the North Downs Special Landscape Area located at the north-east corner of the site; and
- Kent Downs Area of Outstanding Natural Beauty, which borders the eastern and southern edges of the site. The escarpment of the North Downs lies at its closest point approximately 2.0km to the north-east.

The key visual receptors included the:

- Residents of properties surrounding and within the site;
- Users of the North Downs Way, National Trail and Saxon Shore Way Long Distance Path:
- Users of public rights of way within and surrounding the site;
- Users of places of recreation such as Open Access Land and visitor destinations surrounding the site; and
- Users of local roads.

Mitigation measures to reduce impact on sensitive receptors during construction include the following:

- Adequate separation distances between the proposed Development and sensitive receptors;
- 'Early planting' of native vegetation and hoardings, to create visual buffers; and

• Measures to control placement, extent and duration of construction site lighting.

Embedded design principles have been incorporated to reduce impact on sensitive receptors during the operation of the scheme, these include:

- Minimisation of changes to landform;
- Retention of the majority of existing woodland, trees and hedgerows including the wooded skyline formed by the ridge of high land that rises across the south of the site (part of the Greensand Ridge);
- Creation of buffer strips of open space and vegetation around existing dwellings and settlements;
- Use of green/brown roofs on the larger buildings where feasible;
- Creation of a substantial framework of structural woodland, tree belts and hedgerow planting across the site;
- Retention of red brick buildings of Hillhurst Farm and the triple Victorian terrace of Little Greys within the parcel of Special Landscape Area within the site;
- Consideration of the use of local materials and a suitable colour palette for walls and roofs;
- Retention of key views to the North Downs; and
- Strategy for long-term management and governance of all infrastructure.

Following establishment of these embedded design and mitigation measures, there would only be a **significant negative effect** upon the landscape character of the site itself. This would occur throughout the construction and operational periods. All other landscape character receptors would not experience significant effects. With regards to visual amenity there would be **significant negative** residual effects to the following:

- Users of the public rights of way within the Site during construction and up to 30 years following completion.
- Users of the public rights of way within 2km of the north of the Site during construction and up to 5 years following completion.
- Users of the public rights of way between 2-5km of the north of the Site during the 5 years following completion.
- Users of the North Downs Way National Trail during construction and up to 5 years following completion.
- Users of the Open Access Land on the North Down scarp during the 5 years following completion.
- Users and residents of Westenhanger during the 5 years following completion.
- Residents of individual properties inside the application boundary, and which would be demolished by the end of the construction period (i.e.: Elms Acres, The Willows, The Bungalow, Somerfield Court Farm, Rose Cottage, Killymoon, and The White House) during construction.
- Residents of individual properties along the A20 to be retained (or whose demolition cannot be decided until the further tiered planning stages) and which are generally enclosed by the proposed Development (i.e.: Benham Water Farm; Whiteways, Boleh, Red House Farm, Cydonia, Cobtree Cottage, 2 Franks Villas, Quorum, Ivy Cottage, Craylands, Elms Farm and Honeypot) during the 5 years following completion.
- Residents of individual properties along or near to Stone Street, Westenhanger to be retained (or whose demolition cannot be decided until the further tiered planning stages) and which are generally enclosed by the proposed Development (i.e. Tollgate Cottage, and Hillhurst Farmhouse) throughout the construction and operational periods.

- Residents of the individual properties to be retained (or whose demolition cannot be decided until the further tiered planning stages) and which are only partially enclosed by the proposed Development (i.e.: Twin Chimneys and Little Greys, Farm Cottage, 1-2 Barrow Hill Farm Cottages) during construction and up to 5 years following completion.
- Users of roads through the Site including the A20, Stone Street and Otterpool Lane during the 5 years following completion.

The proposed development would, however, reinforce aspects of the character of the landscape within the Vale of Holmesdale, help reduce the views of the existing visually detracting elements, bolster the boundaries of the Area of Outstanding Natural Beauty and connect public rights of way to public open spaces and existing assets in the landscape including Westenhanger Castle, the Otterpool Quarry SSSI and the East Stour River corridor. As the Development is completed, views to the site will be clearly recognisable as a town and would reflect the landform, elevation, pattern and location of the existing environment in its layout, materials used and nature and shape. The cumulative assessment identified that when the proposed Development was added to a landscape where the emerging developments at Ashford and at Sellinge where fully built there would be no additional significant effects to any landscape character or visual amenity receptor, beyond those already recorded in the LVIA. The emerging developments in Sellindge are sited in relatively enclosed locations, and the distances between the developments around Ashford and those at the site (and at Sellindge) would be suitably large to dispel opportunities where all developments would be seen clearly in one view.



View from Tolsford Hill showing Otterpool Park in blue (heights up to 18m), purple (heights up to 15m) and pink (heights up to 12m)

The introduction of new buildings and infrastructure within the Otterpool Park Framework Masterplan area when combined with those of the proposed Development would bring about additional significant effects to a single landscape character receptor (the part of landscape character area 11-Lympne, which covers the site and areas to the west and south, that is located outside of the site itself), and a single visual receptor (users of public right of way HE316FP which actually crosses through the Framework Masterplan area) beyond those already recorded in the LVIA. Given the smaller extent of the Framework Masterplan, and as the proposed Development (and its proposed structural planting) would have already been constructed before the Framework Masterplan on land between it and most viewpoints, there would be little intervisibility between them and therefore only the single significant visual cumulative effect mentioned above.



Structural planting plan

13 Noise and Vibration

Potential noise and vibration impacts during the demolition of existing buildings, construction and operational phases of the Proposed Development have been assessed.

Noise and vibration surveys were carried out in 2017 and 2018, prior to the Covid-19 pandemic. The data collected is considered representative of baseline conditions. The assessment has been made making comparison to the baseline conditions established through these surveys.

During demolition and construction works best practice construction techniques would be applied, and construction methods would be carefully planned to minimise noise and vibration through the implementation of the CoCP. This would ensure that existing and new residents would not be exposed to unacceptable noise and vibration



levels during the construction works and that effects during construction would be **Not Significant**. Construction activity will progress around the site, meaning noise and vibration at any specific location will be temporary.

Baseline noise is highest near the M20 motorway, HS1 railway (this is also a source of groundborne vibration) and Lympne Industrial Park. The assessment considered the day- and night-time noise and vibration environment and found the site suitable for residential development, subject to design mitigation where predicted levels are highest. Design mitigation may include the following:

- Enhanced glazing
- Acoustic barriers / fencing

- Stand-off zones (the distance between the noise source and the receptor)
- Commercial areas providing screening / buffering

The site was also found suitable for the proposed non-residential elements, which include education and healthcare facilities, open space and the business development area, subject to design mitigation. Further assessment will be undertaken as the design progresses to ensure the education and healthcare provision provides a good acoustic environment for users and meets current standards and guidelines.

The assessment considered the noise impact of additional traffic generated by Otterpool Park, individually and cumulatively with other road schemes and reasonably foreseeable committed development, in the following scenarios:

- Construction-phase traffic combined with operational-phase traffic from partial occupation (interim scenario)
- Operational-phase traffic (completion scenario)

There will be **no significant effects** as a result of additional road traffic noise on the local network.

14 Socio-economic Effects and Community

The Otterpool Park development will have the following significant positive socio-economic effects and benefits for the community:

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Construction employment

The development will benefit the local labour market by creating employment opportunities within the construction sector. This includes the creation of 800 full time equivalent jobs in the local area during the construction phase. It is expected that there will be further cumulative benefits for construction-related employment.

Local economy

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Once completed, Otterpool Park will deliver employment opportunities by creating high-quality accessible places of employment and scope for more highly skilled jobs. The development will provide the infrastructure necessary for high-speed broadband, supporting home working. It is estimated that around 8,600 local jobs will be created.

Housing

The population in Folkestone and Hythe District increased 5% between 2011 and 2020. The construction of 8,500 new homes, including 22% affordable housing, will help meet Folkestone & Hythe District Council housing target and providing benefits in terms of the variety and type of housing proposed.

Community facilities and open space

The development will accommodate a new population of approximately 20,4000. Space will be provided for a range of community facilities promoting interaction, empowerment and development. This will include education, healthcare, and green infrastructure, open space, and provision for sports and play.

The Otterpool Park development will discourage the use of private vehicles and promote more sustainable modes of transport, active travel and the use of public transport. Information start-up packs will be provided to homeowners and tenants and public transport links will be promoted through property sales.

There will be improvements to local public rights of way (PROW), notably along the Lympne escarpment, where there will be improvements to drainage, surfacing, fencing and signage. Connectivity with the existing PROW network will be improved through upgrades to access and crossing points and gaps in the existing PROW network will be filled. The development will also create new PROWs and significant open spaces within the town, including a country park, which will provide a local alternative to surrounding areas such as the Kent Downs.

The potential for local communities to experience negative effects during construction, including noise, vibration, dust and light from on-site construction vehicles, plant and machinery and materials transport will be mitigated through a Code of Construction Practice (CoCP). Construction areas will be appropriately cordoned off and signed to ensure public safety and working hours will be restricted.



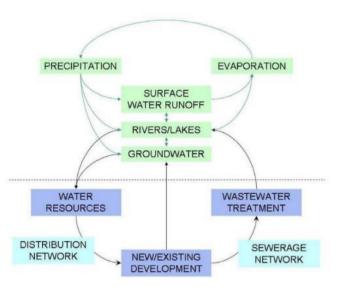




15 Surface Water Resources and Flood Risk

Otterpool Park will be located in a water stressed area (areas where the Environment Agency believes there are or are likely to be, environmental impacts caused by public water supplies or the need for major water resources developments) with limited surface water and groundwater resources. Drinking water is currently supplied by groundwater and treated water imported from neighbouring regions. The implementation of water-sensitive design principles during detailed design will restrict the drinking water consumed by each new household to a policy requirement of 110 litres per person per day.

The two nearby wastewater treatment facilities (Sellindge and West Hythe) do not have enough capacity to accommodate wastewater generated by Otterpool Park. This will be resolved through future investment and careful planning. Longer-term options include upgrading the Sellindge facility and providing a dedicated on-site water treatment facility. The initial development phases will be served by a dedicated on-site facility. Nitrogen and phosphorous discharges to the East Stour river from Otterpool Park will be offset by constructed wetlands and woodland planting.



The following controls to protect water quality will be implemented in the construction and operational phases respectively:

- Best practice will be adhered to throughout the construction phase to minimise risks to groundwater and surface water. This will include measures to prevent excavations creating pathways for contaminants and prevent polluted runoff entering the East Stour.
- Sustainable water reuse and wastewater treatment methods that are widely recognised within the water industry will minimise the
 potential for impacts to water quality and help achieve targets in local planning policy. Surface runoff will be treated by a sustainable
 drainage system, which will provide effective treatment of runoff, safeguarding and improving water quality.

Flood risk within the application site boundary is generally low. New built development will be located on land with a low risk of flooding and the sustainable drainage system will store runoff and ensure existing runoff rates are not exceeded. There are areas of medium or high risk of river flooding within a narrow corridor adjacent to the East Stour. New bridge crossings of the East Stour will be designed to ensure there are no blockages to the rivers flow regime and compensation will be provided by any losses of floodplain storage due to bridge construction.

Following implementation of the mitigation measures proposed, there will be **no significant negative effects** on surface water resources and flood risk as a result of Otterpool Park development individually or cumulatively with other reasonably foreseeable committed developments. The removal of existing culverts on the East Stour and one of its tributary watercourses will restore naturalised channels and flow regimes and remove a potential source of flood risk linked to a culvert blockage, resulting in a **significant positive** effect.

16 Transport

The Otterpool Park development has been designed to maximise benefits to pedestrians, cyclists, other road users and residents. Design measures include the following:

- Walkable neighbourhoods the majority of homes will be within walking or cycling distance of community facilities and services.
- Crossings controlled crossings will be provided at road junctions for pedestrians, cyclists and equestrians (where there is a bridleway).
- Connected and permeable networks of footways and cycleways residential areas will be connected to local and town centres and existing routes will be upgraded.

There will be bus stops with shelters, lighting and electronic displays within 400 metres of the majority of homes with bus services running every 30 minutes from when homes are first occupied. This will increase to between 4 and 6 buses per hour by the time the development is completed. Upgrades to passenger facilities at Westenhanger train station are also being sought in conjunction with key stakeholders.



The highway strategy will mitigate the negative impacts the Otterpool Park development would otherwise have on the highway network but will not provide significant additional capacity that might encourage additional car journeys. Sitewide, resident, school and workplace Travel Plans will be implemented to promote sustainable travel.

There will be safety and capacity improvements to the A20 Ashford Road as well as off-site mitigation facilitated by Otterpool Park through financial contributions. Key junctions will be subject to a 'monitor and manage' strategy secured through a Section 106 agreement (an agreement between a developer and a local planning authority about measures that the developer must take to reduce their impact on the community). The monitor and manage approach is expected to include the use of traffic counting technology to monitor traffic levels around the development as its built out, this can then be compared with the assessments completed to determine what works, if any, are required.

The potential for impacts during the demolition and construction phase will be controlled through a Construction Traffic Management Plan (as part of the Code of Construction Practice). This will, for example, identify appropriate routes for construction traffic to use through the construction phase.

The Otterpool Park development will have **significant positive** effects in relation to severance, amenity, and users of public rights of way; and the safety of pedestrians, cyclists, equestrians, users of public transport and motorists on A261 Hythe Road. The assessment did identify a **significant negative** effect on driver and public transport user delay at A20 Ashford Road at Barrow Hill. However, this effect may not be realised due to the sustainable travel measures included in the design of Otterpool Park.

No other significant effects through construction or operation were identified cumulatively with other reasonably foreseeable committed developments.

17 Waste and Resource Management

The construction phase for Otterpool Park is expected to generate approximately 235,947 tonnes of waste. This includes 58,591 tonnes of waste generated by excavation and the demolition of buildings, 20% of which of which would be re-used within the application site boundary and 80% of which would be subject to off-site disposal.

Subject to implementation of the following controls, there will be no significant effects in the construction phase:

- There is a potential for contamination to be identified within soils or groundwater. appropriate methods for reducing any risk from identified contamination would be developed and subject to a remediation strategy agreed with the Environment Agency.
- The contractor will implement a Site Waste Management Plan (SWMP), which will maximise the reuse and recycling of materials and minimise waste going to landfill, in accordance with the waste hierarchy.



The residential and commercial development at Otterpool Park will generate waste estimated at

39,080 tonnes per year from 2044. This figure comprises 8,133 tonnes per year of municipal (household) waste and 30,947 tonnes per year of non-household waste. This is deemed significant relative to the baseline for the site itself but not significant at the local level, particularly as a higher proportion of the waste generated is expected to be recycled than currently, helping Kent Council and Folkestone & Hythe District Council meet their regional and local targets for recycling.

The following mitigation will be implemented:

- The new residential development will be provided with waste management facilities including internal storage, convenient interim storage and information packs, supporting the principles of the waste hierarchy.
- The new commercial development will include dedicated storage areas for recyclable waste. Commercial developments will be provided with information and encouraged by Facilities Management to segregate waste and ensure recycling is maximised.
- Financial contribution will be made by Otterpool Park LLP in the short-term to use a waste transfer station (where waste is taken once it is collected, and then sorted and separated before transfer to another facility) outside Folkestone and Hythe district, and in the long term a financial contribution will be made towards the provision of a waste transfer station in the district.

A **Significant Negative** effect is expected (from both Otterpool Park alone and cumulatively) in the short term on waste facilities due to a lack of waste transfer station capacity in Folkestone and Hythe district. In the longer term a waste transfer station should be provided in the district by Kent County Council, which will reduce the effect to **not significant**. Otterpool Park development will accord with the principles of the waste hierarchy and support The Kent Waste Needs Assessment 2017. Other than the short-term effect related to the waste transfer station, there will be **no significant effects** on local or regional landfill capacity from Otterpool Park through demolition, construction or operation, either individually or cumulatively with other reasonably foreseeable committed development.

18 What happens next?

The ES has been submitted together with other planning application documents and drawings to the Folkestone & Hythe District Council to assist planning officers in determining the application. During this period the Folkestone & Hythe District Council will contact relevant stakeholders to seek their view on Otterpool Park.

Members of the general public will also be able to provide comments on the planning application and will be consulted by the Folkestone & Hythe District Council, alongside the statutory consultees.

18.1 Who can I contact for more information?

Further information, including an electronic copy of the planning application documents, the Environmental Statement and this Non-Technical Summary are available on the Folkestone & Hythe District Council website. Comments on the planning application can be made on the Folkestone & Hythe District Council website:

https://www.folkestone-hythe.gov.uk/planning-application-process

Please contact Folkestone & Hythe District Council for more information on accessing a paper copy of the ES documents.



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