OTTERPOOL PARK – Y19/0257/FH CONSULTATION SUMMARY TABLE

PARISH AND TOWN COUNCIL RESPONSES SINCE 11 JULY 2019 AND CONSULATION PERIOD 29 APRIL 2022 TO 24 JUNE 2022

(Representations Received as at 08.08.2022)

Table 2					
	Consultation Responses (Local Parish & Town Council responses)				
Ref	Name	Date Received	Comments	LPA Reference	
Ref 1				LPA162	
			 By way of example on 30th March on Goldwell Lane the following anomalies have been highlighted: Between 6 and 7 am 65 vehicles normal average 1 Between 7 and 8 am 107 vehicles normal average 8 		

			Between 5pm and 6pm 198 vehicles normal average 48
			Between 11pm and midnight 100 vehicles normal average 2
			On Calleywell Lane:
			 19th May between 9am and 10am 204 vehicles normal average 60 20th May between 10 cm and 11cm 247 vehicles normal average 65
			 20th May between 10 am and 11am 347 vehicles normal average 65 20th May between 11am and nean 262 vehicles normal average 62
			 20th May between 11am and noon 362 vehicles normal average 63 20th May between noon and 1pm 335 vehicles normal average 68
			 23rd May between 4 am and 5 am 182 vehicles normal average 2
			 23rd May between 5 am and 6 am 98 vehicles normal average 5
			 23rd May between 11 am and noon 130 vehicles normal average 62
			 23rd May between noon and 1 pm 139 vehicles normal average 69
			 23rd May between 1 pm and 2 pm 107 vehicles normal average 46
			 24th May between 6pm and 7 pm 321 vehicles normal average 61
			As can be seen these incidents are not isolated and residents are very concerned about the impact that the development will have on the roads, many of which do not have footpaths and are subject to the National Spectra because the second approximate from residents of Church Language metarists are using the period.
			The Parish Council has also received complaints from residents of Church Lane where motorists are using t route to avoid closures on the A20, this is a single track road totally inappropriate for this type of use.
			Table 16 -15 again no mention of the B2067
			 Table 16 – 17 predicts a 26% increase in traffic on Otterpool Lane, is there an assumption that all of t will go in the direction of the A20 as there are no statistics available to show the impact on the B2067
			• It is acknowledged that this is the early stage of planning for the development and the masterplan does not s that will band e installed it is inevitable that there will be an increase in traffic wanting to use the B2067 espe- access train services from Ashford International Station which is located on that side of the town.
			The Parish Council respectfully request that a full survey is carried out on both the B2067 as it enters the As again at the Green in Bonnington as well as the A20 by Smeeth crossroads which is the main entry point int that mitigation and traffic calming measures can be put in place to protect the residents from the increased t that come with it.
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2	Ashford Parish Council (Peter Hearn)	13 June 2022	Ashford Borough Council has the following representations to make on the above planning application.
			Firstly, Folkestone and Hythe DC should be careful to consider, assess, and respond to the revised outline a context of the previously agreed (February 2020) Statement of Common Ground (SoCG) with Ashford BC.
			Ashford BC advocates that Folkestone and Hythe DC should continue to engage with Ashford BC when con and responding to Otterpool 'Tier 2' and 'Tier 3' applications submitted subsequent to the revised outline app the (Housing, Infrastructure, and Retail) 'Actions Going Forward' detailed in section 3 of the SoCG, and notw proposed abolition of the Duty to Cooperate by the Levelling Up and Regeneration Bill currently working its v Parliament.
			Ashford BC is of the view that now may be an opportune time for Folkestone and Hythe DC and Ashford BC noting that the situation with some strategic issues has evolved considerably since the SoCG was signed.

the Otterpool al Speed Limit. ng this as a diversion	
of this increased traffic 067.	
not show all of the roads especially if they want to	
e Ashford Borough and t into Aldington in order ed traffic and the hazards	
	LPA 350
ne application in the C.	
considering, assessing, application – in line with notwithstanding the its way through	
BC to revisit the SoCG, d.	

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			In particular, Ashford BC notes that the Preferred Option for dealing with wastewater from the Otterpool Par onsite Waste Water Treatment Works, accompanied by wetlands to deliver nutrient neutrality. In its commo outline application, Ashford BC expressed concerns about flood risk, drainage, and wastewater discharge the administrative border into Ashford, including potential effects on water quality. Ashford BC is of the vie solutions should not compromise solutions to nutrient neutrality which are currently being sought in Ashford beneficial to discuss how solutions to nutrient neutrality at Otterpool Park might complement solutions in A Ashford BC also notes in particular that the Transport Strategy for Otterpool Park appears to have evolved improvements to Westenhanger Station ¹ , to provide for the introduction of High-Speed services from the so line with Kent's Rail Strategy 2021. Improvements which provide for residents to use methods of transport other than cars are supported in pri potential to alleviate some of the pressures which the Otterpool Park development may place on Ashford's would be helpful to understand the potential implications of improved services from Westenhanger Station stopping at and passing through Ashford. In taking account of the above representations, it would be appreciated if Folkestone and Hythe DC could the suggestion of revisiting the previously agreed Statement of Common Ground in due course.
3	Burmarsh Parish	15.06.2022	Thank you for consulting Burmarsh Parish Council on this proposal.
	Council (John Rich)		For the record, the parish council objected to the earlier application in 2019, as follows: "Burmarsh Parish Council considered the application at its meeting on 14th May 2019 and resolved to objective because of concerns that the necessary extra infrastructure such as health care, hospital and education fragrovided to an adequate and appropriate level early enough in the process to prevent additional strain on a services." This latest outline planning application no. Y19/0257/FH for Otterpool Park was considered on 31 st May 200 The parish council noted that the plan will enable the district to meet government house building targets for parish council agreed to continue to object, expressing particular concern that there appear to be no plans inadequate hospital provision in the area despite the significant increase in population that will be created I were also identified about the air quality of homes built close to the M20, especially as Operation Brock will traffic.
4	Folkestone Town Council (Georgina Wilson)	15.06.2022	The Committee received and noted the letter detailing the Outline Planning Application for Otterpool Park. Resolved: That Councillors would construct a combined response.
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¹ Including new cycle parking facilities, parking provision for 270-300 cars, platform extensions to accommodate longer trains, new access-for-all footbridge with integrated lifts, new station building with ticket room, waiting area and disabled passenger toilets.

LPA 351

5	Hythe Town Council (Laura Cook)	16.05.2022	Land Bounded By; The M20 And Channel Tunnel Railway Link (Ctrl) To The North; The A20/Stone Street A The East; Harringe Lane To The West, And Aldington Road To The South. Amended outline application with all matters reserved, for a comprehensive residential LED mixed use dev Application: Otterpool Park LTD COMMENTS – The Committee could not make any comments on the Application, as the Committee felt the from the Planning Officer.
6	Lympne Parish Council (Ms J Howes)	24.06.2022	Lympne Parish Council have reviewed the above application and wish to object to the application giving the objection- 1. Lack of Defined Parameters for future Infrastructure, Phasing and Built Environment OP6 Guide to the Planning Application Section 4, paragraph 4.2 states 'The documents and plans for approval prescribe the limits and controls wh future development. It is against these that the outline planning application will be assessed. These paramet development delivered under the outline planning permission, should it be granted.' The OPA is so written as to give no actual commitment as to how a number of key issues will be addressed number of words and diagrams included within the submission no definitive and unequivocal commitment is environment, infrastructure and built environment as well as the general well-being of existing and future or around the development area. The OPA actually admits to this: '1. Under the 3-tier planning approach adopted, Tier 1 comprises 'setting out a spatial diagram of the propor the strategic design principal that guide detailed design in the later tiers' OP16 2 Application Proposals states: '2.5 With a large-scale project such as the Proposed Development, it is inevitable that there will be changes preparation of the planning application and the completion of the development. It is highly unlikely that the p precisely as originally considered. As such, the Applicant needs to ensure that the permission is flexible. 2.6 The initial OPA provides a set of prescriptive Parameter Plans and Phasing plans for approval, together Specification confirming what will be delivered within each phase. As submitted, the documents for approval paproval have been removed Lympne Parish Council object to the OPA on the grounds that the information provided within that applicati planning format, fails to provide sufficient definitive parameters to ensure the visions and plans described ir documents which form the application will actually be provided or constructed, or in what order (phasin
			2. Visual Impact

And Sandling Park To	LPA 353
evelopment.	
hey required a briefing	
he following grounds for	LPA 354
which would apply to any neters will shape future	
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er with a Development val include very limited	
ilst Phasing Plans for	
tion, due to the 3-tier in the multitude of they will be provided. acted (a probable ficient infra structure s, widespread, and current needs 'viability'	

Lympne Parish Council object to the OPA on the grounds that the scale and area of the application is totally inappropriate and contravenes all normal planning parameters associated with a predominantly Greenfield site located in close proximity to AONB
areas to the North, East, and South. 3. Loss of Agricultural Potential Although in overall terms a small area, great weight has been given in the OPA to the contribution the proposed development will
make to the quest for a carbon neutral Britain, and the policies of the Government to increase housing stock particularly on brown field sites (of which this is not) Following recent world events that have brought the need for locally produced food to the fore, the UK government has indicated
that new laws may be enacted in the near future to encourage the production of home grown foods, and the need to retain and improve agricultural land (of which this predominantly is)
Whilst normal planning applications can only be judged on current laws and policies, under the 3-tier application process being used regarding this project, this norm does not apply, as no application has yet been made regarding specific uses.
Lympne Parish Council object to the OPA on the grounds that the information provided within that application fails to take into account the agricultural value of the proposed site, and possible changes to food production policies and laws brought about by recent world events.
4. Health & Wellbeing During Construction The Otterpool Park project has been impacting on residents' health since the proposals were first put forward. There had been no initial consultations prior to the scheme being made public, and any decision making prior to the first public announcements was kept secret, even from the locally elected Parish Councils.
Residents in or close to the proposed area have had their lives affected by worry regarding disruption to their lives and loss of property value due to property blight. OP5 Chapter 11 and appendix 11.1 Human Health contains pages of data and assessments, mostly referring to the completed built any irrepresent of Otterpage Park.
built environment of Otterpool Park. Very little consideration has been given to the cumulative negatives effects in living adjacent to a major construction project for 19 years, and the document concedes in 11.2.26 that
'generally, there is a level of uncertainty around health effects arising from a particular intervention by virtue of the interrelationships of other factors'
In an attempt to address concerns during construction, reference is made in the Code of Construction Practice regarding mitigating effects on health and well-being during the Construction phase, chapter 11: human Health follows the same pattern as the rest of the OPA by not offering any guaranteed safe guarding for example 11.4.6 discusses the Outline CoCP included in the OPA and states 'It is expected that a planning condition would be established requiring the outline CoCP to be further developed into a detailed CoCP' why is the word expected as opposed to will used?
Regarding 11.4.7 Measures included in the CoCP 50% of the bullet points contain the phrase 'where practicable' Nowhere in the assessment of 'factors creating effect on Human health' is the Cumulative effects on the community due to a prolonged construction period assessed.
Lympne Parish Council object to the OPA on the grounds that the information provided within that application fails to address the concerns of local residents that their Health and Well-being will be detrimentally affected during the construction phase due to Traffic congestion, uncertainty as to how the development will proceed, Length (19 years) of the disruption, Utility supply problems, Housing Blight, Change from a rural landscape and environment to a large building site, and disruption to Health Services due to a catch up policy regarding health provision.

5. Traffic Congestion during and after build The area adjacent to junction 11 and the A20 has long suffered from congestion during periods of disruption to cross channel traffic. Although the official Highways England diversion route is not the A20 in reality this is the preferred route. Despite the instigation of operation Brock during the recent cross channel travel problems, the area around the A20 corridor still suffered from disruptive congestion. The traffic report concedes the capacity of the A20 has already been exceeded during certain times without the additional problems associated with protracted construction works, and ultimately a large town being built around it.	
Lympne Parish Council object to the OPA on the grounds that the information provided within that application fails to adequately address the road transport issues associated with the location of a large protracted construction site around a road that is critical to the local areas transport infra structure, and that the proposals regarding the road layout of the completed project ignore the realities of what the actual transport movement in the area are, and will be, which is local and non local traffic vehicle journeys will grow (due to an additional population of 30,000) and not decrease, and at times of disrupted road travel to cross channel routes large volumes of commercial traffic will not follow Highways England official diversions but use the A20 and surrounding roads as unofficial diversion routes.	
6. Education & Health The Community Development and Facilities Strategy states the following:	
Education Early Years facilities 'it is assumed that existing providers are unlikely to be able to cater for a significant amount of demand from Otterpool Park' Primary Schools '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' 'Key infrastructure, such as a new primary school should be provided in phase one of the new settlement' Secondary Schools 'It is expected that a majority of secondary school places for Otterpool Park will be met on-site. However, considering that primary demand has now started levelling off, it is possible that the secondary school surplus will increase in the medium term. Therefore, it is possible that off-site solutions may be possible in the early phases of the development.' There is a key footnote regarding all the above: 'however, school commissioning and school funding is subject to legal and funding agreements between the Department for Education and the Academy Trust and is therefore subject to a needs assessment which may show that a school is not required this early in the development, and that school place needs can be met in existing schools for a period of time'	
Healthcare 'Kent and Medway has one of the lowest GP to patient ratios in the country' 'The exact model for delivering these services will depend on the strategic plans, objectives and funding available to the CCGs at the time of detailed planning permissions and delivery' 'Provision of GP services may be provided off-site in early years potentially requiring some financial contributions' 'Provision of GP services on-site may be phased'	
Lympne Parish Council object to the OPA on the grounds that all school and medical provision final decisions have been deferred to later planning stages, and as a result of this existing school and medical facilities may be overloaded due to lag between assessment and build or lack of funding of assessed need, leading to the swamping of existing facilities which will be to the detriment of existing and new residents.	

7. Utilities
When considering provision of utilities, the incumbent providers are the duty holders responsible for provision of a utility within a
particular region, the OPA can make
statements about Utilities but ultimately it is not the site developers who have control over utilities provision to the site.
Potable Water
The OPA claims that the current network has capacity for 1500 units based on an assumption that usage is 4001/household/day.
This is the same figure as given in the original 2019 submission but does not make clear whether recent completed and planned
building in Sellindge is included within this figure. An assumed consumption rate for the new development is given as
110l/person/day, this is an aspiration not a fact.
Homes in excess of the 1500 stated in 2019 will require a new 11km water main to be installed from Paddlesworth Reservoir,
which the OPA states as requiring a 4/5 year build and assumes completion
In 2029. Again, the OPA does not make it clear whether the existing water network serving the area has a total capacity to service
only 1500 new built houses and any other new users within the existing network area for the 10 year period 2019 – 2029.
Presumably, every home built in the current network area but not on the proposed Otterpool Park site during the period 2019 -29
will result in a reduction to the 1500 homes that the existing network can supply. The new water main will only have capacity to supply an additional 6000 homes, assuming that the Paddlesworth Reservoir will have sufficient resources to supply its whole
receiving network.
Waste Water
The current local wastewater network is served by Sellindge WTW which does currently have some spare capacity for
approximately 1000homes (total local new and upgrades not just Otterpool) but to access this a new rising main would have to be
installed. There is a great deal of doubt concerning the discharge from Sellindge WTW currently regarding the impact its
discharge is having on the nutrient enrichment of Stodmarsh lakes, this issue is yet to be resolved, although an upgraded and up
sized Sellindge WTW would be able to serve the completed Otterpool Park.
An option for an on-site WTW is discussed in the OPA which would exclusively serve and be controlled by a company appointed
by Ofwat and engaged by Otterpool Park. The standard of discharge could be carefully controlled and there may be energy
generation possibilities provided by the treatment process Lympne PC consider this to be the best option.
Electricity
The power network has currently enough capacity to serve the first 350 properties, as with the figures given for capacity in the
potable water network it is not clear if this figure covers all new builds and upgrades in the area served by the 11kV network.
A network upgrade will be required for additional properties which the OPA indicates will take 2 – 4 years to deliver from the time
of order. UKPN will be responsible for this work and hence the actual time to delivery cannot be determined by Otterpool Park developers.
Energy Strategy 2.4.18 states 'An assessment has been undertaken of the diversified peak electrical capacity. Although this
demonstrates it is likely to be within future capacity available, some load shifting may still be required.'
The OPA states the existing 11KV network will be sufficient for the first 2 years of residential development.
Lympne Parish Council object to the OPA on the grounds that the lack of spare capacity in the current Potable water, Waste
Water and Electricity network, and the lag between approval and build of upgraded networks will lead to supply and treatment
issues to existing local residents already connected to those networks.
8 Westenberger Station
8. Westenhanger Station

			 In reality and despite the OPA's submission that Otterpool Park will largely be a self sustaining and short of high proportion of residents will travel off site for work. For many, as it is for some current residents of Lympne their preferred mode of transport will be by train visitation. Current access from Lympne is via the country lane off the A20. The proposed route, as currently shown in the OPA is via the new high street. OP5 Appendix 16.5, 7.6 Rail Provision, whilst detailing 'Rail Service Enhancement' at some length shows 'enhance' has been reached and are unlikely to be agreed soon, and if at all no actual actions started until Lympne Parish Council object to the OPA on the grounds that during the protracted construction period ac station will disrupted, and that if on completion the main access route will be via the new high street, this w traffic environment for that area that the OPA is promoting. 9. Provision of Photovoltaic panels to individual dwellings The OPA describes throughout the various documents submitted that the whole ethos behind the developer carbon site. However, the approach to achieving this appears, more keeping up to date with current policy any built structure would have to do anyway) rather than a more proactive approach of identifying what current proven technology and methods can be employed in the queries.
			site. Energy Strategy 2.1.6 states 'This document therefore sets out the overall site wide approach to energy and that the development will deliver. This document will be updated periodically to reflect changes in national 6.1.5 states 'To provide flexibility for future developers, the exact approach to energy efficient design is not stage, however, low non-fossil fuel carbon heating and renewable PV where feasible, are required to be in design'
			As Photovoltaic panels are a proven technology, and as the approach as stated in the OPA is that the who Green', instead not committing to any specific approach by stating 'flexibility for future developers' 'where t changes in national policy/regulations' the OPA should state PV panels will be fitted to all suitable roofs of commercial buildings (orientation and structural considerations being the only exclusions).
7	Postling Parish Council	23.06.2022	Postling Parish Council finds the loss of open green space and the effect on the landscape of a development enormous long-term consequences for this rural area. The potential light pollution will be unforgiving, and t Downs and Farthing Common will be changed forever. However, councillors accept that more homes are needed, therefore accept this development in principle a
			points be taken into consideration:
			- The original affordable housing quota of 30% should be retained, not reduced to 22%, and preferably rev from the original figure. Social housing properties and shared ownership properties should be included for
			- More detail is needed on medical provision as this remains vague. Major investment will be needed at W or another hospital built (not just a 'Medical Centre') to provide care to the influx of population at Otterpool this will bring.
			- More detail is needed on traffic management and road networks, and management of traffic when the M2

commute community, a	
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Villiam Harvey Hospital,	
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120 is closed.	

Council (Dan Wheeler) wish to object to the proposals for Otherpool Park development would not materially impact negatively upon the interests of this Council. However, given the scale of the proposed development and the potential for new residents to access the Dungeness area for recreation, Folkestone & Hythe District Council should ensure there is no adverse effects on the integrity of the Dungeness Complex of Natura 2000 sites, which straddle the district boundaries and that the recommendations of the SARMS are implemented where relevant. P 9 Saltwood Parish Council (Clir Frank Boland) 20.06.2022 When Saltwood Parish Council commented on the original Outline Planning Application for Otterpool in February 2019, strongly objecting to the application, it referred to a "lack of clarity" on a number of important points related to the application. Despite all the work that gone into the amended Outline Planning Application, the Parish Council that clarity is still absent to a number of points. In view of the scale of paperwork associated with this application we have focussed on a limited number of issues. With more time, and if given the scale of paperwork associated with this application we have focussed on a limited number of issues. With more time, and if given the scale of paperwork associated with the adset of the scale sc				- The impact and demand on current water supply and management of waste water by the Otterpool development (and by developments at Sellindge and Martello Lakes) remains a concern.	
Council (Dan Wheeler) wish to object to the proposed set of the proposed development would not materially impact negatively upon the interests of this council. However, given the scale of the proposed development and the potential for new residents to access the Dungeness area for recreation, Folkestone & Hythe District Council should ensure there is no adverse effects on the integrity of the Dungeness Complex of Natura 2000 sites, which straddle the district boundaries and that the recommendations of the SARMS are implemented where relevant. Implemented where relevant. 9 Saltwood Parish Council (CIIr Frank Boland) 20.06.2022 When Saltwood Parish Council commented on the original Outline Planning Application for Otterpool in February 2019, strongly objecting to the application, it referred to a "lack of clarity" on a number of important points related to the application. Despite all the work that gone into the amended Outline Planning Application we have focussed on a limited number of issues. With more time, and if given the scale of paperwork associated with this application we have focussed on a limited number of issues. With more time, and if given the scale of professional resources available to Otterpool LLP, we would likely have other comments. Population Profile It is insecapable that any proposel of this sort should be accompanied by a population profile (or, perhaps a range of population profiles, with a discussion of the merits of aeach that sets out, clearly, the assumptions about the number and ages of residents at all stages of the proposed development timeline. Clearly the mix of ages of residents will have enote of the developments on utilities such as drinking water and wastewater treatment as well as local services such as schooling and health care provision. In trying to discerm what the population might be, the different					•
Council (Cilr Frank Boland) objecting to the application, it referred to a "lack of clarity" on a number of important points related to the application. Despite all the work that gone into the amended Outline Planning Application, it seems to the Parish Council that clarity is still absent on a number of points. In view of the scale of professional resources available to Otterpool LLP, we would likely have other comments. Population Profile It is inescapable that any proposal of this sort should be accompanied by a population profile (or, perhaps a range of population profiles, with a discussion of the merits of each) that sets out, clearly, the assumptions about the number and ages of residents at all stages of the proposed development timeline. Clearly the mix of ages of residents will have important implications for the effect of the developments on utilities such as drinking water and wastewater treatment as well as local services such as schooling and health care provision. In trying to discern what the population might be, the different Appendices seem to suggest different figures. For example, Appendix 11.2, dealing with retail, uses an average of 2.1 people per household for all years between 2026 and 2042 (1,500 residents in 716 dwellings in 2025, rising to 17,850 in 8,500 dwellings in 2042). Such figures would seem to suggest almost no children living with adults in Otterpool. On the other hand, the proposals regarding schools envisage up to seven primary schools (a 2 torm entry in each – a tolal of about 3000 primary school children) a 10 form entry secondary schools (a 2 torm entry in each – a tolal of about 3000 primary school children) a 10 form entry secondary school. How the figures. Shopping The planning application makes an assumption that 75% of food shopping would be undertaken within Otterpool. How the figures of 75	8	Council	01.06.2022	wish to object to the proposals for Otterpool Park development would not materially impact negatively upon the interests of this Council. However, given the scale of the proposed development and the potential for new residents to access the Dungeness area for recreation, Folkestone & Hythe District Council should ensure there is no adverse effects on the integrity of the Dungeness Complex of Natura 2000 sites, which straddle the district boundaries and that the recommendations of the SARMS	LPA 356
store shopping in Otterpool. This clearly would not qualify as a large supermarket – Sainsbury in Hythe has a floor area of 4,500 m ² . Therefore, it is reasonable to assume that the residents of Otterpool will travel to large supermarkets in Ashford or Hythe for their food (and other) shopping. Inevitably this will have consequences for the volume of traffic using existing and planned routes to Ashford and Hythe.	9	Council	20.06.2022	 objecting to the application, it referred to a "lack of clarity" on a number of important points related to the application. Despite all the work that gone into the amended Outline Planning Application, it seems to the Parish Council that clarity is still absent on a number of points. In view of the scale of paperwork associated with this application we have focussed on a limited number of issues. With more time, and if given the scale of professional resources available to Otterpool LLP, we would likely have other comments. Population Profile It is inescapable that any proposal of this sort should be accompanied by a population profile (or, perhaps a range of population profiles, with a discussion of the merits of each) that sets out, clearly, the assumptions about the number and ages of residents at all stages of the proposed development timeline. Clearly the mix of ages of residents will have important implications for the effect of the developments on utilities such as drinking water and wastewater treatment as well as local services such as schooling and health care provision. In trying to discern what the population might be, the different Appendices seem to suggest different figures. For example, Appendix 11.2, dealing with retail, uses an average of 2.1 people per household for all years between 2026 and 2042 (1,500 residents in 716 dwellings in 2026, rising to 17.850 m 8,500 dwellings in 2042). Such figures would seem to suggest almost no children living with adults in Otterpool. On the other hand, the proposals regarding schools envisage up to seven primary schools (a 2 form entry in each – a total of about 3000 primary school children) a 10 form entry secondary school, presumably a "Wide Ability" school, (total of about 1,500 students to age 16 but a total of 2,000 11 to 16 year olds when you include the, on average, 25% of secondary students who could be expected to go to selective schools outside Otterpool. This gives, in total, 5,000 additional b	

A principal concern of the Council is the effect the Otterpool development will have on traffic flows going to Hythe, and particularly, through Saltwood. The assumption in the planning application (and the associated modelling) is that most traffic going to and from Otterpool will take the London Road from the bottom of Barrack Hill, via Pedlinge, to Newingreen. However, this is a difficult road which is prone to congestion. As residents of Otterpool become more familiar with the local area they may become aware that there are two routes from their location to Hythe; the other being Sandling Road through Saltwood. It may be therefore expected that traffic on Sandling Road will increase significantly. Since most secondary age children will need to attend Brockhill Park Performing Arts College before a secondary school is established in Otterpool, parents will be encouraged to regard Sandling Road as a "natural" route to Hythe. But Sandling Road is a difficult road with poor sight lines and is very narrow in places. It provides access to one secondary school and two primary schools with the associated concerns about children being less aware of safe behaviour on or near busy roads. It was, therefore, very surprising that the problems associated with Sandling Road are entirely ignored in the Transport documents in the Outline Planning Application. The village of Saltwood, itself, is mentioned only once, as the direction taken by a particular footpath. Moreover, in relation to shopping, Otterpool residents wishing to shop at Waitrose in Hythe, and to avoid the increasingly common congestion of a 20 mph speed limit in the entirety of the road. Anything that is likely to increase traffic flow through School Road must be regarded as serious issue to be avoided. Parenthetically, given the attention devoted in the Outline Planning Application to footpaths and cycle routes, including to Hythe
 Water Water provision has been an issue since the idea of Otterpool was first mooted. Affinity Water, the local supplier to our area, states explicitly that we liver in an area of "water stress". Reservoirs are lower than expected and aquifer resources are under pressure. The mitigating measures suggested in the planning application, and in the public presentation is that Otterpool residents will be "encouraged" to keep water consumption to a level of about 110 litres per person per day (but see Section on Population Profile above that makes clear that we do not know how many people there will be Otterpool) compared to the averaged consumption in this area of 152 litres per person per day. This would represent a reduction in usage per person(sic) of around 70%. Such a target is ambitious, to say the least. It is also not clear whether this is something to be applied to (forced on?) resident of existing communities.
It is admitted, already, that existing water infrastructure is only adequate to meet the needs of the first 1,500 dwelling in Otterpool. Thereafter, an additional 11 kilometres of pipeline would be required to pump the volume of water (110ltr/p/d or 152ltr/p/d?) for the rest of the development. However, it is still entirely unclear where the water would come from to fill this pipeline! Suggestions have been made that there could be transfers of water to Affinity Water from South East Water and Albion Water but without any convincing demonstration that these companies (also in rain-starved southern part of the country) will have sufficient "spare" water to share with Affinity Water. Similarly, it has been suggested that more water could be extracted from existing bore holes without any serious demonstration that the existing aquifers would be able to support an even greater level of water extraction without creating more serious supply problems down the line. Finally, in relation to water (although it could also apply to many other areas), the discussion on water resources has been framed largely in the context of the Otterpool development. There are many other planned or proposed housing developments in Kent

			that will also need to draw on finite, and reducing, water resources. These issues are not dealt with in a co Outline Planning Application
			Outline Planning Application. Public Services Placing a new development, the size of two towns the size of Hythe onto what had heretofore been agricul raises questions about public services. Among these are resources for policing. Apparently, no additional Similarly, fire service provision for Otterpool appears to be assumed to be manageable without any increas (personnel, fire appliances, fire stations) thus spreading the coverage much more thinly for current commu major hospital will be William Harvey in Ashford which is already under great pressure: having to cover the 18,000 (or more) people without additional resources (none promised or, apparently, contemplated) can or residents of existing communities. It is proposed to have new primary health facilities within Otterpool; this would, of course, make sense but to recruit sufficient health care professionals, including dentistry, (and the situation in this area is not promi only spread the loas more widely among existing practitioners to the detriment of members of existing com concerning that the amended Outline Planning Application appears to downgrade the importance of custor facility when Appendix 11.1 Para 5.3.19 says "A portion of the health centre could be built (sic) the early ye not required for healthcare to be let out on short-term lease to other retail or commercial uses. Expansion facilities could meet some or all of Otterpool's needs for some years." Conclusion There are many more points that could be raised. But, as stated at the outset, the timescale allocated for t is unreasonably short. I recognise that in answer to a number of points raised, it will be stated that this is c application and that answers to some (at least) of them will be forthcoming as work progresses. But the out
			creates a momentum that then becomes very difficult to reverse. Given the importance of this proposal and information available members of the public, Saltwood Parish Council's response, at this stage, must be the strongly oppose this application.
10	Sellindge Parish Council (N Fursden)	01.07.2022	In the numerous comments in the past the Parish Council have mentioned the need of a by-pass for Selling have experienced traffic jams back to the Mersham turning off the A20, with Otterpool New Town traffic jam occurrence! Ok maybe the traffic jams will not be as bad, on a daily basis. Also, during the M20 junction 10 were traffic jams back to junction 11 from Grove Bridge, which if Otterpool New Town had been in place we completely cut off.
			The only way that makes sense is to by-pass Sellindge altogether. This could be achieved by coming off the A20 before the Church, cutting across to Harringe Lane, where the and the two railways will have to be widen, then across the fields going to the South of Park Wood finally jo The road need not be a dual carriageway, just a good width road.
			This will also benefit Otterpool Park Garden Town.
			Prevent the whole area from being gridlocked.
			 Could provide a spinal road for the developments to the South of Barrow Hill.
			 Would aid the development of the residential area to the South of Barrow Hill, having a spinal road in beneficial for building supplies.

convincing way in the	
ultural land inevitably al policing is planned. ase in resources unities. The nearest e needs of an additional only reduce access for	
t if it proves impossible hising at present) it will mmunities. It was also om-built health care years, with space that is n of existing GP Surgery	
this public consultation only an outline planning outline planning stage nd the numerous gaps in hat it continues to	
ndge, over the years we ams will become a daily 0A construction, there vould have been	LPA 358
the bridges over the M20 oining Otterpool Lane.	
in place, would be	

 Business's in Lympne Industrial Estate and the new business centre, will be attracted by the fact that even if the M20 was closed, their orders will get through, with less problems, it could also benefit the economy of the whole District.
 Less air pollution, having vehicles driving through and not held up in traffic jams.
 Public safety, traffic jams equals frustrated drivers, also problems for pedestrians trying to cross the road.
Upgrading the A20 will not have the desired effect, with the A20 going straight through Sellindge, with the amount of extra traffic that could well be using the road, the village could well be completely gridlocked on a daily basis. When the M20 is shut significantly worse.
We feel that there is a need to have signage encouraging driver's to M20 junction 11 for going to Ashford
A DEVELOPER HAS A DUTY NOT TO DETRIMENTALLY AFFECT AN EXISTING NEIGHBOURING COMMUNITY IN ANY WAY
Sellindge village is described with in the recent Folkestone & Hythe Development Core Strategy as a "Community Hub" providing key community infrastructure (G.P surgery, pharmacy, primary school, local supermarket, post office, sports club, as well as a wealth of private small businesses.
The village is predominately built along the A20 and many of the older houses and properties are built right next to the A20 Barrow Hill.
The International Rail bridge, the M20 bridge and East Coast Rail bridge or Grove Bridge, split the Main village of Sellindge from the remaining part of the Village up the A20 Barrow Hill & other closes.
Grove Bridge, restrict the A20 road through single running traffic light system.
Barrow Hill has a care home for people with learning disabilities some are wheelchair bound, who to access the village infrastructure have to walk or have their wheelchairs pushed along this stretch of the A20. There is also a significant elderly local population who use their mobility scooters along the footpath of Barrow Hill and Grove Bridge to access the services in Sellindge.
The Core Strategy states:
MM06 Settlement Development Requirements
Phasing of Otterpool development.
Other phases of development may come forward in tandem if they are well-connected to an existing rural centre or primary village with capacity to provide for the day-to-day needs of new residents.
It goes on to say:
This should link in with MM07 Policy SS7: New Garden Settlement – Place-Shaping Principles Policy SS7 New Garden Settlement – Place Shaping Principles.
Point H: The nearby communities of Lympne, Barrow Hill, Sellindge, Westenhanger, Saltwood, Stanford and Postling should have appropriate access to and benefit from the infrastructure provided.
It is imperative that in line with OP5. Appendix 4.3, Strategic Design Principles, 5.3 (A Connected Place) & 3.5 (Cycle & Pedestrian Movement), that the whole of Barrow Hill A20, from Grove Bridge to Otterpool Lane, has the enhancements to pedestrian and cycle paths along the A20. Currently it is not included as part of the red site boundary only stands outside this, showing only from Barrow Hill to Newingreen.

Concern & Object
We are concerned that these revised plans, contain a significant number of documents and the time scale given for responses is insufficient for proper due diligence, consideration and response in the time frame allowed.
We are also concerned and disappointed that previous concerns and recommendations from this Parish Council and many residents are not being taken into account. Many of our points under the new updated plans have been ignored.
The traffic surveys conducted as part of this application were conducted in 2018, before Junction 10A of the M20 was operational. As result of this, there is now a significant increase of all traffic movement along the A20, through Sellindge & to this proposed Otterpool development. This current traffic increase is not being taken into account as part of this proposed planning application. Due to this, the traffic statistics quoted as a current base line are inaccurate and thus, all the future traffic movements are also likely to be inaccurate. The main access and egress West to and from this new proposed Garden settlement has to go via the A20, Grove Bridge and Sellindge village community. Sellindge will see a considerable detrimental increase of traffic through the noise and air pollution, with detrimental impact to the existing community. The previous proposals to mitigate this traffic and encourage it to use junction 11 of the M20, appear not to have been put into the updated plans.
The key pinch point of the A20, is the single one-way traffic lights at Grove Bridge and Barrow Hill. This is also the only road, pedestrian, and cycle access to and from Sellindge to this proposed Garden Settlements. The New town development is reliant on all traffic going West along the A20 & Junction 10A of the M20, to drive through Barrow Hill & Grove Bridge in Sellindge.
This area has been recognised by all parties, including KCC, Highways and the Otterpool development Strategic Site Design Principles document (OP5 Appendix 4.3), to be a significant traffic pinch point.
The A20 Barrow Hill is also an area where a significant junction into the new proposed development is to be constructed, into Barrow Hill West development. Also, in the proposed Update document, the development H.T 4, now appears to be incorporated into the development, where before this area was outlined as part of the green buffer zone between Barrow Hill West and the proposed development. It also appears that the farm track leading onto Barrow Hill, is now being proposed to become a Road, leading to the H.T.4 development area. This will add another significant road junction onto Barrow Hill & the A20.
Due to the whole of the A20 Barrow Hill, from Grove Bridge to Otterpool Lane being such a key transport hub and pinch point, this Parish council demand that the red line site boundary of this proposed application should incorporate & include the whole of the A20 from Gove Bridge, Barrow Hill and extend to the new proposed junction at the top end of Barrow Hill & Otterpool Lane.
This is required as this part of the A20 Barrow Hill has a significant impact on the connectivity to this proposed development as well as the KCC & Highways, as this is the main route for all local and international traffic when the M20 is closed, and traffic is heading to and from the Kent international gate way ports of Dover and the Channel Tunnel.
By incorporating the A20 road and pavement area from Grove Bridge all the way to Otterpool lane within the site boundary of this proposed development area, future funding needs for enhancements of the footpath, cycle path and road traffic calming can be obtained from the development 1.0.9 agreements.
Most residents using the pavement are at Grove Bridge and Barrow Hill are concerned and suffer from anxiety due to the amount of traffic and speed.
It is request that not only should the speed limit be reduces to 30mph but similar to the road traffic calming taking place in the rest of the A20 with in Sellindge village, with widening of footpaths and cycle path along the A20, that this should be extended to the whole stretch of the A20 Barrow Hill, leading to the new Proposed development of Otterpool Town.

As part of this proposed development, the increase of HGV traffic projected along the A20 Barrow Hill is 456% (Otterpool Park Environmental Statement Volume 2, Chapter 16). With 17806 all traffic movements during 18 hours traffic daily.
Being that Grove Bridge is single one-way traffic system operated by traffic lights, the whole of Barrow Hill residents will be significantly impacted as they will not be able to get in or out of their drives, as result of queuing traffic at these traffic lights, as well as though at the new proposed junction near Otterpool Lane.
Without this stretch of the A20 Barrow Hill being incorporated with in the red line boundary of this proposed development, then any green sustainable traffic and connected places & 9 mobility principles to support connectivity as outlined in OP 5.3 "A Connected Place", will not be achievable. If current residents are frightened walking or cycling along this stretch of the A20 Barrow Hill, this will only be detrimentally impacted by such a significant increase of traffic.
As part of the recent Core Strategy and Otterpool Planning Application, Sellindge village community is intended to be used as a community hub, to provide services to the proposed early phases of this developments. Due to this, the A20 Barrow Hill & Grove Bridge is the only connectivity between both these communities via vehicle, cycle, or footpath.
As part of this proposed development, the enhancement of the A20, to make it a greener, safer, pedestrian and cycle route, then it is paramount, that the whole length of Barrow Hill from Grove Bridge to this proposed development is incorporated into this development.
The Core Strategy states:
MM06 Settlement Development Requirements
Phasing of Otterpool development.
Other phases of development may come forward in tandem if they are well-connected to an existing rural centre or primary village with capacity to provide for the day-to-day needs of new residents.
It goes on to say:
This should link in with MM07 Policy SS7: New Garden Settlement – Place-Shaping Principles Policy SS7 New Garden Settlement – Place Shaping Principles.
Point H: The nearby communities of Lympne, Barrow Hill, Sellindge, Westenhanger, Saltwood, Stanford and Postling should have appropriate access to and benefit from the infrastructure provided.
Grove Bridge and the whole of the A20 Barrow Hill is key to the connectivity for vehicle transport, cycle, and footpath corridor link to this intended new development. Due to this, it must become part of the red site boundary line, ensuring that funding requirements for the enhancement of the road, footpath and cycle area can be properly funded through 1.0.6 development agreements.
The Strategic Design Principles document OP.5, section 3.5: Cycle & Pedestrian Movement, shows a purple line along the A20 from Barrow Hill, but not including it, towards Newingreen.
It states that a cycleway/footpath will be provided in both sides of the proposed enhancement to the A20, from Barrow Hill, (though not including the A20 Barrow Hill), to Newingreen, the layout of which will be subject to detailed design.
Section 5.3 (A Connected Place), states that the 9 mobile principles of this proposed development is to support connectivity to support residents & visitors from and to other communities. Walking, cycling and active travel MUST remain the best option for short urban journeys. The design is to be well integrated.

Sellindge, not only is the nearest community to this intended development but is also intended to provide c supporting this development. Without providing this same amount of connectivity along the whole of the A2 facilities in Sellindge, then it would make a mockery of Section 5.3 (Connected Places and the 9 mobile prior)
The A20 Barrow Hill pictured right \rightarrow (can be supplied on request – ref: picture no 1)
Barrow Hill has 80 properties, a lot of which have drives to access the A20
 Also, there are a number of small roads adjoining: Grove Bridge 4 properties, Meadow Grove 22 properties, The Cedars 22 properties, Bernhurst Close 5 properties, Barrow Hill Rise 10 properties, So, there is a total of 120 properties.
There is also Planning permission for a further 10 properties, at the Mount. Therefore, there will soon be a
The road is approx. 9M wide Looking and the picture the Footway to the right (Southern side) is an average. The Footway to the left (Northern side) is only 1.2M wide, this is the side that the Care workers to the car learning disabilities have to use to walk and push the wheelchairs along.
It is of utmost importance for public Health and Safety that this area has a speed reduction to 30MPH and the both footways need to be widened to at least 2M, we realise that there the highway area on Barrow Hill is we having a 2M path would be a great improvement for the visual spays to the properties on Barrow Hill as we pedestrians and mobility scooter users. We have 2 suggestions for a cycle / footway bypass to Barrow Hill suggestion A is pictured to the right (can be supplied on request – ref: picture no 2)
Suggestion A: This by passes Barrow Hill to the South due to the need of some Lighting, the footpath / cycle way is out away from the rear Gardens and uses the small development plots for this reason.
1. Accessed by going down Meadow Grove to the end of the road, then through to the field which is pa
 The blue spur is a possible suggestion that a riverside walk / cycle way which would take you to Har would be a very pleasant walk which could be enjoyed by both the villagers of Sellindge and Otterport
This spur takes you to Barrow Hill midway.
4. At this point the shared footpath / cycleway joins the top of Barrow Hill and will join into the other foo
Suggestion B: (picture can be supplied – ref: picture numbers 3 & 4)
 This is to the North of Barrow Hill and is accessed by using the footpath / bridleway, upgrading it to footpath / bridleway / cycleway which will make it more usable all year, as at present gets really muddy at times.
 At this point the footpath / bridleway / cycleway will turn East Under the two railway bridges, which are already in place and makes this financially feasible.

community hub 20 Barrow Hill, to the rinciples).	
a total of 130! age of 1.6M wide	
are home for people with	
traffic calming, also very restricted but vell as a safer route for	
n	
part of the Otterpool site. arringe Lane, which bool residents.	
otpath/cycle ways.	

		 The blue line is a suggestion for a footpath / cycleway route to Westenhanger railway station the four hatched areas of development could also link into this, and would of benefit to both the villagers of Sellindge and the new residents of Otterpool Park At this point the shared footpath / cycleway joins the top of Barrow Hill and will join into the other footpath/cycle ways. 	
1 Stanford Parish	24.06.2022	Stanford Parish Council thanks Folkestone & Hythe District Council for consulting us on the revised outline planning	LPA 359
Council (Denise Alchin)		application.	
		Having viewed the documents, in particular those marked 'For Approval' we object to the application for the following reasons.	
		Clearly, the prospect of the loss of open countryside and the prospect of a 20- year building site immediately adjacent to our residents is reason enough for us to object to this application. Given the recent adoption of the Core Strategy Review, however, it seems we are powerless to object to this application in principle. The latest Visual Impact Appraisal shows the horrendous scale of the impact on homes in the parish and popular walking routes from Stanford up to the Downs and the application has not demonstrated that this impact can be mitigated acceptably.	
		Notable in the application, despite its length, is a lack of clarity about the actual commitments the applicant will make. Even the phasing has now been removed from the documents 'for approval.' Whilst we understand the need for flexibility, this can still be achieved by agreeing a plan now so that residents and third parties know where they stand and can make their plans accordingly. Changes can be the subject of subsequent amendments in the usual way. We do however expect important matters to be the subject of s106 agreements and we look forward to seeing how the applicant's apparent promises are to be reflected in any consent.	
		The comments we made on the original application in June 2019 remain relevant and most have not been satisfactorily addressed in this new revision. We made the following observations and requests, using our previous paragraph numbering.	
		 We criticised the proposed "High Street" as an outdated concept for a new town centre. To an extent, the applicant has responded by including a "town square." It remains to be seen how successful this will be in creating the required sense of place. We note in particular the proposed town square risks being substantially in the shade in the winter. This parish is promised a 30m buffer zone separating new development buildings and streets from the edges of all properties in Westenhanger. This requirement has been implemented along the western edge of Westenhanger, as shown in the emerging Phase 1 masterplan. A buffer is also shown to the east of Stone St on the parameter plans but these are not dimensioned. We would welcome confirmation that this buffer is indeed 30m wide. Existing properties to the north and south of Westenhanger are shown to be not protected by any buffer. In particular the revised parameter plans continue to show multi-storey buildings immediately south of "Lyveden" (area TC7). Also, building heights have been increased immediately to the west of "Little Greys" and there is no buffer shown for Tollgate Cottage. These matters have been discussed extensively with the applicant, but the current proposals are still not acceptable to this Council. We have commented directly to the applicant on the design of these buffer areas, in particular our requirement that there be no formal foot/cycleway constructed within the land to be ceded to us. 	
		3. We expressed concern that delays in provision of supporting infrastructure would impact not only on the residents of the new town but on existing residents, especially in respect of water supply and drainage. This concern remains. We request the applicant is required to keep us informed of the detailed programme for the development through regular liaison and continued consultation. We recognise that the applicant's consultants generally do not live nearby. The design should have the benefit of local knowledge, such as the matter of persistent flooding on Stone St that we mentioned in our previous	

 response, and which is not mentioned in the flood studies. We also asked for an information/complaints office to be established by the applicant to address ongoing enquiries from the public in general. We therefore welcome the proposals in the CoCP Chapter 4 but are concerned about how many contractors might be involved. Residents need a single point of contact and should not have to identify which party is the subject of any complaint/enquiry. 4. We note that the applicant aims to discourage through traffic (especially HGVs) along "Otterpool Avenue" and we welcome the re-arrangement at the western junction with the A20. We note that the responses in the Statement of Community Involvement have not been updated to reflect this change in strategy. We remain concerned that the road design will not actually achieve the desired outcome. In particular, the proposal for traffic lights at the Newingreen junction seems counter-productive. Any significant tail-back there (which will be visible from the junction at the eastern end of Otterpool Avenue) will cause traffic to diver along Otterpool Avenue. Such congestion will be especially bad whenever the M20 is shut between Junctions 10 and 11 which is happening more and more frequently. We have continually promoted the idea of a roundabout at the Newingreen junction culd be relieved by a road which did not go through the town centre. We have been told that these options have been considered and discounted but we could find no reference to that in the Transport Assessment, nor any record of the consultation meeting with parish councils at which this matter was discussed (in OP5, Chapter 16). Could the applicant confirm exactly why a roundabout is not feasible and the reasons ore, which ones are to be built over and how those will be further investigated. We listed a number of observations, amongst which was our concern about the impact construction activities will have on residents nearby. We have censulted on far traffic lights we also eacted the drawing
We expressed concerns about the availability of communal facilities, in particular health centres and the staffing of them. These concerns remain.
The applicant has agreed that no construction traffic will be allowed along Stone St in Westenhanger. This restriction should be the subject of a condition on planning consent and added to paragraph 5.10.2 of the CoCP as an exception to the first sentence.
We object to the proposals for Stone St by which it seems it would have two sections: one with access to Westenhanger from Otterpool Avenue and the other to Stanford South via the new town centre. This would further divide our parish, already blighted by motorway and railways, a substantial loss of amenity. Some of the submitted documents still refer to a bus-only crossing of Stone St near the existing racecourse entrance but we understand that is no longer the preferred option: that crossing would be open to all traffic.
If a crossing of Stone St is necessary, we prefer it to be restricted to buses, emergency services and NMUs since otherwise Stone St would need a barrier to stop through traffic on this narrow road. Whichever design is chosen, it is essential that parking on Stone St by non-residents is controlled. There is already indiscriminate and illegal parking for the station which can only get worse. The applicant has shared some ideas with residents for how traffic might be controlled, and we have expressed some reservations about that. Any solution must be funded by the applicant as a necessary mitigation for the development (capital and running costs).

		Finally, we have had sight of the proposed response from our colleagues at Lympne PC and support all of their objections for similar reasons to those they present.	
12	Stowting Parish Meeting	The Parish Meeting maintains its objection to the application. The Parish Meeting continues to consider that the proposals would represent an unprecedented detraction from the setting of the Kent Downs AONB and would be detrimental to the District as a whole.	LPA 360
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