



OTTERPOOL PARK

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DOCUMENTS SUBMITTED IN SUPPORT

OP8 – PLANNING AND DELIVERY STATEMENT ADDENDUM

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OP8 – Planning and Delivery Statement Addendum

Otterpool Park

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1.0 EXECUTIVE SUMMARY

- 1.1 This Planning and Delivery Statement Addendum (PDSA) has been prepared on behalf of Otterpool Park LLP in support of the submission of updated documents and drawings relating to the Otterpool Park Outline Planning Application (OPA) (Ref. Y19/0257/FH). The OPA was originally submitted in 2019 and was subsequently the subject of a resolution to grant planning permission by Folkestone & Hythe District Council's Planning and Licensing Committee in April 2023, subject to planning conditions and completion of the necessary planning obligations.
- 1.2 Since that resolution, the project has undergone a period of strategic review to ensure that the long-term vision for Otterpool Park can be delivered in a sustainable and coordinated manner. As part of that process, opportunities have been identified to accelerate the delivery of new homes whilst maintaining the comprehensive masterplanned approach that underpins the Garden Town vision. This has led to the preparation of an updated application package and the introduction of an Early Homes Parcel (EHP) capable of delivering up to 300 homes at the Hillhurst Green Residential Area (North) parcel.
- 1.3 This document provides an addendum to the previously submitted Planning and Delivery Statement. It should be read alongside the original document and explains the amendments and updates that have been made following changes in policy, guidance, baseline conditions and delivery strategy. The description of development remains unchanged, and the proposals continue to comprise a comprehensive residential-led mixed-use Garden Town development of up to 8,500 homes supported by employment, education, community, retail, leisure, green infrastructure and transport facilities.
- 1.4 The key updates contained within the submission include:
- Introduction of a Tier 0 approval route to facilitate the delivery of the EHP whilst retaining the wider tiered planning structure;
 - Updated Parameter Plans providing additional flexibility to support deliverability, reflect heritage considerations and the operational status of the existing waste facility at Otterpool Quarry;
 - Withdrawal of the alternative waste-related parameter plans and replacement with a single coordinated set of updated Parameter Plans;
 - Updates to the Environmental Statement and supporting technical evidence to reflect the passage of time, revised guidance, updated baseline conditions and changes in national planning policy;
 - Amendments to key supporting strategies and documents, including transport, green infrastructure and design-related material;

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- Preparation of updated Section 106 Heads of Terms, including separate arrangements for the EHP and the wider Otterpool Park development;
- Continued engagement with the Local Planning Authority, statutory consultees, stakeholders, elected members and the local community throughout the review process.

1.5 The updated submission demonstrates that Otterpool Park remains a sustainable and strategically important location for growth within Folkestone and Hythe. In the context of strengthened national housing delivery objectives and the district's continuing reliance on Otterpool Park as a key component of future housing supply, the proposed amendments will help bring forward much-needed homes while maintaining the long-term vision for a comprehensively planned Garden Town.

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2.0 INTRODUCTION**Context to the updated submission**

- 2.1 The Outline Planning Application (OPA) was originally submitted to Folkestone and Hythe District Council (FHDC) Local Planning Authority (LPA) in February 2019 (application reference no. Y19/0257/FH). The application was presented to the Planning and Licensing Committee on 4th April 2023 where a resolution to grant planning permission was made, subject to planning conditions and the completion of satisfactory Section 106 (S106) agreement/s.
- 2.2 In October 2023, FHDC Cabinet agreed (along with a series of other recommendations) to explore third party investment in Otterpool Park (either public or private) on a joint venture basis, reporting the outcome to Cabinet for further consideration and decision; to approve a Transition Plan, setting out the focus of the Applicant's work.
- 2.3 FHDC has therefore had to consider the strategic direction, funding and delivery of the project to ensure that the vision for a sustainable new Garden Town can be successfully planned and delivered.
- 2.4 This PDSA is provided in support of the submission of an updated suite of documents. The structure of this addendum follows that of the existing PDS to aid legibility. This document is an addendum to the existing Planning and Delivery Statement (PDS) prepared and submitted in support of the original OPA in 2019 and amended in 2023. This document does not supersede the existing PDS, it should be read in conjunction with it and seeks to provide updates because of changes which have occurred since the preparation of the original document.
- 2.5 There are some instances where changes and updates are not needed to be included within this document. Where this is the case, the reader is referred back to the original PDS.

Purpose of this document

- 2.6 This document has been prepared to provide an addendum to the existing PDS. The reasons for the update are set out in the paragraphs below.
- 2.7 As a result of these changes, and to ensure the information originally submitted to support the application is brought up to date, the Applicant is submitting a suite of updated documents and drawings prepared in support of the OPA for consideration and approval.
- 2.8 The description of development remains as existing.
- 2.9 The tiered approach to the permission remains. This update pack seeks no update to the general planning approach set out in Para 2.1 (page 4) of the PDS. However, it does seek the following:
- consent for an updated set of Parameter Plans submitted as Appendix 4.2 of the ES;

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- withdrawal of the “alternative” Parameter Plans submitted as Appendix 2.8 of the ES; and
- the introduction of additional details for the first homes within Parcel HF2 and HF3 and referenced as the Hillhurst Green Residential Area (North) as an Early Homes Parcel (EHP).

Structure of this Document

- 2.10 To allow this addendum to be read alongside the 2023 document, this document has been structured in the same format. The table below sets out which sections have been updated as part of this document and the extent of these changes:

CONTENTS OF ORIGINAL PDS		SCOPE OF CHANGE WITHIN THIS DOCUMENT
1	Executive summary	
	Purpose of this document	Updated to reflect the nature of the PDSA.
	Garden settlement approach	No change. Refer to PDS.
	The Site and the outline planning application proposals	Update to reflect changes to key documents such as the Parameter Plans and the Dev Spec.
	Policy allocation	No change. Refer to PDS.
	Consultation	No change. Refer to PDS.
	Benefits of the proposed development	No change. Refer to PDS.
2	Introduction	
	Context to the submission	Update to reflect resubmission context
	Purpose of this document	Update to note the change in author and purpose of the addendum.
	Structure of this document	Updated to reflect the nature of the addendum.
	Proposed development	No change. Refer to PDS.
	Application documents	Updated to reflect changes. Now contained at Appendix A.
	Planning Strategy	Updated to reflect changes to the planning strategy including introduction of Tier 0 (EHP).
3	Vision	
	Environmental	No change. Refer to PDS.
	Social	No change. Refer to PDS.
	Economic	No change. Refer to PDS.
4	Background	
	Garden cities and towns	No change. Refer to PDS.
	Housing need	Updated to reflect changes in government ambitions since the PDS.
	Otterpool Park Site – strategic location for growth	No change. Refer to PDS.
5	Site	No change. Refer to PDS.
	Site Location	No change. Refer to PDS.
	Site character and land uses	No change. Note references to updated supporting documents and drawings should be read to mean the updated versions provided as part of this submission.
	Planning History	No change. Refer to PDS.
	Conservation Areas	No change. Refer to PDS.

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	Heritage Assets	No change. Refer to PDS.
6	Consultation	Minor update to cover resubmission engagement.
	Place Panel Meetings	Update to reflect our version of the Place Panel that took place on 05/08.
	Pre-Application Technical Meetings	Minor update to include EHP pre-application discussions.
	Public consultation	No change. Refer to PDS.
	Stage one engagement – December 2016 Stage two engagement – June/July 2017 Stage three engagement – June 2018	No change. Refer to PDS.
	OPA Consultation 2019	No change. Refer to PDS.
	Consultation 2021	No change. Refer to PDS.
	Design responses	No change.
	Public Exhibition 2026	New section to include the most recent public exhibition which took place on 24/06/2026.
	Conclusion	Minor update to capture the above changes, with reference to the resubmission context.
7	Planning context	
	Background	No change. Refer to PDS.
	National	Update to reflect the changes in national policies (adopted NPPF 2026, PPG, etc.).
	Development Plan	No change. Refer to PDS.
	Local	No change. Refer to PDS.
	Other Material Considerations	No change. Refer to PDS.
8	Otterpool Park – proposed development	Limited update to note changes to outline proposals, drawings/document references and tiered delivery structure.
9	Planning issues	
	Principle of Strategic Development	No change. Refer to PDS.
	Provision of housing	Update to cover the new housing ambitions set by government and indicative housing trajectory.
	Housing sizes and tenures	Updated.
	Amenity	Updated.
	Employment	Updated.
	Retail	Updated.
	Transport	Updated.
	Built heritage and archaeology	Updated.
	Green infrastructure and landscape and visual effects	Updated.
	Biodiversity	Updated.
	Blue infrastructure and flood risk	Updated.
	Sustainability	Updated.
	Smart City Principles	Updated.
	Socioeconomics	Updated.
	Waste	Updated.
	Minerals	Updated.
	Design	Updated.
	Conclusion	Updated to clarify how the resubmission continues to achieve the aim of delivering a settlement based

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		on garden town principles and is acceptable in planning terms.
10	Delivery statement	Updated to confirm the delivery strategy of the development including infrastructure and where details will be agreed later through the right mechanisms in the Tiered structure.
	Housing Delivery	Updated & clarified.
	Infrastructure Delivery	Updated & clarified.
	Pattern of Development	Updated & clarified.
	Conclusions	Updated.
11	Planning obligations	Updated to cover two HoTs for EHP and wider side
	Emerging Section 106 Heads of Terms	Updated to reflect passage of time and updated analysis/evidence
12	Conclusion	Update to conclude on all the key updates made for this OPA resubmission.
	Apex 1 OPA Boundary Plan	No change. Refer to PDS.
	Apex 2 OFMA Plan	No change. Refer to PDS.
	Apex 3 OPA Planning history schedule	No change. Refer to PDS.
	Apex 4 Schedule of Pre-app comments & how they have been responded to	No change. Refer to PDS
	Apex 5 Planning Policy Schedule	No change. Refer to PDS.
	Apex 6 Schedule of Strategic Infrastructure	Replaced by new Appendix F
	Apex A Extent of updated submission package	New appendix.
	Apex B 2026 Exhibition boards	New appendix
	Apex C Response to place panel and FHDC comments	New appendix
	Apex D Non-residential trajectory	New appendix
	Apex E Overview of S106 HoTS	New appendix
	Apex F Schedule of Strategic Infrastructure	Replaces old Appendix 6

- 2.11 In the event of this document not providing an update to the original document, and reference is made to the original PDS, please note references to supporting documents and drawings contained therein should be read to mean the updated versions provided as part of this submission.

Proposed Development

- 2.12 The nature and scale of the Proposed Development has not altered since the original PDS. The changes to the proposal are set out in Paragraph 2.9 above.

Application Documents

- 2.13 The scope of the 2026 Update is set out within the Covering Letter and for simplicity follows the same structure as the original submission updating or replacing documents where necessary (a copy of this is provided at Appendix A).

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Planning Strategy

- 2.14 This OPA seeks approval for the general principles of how the site will be developed, with the following matters reserved: access, appearance, landscaping, layout and scale. This continues to be advanced within the Tiered structure set out within the 2022 updates, albeit with the introduction of a 'Tier 0' to allow the delivery of the EHP.
- 2.15 Tier 0 is specifically designed to allow the delivery of the EHP within the context of the Tiered Structure as set out within the PDS to underpin the delivery of the remaining part of the Site.
- 2.16 The key ambition is to accelerate the delivery of Early Homes in a way which respects the aim of achieving a comprehensive and master planned development of the whole of Otterpool Park. This early delivery is critical to securing investment, building confidence in the deliverability of the Garden Town and procuring a strategic delivery partner for FHDC to deliver the Vision as set out in the original PDS.
- 2.17 The most appropriate mechanism for securing an implementable consent for the Early Homes is through the approval of reserved matters pursuant to the Outline Planning Permission. However, this approach is contingent upon first securing a deliverable Outline Planning Permission for Otterpool Park.
- 2.18 The draft conditions that were appended to the Resolution are extensive. Whilst the tiered approach to those conditions is generally helpful, the need to discharge the (T1) site wide conditions, the (T2) key phase conditions and the RMA conditions (as well as any parcel specific conditions) in respect of the EHP before construction of the Early Homes can commence presents a significant barrier to the early delivery of those homes. The Applicant accordingly proposes that the EHP(s) are carved out of the Site-wide tiered conditions with a Tier 0 mechanism introduced to ensure consistency with the outline Vision.
- 2.19 However, the Applicant recognises the need to ensure that the Early Homes are delivered in a way that respects the aim of achieving a coherent, comprehensive and master planned development at Otterpool Park. Accordingly, the Applicant will work with FHDC to develop and agree a set of Early Homes specific conditions that will enable the Early Homes to come forward independently at the earliest possible juncture, while addressing the need for the Early Homes to align with and integrate into the wider Garden Town Development.
- 2.20 The Applicant suggests that the Outline Planning Permission should be granted subject to an Early Homes condition, which prescribes (in headline terms) the matters that will need to be addressed through a more detailed set of conditions that would be attached to the Early Homes RMA. This Early Homes condition could address, by way of example, the need for the EHP to align with the site-wide Parameter Plans, and stewardship. The applicant and FHDC can thereafter work together to agree a detailed set of Conditions that can be attached to the EHP RMA.

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- 2.21 It is important that Early Homes delivery is accelerated during this Parliament, for the reasons set out further above. However, this objective would be put at risk if commencement of the Early Homes was dependent on completion of the site wide S106, or the practical completion of any 'early infrastructure delivery' secured through that site wide S106.
- 2.22 There is consequently a need for an Early Homes S106 that can secure Early Homes specific mitigation, and a proportionate contribution to site-wide infrastructure delivery as part of the wider Garden Town Development.
- 2.23 The Applicant therefore proposes that a standalone S106 agreement is provided for the EHP. The detailed HoT for the EHP S106 should be agreed between the Applicant and FHDC prior to the Planning Application being presented to Committee, reflected in the Arsenal condition securing the EHP S106, and appended to the grant of Outline Planning Permission.

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3.0 VISION

- 3.1 The environmental, social and economic vision for Otterpool Park remains unchanged from the position set out within the original PDS. Although there has been a change in the NPPF since the original submission, this does not materially affect the vision for Otterpool Park. As such please refer to the PDS.

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4.0 BACKGROUND

- 4.1 The background to the history of the Site as set out in the PDS remains valid, including the rationale for promoting a garden settlement at the Site and Otterpool Park's identification as a strategic location for growth. This section therefore provides an update with regards to housing targets.

National Housing Targets

- 4.2 Folkestone and Hythe's housing need is acute and well evidenced. The urgency of delivery of new housing at Otterpool Park is reinforced by the LPAs housing land supply and levels of housing delivery. The Council's most recent Housing Delivery Test result as published in the Housing Delivery Action Plan (August 2025) for 2023 stands at only 83% of the homes required over the previous three years.
- 4.3 Annex D of the NPPF sets out housing calculations and delivery targets. Paragraph 12 states that where housing delivery within Local Authorities falls below 85% the housing requirement over the previous three years, a buffer of 20% should be added to the identified supply of specific deliverable sites in addition to the requirement for a Housing Action Plan to be published.

Homes England Strategic Plan 2025-2030 (updated 2025)

- 4.4 Homes England's Strategic Plan focuses on tackling barriers faced by the housing and sector, including providing support to increase the pace of delivery of new homes and communities. The Plan envisages the delivery of approximately 280,000 new homes and to unlock land which is capable of supporting almost 400,000 homes.
- 4.5 The Plan sets out 6 objectives, including to "significant increase new housing supply and accelerate housing delivery across all tenures". As part of this, Homes England will "significantly increase the availability of land for housing and mixed-use schemes, by proactively acquiring, preparing and enabling land that the market is unable to bring forward....invest in infrastructure to unlock land for both housing and mixed-use schemes – targeting places where market failure or viability issues have stalled delivery."

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5.0 SITE

- 5.1 The site boundary remains unchanged as does the general site character and existing land uses on the Site.
- 5.2 Kent County Council (KCC) granted planning consent to Countrystyle Recycling Ltd for an anaerobic digestion plant and recycling facility at Otterpool Quarry, Ashford Road in March 2011 (application reference SH/08/124). The development was referred to as the 'permitted waste facility' within this Outline Planning Application. The recycling facility has been constructed and is operational. The anaerobic digestion plant has not been constructed and does not currently hold an Environmental Permit.
- 5.3 The original Parameter Plans (Appendix 4.2) as submitted showed Otterpool Park with proposed residential development in the location of the now operational waste facility, including Parcel CP3. An alternative set of Parameter Plans ((ref OPM(P)5001_WW, 5002_WW and 5003_WW)) were submitted (Appendix 2.8) showing how Otterpool Park could be developed in the scenario the waste facility was approved.
- 5.4 As a result, this update withdraws Appendix 2.8 (alternative Parameter Plans) and submits a new revised single set of Parameter Plans as part of Appendix 4.2 for approval which show the operational waste facility and includes a 250m "consultation" rather than "exclusion" zone; and the removal of Parcel CP3 albeit this will be solely shown on the illustrative masterplan as containing the waste facility.
- 5.5 The updated Parameter Plans include an additional green buffer adjacent to the A20 road frontage to ensure an appropriate design approach to this operation for Parcel RS1 along with a 250m line which denotes the KCC consultation area. This consultation area is considered to align with the principles of KCC Minerals and Waste Guidance Policy CSW16 having regard to the information provided and expected impact assessed as part of the approved waste site planning application. Accordingly, any Tier 2 submission including land within this consultation area will be required to demonstrate how development inside of that area would not act as an 'agent of change' in respect of the existing waste site (i.e. that the development would not curtail the operation of the existing waste site).
- 5.6 The omission of CP3 would result in the loss of a small residential parcel at low density, accordingly the housing numbers are considered to be easily recovered within the wider site having regard to assumed density ranges. Should a greater area than the consultation area be unable to support development then potentially this would result in a larger proportion of RS1 not being delivered. Whilst some housing numbers will be recoverable in the lifetime of the development, inevitably there could be some numerical loss. However, it is not expected that this scenario will occur having regard to the evidence provided by the waste operator in support of their planning application.

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- 5.7 The original ES assessed a reasonable worst-case scenario by considering the full extent of land within the red line boundary, including the area that was previously treated as a 250m exclusion zone around the waste facility. The waste facility and associated buffer were also assessed cumulatively across the relevant technical chapters. With regards to transport, the ES compared the development with the waste facility in situ, which assumed a reduction of approximately 800 homes and one primary school, against the development without the waste facility. The latter scenario generated higher traffic flows and therefore represented the worst case for traffic-related effects, including emissions. For ecology and landscape matters, the worst-case position was similarly the development without the waste facility, as retaining the facility and associated buffer would result in a greater extent of undeveloped green space within parcel RS1.
- 5.8 The previous approach reflected the 250m safeguarding policy for waste recycling facilities in the Kent Minerals and Waste Local Plan 2013–2030. However, that policy, together with the associated Safeguarding Supplementary Planning Document, allows for development within the safeguarding area to be considered where appropriate assessment demonstrates that the operation of the safeguarded waste facility would not be prejudiced. On this basis, and following discussion with KCC, the updated Parameter Plans now identify the 250m area as a consultation zone rather than an exclusion zone. Any future Tier 2 submission that includes land within this zone will therefore need to demonstrate that proposed development would be compatible with the continued operation of the waste facility and would not give rise to an unacceptable 'agent of change' effect. The ES Addendum has accordingly considered a reasonable worst-case scenario in which development comes forward within the consultation zone, consistent with the land take assessed in the 2022 ES main assessment.

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6.0 CONSULTATION

- 6.1 This section of the PDSA reflect the additional consultation and engagement that has taken place since the Planning and Licensing Committee on Tuesday, 04 April 2023 regarding the Outline Planning Application for Otterpool Park (Y19/0257/FH) 1.
- 6.2 At its meeting on 18th October 2023 Folkestone & Hythe District Council (FHDC) Cabinet agreed (along with a series of other recommendations) the following (report C/23/50). Agenda item - Otterpool Park: Strategic Direction and Delivery Priorities 2023-25 | Folkestone & Hythe District Council:
- *To explore third party investment in Otterpool Park (public and/or private sector) on a joint venture basis, reporting the outcome to Cabinet for further consideration and decision; and*
 - *To approve a Transition Plan setting out the focus of the LLP's work for the next 12 to 18 months.*
- 6.3 As such the project has been in a process of review with updates being provided to FHDC for formal consideration in September 2026 prior to a return to Planning Committee at the earliest possible date. Technical meetings have been undertaken with key consultees between 2023 and 2026 to enable this update pack to be prepared alongside statutory and non-statutory stakeholders.
- 6.4 There has been significant engagement with both members of the public and key stakeholders in the lead up to the submission of this Update Pack. The table below sets out the details of these.

Date	Topic
Folkestone and Hythe District Council	
	Air quality – to discuss the air quality scope relevant to human receptors.
w/c 23/02/26	Discussion to agree scope of resubmission pack
w/c 09/03/26	Noise and Vibration – to discuss the baseline noise and vibration survey scope and seek agreement to confirm the validity of the baseline survey data used in the 2022 ES.
13/05/26	Biodiversity – to discuss the ES Addendum scope, survey timing and seek to agree a broad approach to species mitigation.
21/05/26	Heritage – to discuss heritage scope and approach with appointed consultants, Alan Baxter Associates
22/05/26	Environmental Statement – Meeting with Council appointed ES consultants RSK to discuss timescales and approach taken.

¹ <https://www.folkestone-hythe.gov.uk/otterpool-park/otterpool-park-2023>

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06/08/26	Landscape – to discuss the ES Addendum scope and advanced planting, and to seek agreement (if possible) for no requirement to update the ES baseline photography, photo-sheets and visualisations. Advanced Planting – to discuss proposed changes to advanced planting as a result of EHP.
Kent County Council	
06/03/26	Monitor and manage – discussion on approach (with National Highways) .
17/03/26	Education – establishment and discussion of position to enable S106 Heads of Terms to be created.
20/03/26	Transport – Update on trip generation and mode share including corridor analysis (with National Highways) .
23/04/26	Transport Assessment (EHP) – Scoping meeting (with National Highways) .
01/05/26	Transport : Buses – Clarifications on inputs to inform bus strategy (with National Highways) .
TBC	Transport: Highway contributions – discussion of modelling results to enable S106 Heads of Terms to be created (with National Highways) .
07/05/26	Transport: PRow – Clarifications on inputs relating to PRow in order to establish S106 contributions to be sought (with National Highways) .
07/05/26	Waste – discussion on waste facilities
13/05/26	Ecology, Water and Heritage – Requested by KCC to discuss issues arising.
20/05/26	Water - additional meeting to discuss in more depth
22/05/26	Ecology – additional meeting to discuss in more depth
TBC	Transport – to discuss rail strategy to inform updated Transport Assessment (with National Highways) .
22/06/26	Heritage - additional meeting to discuss in more depth
01/07/26	Arsenal Condition – to discuss the acceptability and use of this form of condition (with FHDC)
01/07/26	Community facilities – establishment and discussion of position to enable S106 Heads of Terms to be created (with FHDC) .

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01/09/26	Waste Transfer Station - To clarify the current position for the waste transfer station and discuss implications for the ES Waste chapter (with FHDC).
Natural England	
14/05/26	Agriculture and soils - It was intended to consult with Natural England. However after submission of the Discretionary Advisory Service form, we were informed Natural England have no capacity for consultation at this stage. Water - to discuss the ES Addendum scope in relation to the wastewater treatment works and nutrient neutrality for the EHP. To understand the scope for any updates to nutrient neutrality calculations or confirmation that previously submitted calculations as part of the OPA are still acceptable (i.e. assuming no major changes to land use details and the nutrient mitigation strategy). Biodiversity and Air Quality - to discuss the scope and Habitats Regulations Assessment update, if required and what initial work would need to be undertaken regarding the nitrogen loading and species mitigation prior to a meeting being arranged.
Southern Water	
w/c 09/03/26	To discuss the ES Addendum scope in relation to water supply, the wastewater treatment works and nutrient neutrality for the EHP.
Council Members	
17/06/26	Provide an overview of EHP and future public engagement approach.
Parish Council, Councillors and Public Exhibition (boards can be found at Appendix B)	
24/06/26	Event at Sellinge focused around Early Homes and an overview of the Site and updated plans

- 6.5 In addition to the above, on 3rd August 2026, a further Place Panel meeting was held, which included a further site visit and presentation by the team to the members with regards to the EHP, particularly the landscape and design elements.
- 6.6 On 21st August 2026, an email was received from FHDC, setting out the key points in respect to the design of the EHP which had been subject to earlier discussions. In some cases these issues are endorsed by the Place Panel. However, the Panel did not agree with FHDC's view, with respect to the design approach to the southern and eastern edges where FHDC remain of the opinion that the edge should be two not three storey. A table which sets out these comments, alongside our responses is attached at Appendix C.

7.0 PLANNING CONTEXT**National*****National Planning Policy Framework***

- 7.1 The National Planning Policy Framework (NPPF) was republished by the Ministry of Housing, Communities and Local Government on 17 August 2026 and now sets out national planning policy for both plan-making and decision-making in England. It replaces the previous December 2024 Framework and introduces a revised structure based around plan-making policies, national decision-making policies and thematic policy codes. The 2026 NPPF is therefore a material consideration for the determination of the Otterpool Park Outline Planning Application and the proposed EHP. On 17th August 2026, a new version of was published.

Policy structure and decision making

- 7.2 The 2026 NPPF distinguishes more clearly between policies that guide the preparation of Development Plans and national decision making policies that apply directly to the assessment of planning applications.
- 7.3 The revised Framework confirms the continuing presumption in favour of sustainable development, while presenting decision-making policies in a more rules-based format. In practical terms, this reinforces the need to consider whether the updated OPA would deliver sustainable development when assessed as a whole, balancing the benefits of the scheme against any adverse effects.
- 7.4 Where existing development plan policies are materially inconsistent with the 2026 national decision-making policies, the new Framework indicates that such policies may attract reduced weight. This does not displace the statutory primacy of the development plan, but it makes it important that the planning balance for Otterpool Park is considered in light of current national policy as well as local policy.

Housing delivery and the role of large-scale development

- 7.5 The 2026 NPPF continues to place significant emphasis on delivering a sufficient supply of houses and supporting growth. The NPPF gives substantial weight to meeting evidenced housing need under Policy HO7, and the prompt build-out of large, phased developments such as Otterpool Park is expressly encouraged under Policy HO13.
- 7.6 Paragraph 1 of Policy HO13 links the significant boosting of housing supply directly to the prompt build-out of land with permission. Major housing schemes should be capable of coming forward within a reasonable period, having regard to the proposed tenure mix, local market conditions (including absorption rates) and the development history of the site. Otterpool Park is well placed to meet this test. The proposals secure a diverse tenure and unit-type mix across multiple phases to maximise market absorption, and the current

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delivery trajectory reflects the advanced stage of OPA preparation already undertaken. As explained further below, this capability for prompt and flexible delivery is reinforced by the evolution of the EHP proposition with responds directly to this national requirement.

- 7.7 Otterpool Park is a Strategic Site including for the application of the policies of the NPPF, and the consenting framework sought through this OPA has been shaped to accord with the approach commended by HO13(3). This includes fixing the parameters for the development which at outline stage, whilst retaining flexibility to respond positively to changing circumstances through the delivery of the project and the ability to bring forward early homes via the EHP.
- 7.8 In terms of scale, the proposals for Otterpool Park reflect, and arguably surpass, the NPPF's definition of a Strategic Site at Annex B:
- "...A site for residential, commercial or mixed-use development which would be implemented in multiple phases, have significant infrastructure requirements and require a masterplan. Typically, for a residential-led development, strategic sites would have capacity for at least 1,500 dwellings (although the scale of residential development can vary depending on the mix of uses on the site"*
- 7.9 The status of Otterpool Park as a 'Strategic Site' is not merely definitional. This status engages a specific set of NPPF provisions, addressed in the paragraphs below and, in respect of the flexibility sought under Policy HO13(3)(b).
- 7.10 Policy HO13(3)(a) requires that, for strategic sites, the consenting framework set out the parameters and requirements for the design, infrastructure and other features of the development — including the quantity and type of affordable housing to be provided — with the level of initial and subsequent detail tailored to the proposed scale and phasing of the development. Otterpool Park complies with this requirement through the Development Specification and the Parameter Plans submitted with the OPA, which fix the quantum, land use mix, supplemented by the Design Principles, which together set the key design parameters for the development, including the affordable housing quantum and tenure mix, at a level of detail appropriate to the outline stage, with further detail brought forward and fixed progressively at each key phase and under the EHP.
- 7.11 Policy HO13(3)(b) requires that the consenting framework be flexible enough to respond positively to changing circumstances as phases of the development come forward, including in relation to housing need, infrastructure requirements, viability and design. The consenting framework for Otterpool Park has been deliberately structured to secure this flexibility. This ensures flexibility is available where genuinely needed to respond to changing circumstances, while the core parameters of the development are to be approved as part of the OPP.

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- 7.12 In light of this, Otterpool Park remains a strategically important part of future housing supply within FHDC, capable of delivering 8,500 homes alongside employment, community and transport and green infrastructure.
- 7.13 The new planning strategy for Otterpool Park, including the introduction of the EHP is consistent with the NPPF's objective of boosting housing supply and supporting delivery. The introduction of the EHP, which is capable of providing up to 300 homes, responds to the NPPFs focus on delivery, whilst maintaining the masterplanned approach for the wider Garden Town.

Meeting the needs of Business Land and Premises

- 7.14 Policy E2 identifies that substantial weight should be given to the economic benefits for commercial development. The Proposed Development includes flexible commercial, business and service floorspace with further potential for medical / health uses, supporting business growth and the economic vision for Folkestone and Hythe.

Sustainable development, transport and infrastructure

- 7.15 The 2026 NPPF supports patterns of growth that promote sustainable development, make effective use of land, reduce the need to travel by private car and support walking, cycling and public transport. Policy S3 of NPPF 2026 establishes a presumption in favour of sustainable development.
- 7.16 Policy TR1 requires a vision led approach to planning for transport. Policy TR3, requires locating development in sustainable locations. Policy TR6: Assessing Transport Impacts requires appropriate mitigation of transport impacts. The updated Transport Assessment submitted with the OPA confirms that the vision-led transport strategy for Otterpool Park, together with the mitigation measures and wider network improvements to be secured through planning conditions and the Section 106 agreement, would avoid a severe adverse impact on the transport network in terms of capacity and congestion (including cumulative impacts), and would not give rise to an unacceptable impact on highway safety, during both the construction and completion phases of the development. This is consistent with the vision-led, sustainable transport strategy addressed above under Policies TR1 and TR3.
- 7.17 In this context, the location of the EHP close to Westenhanger Station, the A20 corridor and the emerging movement network is an important consideration in favour of early delivery, subject to detailed mitigation and integration with the wider transport strategy.
- 7.18 The updated submission also reflects the NPPF's emphasis on infrastructure-led and comprehensively planned growth. The revised tiered planning strategy, updated conditions and planning obligations package are intended to ensure that early housing delivery is supported by proportionate mitigation, while preserving the ability of the wider development to deliver strategic infrastructure over time.

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Design, Climate, environment and healthy communities

- 7.19 Design, Climate change, green infrastructure and healthy community objectives. These matters remain central to the Otterpool Park vision and are addressed through the updated Parameter Plans, Strategic Design Principles, Environmental Statement Addendum and supporting strategies.
- 7.20 The 2026 NPPF continues to require high quality, well-designed places and gives policy support to development that responds positively to local character, landscape, heritage.
- Policy DP3 establishes the principles for well-design places that balance innovation with the importance of responding appropriately to their setting.
- 7.21 The masterplan & vision for Otterpool Park reflects the seven principles of Policy DP3, and is being progressed through ongoing engagement with FHDC. These principles follow the guidance / structure as set out in the NPPF and form the basis of the Design and Access Statement ('DAS'). Policy L3, identifies the need to achieve appropriate densities. The Design Principles for Otterpool Park and the Key Phase mechanism will allow for this to be agreed as the development progresses responding appropriately to different parts of the site.
- 7.22 Policy HE6 requires the consideration of a development proposal's effect on heritage assets. The likely significant environmental impacts of the Proposed Development upon designated built heritage assets are considered in the Environmental Statement addendum, including the Castle and associated structures, and the Barrows. The extent of harm has been confirmed through the Heritage Impact Assessment submitted with the OPA.
- 7.23 The Framework's continued emphasis on climate change, clean energy, water management, biodiversity, green infrastructure and sustainable transport is reflected in the technical updates now submitted. These include updated assessment work and mitigation in relation to transport, green infrastructure, biodiversity, water, nutrient neutrality, waste and minerals matters.
- 7.24 Policy CC2: Mitigation of Climate Change identifies that substantial weight should be given to these matters.
- 7.25 The Proposed Development will accord with the Future Homes and Buildings Standards which take effect from March 2027, reflecting the requirements of Policy CC2 as a whole, including in relation to sustainable transport choice, development densities which support local services, low carbon energy, and the re-use of existing structures and materials.
- 7.26 Policy N2 of the NPPF relating to the natural environment and Policy N6 supporting the Conservation of important habitats, species and sites of geodiversity value have been reflected in the green infrastructure Strategy for Otterpool Park as a landscape led Garden Settlement.

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- 7.27 The 2026 NPPF also reinforces the importance of creating healthy, inclusive and mixed communities via Policy HC4: Proposals for New and Improved Community Facilities, Public Service Infrastructure and Development providing Health Benefits
- 7.28 Otterpool Park will deliver a comprehensive range of new community and public service infrastructure, including primary schools, secondary schools, a health hub and community buildings. Substantial weight should be given to these benefits under Policy HC4. Necessary commitments to the development of the infrastructure serving Otterpool Park and the timing for this delivery will be secured through planning conditions and obligations for the outline planning permission.
- 7.29 Health benefits are also embedded in all aspects of the approach for Otterpool Park reflecting the requirements of Policy HC3. The EHP is intended to establish the first component of that new community in a manner that is capable of integrating with the wider masterplan.

Summary

- 7.30 Overall, the 2026 NPPF strengthens the national policy context for the delivery of sustainable, well-planned housing growth via strategic sites such as Otterpool Park while also requiring development proposals to be assessed against a clearer set of national decision-making policies. Otterpool Park remains capable of making a substantial contribution to housing delivery and to the creation of a sustainable new Garden Town supported by infrastructure, community facilities, green space and employment opportunities.
- 7.31 In this context, the updated OPA and EHP strategy are considered to accord with the direction of national planning policy. The proposed amendments do not alter the scale or purpose of the Garden Town, but they improve deliverability, update the supporting evidence and provide a proportionate mechanism for early housing delivery. The 2026 NPPF therefore adds weight to the case for granting an implementable outline permission and enabling the EHP to proceed as the first phase of Otterpool Park.

Local

- 7.32 No change. Refer to PDS.

Other Material Considerations

- 7.33 No change. Refer to PDS.

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8.0 OTTERPOOL PARK – PROPOSED DEVELOPMENT

- 8.1 The original chapter in the PDS sets out the proposals put forward as part of the OPA. The Description of Development has not changed since the original submission. Paragraph 8.4 of the PDS provides a summary of the Otterpool Park proposal. However, for ease of reference, the description of development as taken from the original application forms is provided below:

"Outline planning application seeking permission for the redevelopment of the site through the demolition of identified existing buildings and erection of a residential led mixed use development comprising up to 8,500 residential homes including market and affordable homes; age restricted homes, assisted living homes, extra care facilities, care homes, sheltered housing and care villages; a range of community uses including primary and secondary schools, health centres and nursery facilities; retail and related uses; leisure facilities; business and commercial uses; open space and public realm; burial ground, sustainable urban drainage systems; utility and energy facilities and infrastructure; waste and waste water infrastructure and management facilities; vehicular bridge links; undercroft, surface and multi-storey car parking; creation of new vehicular and pedestrian accesses into the site, and creation of a new vehicular, pedestrian and cycle network within the site; improvements to the existing highway and local road network; lighting; engineering works, infrastructure and associated facilities; together with interim works or temporary structures required by the development and other associated works including temporary meanwhile uses. Layout, scale, appearance, landscaping and means of access are reserved for approval."

- 8.2 Given that there have been no changes to the overall quantum of development, this chapter provides an update on the key changes only since the previous application.

Key updates

- 8.3 There are two parts to the updates provided, (a) updates to the OPA and (b) updates and additional submissions to support the delivery of the EHP. The approach taken has been discussed and agreed in advance with the Local Planning Authority (LPA) and is summarised as follows:

a) Updates to the OPA

- Passage of time updates and amendments to the approach/methodology to reflect changes in national policy e.g. Vision Led approach to transport and revised NPPF published in 2026;
- Added flexibility and improved simplicity to the Parameter Plans addressing potential barriers to delivery such as the Advanced Planting and restrictive terminology including the Split of Parcel HT2 into HT2 and HT6 to establish a more responsive approach to the Barrows (as discussed with Historic England);
- Removal of alternative set of Parameter Plans;

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- Changes to wider ES Strategies to reflect an updated approach, e.g. Transport and Advanced Planting;
- Updates to the ES to reflect the passage of time, updates to guidance/methodology and any amends to cover the above; and
- Updates to other approved documents such as the Development Specification and Strategic Design Principles to reflect the need for flexibility and their role in a tiered planning permission.

Updated Parameter Plans

8.4 The parameter plans form part of the planning application package of documents for approval and set parameters within which details of reserved matters must be prepared, submitted and approved in substantial accordance with.

8.5 The parameter plans for approval are as follows:

- OTT001/004/N – Movement and Access Plan;
- OTT001/006/J – Open Space and Vegetation;
- OTT001/008/K – Building Heights Plans.

8.6 The proposed changes to the parameter plans include:

- Redefinition of Development Parcels to allow for better response to the heritage assets at the Barrows;
- Some additional flexibility on alignment of movement corridors with limited deviation where necessary;
- Potential for an additional access point to be provided to the A20;
- Minor adjustments to allow flexibility in terms of the new link to the A20; and
- Update to reflect the fact that the waste facility at Otterpool Quarry has now been implement and sensitivities need to be considered.

Environmental Statement (ES)

8.7 An update to the ES which includes:

- Updates to the ES chapters and analysis to reflect the passage of time, policy, guidance and updated baseline;
- Updates to appendices and supporting documents where this is required to reflect updated evidence/achieve greater flexibility;

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- Updates to key supporting documents as required, in particular the Transport Assessment and Framework Travel Plan and Green Infrastructure Strategy to reflect the passage of time, policy, guidance and updated analysis/position;
- Updates to the ES to establish mitigation required as a result of the EHP.

b) Early Homes Parcel (EHP)

- 8.8 In the delivery of any new settlement, the first homes are hugely important and need to be considered as part of the wider proposition of creating an attractive and market facing development. The first homes set the tone in terms, creating the embryo of a new community but also by establishing the sense of place and quality.
- 8.9 In targeting the early delivery of housing at Otterpool Park, the LLP have identified an EHP within the Hillhurst Green Residential Area (North) part of the Site which will deliver up to 300 homes. The delivery of this parcel will come forward under the Outline Planning Permission albeit under a separate set of conditions specific to the EHP which will enable quicker delivery of the parcel.
- 8.10 The reason why the area at Hillhurst Green Residential Area (North) was chosen as the EHP is as follows:
- It is in Homes England's ownership and therefore in a good position to enable the delivery of the first homes for Otterpool Park;
 - It is located in the area envisioned to be the gateway entrance to Otterpool Park, therefore it is logical that this comes forward early as the "front door" to the wider development;
 - It is adjacent to Westenhanger Station and therefore it is well located for connections to the existing public transport network;
 - It is adjacent to the A20 (Ashford Road) and Junction 11 of the M20 thereby enabling vehicular trips to connect to the strategic road network, minimising traffic impacts to local roads. Furthermore, it's connections to the walking, cycling and active travel network enables the area to benefit from sustainable and active travel from the outset;
 - The area is adjacent to existing residential development along Stone Street;
 - There are clear opportunities to provide enhancements to the natural environment within this land, which can enable good integration with its attractive landscape setting.

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- 8.11 The EHP has been developed so that it can be delivered as the first homes for Otterpool Park remaining fully integrated with, and supportive of, the wider Garden Town vision. Rather than being developed as a standalone development, the EHP has been developed directly from the Committee approved site-wide framework and design principles established through the original OPA submission, ensuring that it forms an integral component of the long-term masterplan.
- 8.12 A key strength of the EHP is its landscape-led approach. The proposed layout has been shaped by the site's topography, landscape sensitivities, existing vegetation, public rights of way and views to and from the Kent Downs National Landscape. The development is organised around a strong green infrastructure framework, including the retention and enhancement of existing trees and hedgerows, advanced structural planting, sustainable drainage systems and a significant east-west ecological corridor. This corridor performs multiple functions, including biodiversity enhancement, recreational provision, sustainable drainage, visual mitigation and active travel connectivity.
- 8.13 The proposals have been carefully developed to respond to existing site features and constraints. The retained Hillhurst Farm buildings, mature oak tree, Stone Street corridor, existing public rights of way and surrounding landscape all influence the structure of the masterplan. The EHP Design Principles will show how development will be arranged around these assets, allowing landscape and heritage features to become defining elements of the new neighbourhood.
- 8.14 The development also aligns closely with the wider movement and access strategy for Otterpool Park. The EHP incorporates direct pedestrian and cycle connections to Westenhanger Station, future neighbourhoods, public transport infrastructure and the wider active travel network across the Garden Town. The street hierarchy prioritises walking, cycling and public transport, with greenways, shared streets and low-traffic residential environments designed to encourage sustainable travel choices from the outset.
- 8.15 In placemaking terms, the design of the EHP establishes three distinct character areas: Station Approach, The Fold Yard and Oak Hythe. Each responds to local context and Kentish vernacular influences, whilst collectively creating a coherent neighbourhood identity. Building heights, densities, materials and urban form vary across the site to create a transition from a more urban station-focused character in the north-west to a softer rural edge adjoining the countryside and Stone Street to the east and south.
- 8.16 The EHP seeks to deliver the same core ambitions as the wider Otterpool Park development, including:
- A landscape-led Garden Town.
 - Approximately 36% green and blue infrastructure within the parcel.
 - Biodiversity enhancement and ecological connectivity.
 - Integrated sustainable drainage systems.

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- High-quality public realm and play spaces.
- Sustainable transport and active travel.
- Climate-resilient and energy-efficient development.
- Strong relationships between homes, landscape and community infrastructure.

8.17 The proposals reflect and reinforce the approved Otterpool Park vision, ensuring that early delivery supports the long-term objectives, character, landscape structure and placemaking ambitions of the wider development.

Waste Water treatment Works

8.18 In parallel to the review process and the preparation of this resubmission pack to ensure the earliest delivery, a standalone detailed planning application for the proposed Waste Water Treatment Works (WwTW) was submitted to KCC as the Waste and Mineral Authority (Application KCC/FH/0020/2025) with the scheme being approved in April 2026.

8.19 Cognisant that this outline application is reliant on the consented WwTW, and in order to ensure the two permissions are linked, it is proposed that either a term is added to the S106 or a condition is attached to any permission to secure the provision of the WwTW at an agreed point of the development.

8.20 The Parameter Plans indicate the location of the consented WwTW.

S106 Heads of Terms/Conditions

8.21 Provision of updated Heads of Terms to reflect the passage of time, appropriate CIL compliant mitigation, updated assessments and the position on EHP delivery. Key areas of change include:

- Heritage;
- Education;
- Transport;
- Community facilities;
- Waste.

8.22 In addition, updated Conditions to better reflect the tiered structure, provide clarity and address issues including Advanced Planting.

8.23 The addition of a separate EHP S106 and Conditions.

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9.0 PLANNING ISSUES

- 9.1 The PDS identifies the topics for consideration as part of the determination of this application. The topics are unaltered and as such an updated position is set out below.
- 9.2 The 2026 changes to the scheme are set out in section 8 of this PDSA. This section considers the impact each of these update areas below. As before, it is concluded that the proposals are acceptable in planning terms and should continue to retain the support of Officers and be granted planning permission.
- 9.3 This section provides a high-level planning summary of the relevant ES chapters only. The detailed EIA methodology, baseline information, impact assessment and significance conclusions are set out in the ES Addendum chapters as submitted which should be read as the primary EIA documents.

The principle of strategic development

- 9.4 Unchanged. Refer to PDS.

Provision of housing, housing mix and type

- 9.5 In 2023 the district test result fell below the 85% threshold with a score of 83% against the housing requirement. Consequently, the council must now prepare and publish a Housing Delivery Action Plan and add a 20% buffer to the 5-year land supply. This Action Plan was published in August 2025² which noted at Para 3.5 that the 'districts primary mechanism for the delivery of new homes is through the allocation of a new garden settlement at Otterpool Park.'
- 9.6 Whilst there has been a necessary delay in the delivery of development at Otterpool Park, its importance to housing delivery as a whole within FHDC is still apparent. To that end, the EHP has been developed which will specifically allow development to come forward as early as possible to contribute to wider needs in the district

Agriculture and soils

- 9.7 The ES Addendum has reviewed the effects of the Proposed Development on agricultural land, soils and agricultural businesses, taking account of updated policy and guidance, enhanced baseline information, predictive Agricultural Land Classification (ALC) mapping, the revised construction programme, the introduction of the EHP and other proposed changes to the scheme. The assessment confirms that the principal conclusions of the 2022 Environmental Statement remain unchanged.
- 9.8 The addendum identifies that whilst approximately 584 hectares of agricultural land would be affected by the Proposed Development, that the loss of agricultural land remains justified in the context of the substantial public benefits arising from the delivery of a strategically

² <https://www.folkestone-hythe.gov.uk/downloads/file/6073/housing-delivery-action-plan-v2>

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important new settlement, including housing, employment, community infrastructure and extensive green infrastructure. Approximately 50% of the Site will be retained as green infrastructure, helping to sustain a range of soil-related ecosystem services and recreational, landscape and biodiversity benefit.

- 9.9 As part of the addendum, an updated soil resource assessment has been undertaken, reflecting current professional guidance on soil functions and ecosystem services. An overarching Soil Management Plan and Soil Strategy will be provided to ensure that soil resources are carefully managed, retained and reused across the development, supporting landscape, habitat creation, food growing, recreation and other long-term land uses.
- 9.10 The EHP falls wholly within land already assessed as part of the wider development and does not alter the overall assessment conclusions. Similarly, the proposed 250 metre consultation zone associated with the operational Materials Recovery Facility does not result in any additional effects on agriculture or soils. Whilst significant adverse effects associated with the permanent loss of agricultural land and soil resources remain, these conclusions are unchanged from those identified in the original ES and are appropriately managed through the embedded design measures and soil management framework proposed for the development.

Air Quality

- 9.11 This Addendum reviews the air quality implications of the updated proposals, including changes to the development parameters, construction programme, phasing, traffic data and the inclusion of the EHP. The assessment has also been updated to reflect current legislation, policy, guidance, baseline monitoring data and modelling tools.
- 9.12 The updated assessment confirms that existing baseline air quality has generally improved since the 2022 ES and that future background pollutant concentrations are expected to reduce further. Potential effects associated with construction dust, operational traffic emissions, future on-site receptors, nearby waste management infrastructure and ecological receptors, including the Folkestone to Etchinghill SAC and SSSI, have been considered. Subject to the implementation of embedded mitigation and good-practice construction controls, no unacceptable air quality effects are anticipated.
- 9.13 It concludes that the Proposed Development is considered capable of being delivered without giving rise to significant adverse air quality effects or prejudicing compliance with relevant air quality objectives and national PM_{2.5} targets, and that air quality matters can be appropriately managed through the proposed mitigation, design measures and the tiered planning approval process.

Noise and vibration

- 9.14 This Chapter confirms that the updated proposals do not materially alter the conclusions of the 2022 ES with regards to noise and vibration. The assessment has reviewed the proposed

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amendments, including the EHP, updated parameter plans, revised programme assumptions and nearby consented waste infrastructure, together with updated policy, guidance and assessment methodology.

- 9.15 The previously established baseline noise data remains appropriate for the purposes of the Addendum, following review and consultation with FHDC's Environmental Health Officer. Operational road traffic noise has been reassessed using the updated 2055 traffic modelling and DMRB LA 111 methodology. The assessment identifies effects that are predominantly negligible adverse to minor adverse, with some beneficial changes, and concludes that there would be no significant adverse residual noise effects arising from changes in traffic associated with the development
- 9.16 No changes are required to the embedded design measures or additional mitigation identified in the 2022 ES. With regards to the EHP, acoustic matters will be addressed through detailed design, including an Acoustic Design Statement where appropriate, covering façade mitigation, layout, screening and buffer zones. Any future residential development within the 250m consultation zone around the Materials Recovery Facility will need to be supported by further noise assessment and suitable mitigation to demonstrate that acceptable residential amenity can be achieved without prejudicing the ongoing operation of existing waste facilities.
- 9.17 Subject to the established mitigation framework and appropriate acoustic design controls at subsequent approval stages, the Proposed Development is not expected to give rise to significant adverse noise or vibration effects.

Climate Change

- 9.18 The ES Addendum has reviewed the climate change effects of the Proposed Development, taking account of updated legislation, policy and guidance, revised carbon assessment methodologies, updated climate projections, changes to the construction programme and the introduction of the EHP.
- 9.19 The assessment demonstrates that the Proposed Development continues to support national and local climate objectives through a comprehensive package of embedded mitigation measures, including a fabric-first approach to building design, all-electric homes, renewable energy generation, sustainable travel infrastructure, energy efficiency measures and alignment with the Future Homes Standard and Future Buildings Standard. The development also remains underpinned by a transport strategy that promotes walking, cycling, public transport use and electric vehicle infrastructure to reduce operational carbon emissions over the lifetime of the scheme.
- 9.20 Updated greenhouse gas assessments have been undertaken using the latest guidance, emissions factors and carbon budget frameworks. Whilst the scale of the development inevitably generates greenhouse gas emissions during construction and operation, the assessment concludes that the Proposed Development would make only a minor contribution

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to relevant UK carbon budgets and would not materially affect the achievement of national net zero objectives. Accordingly, the residual effects associated with greenhouse gas emissions are assessed as not significant.

- 9.21 The climate resilience assessment confirms that the Proposed Development remains capable of adapting to future climate conditions, including increased temperatures, more frequent heatwaves, changes in rainfall patterns and flood risk. Embedded adaptation measures, including sustainable drainage systems, climate-responsive design and the consented wastewater treatment infrastructure, ensure the development remains resilient to projected climate change impacts. The introduction of the EHP does not alter these conclusions.

Transport

- 9.22 The Environmental Statement Addendum reassesses the transport impacts of the updated Proposed Development having regard to the revised development parameters, updated construction programme, inclusion of the EHP as well as the most up-to-date transport policy and guidance. The assessment has been informed by the Transport Assessment Addendum, Transport Strategy and Framework Travel Plan Addendum.
- 9.23 The proposal continues to be underpinned by a vision-led approach to transport planning, prioritising active travel, public transport, accessibility and reduced reliance on private car use. Updated baseline and future-year scenarios have been undertaken, including the 2025 baseline, 2035 peak construction year and 2055 operational assessment year.
- 9.24 Construction traffic would be managed through a Construction Traffic Management Plan, while operational impacts would be addressed through an updated Transport Strategy, Framework Travel Plan, and agreed off-site highway mitigation, including junction improvements and monitor-and-manage arrangements developed with Kent County Council and National Highways.
- 9.25 The assessment demonstrates that the transport effects of the updated Proposed Development can be appropriately managed and mitigated and confirms that the proposal continues to support sustainable movement, accessibility and connectivity objectives and is therefore considered acceptable in transport planning terms.

Heritage and archaeology

- 9.26 An updated assessment of cultural heritage has been undertaken to consider changes to the Proposed Development since the original submission, including the introduction of the EHP, amendments to parameter plans and strategies, additional archaeological investigations, and updates to policy and guidance. The assessment concludes that the methodology remains robust and that the cultural heritage effects identified in the 2022 ES remain largely unchanged.

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- 9.27 Since 2022, extensive archaeological and heritage investigations have been completed across the Site, including evaluation trenching, geophysical surveys, historic building recording, geoarchaeological investigations and monitoring works. These surveys have enhanced understanding of the archaeological resource, identifying additional features of principally low to medium significance, including prehistoric, Romano-British, medieval and post-medieval remains. Appropriate mitigation, principally through preservation in situ, archaeological excavation, watching briefs and building recording, has either been completed or will be secured through planning conditions and the Heritage Strategy.
- 9.28 No new designated heritage assets have been identified within the Site or surrounding study area. Additional non-designated heritage assets recorded since 2022 are generally of low significance and either lie outside the development area, or can be appropriately mitigated. The EHP does not give rise to any new significant effects and does not alter the mitigation strategy established through the 2022 ES, aside from bringing forward archaeological mitigation as part of the EHP.
- 9.29 The assessment confirms that, following implementation of embedded design measures and additional mitigation, there would be no significant residual effects on cultural heritage arising from the construction or operation of the Proposed Development. While updates to national planning policy in the form of the NPPF 2026, alter the interpretation of "substantial harm", this affects only the classification of impacts to the setting of Barrow 44. The assessment concludes that any substantial harm in this instance would be outweighed by the significant public benefits of the scheme and the long-term conservation benefits arising from removing the monument from agricultural cultivation. Overall, the conclusions of the 2022 ES remain valid and the Proposed Development is considered acceptable in cultural heritage terms.

Landscape and visual impact

- 9.30 The Addendum confirms that the landscape-led design approach, assessment methodology and overall conclusions of the existing LVIA remain valid.
- 9.31 There have been no material changes to the landscape character or visual baseline that would alter the sensitivity of receptors previously identified. The Site continues to be influenced by the surrounding rural landscape, the Kent Downs National Landscape, local landscape character areas, public rights of way and nearby settlements. The landscape-led masterplan retains and strengthens the extensive green infrastructure framework that underpins the Garden Town concept, including structural planting, habitat corridors, open spaces and landscape buffers.
- 9.32 The EHP has been designed in accordance with the established landscape strategy and remains consistent with the principles assessed through the outline application. Whilst minor amendments to structural planting arrangements are proposed, these do not materially alter the landscape mitigation strategy or the functionality of the green infrastructure network.

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Similarly, the operational Materials Recovery Facility and associated consultation zone do not introduce any new landscape or visual impact pathways beyond those already considered through the original assessment.

- 9.33 Overall, the Addendum concludes that the proposed amendments, including the updates to the Green Infrastructure Strategy and Advanced Planting do not materially change the nature or significance of the landscape and visual effects identified in the original ES. The embedded landscape mitigation within the scheme, structural planting and green infrastructure proposals continue to provide an effective framework for integrating the development into the surrounding landscape and minimising visual effects, while delivering substantial long-term landscape and environmental enhancements across the Site.

Ecology and Biodiversity

- 9.34 The Addendum reviews the biodiversity effects of the Proposed Development taking account of updated ecological data, additional survey information, changes to legislation and policy, the introduction of the EHP and amendments to the development parameters since submission of the 2022 ES. The assessment confirms that the ecological baseline remains broadly consistent with that previously assessed and that the overall conclusions of the 2022 ES remain unchanged.
- 9.35 The assessment demonstrates that the proposal continues to follow the mitigation hierarchy by retaining, enhancing and connecting key ecological features across the Site. Significant areas of green infrastructure, habitat creation, ecological corridors, woodland planting, wetland features and sustainable drainage infrastructure are embedded within the proposals, supporting biodiversity enhancement, ecological connectivity and climate resilience. The development continues to have the potential to deliver substantial Biodiversity Net Gain, with calculations indicating that a net gain of approximately 20% remains achievable.
- 9.36 Updated ecological information confirms that habitats and protected species across the Site remain broadly comparable to those assessed in 2022. Additional surveys undertaken since submission of the original application have not identified any material changes that would alter the assessment outcomes. The EHP is located within an area already assessed through the original submission and does not give rise to any new or materially different ecological effects. Appropriate species mitigation, habitat management and future survey requirements will continue to be secured through the planning process.
- 9.37 The assessment concludes that following the implementation of embedded mitigation, habitat creation and proposed offsetting measures, there would be no significant adverse residual effects on designated sites, protected species or ecological networks. Habitat creation and enhancement measures are expected to deliver significant long-term biodiversity benefits, while previously identified impacts on certain bird species are addressed through targeted offsetting strategies. Overall, the Addendum confirms that the

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Proposed Development remains consistent with national and local planning policy objectives for biodiversity conservation, enhancement and nature recovery.

Surface water resources and flood risk

- 9.38 Updated assessments confirm that the Site remains predominantly within Flood Zone 1, with a low risk of flooding from all relevant sources. The Flood Risk Assessment and Surface Water Drainage Strategy Addendum demonstrates that the embedded sustainable drainage strategy continues to manage runoff effectively, incorporate current climate change allowances and ensure that flood risk will not be increased on-site or elsewhere. The proposals continue to integrate sustainable drainage systems throughout the green and blue infrastructure network, delivering both flood attenuation and water quality benefits.
- 9.39 The Water Cycle Study Addendum and Nutrient Neutrality Assessment confirm that the Proposed Development remains capable of achieving nutrient neutrality through a combination of on-site wastewater treatment infrastructure, wetlands, sustainable drainage measures and associated mitigation. Planning permission has now been granted for the on-site WwTW and associated wetlands, providing a robust long-term solution for wastewater management and water quality protection.
- 9.40 The EHP is included within the original assessment envelope and is located entirely within Flood Zone 1. Its development does not alter the flood risk, drainage or water quality conclusions previously reached. Similarly, the introduction of the consultation zone associated with the operational Materials Recovery Facility does not materially affect the assessment outcomes.
- 9.41 The Addendum confirms that the Proposed Development will continue to avoid significant adverse effects on surface water resources and flood risk, while delivering a sustainable and climate-resilient drainage strategy consistent with national and local planning policy objectives.

Nutrient Neutrality Assessment and Strategy Addendum

- 9.42 A revised Nutrient Neutrality Assessment and Strategy has been undertaken which reflects updated Natural England guidance, revised nutrient neutrality calculators, the consented on-site WwTW and wetlands infrastructure, and the introduction of the EHP. It confirms that nutrient neutrality remains capable of being achieved for the Proposed Development and that a suitable strategy is available to ensure compliance with the requirements of the Habitats Regulations.
- 9.43 The updated assessment has considered the full proposed development of 8,500 homes and associated uses, together with revised wastewater treatment permit standards and the latest nutrient budgeting methodologies. The assessment demonstrates that the consented on-site WwTW remains the most effective long-term wastewater solution, significantly reducing nutrient loading compared with alternative wastewater treatment option.

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- 9.44 The assessment confirms that the proposed wastewater treatment wetlands are capable of removing substantial quantities of phosphorus and nitrogen, with additional mitigation measures available to address the small residual nutrient budget and provide flexibility throughout the delivery of the scheme.
- 9.45 A specific nutrient neutrality assessment has also been undertaken for the EHP which demonstrates that nutrient neutrality can be achieved through an interim strategy involving connection to the existing Sellindge Wastewater Treatment Works and temporary agricultural land fallowing, before transfer to the consented on-site wastewater treatment infrastructure once operational.
- 9.46 Overall, the updated assessment demonstrates that Otterpool Park can be delivered in a manner that achieves nutrient neutrality and avoids adverse effects on the integrity of the Stodmarsh designated sites. The assessment confirms that sufficient mitigation mechanisms are identified and available to support delivery of the development, with detailed implementation and monitoring to be secured through subsequent planning submissions.

Socio-economic effects and human health

- 9.47 The Addendum reviews and updates the previously provided assessment of socio-economic and community effects associated with the Proposed Development, considering amendments to the scheme, the introduction of the EHP, updated baseline information and the passage of time since the submission of the original ES.
- 9.48 The Proposed Development will continue to deliver substantial socio-economic benefits through the provision of up to 8,500 homes, including affordable housing, significant employment opportunities during both construction and operation, new education, healthcare, community and recreational facilities, and associated infrastructure. Based on updated assumptions, the development is estimated to accommodate a population of approximately 17,000 residents and support around 9,400 jobs, reinforcing its role as a sustainable new settlement and an important economic driver for the area.
- 9.49 During construction, the principal effect remains a significant beneficial impact arising from employment generation, skills development and investment in the local economy. During operation, the delivery of housing, jobs, community infrastructure and green infrastructure will result in significant beneficial effects for the district. No significant adverse socio-economic effects have been identified, either from the revised scheme parameters or the introduction of the EHP.
- 9.50 The updated development proposals remain capable of supporting population growth and responding to identified housing and economic needs within the district. Appropriate provision for education, healthcare, community facilities, open space and employment opportunities will continue to be secured through the granting of OPP and subsequent planning approvals. Consequently, the Proposed Development remains compliant with

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national and local planning policy objectives relating to sustainable growth, housing delivery, economic development and community infrastructure.

- 9.51 The updated baseline indicates that the local population continues to experience a range of health challenges, including an ageing demographic profile, relatively high levels of deprivation and health inequality, higher mortality rates than regional averages, elevated rates of obesity, and increasing demand for health and wellbeing services. These circumstances reinforce the importance of delivering high-quality housing, accessible healthcare, active travel opportunities, open space, employment opportunities and community infrastructure.
- 9.52 The update demonstrates that the Proposed Development will continue to generate significant positive health benefits through the provision of new homes, employment opportunities, healthcare and community facilities, extensive green infrastructure, high-quality walking and cycling connections, and improved access to services and recreation.
- 9.53 The EHP remains within the parameters of the development previously assessed and does not give rise to any additional or materially different health effects. Similarly, the proposed 250m consultation zone around the operational Materials Recovery Facility does not alter the conclusions of the assessment, with any future development proposals within that area subject to detailed assessment at subsequent planning stages.
- 9.54 Overall, the ES Addendum confirms that the residual human health effects remain consistent with those identified in the 2022 ES, with no new significant adverse effects identified and substantial long-term benefits continuing to arise from the delivery of the Proposed Development.

Waste and Resource Management

- 9.55 The Addendum has reviewed the waste and resource management effects of the Proposed Development in light of amendments to the scheme, updated legislation and policy, revised baseline information, the introduction of the EHP and changes to local waste infrastructure since the original submission.
- 9.56 The updated Addendum shows that waste management infrastructure capacity within Kent has been maintained and strengthened through the operation of the Materials Recovery Facility at Otterpool Quarry and the consented waste transfer station adjacent to the Site. The Proposed Development will continue to apply the waste hierarchy, prioritising waste prevention, reuse, recycling and recovery, supported by an updated Waste Strategy and Outline Site Waste Management Plan.
- 9.57 The assessment concludes that the EHP would not give rise to new waste streams, materially increase waste generation, or require additional waste management infrastructure beyond that already assessed. Similarly, the proposed consultation zone associated with the operational Materials Recovery Facility does not alter the waste assessment conclusions or

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preclude compatible development from coming forward where appropriate evidence is provided at subsequent stages.

- 9.58 Overall, the assessment confirms that there are no material changes to the likely waste and resource management effects identified in the original ES. No new significant adverse effects have been identified, and the residual effects of the Proposed Development remain unchanged, waste arising during construction and operation capable of being managed sustainably through existing and planned waste management infrastructure in accordance with national and local policy objectives.

Geology, hydrology and land quality

- 9.59 The ES Addendum has reviewed the geology, hydrogeology and land quality effects of the Proposed Development, taking account of updated policy and guidance, additional ground investigation works undertaken since 2022, the introduction of the EHP and the proposed consultation zone associated with the operational Materials Recovery Facility. The assessment confirms that the baseline understanding of ground conditions remains substantially unchanged and that the findings of the 2022 ES remain valid.
- 9.60 Additional ground investigations completed across the Site, including within the EHP confirm the previously identified geological and hydrogeological conditions. Soil testing identified no material contamination constraints within the EHP, while groundwater monitoring confirmed the presence of locally shallow groundwater in parts of the Site, which can be appropriately managed through detailed design, construction controls and drainage measures.
- 9.61 The assessment confirms that there are no registered private water supplies within the study area and no evidence of impacts on groundwater resources, designated ecological receptors or mineral safeguarding interests beyond those previously assessed. Existing embedded mitigation measures, including further site investigation, groundwater management and sustainable drainage design, remain appropriate and effective.
- 9.62 Overall, the ES Addendum concludes that neither the revised development parameters, the EHP nor the proposed consultation zone give rise to any materially different effects in relation to geology, hydrogeology or land quality. The residual effects remain unchanged from those identified in the 2022 Environmental Statement, with no significant adverse effects identified and the Proposed Development continuing to accord with national and local planning policy requirements.

Retail Impact Assessment

- 9.63 A review of the 2022 Retail Impact Assessment has been undertaken to consider whether changes in planning policy, legislation, local retail provision and baseline conditions materially affect the conclusions of the original assessment. The review confirms that the assessment framework and findings remain robust and that no material changes have arisen which would alter the conclusions previously reached.

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- 9.64 The assessment identifies that updates to national planning policy, including revisions to the National Planning Policy Framework, are largely procedural in nature and do not introduce substantive changes to retail planning policy requirements. Similarly, the local development plan context remains materially unchanged and continues to support the principles underpinning the retail strategy for Otterpool Park.
- 9.65 A review of the principal centres assessed within the original study, including Folkestone, Hythe, New Romney, Ashford and Cheriton, confirms that there have been no significant changes to their retail role, function or vitality that would alter the previous conclusions. Limited changes to retail provision have occurred since 2022, but none are of a scale or nature that materially affects the assessment of retail impact, consumer choice or town centre performance.
- 9.66 Overall, the review concludes that the proposed retail and town centre uses at Otterpool Park remain appropriate in scale and function to serve the needs of the new community and continue to accord with national and local retail planning policy objectives. The findings of the 2022 Retail Impact Assessment therefore remain valid and there is no evidence to suggest that the proposed retail provision would give rise to materially different impacts than those previously assessed. It is anticipated that an updated quantitative retail assessment will be undertaken at subsequent planning stages to support the delivery of detailed phases of development.

Economic Strategy

- 9.67 The Economic Strategy Addendum has reviewed the economic evidence base, policy context and strategic objectives underpinning the Proposed Development since submission of the outline planning application in 2022. The assessment concludes that, whilst local economic conditions have evolved, there are no material changes that alter the economic case for Otterpool Park or the strategic rationale established through the original Economic Strategy.
- 9.68 FHDC continues to face a number of structural economic challenges, including an ageing population, lower levels of economic activity and skills attainment than regional averages, concentrations of deprivation, and a need to improve productivity and attract higher value employment. At the same time, changing patterns of homeworking, flexible working and self-employment reinforce the importance of delivering high-quality homes, modern digital infrastructure, employment space and business support facilities.
- 9.69 The Addendum confirms that the Proposed Development retains its strategic economic role by providing a significant range of employment, commercial, community and educational uses alongside new housing. Current estimates indicate that Otterpool Park could support approximately 9,400 jobs across a range of sectors and generate around £373 million of annual Gross Value Added (GVA), with particular opportunities in higher-value office, business and innovation sectors. The increase in homeworking since the original assessment

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further strengthens the case for the flexible and mixed-use employment offer proposed within the development.

- 9.70 The policy review confirms continued support at national and local levels for economic growth, productivity improvement, skills development, inward investment and sustainable place-making. Consequently, the economic aspirations identified in the original strategy remain fully aligned with current policy objectives. The Addendum concludes that Otterpool Park remains uniquely positioned to support the long-term economic sustainability of the District through the delivery of homes, employment space, infrastructure, education, training opportunities and business growth, while helping to address the socio-economic challenges identified.

Energy Strategy

- 9.71 The Energy Strategy Addendum confirms that the fundamental energy and carbon reduction principles established through the original Otterpool Park Energy Strategy remain unchanged and continue to provide a robust framework for the delivery of a highly sustainable, low-carbon new settlement. The strategy retains its fabric-first approach, commitment to all-electric buildings, low-carbon heating through air source heat pumps, and the extensive use of on-site renewable energy generation, principally solar photovoltaic panels.
- 9.72 The Addendum has been prepared to reflect significant changes to the regulatory environment since 2022, including updated Building Regulations and the publication of the Future Homes Standard and Future Buildings Standard. Updated modelling demonstrates that the Proposed Development is capable of achieving carbon reductions in excess of 90% against the 2013 Building Regulations baseline, substantially exceeding both previous commitments and anticipated future regulatory requirements. The assessment confirms that the Proposed Development remains well positioned to align with emerging national policy objectives relating to net zero carbon development.
- 9.73 The review also confirms that the preferred energy strategy has evolved away from reliance on communal energy infrastructure and towards efficient building-level solutions. As a consequence, previously proposed commitments relating to Energy Services Company feasibility studies, site-wide energy monitoring and wastewater heat recovery have been rationalised. These changes reflect practical delivery considerations and technological evolution rather than any reduction in environmental ambition.
- 9.74 Overall, the strategic energy vision for Otterpool Park remains robust, deliverable and aligned with current policy requirements. The EHP will be designed in accordance with the same principles and future standards as the wider development, ensuring that high levels of energy efficiency, low operational carbon emissions and climate resilience are embedded from the outset of delivery.

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10.0 DELIVERY STATEMENT

- 10.1 This section provides an updated position regarding the following matters, as set out in the Planning Delivery Statement.

Housing Delivery

- 10.2 The updated housing trajectory is set out below, with construction expected to commence in 2028 in the EHP which will provide up to 300 homes.

Year	Completions	Cumulative
2029	38	38
2030	133	171
2031	295	466
2032	395	861
2033	492	1353
2034	419	1772
2035	314	2086
2036	253	2339
2037	278	2617
2038	309	2926
2039	302	3228
2040	253	3481
2041	262	3743
2042	459	4202
2043	421	4623
2044	429	5052
2045	273	5325
2046	348	5673
2047	251	5924
2048	297	6221
2049	326	6547
2050	425	6972
2051	373	7345
2052	431	7776
2053	375	8151
2054	247	8398
2055	102	8500

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- 10.3 Conditions attached to the OPP will require the submission of a Housing Delivery Statement to be provided as part of each Key Phase Framework Submission.
- 10.4 Attached at Appendix D is the non-residential trajectory for the development.

Infrastructure Delivery

- 10.5 Appendix F provides an updated schedule of infrastructure required to support the development reflecting discussions with stakeholders and updated evidence.

Pattern of Development

- 10.6 An indicative Phasing Plan is being submitted for information purposes as part of the OPA.
- 10.7 The EHP will be the first location for the delivery of Otterpool Park. A proposed planning condition requires the submission of the RMA for the EHP to be submitted within three years of the grant of the OPA.

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11.0 PLANNING OBLIGATIONS

- 11.1 This updated application pack proposes two S106 agreements, one for the EHP parcel and a further agreement for the wider Site. These agreements have been worked on in parallel and seek to ensure that the provision of and triggers for contributions and infrastructure is proportionate and appropriate. An overview of the Heads of Terms for the S106 legal agreements is attached at Appendix E.

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12.0 CONCLUSIONS

- 12.1 This Planning and Delivery Statement Addendum demonstrates that the Otterpool Park Outline Planning Application remains fundamentally unchanged in its vision, scale, purpose and strategic justification. The proposed amendments do not alter the approved Garden Town concept or the overall development quantum of up to 8,500 homes and associated supporting uses. Instead, they respond positively to changes in policy, technical evidence, site circumstances and delivery considerations that have arisen since the application was originally considered.
- 12.2 The updated submission has been prepared to improve clarity, flexibility and deliverability. In particular, it introduces a robust mechanism for the accelerated delivery of the Early Homes Parcel, enabling the first homes at Otterpool Park to be brought forward at the earliest opportunity while ensuring that development remains aligned with the wider masterplan, infrastructure strategy and long-term stewardship objectives. The EHP will provide confidence in the delivery of the wider project, support investment and demonstrate tangible progress towards the creation of the new Garden Town community.
- 12.3 The revised Parameter Plans, updated Environmental Statement, refreshed supporting evidence and amended planning obligations package collectively demonstrate that the proposed development continues to be environmentally, socially and economically sustainable. The updates also ensure that the application reflects current national planning policy, contemporary technical guidance and operational changes within and around the site.
- 12.4 Otterpool Park remains a strategically significant allocation and a critical contributor to the long-term housing, employment and infrastructure needs of FHDC. The proposed development will continue to deliver substantial public benefits, including a significant supply of new homes, affordable housing, employment opportunities, community facilities, education provision, green infrastructure and transport investment. The updated delivery strategy further strengthens the ability of the scheme to contribute towards meeting both local and national housing objectives.
- 12.5 For these reasons, the updated application package should be considered acceptable in planning terms. The amendments proposed through this resubmission maintain the integrity of the approved Garden Town vision, enhance deliverability and support the timely provision of new homes and infrastructure. Accordingly, the updated Outline Planning Application continues to accord with the Development Plan when read as a whole, national planning policy and other material considerations, and should therefore be approved.

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APPENDIX A

EXTENT OF UPDATED SUBMISSION PACKAGE

Appendix A: Otterpool Park OPA submission documents

Ref	Document Title	Status	Submitted as part of this update	Comment
Application Administration				
OP1	Covering Letter	New	Yes	
OP2	Planning application fee	As existing	No	
OP3	Application form, CIL form, Certificates	As existing	No	
Environmental Statement				
OP4	Non-technical Summary	Addendum	Yes	
OP5	Environmental Statement	Addendum	Yes	
	Chapter 1 Introduction	Addendum	Yes	
	Chapter 2 EIA Approach and Methodology	Addendum	Yes	
	Chapter 3 Development and Consideration of Alternatives	Addendum	Yes	
	Chapter 4 The Site and Proposed Development	Addendum	Yes	
	Chapter 5 Agriculture and Soils	Addendum + Evidence	Yes	
	Chapter 6 Air Quality	Addendum + Evidence	Yes	
	Chapter 7 Ecology and Biodiversity	Addendum + Evidence	Yes	
	Chapter 8 Climate Change	Addendum + Evidence	Yes	
	Chapter 9 Cultural Heritage (+ Heritage Assets Added Plan; Events since 2022 Plan)	Addendum + Evidence	Yes	
	Chapter 10 Geology, Hydrology and Land Quality	Addendum + Evidence	Yes	
	Chapter 11 Human Health	Addendum + Evidence	Yes	
	Chapter 12 Landscape and Visual Impact	Addendum + Evidence	Yes	
	Chapter 13 Noise and Vibration	Addendum	Yes	
	Chapter 14 Socioeconomic effects and community	Addendum	Yes	
	Chapter 15 Surface water resources and flood risk	Addendum + Evidence	Yes	
	Chapter 16 Transport	Addendum + Evidence	Yes	

Appendix A: Otterpool Park OPA submission documents

	Chapter 17 Waste and resource management	Addendum + Evidence	Yes	
Environmental Statement Appendices (documents submitted in support but not for approval)				
OP5	Appendix 1.1 Figures	Updated	Yes	
	Appendix 2.1 Scoping Report	As existing	No	
	Appendix 2.2 Scoping Opinion	As existing	No	
	Appendix 2.3 Scoping Opinion Addendum	As existing	No	
	Appendix 2.4 Responses to overarching Scoping Opinion Comments	As existing	No	
	Appendix 2.5 Cumulative Assessment Scheme Information	Updated	Yes	
	Appendix 2.6 Commitments Register	Updated new document	Yes	
	Appendix 2.7 Infrastructure Assessment (regarding the permitted waste facility)	As existing	No	
	Appendix 2.9 Competent Expert Details	Updated new document	Yes	
	Appendix 4.4 Illustrative accommodation schedule	Updated	Yes	
	Appendix 4.5 Illustrative plans	As existing	No	
	Appendix 4.6 Indicative Phasing Plan	Updated new drawing	Yes	Updated to reflect changes in Parcel HT2 and to show outline of EHP area.
	Appendix 4.7 Off-Site Infrastructure Assessment	Addendum	Yes	
	Appendix 4.8 Utilities Strategy	Addendum	Yes	
	Appendix 4.9 Energy Strategy Addendum	Addendum	Yes	
	Appendix 4.10 Community Development and Facilities Strategy	Addendum	Yes	
	Appendix 4.11 Green Infrastructure Strategy Addendum	Addendum	Yes	
	Appendix 4.12 Heritage Strategy	Addendum	Yes	
	Appendix 4.13 Governance and Stewardship Strategy	As existing	No	
	Appendix 4.14 Housing Strategy (including affordable housing strategy)	As existing	No	
	Appendix 4.15 Overarching Delivery Management Strategy	As existing	No	

Appendix A: Otterpool Park OPA submission documents

Appendix 4.16 Design and Access Statement	New (addendum)	Yes	
Appendix 4.17 Outline Code of Construction Practice	As existing	No	
Appendix 5.1 Figures	Updated	Yes	
Appendix 5.2 Predictive ALC mapping log	New	Yes	
Appendix 5.3 Soil Management Plan	New	Yes	
Appendix 6.1 Figures	New	Yes	
Appendix 6.2 Model verification	New	Yes	
Appendix 6.3 IAQM Construction Phase Method	New	Yes	
Appendix 6.4 Dispersion Modelling Parameters	New	Yes	
Appendix 6.5 Operational Phase Local Air Quality Receptor Results	New	Yes	
Appendix 6.6 Operational Phase Local Ecological Transect Results	New	Yes	
Appendix 6.7 Canterbury AQMA No3 Sensitivity Test	Existing	No	
Appendix 6.8 Scenario 2 and 3 Operational Phase Local Air Quality Receptor Results	Existing	No	
Appendix 6.9 Operational Phase Scenario 2 and 3 Ecological Transect Results	Existing	No	
Appendix 6.10 Arcadis Monitoring	New	Yes	
Appendix 7.1 Survey Summary, Mitigation, Impact Assessment and ES Figures	Existing	No	
Appendix 7.2 Consultation and EIA Scoping	Existing	No	
Appendix 7.3 Habitat and Hedgerow Survey Report - Update to Include 2021 Survey Data	Existing	No	
Appendix 7.4 Arboricultural Scoping Report - Update to Include 2020 Survey Data	Existing	No	
Appendix 7.5 Desk study data from Kent and Medway Biological Records Centre	Existing	No	
Appendix 7.6 Reptile Survey Report - Update to Include 2020 Survey Data	Existing	No	
Appendix 7.7 Confidential Badger Survey Report - Update to Include 2020 Survey Data	Existing	No	

Appendix A: Otterpool Park OPA submission documents

Appendix 7.8 Hazel Dormouse Survey Report - Update to Include 2021 Survey Data	Existing	No	
Appendix 7.9 Great Crested Newt Survey Report - Update to include 2020 and 2021 Survey Data	Existing	No	
Appendix 7.10 Water Vole and Otter Survey Report - Update to include 2020 and 2021 Survey Data	Existing	No	
Appendix 7.12 Bat Activity Survey (Transects) 2017 and 2021	Existing	No	
Appendix 7.13 Bat Building Assessment and Emergence/Re-entry Surveys - Update to include 2020 and 2021 Survey Data	Existing	No	
Appendix 7.14 Bat Static Detector Surveys 2017 and 2021	Existing	No	
Appendix 7.15 Breeding Bird and Barn Owl Survey Report	Update	Yes	
Appendix 7.16 Wintering Bird Survey	Update	Yes	
Appendix 7.17 Invertebrate Scoping Report	Existing	No	
Appendix 7.18 Targeted Species Mitigation Strategies BADGER INFORMATION CONFIDENTIAL	Update	Yes	
Appendix 7.19 Habitats Regulations Assessment- Stage 1 and 2 (for Stodmarsh SPA, SAC and Ramsar Site)	Update	Yes	
Appendix 7.20 Biodiversity Action Plan (BAP) 2022 Update	Existing	No	
Appendix 7.21 Biodiversity Net Gain Calculations	Update	Yes	
Appendix 7.23 Otterpool Park Site Wide Ecological Update	New	Yes	
Appendix 7.24 CONFIDENTIAL Ecological Assessment Report Otterpool Park Waste-Water Treatment Works, Primary Substation and Integrated Constructed Wetlands	New	Yes	
Appendix 7.25 CONFIDENTIAL Otterpool Park 2023 Bat Survey Report	New	Yes	
Appendix 7.26 CONFIDENTIAL Badger Survey Results	New	Yes	
Appendix 7.27 Riparian Mammal Survey Report	New	Yes	

Appendix A: Otterpool Park OPA submission documents

Appendix 7.28 Phase 1 Mitigation Recommendations - Barn Owl	New	Yes	
Appendix 7.29 Phase 1 Mitigation Recommendations - Barn Owl	New	Yes	
Appendix 7.30 CONFIDENTIAL Badger Survey Results 2023	New	Yes	
Appendix 7.31 CONFIDENTIAL Phase 1 Mitigation Recommendations - Kingfisher and Black Redstart	New	Yes	
Appendix 7.32 Ecological Appraisal Report Otterpool Park Reservoir Spillway Works	New	Yes	
Appendix 8.1 - Carbon calculations	New	Yes	
Appendix 9.1 Cultural Heritage Figures	Update	Yes	Includes 2no new figures
Appendix 9.2 Cultural Heritage Desk Based Assessment 2016 and Addendum 2018	Existing	No	
Appendix 9.3 Otterpool Park Historic Landscape Characterisation and Farmsteads Analysis 2017, updated 2018	Existing	No	
Appendix 9.4 Otterpool Park Archaeological Appraisal and Fieldwork Strategy, 2017, Updated 2018	Existing	No	
Appendix 9.5 Otterpool Park Historic Buildings and Structures Appraisal, 2017, updated 2018	Existing	No	
Appendix 9.6 Westenhanger Castle Statement of Significance, 2017, Updated 2018	Existing	No	
Appendix 9.7 Prehistoric Barrows at Otterpool, Statement of Significance, 2018	Existing	No	
Appendix 9.8 Otterpool Roman Villa Statement of Significance, 2018	Existing	No	
Appendix 9.9 Cultural Heritage Consultation and Scoping Opinions, including Responses, Planning Policies, Baseline Sources	Existing	No	
Appendix 9.10 Otterpool Park, Kent Geophysical Survey - Headland Archaeology Report Ophk17, February 2018	Existing	No	
Appendix 9.11 Westenhanger Castle, Lympne, Kent Geophysical Survey - Headland Archaeological Report Whck17, February 2018	Existing	No	

Appendix A: Otterpool Park OPA submission documents

Appendix 9.12 Geophysical Survey Report, Otterpool Kent - Sumo Services Report 11903, January 2018	Existing	No	
Appendix 9.13 Geophysical Survey Report Former Lympe Airfield, Otterpool, Kent - Sumo Services Report 12992, July 2018	Existing	No	
Appendix 9.14 - Geophysical Survey Report, East of Lympe Industrial Estate, Otterpool, Kent - Sumo Services Report 12993, July 2018	Existing	No	
Appendix 9.15 Ground Penetrating Radar and Magnetometry Survey of the Roman Villa at Otterpool, Near Hythe, Kent - Magnitude Surveys October 2018. Report Mstr375	Existing	No	
Appendix 9.16 Otterpool Park, Sellindge, Kent - Desk Based Geoarchaeological Assessment of Pleistocene and Early Holocene Stratigraphy - Oxford Archaeological, August 2018, Ref 6784	Existing	No	
Appendix 9.17 Otterpool Park Lympe, Kent - Archaeological Watching Brief - Wessex Archaeology, November 2018, Ref 211110.03	Existing	No	
Appendix 9.18 Otterpool Park Evaluation Reports (Trial Trenching). Oxford Archaeology 2018 (Made up of 9 separate area reports)	Existing	No	
Appendix 9.19 Geophysical Survey Report - Wessex Archaeology 2020	Existing	No	
Appendix 9.20 Geoarchaeological Test Pit Report - Wessex Archaeology 2021	Existing	No	
Appendix 9.21 Trial Trenching Report - Wessex Archaeology 2021	Existing	No	
Appendix 9.22 Westenhanger Castle and its Landscape - Report by Paul Stamper 2020	Existing	No	
Appendix 9.23 Geophysical Survey Report (Resistivity) on the Site of the Roman Villa at Otterpool - Wessex Archaeology 2021Appendix 9.24 Geophysical Survey Report - Lyveden, Stone Street - Wessex Archaeology 2021	Existing	No	
Appendix 9.25 Conservation Management Plan	Existing	No	
Appendix 9.26 Schedule Monument Consent Decision	Existing	No	

Appendix A: Otterpool Park OPA submission documents

	Appendix 9.27 Wessex Archaeology Castle Causeway Evaluation Report 2022	New	Yes	
	Appendix 9.28 Stantec WwTW Geophysical survey Report 2023	New	Yes	
	Appendix 9.29 Stantec WwTW Geophysical Survey Report 2025	New	Yes	
	Appendix 9.30 Wessex Archaeology Phase 1 Infrastructure Evaluation Report 2023	New	Yes	
	Appendix 9.31 Ecus Ltd Eastern Part of WwTW Evaluation Report 2025	New	Yes	
	Appendix 9.32 Sumo UAS Landscape Survey Report 2023	New	Yes	
	Appendix 9.33 Stantec Folkestone Racecourse Built Heritage Assessment Report 2023	New	Yes	
	Appendix 9.34 Stantec Nissen Hut Built Heritage Assessment Report 2023	New	Yes	
	Appendix 9.35 Stantec White House Built Heritage Assessment Report 2024	New	Yes	
	Appendix 9.36 Wessex Archaeology Geoarchaeological and Archaeological Watching brief on Phase 1 GI work 2023	New	Yes	
	Appendix 9.37 Stantec Otterpool Spillway Archaeological and Geoarchaeological Monitoring Report 2026	New	Yes	
	Appendix 10.1 Ground conditions report	Existing	No	
	Appendix 10.2 Figures	Existing	No	
	Appendix 10.3 Ground Investigation Factual Report	New	Yes	
	Appendix 10.4 Soil Screening Sheets	New	Yes	

Appendix A: Otterpool Park OPA submission documents

	Appendix 10.5 Phase 1 Ground Condition Assessment	New	Yes	
	Appendix 11.1 Health Impact Assessment	Addendum	Yes	
	Appendix 11.2 Retail Impact Assessment Addendum	Addendum	Yes	
	Appendix 12.1 Site Specific Landscape Character Assessment	Existing	No	
	Appendix 12.2 Landscape Character and Visual Amenity Impact Assessment Tables	Existing	No	
	Appendix 12.3 Figures	Existing	No	
	Appendix 12.4 Minutes of Meeting with F&HDC and AONB Unit 31 July 2018	Existing	No	
	Appendix 12.5 Kentish Vernacular Study and Colour Studies	Existing	No	
	Appendix 13.1 Noise and Vibration Legislation, Policy and Technical Guidance	Existing	No	
	Appendix 13.2 Short-term Monitoring Datasets	Existing	No	
	Appendix 13.3 Noise and Vibration Figures	Existing	No	
	Appendix 13.4 Further Traffic Noise Sensitivity Tests	Existing	No	
	Appendix 14.1 Economic Strategy	Addendum	Yes	
	Appendix 15.1 Flood Risk Assessment & Surface Water Drainage Strategy Addendum	Update	Yes	
	Appendix 15.2 Water Cycle Study	Update	Yes	
	Appendix 15.3 Water Framework Directive (WFD) Screening Assessment	Existing	No	
	Appendix 15.4 Figure 15.1 Study Area	Existing	No	

Appendix A: Otterpool Park OPA submission documents

	Appendix 15.5 Land at Hillhurst Green Drainage Technical Note	New	Yes	
	Appendix 16.1 Transport Figures	Existing	No	
	Appendix 16.2 Collision Data	Existing	No	
	Appendix 16.3 Collision Analysis Technical Note	Existing	No	
	Appendix 16.4 Transport Assessment	Addendum	Yes	
	Appendix 16.5 Transport Strategy	Updated	Yes	
	Appendix 16.6 Framework Travel Plan	Updated	Yes	
	Appendix 16.7 EHP Transport Assessment	New	Yes	
	Appendix 16.8 EHP Travel Plan	New	Yes	
	Appendix 17.1 Waste strategy	Updated	Yes	
	Appendix 17.2 Minerals Resource Assessment	As existing	No	
	Appendix 17.3 Outline Site Waste Management Plan	Updated	Yes	
Documents submitted for approval				
OP5	Appendix 2.8 Updated Parameter Plans (with permitted waste facility in situ)			Withdraw as "Alternative" scenario no longer needed
	Appendix 4.1 Development Specification	Updated	Yes	
	Appendix 4.2 Redline boundary	As existing	No	Parameter Plans show waste facility in situ
	Movement and Access Parameter Plan	New	Yes	
	Open Space and Vegetation Parameter Plan	New	Yes	
	Building heights Parameter Plan	New	Yes	
	Early Homes Parcel redline boundary	New	Yes	
	Appendix 4.3 Strategic Design Principles	Updated	Yes	
OP17	Early Homes Parcel - Design Principles	New	Yes	Includes Early Homes Statement

Appendix A: Otterpool Park OPA submission documents

Documents Submitted in Support but not for formal approval				
OP6	Guide to the planning application	Updated	Yes	
OP7	Spatial vision	Existing	No	
OP8	Planning and Delivery Statement	New (addendum)		New document prepared by DLA but as addendum to existing document
OP9	Sustainability statement	Addendum	Yes	
OP10	Monitoring and Evaluation Framework Document	Existing	No	
OP11	Mobility vision report	Existing	No	
OP12	User-centric Travel Document	Existing	No	
OP13	Access and Movement Mode Share Targets			Withdrawn. Relevant information is contained with the Transport documents at Appendix 16.
OP14	Cultural and Creative Strategy	Existing	No	
OP15	Statement of Community Involvement	Existing	No	
OP16	Supplemental Statement of Community Involvement	Existing	No	

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APPENDIX B

COPY OF JUNE 2026 PUBLIC EXHIBITION BOARDS



OTTERPOOL PARK
COUNTRYSIDE • CONNECTED • CREATIVE

Welcome

**Thank you for coming to our public exhibition
about the next steps for Otterpool Park.**

Otterpool Park is a new garden town that will deliver up to 8,500 high-quality homes alongside the supporting infrastructure to create a sustainable and successful new community.

In April 2023, a resolution to grant planning permission for Otterpool Park was secured from Folkestone & Hythe District Council's Planning & Licensing Committee.

Full planning approval has not yet been issued and, given more than three years has passed since that Committee resolution, Otterpool Park LLP, the master developer leading the project, is preparing to submit additional and updated information to the Local Planning Authority later this year.

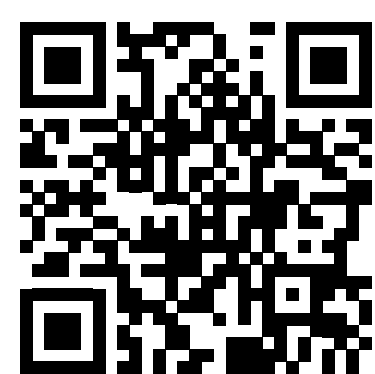
The information will reflect changes in policy, legislation and guidance that have progressed since 2023, as well as updated survey information.

The information will also reflect progress that has been made across key areas, helping to accelerate delivery of the garden town.

This will enable a planning approval to be issued and allow the project to move forward.

We are holding this event to share with the local community the details of the information that is to be submitted, and the next steps in the process.

Talk to our team to find out more.



SCAN ME

www.otterpoolpark.org



Vision

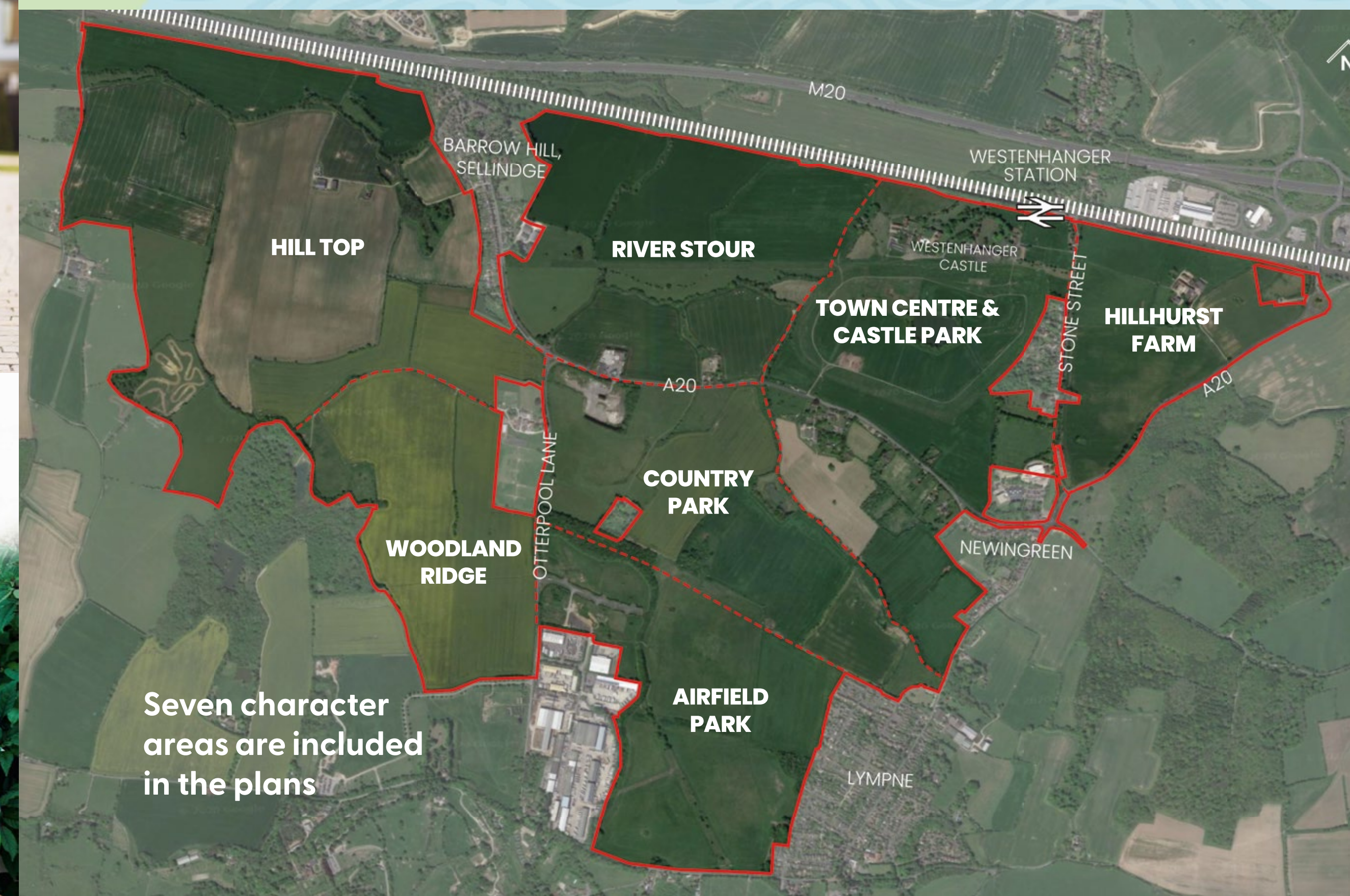
Otterpool Park is a new garden town that will deliver up to 8,500 high-quality homes alongside the supporting infrastructure to create a sustainable and successful new community.

Our vision is for a landscape-led, high-quality place of exemplary design and high sustainability standards.

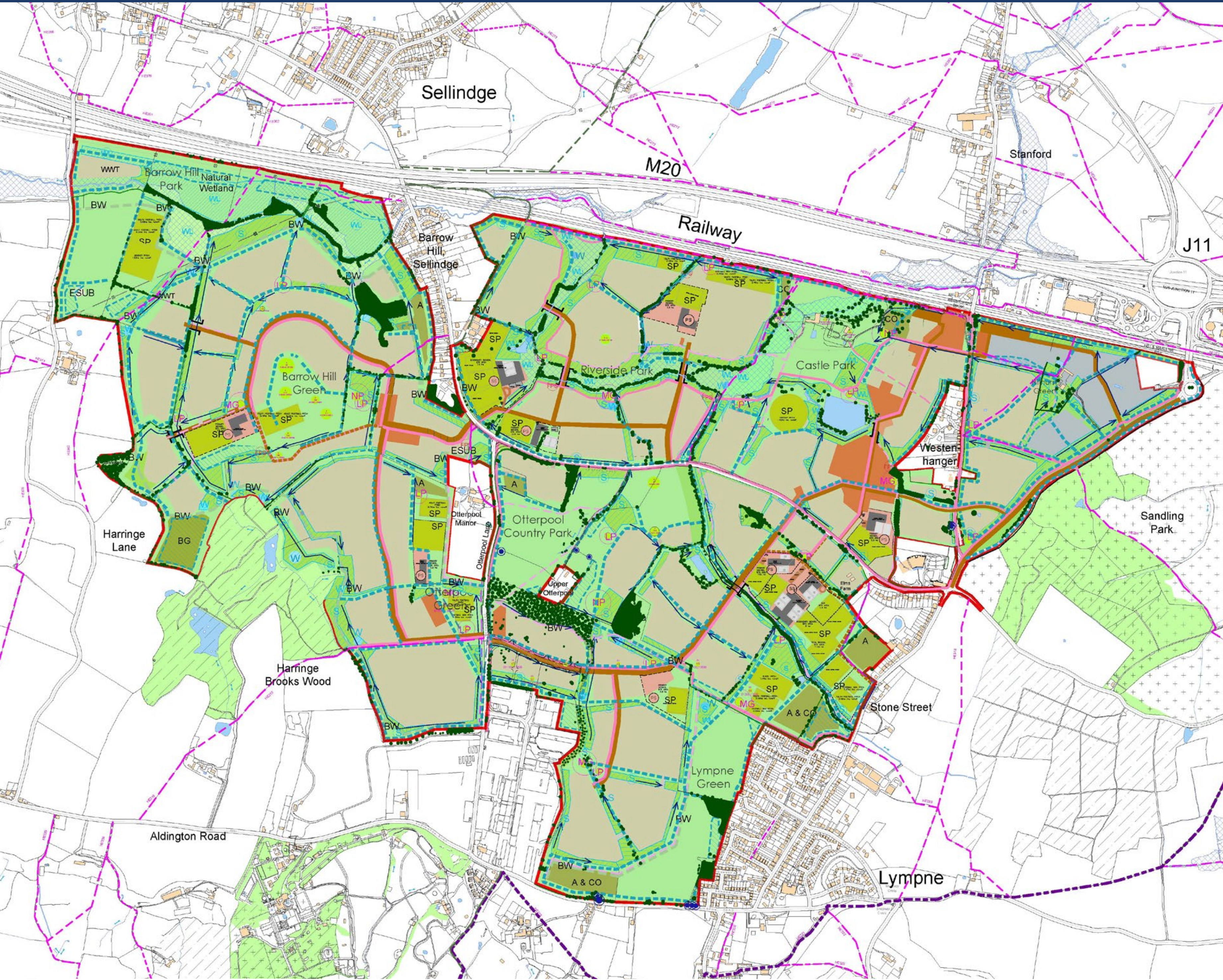
This vision for a future place is captured in the Charter for Otterpool Park. The updates to the planning application do not change this overall vision and Otterpool Park LLP remains committed to its delivery.



You can read more about our Vision and the Charter for Otterpool Park on our website or ask our team for more details.



Submitted Illustrative Masterplan



- Existing**
- Existing Communities & Buildings
 - Existing Rivers, Streams and Ponds
 - Existing Woods
 - Existing Ancient Woodlands
 - Existing Registered Parklands
 - Existing Footpaths
 - Existing Bridleway
 - Existing Saxon Shore Way
 - HV cables
 - Existing Flood Zone 2 + 3
- Proposed**
- Proposed Development Areas
 - Proposed Green Infrastructure
 - Proposed Primary Cyclepaths & Footpaths
 - Proposed Primary Roads
 - Proposed Bridge Crossing over Water Course
 - Proposed Cyclepaths & Footpaths
 - Proposed Bus and Emergency Routes
 - Existing Scattered Trees
 - Existing Hedgerows and Tree Groups
 - Existing Trees with TPO
 - Proposed Bus and Emergency Routes & Proposed Cyclepath and footpath
 - Proposed Bridleway
 - Proposed Community Orchards
 - Proposed Burial Ground area
 - Proposed Allotments
 - Proposed Sports Pitch areas
 - Proposed Play areas
 - Location of Heritage Feature
 - Proposed areas of structure planting
 - Proposed rows of structure planting
 - Proposed Secondary School
 - Proposed Primary School
 - Mixed use Local Centres
 - Proposed Business development area
 - Proposed Wetlands
 - Proposed SUDS Water Management
 - Proposed Conveyance Swales
 - Proposed Foul Pump Station
 - Proposed Water Feature
 - Proposed Waste Water Treatment Infrastructure and Pipes
 - Proposed Electricity Sub Station
 - Application Red Line

Up to 8,500
homes

A thriving
new garden town

50% open space

Community
spaces

Schools and
other education
opportunities

20% biodiversity
gain

A sustainable
transport system

Jobs and
employment
spaces

What's changing and what's not

Things have moved on since the council resolved to grant planning permission in 2023. Submitting this updated information aims to accelerate delivery of the first homes at Otterpool Park.

The updates include any changes in policy, legislation and guidance, as well as updated survey information.

What will the updates to the planning application do?

The updated application provides a strong yet adaptable structure to guide decisions as the project progresses. It will:

- **Reflect new policies and guidance** that have emerged since the last committee decision three years ago.
- **Update mitigation measures** so they match the latest surveys and evidence.
- **Increase flexibility** so the development can adapt where appropriate as it progresses.
- **Accelerate delivery of the first homes**, helping the project move from planning into delivery.



There are no changes to:

- The site's red line boundary
- The description of the development
- The number of homes proposed or the key principles of the development
- The objectives of the Otterpool Park Charter
- The fundamentals of the Parameter Plans and Development Specification

Updates to the Development Specification & Strategic Design Principles

These documents guide how the whole development will come forward. They have been updated to:

- Simplify and streamline the text by removing duplication and making the information easier to follow.
- Reflect the tiered planning structure, which allows for further detail as the project evolves over time.
- Allow flexibility in the housing mix, recognising that needs will evolve over the lifetime of Otterpool Park.

- Show how the first homes at Otterpool Park will be delivered and how these homes fit into the wider masterplan.
- Update the approach now that the waste facility at Otterpool Quarry is operational, meaning only one set of parameter plans is needed.

We have also updated the Environmental Statement and Mitigation Matters so they match the updated documents, including the plans for the first homes. These updates also reflect any changes in the environment and in national policy, legislation and guidance.

Parameter Plans

The Parameter Plans are the high-level plans that set the key principles for how Otterpool Park can be developed. The three Parameter Plans are:

Open Space and Vegetation

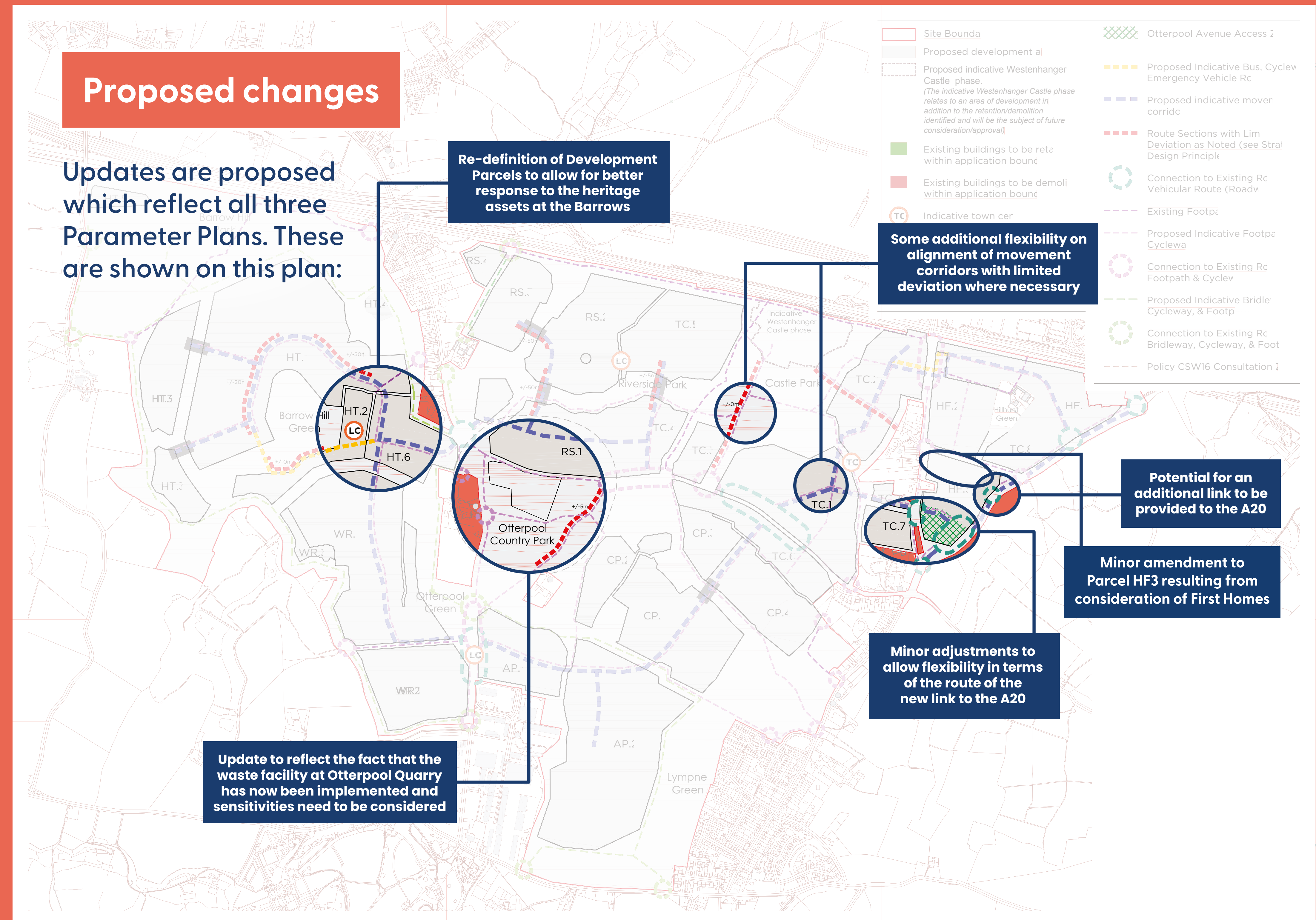
Setting out the new green spaces, planting, woodlands and trees.

Movement and Access

Identifying the new roads, footpaths, bridleways and cycleways.

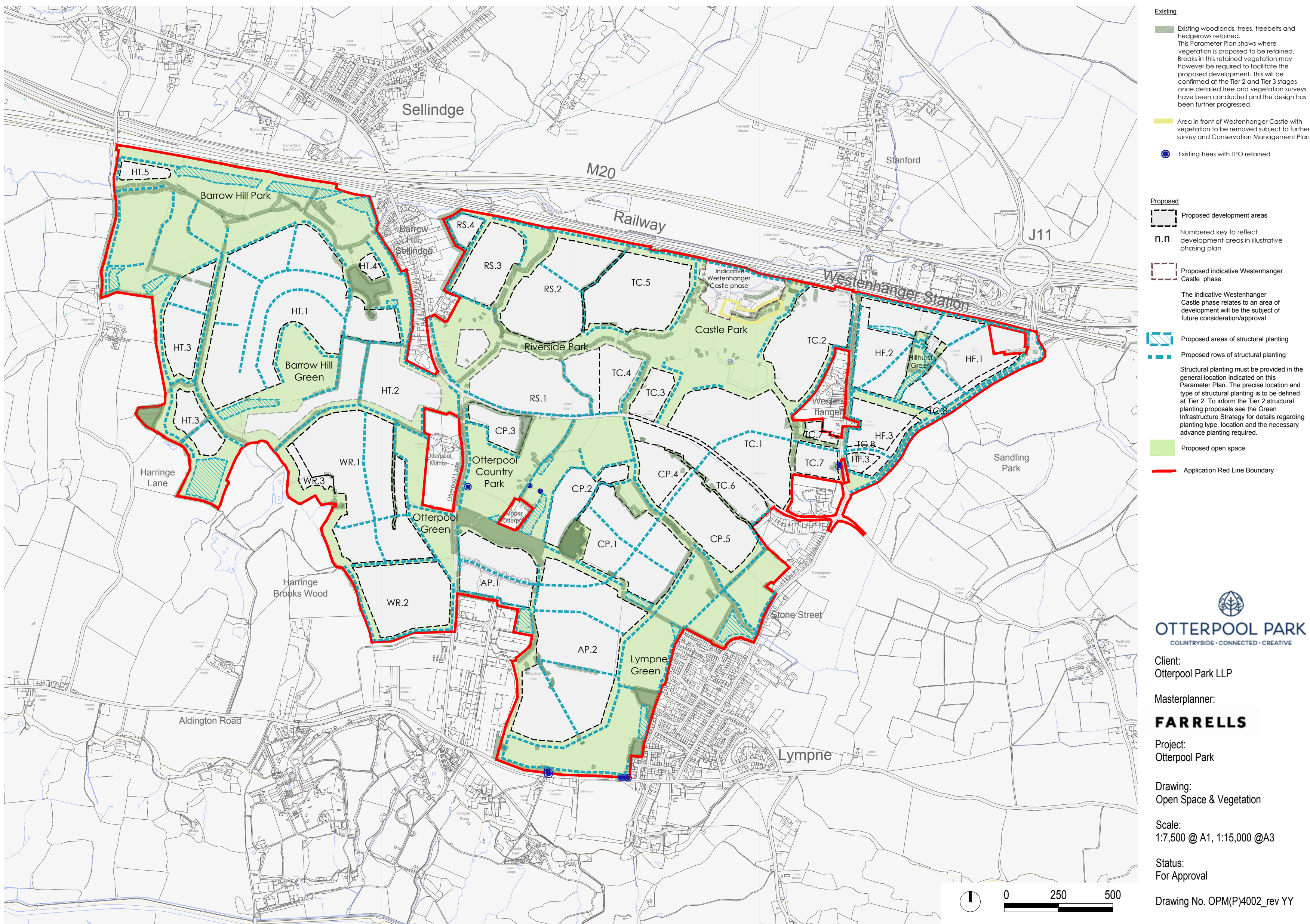
Building Heights

Setting the scale of new buildings within the identified development areas.



Open Space and Vegetation

Original

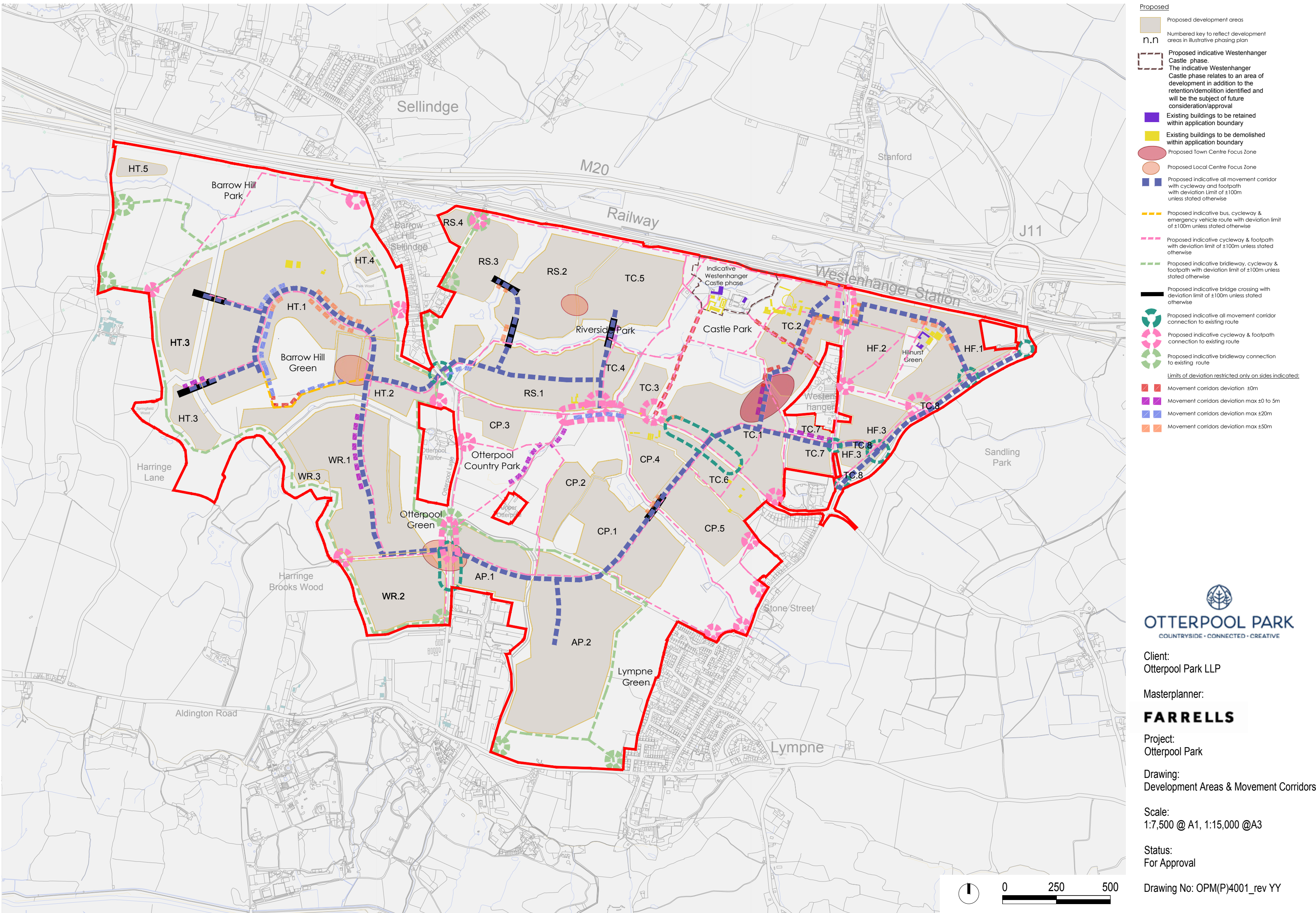


Updated



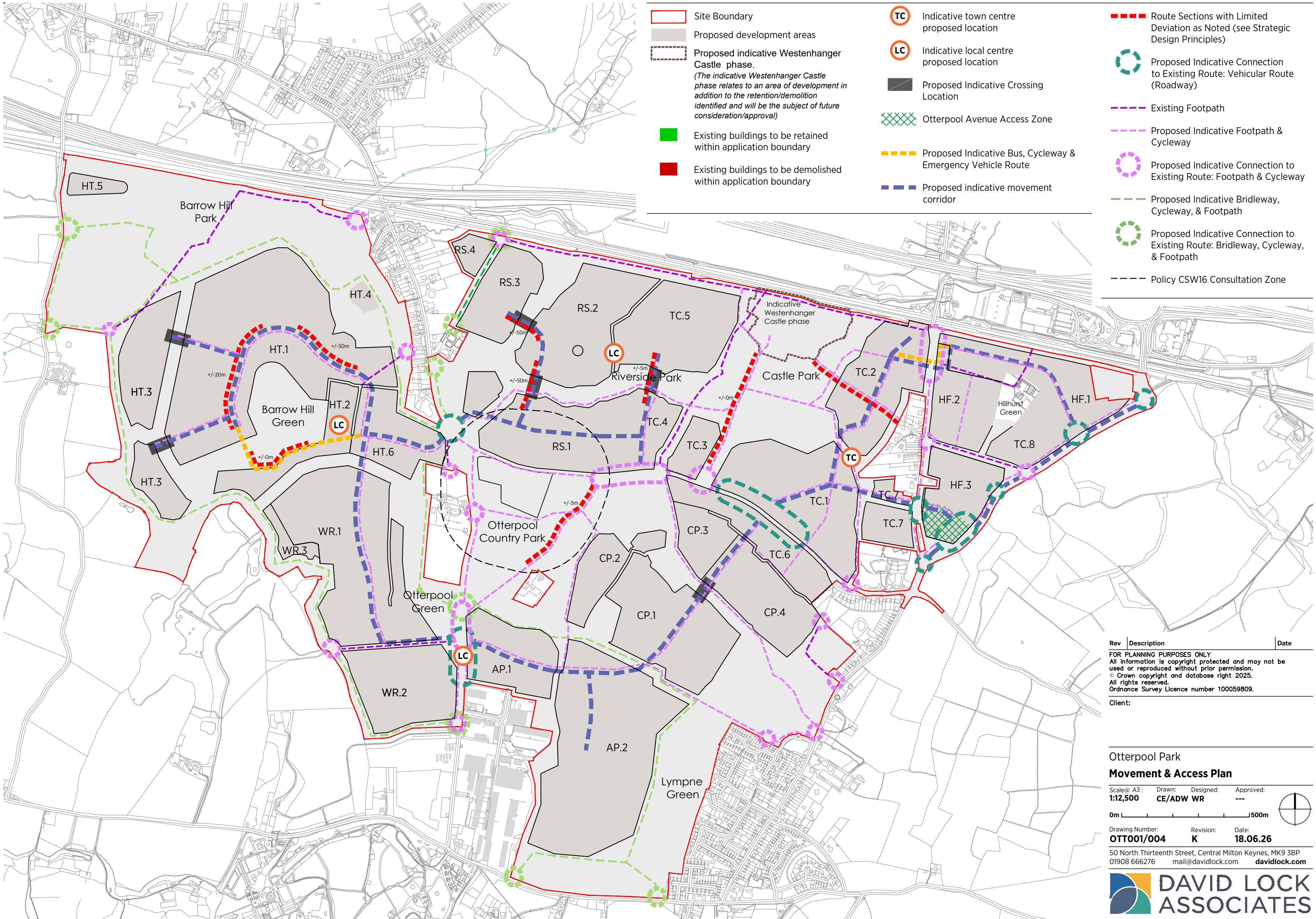
Movement and Access

Original



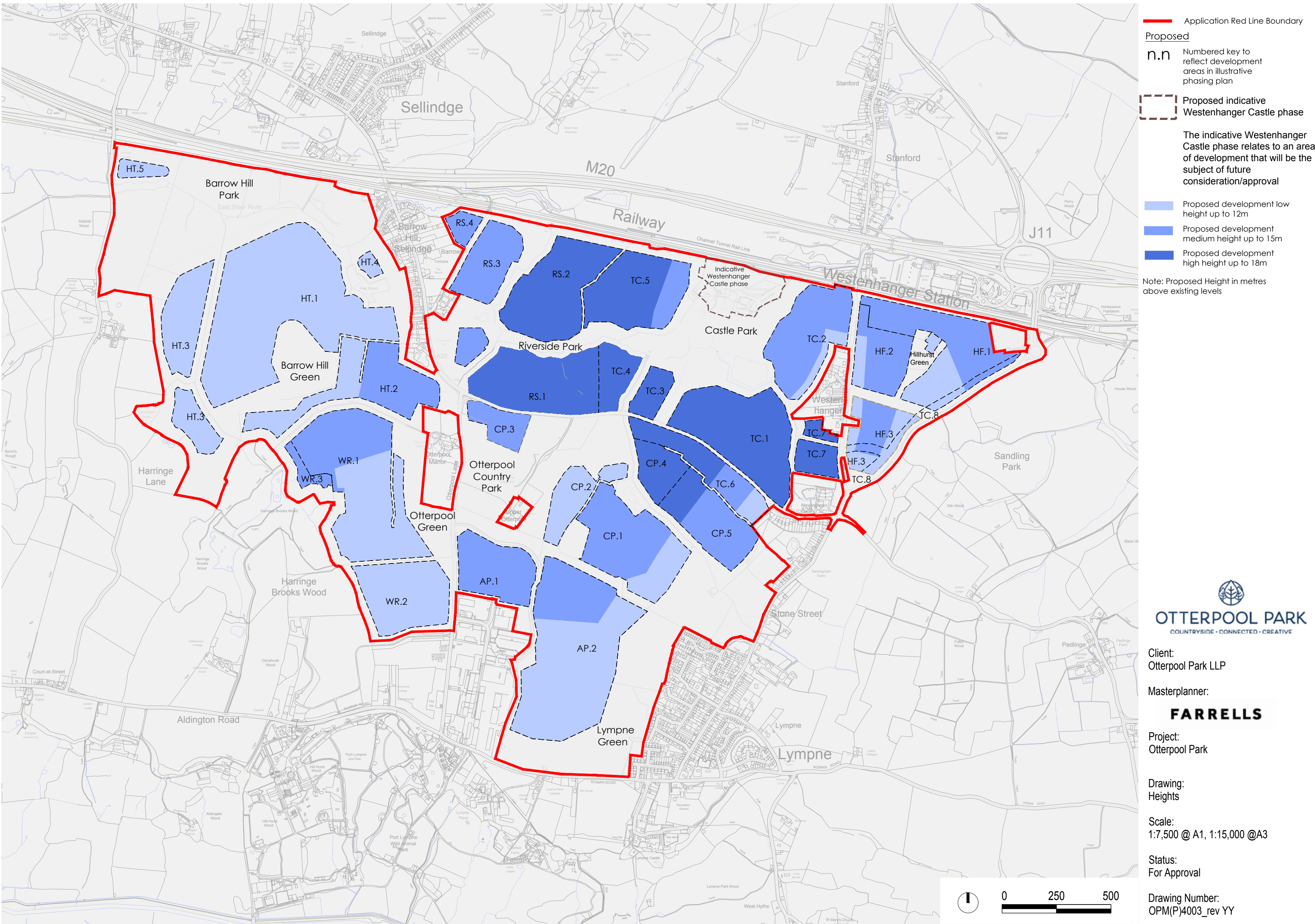
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Updated



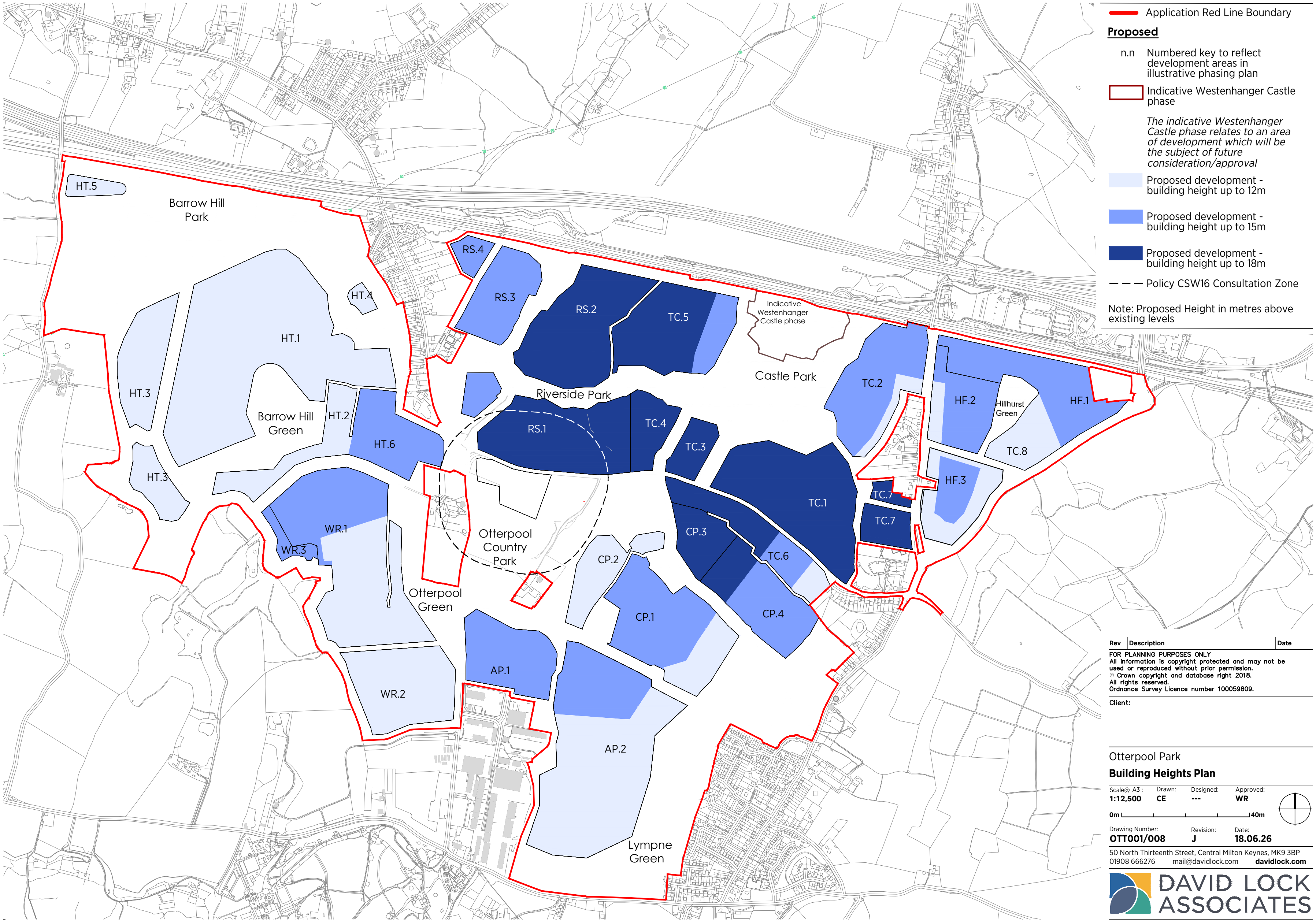
Building Heights

Original



ALL DIMENSIONS, LEVELS, COORDINATES, SETTING OUT, TO BE CHECKED ON SITE AND ANY DISCREPANCY REPORTED IMMEDIATELY TO THE ARCHITECT AND PROJECT MANAGER.

Updated



Rev | Description | Date

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Client:

OTterpool Park
Building Heights Plan

Scales: A3: 1:12,500 Drawn: CE Designed: --- Approved: WR

0m 140m

Drawing Number: OTT001/008 Revision: J Date: 18.06.26

50 North Thirteenth Street, Central Milton Keynes, MK9 3BP
01908 666276 mail@davidlock.com davidlock.com

DAVID LOCK ASSOCIATES

First homes at Hillhurst Green

Otterpool Park has been planned to help meet both local housing needs and the wider national demand for new homes. Bringing forward the first homes will contribute to the Folkestone and Hythe District's immediate and long term housing requirements.

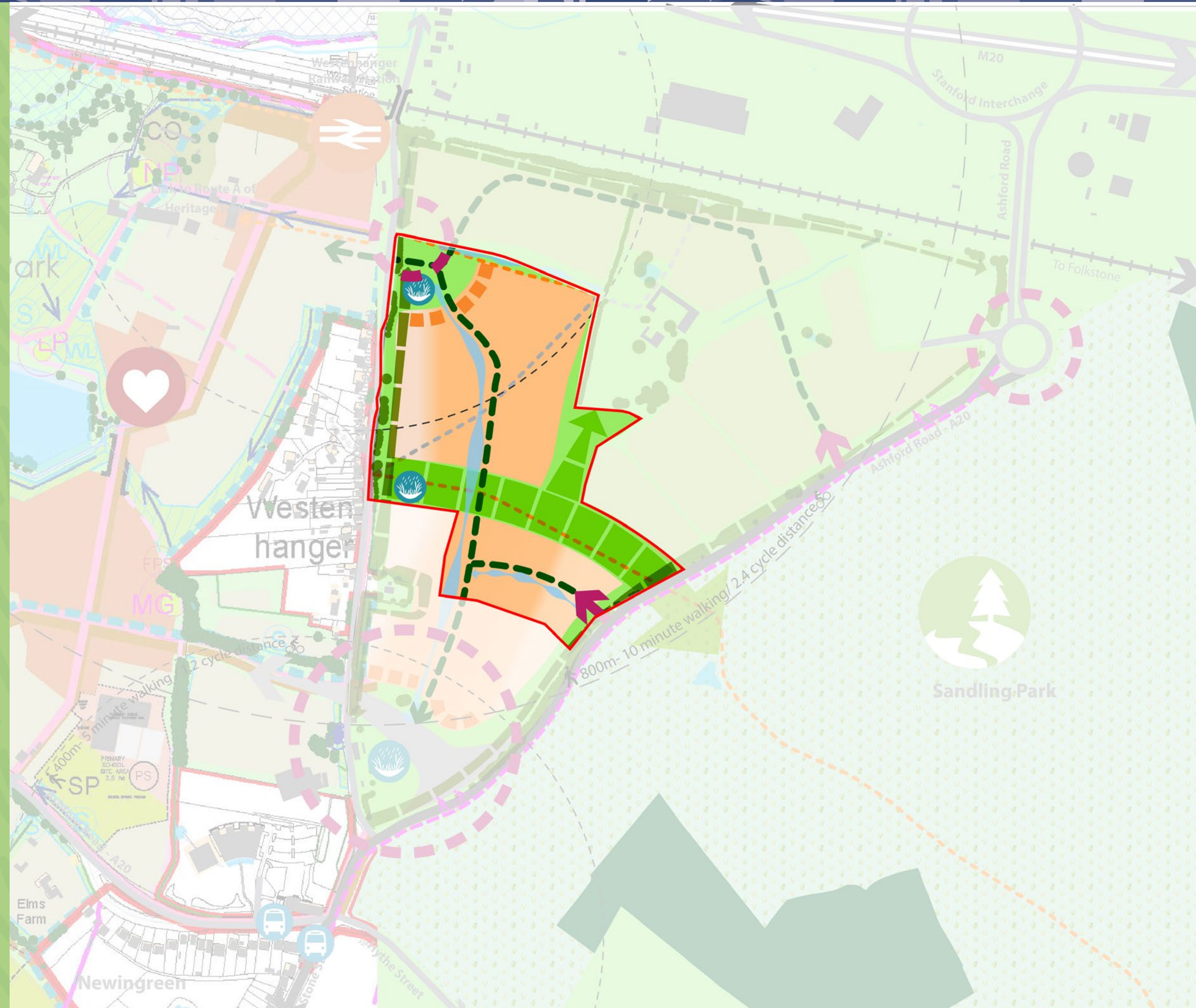


THE FIRST 300 HOMES

will be a mix of housing types and will be located in the Hillhurst Green character area to the north-east of the Otterpool Park site.

Proposals for the first homes will be subject to public consultation before a reserved matters application that will set out the detail of the first homes is submitted to the Local Planning Authority.

The updated submission information will include documents setting out the principles for the area of first homes at Otterpool Park.



- | | | | |
|------------------------------|----------------------------|--|-----------------------|
| Indicative EHP Site Boundary | Swales | Gateway | Otterpool Avenue |
| Development Area | Green Corridor/ Links | Public Right of Way | Bridge over railway |
| Employment / Mixed use | Landscape Buffer | Potential Public Right of Way to be re | 400m Walking Distance |
| Gateway Frontage | Motorway | Railway | 800m Walking Distance |
| Open Space | A20 | Railway Station | |
| Existing Trees and Hedgerows | Main Roads | Community Heart | |
| Ancient Woodland | Proposed Infrastructure | Existing Bus Stops | |
| Sanding Park | Potential Vehicular Access | Ped/Cycle Route | |
| Attenuation Basins | | | |

First homes at Hillhurst Green

Why are the first homes located here?

The first homes are positioned close to Westenhanger Station and have direct access to the A20. This helps future residents travel easily while reducing traffic impacts on existing communities.

What else will be delivered with the first homes?

There will be key infrastructure including new roads and footpaths, landscaping and water-management features, new habitats, open space and tree planting. Improved access is also planned for the rail station.

Will there be a school?

The estimated number of pupils generated by occupants of the first homes will not trigger the need for a new school. Instead, contributions to existing schools will be made, along with investment in public transport to help children travel safely to and from school.



Will there be any shops?

There are no permanent shops planned within the first homes area, as it sits outside the designated local and town centres for Otterpool Park. However, temporary community shops are being explored to support both new and existing residents.

How will you make sure the design of the first homes area is high quality?

All first homes must meet the design aspirations set out in the Otterpool Park Vision, Charter and Design Principles. A Design Brief is also being prepared and will be submitted as part of the Outline Planning Application update for consultation.

What technical work is being carried out on this area to assess its suitability for new housing?

Survey work on drainage, power, ecology and highways impact is already well underway to ensure that this area of the site can come forward with minimal disruption to the community.

When will the first homes be ready?

This depends on the planning process, but Otterpool Park LLP aims to begin delivering the first homes by 2028/29.

Early infrastructure

Essential early infrastructure, including a wastewater treatment works, associated wetlands and a primary substation will support the community’s needs, ensure sustainable water management and safeguard environmental standards.

This will be located in the north-west corner of the Otterpool Park site.

Public consultation activity was undertaken before the submission of the planning application, and the plans were approved by Kent County Council in April 2026. This marked a major milestone towards delivery.



WASTEWATER TREATMENT WORKS

Treating foul water from the Otterpool Park development.



WETLANDS

Creating a publicly accessible landscaped area with footpaths, boardwalks and wildlife.



PRIMARY SUBSTATION

Providing electricity to the Otterpool Park development.



Legend

	Proposed Planning Application Boundary		Wetland reed beds		View arrows		Proposed footpath connections to wider future development
	Existing vegetation retained		Access road		Public Right of Way (existing)		Vehicular access
	New planting		Boardwalks		Public Right of Way (diverted)		Overhead power cables

Landscape Elements

	Phase 1 wetlands (Ponds 1-3)		Phase 3 wetlands (Ponds 8-10)
	Phase 2 wetlands (Ponds 4-7)		Structural planting plots

Thank you for coming

We hope you have found the information presented today to be helpful and that it has provided you with a good understanding of the next steps for Otterpool Park.

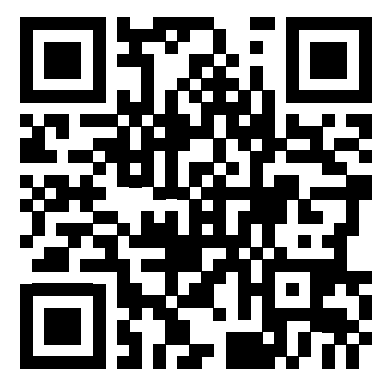
The updated information will be submitted later this year, and we will keep you informed as this progresses.

The Local Planning Authority will be seeking feedback from the local community following the submission of the finalised information. That feedback will be taken into account as part of their review and decision making process.

Further details for the first 300 homes – including elements such as materials, street lighting, planting and other design elements – will be considered through a Reserved Matters Application, expected in late 2027.

You can continue to keep up-to-date by finding out latest news on the Otterpool Park website.

Our team are happy to answer any further queries.



SCAN ME

www.otterpoolpark.org



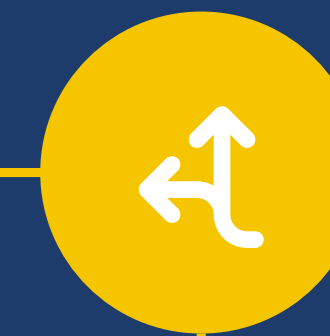
Next steps



Late 2026: updated information submitted to Local Planning Authority



Public and consultees to be invited to comment on information by Local Planning Authority



Decision on application from Local Planning Authority



Consultation on first homes



Late 2027: Reserved Matters / detailed designs submitted for the first homes



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APPENDIX C

RESPONSES TO PLACE PANEL AND FHDC COMMENTS

Appendix C Responses to EHP design comments

Key comments to the EHP	
LPA comment	Applicant response
The proposal is not sufficiently design-led, landscape-led or context-led, and currently reads as a generic suburban layout rather than a distinctive first phase for Otterpool Park.	The preparation for the OPA was 'landscape-led' from the outset with Arcadis and other project team members consulting the public, statutory bodies and the LPA to agree an approach. This approach was supported by the LPA and this resulted in the content of the Otterpool Park Parameter Plans, Development Specification, Strategic Design Principles, Green Infrastructure Strategy and other supporting documents to be recommended for approval at Committee. The proposal for Hillhurst Farm – Residential and the EHP has been developed as a landscape-led masterplan, in conformity with the LPA accepted Parameter Plans. It uses the Site's existing landform, landscape assets, ecological features and movement corridors as the primary structuring elements of the development. The EHP Design Principles Document (DPD) explicitly identifies landscape as underpinning the design vision, with a green and blue framework formed by existing natural features, new ecological corridors, strategic planting and SuDS infrastructure. The indicative Illustrative Masterplan is organised around interconnected green spaces, landscape corridors and public open spaces that shape development parcels and movement patterns, rather than being retrofitted around housing parcels. The proposal also responds to local context through its character areas, architectural influences, heritage assets, and relationship to surrounding settlements, creating a distinctive neighbourhood that reflects the wider Garden Town aspirations set out for Otterpool Park rather than a conventional suburban layout.
The scheme does not adequately respond to the wider Otterpool Park vision, garden town principles, historic landscape setting, topography, watercourses and settlement patterns.	The EHP DPD has been prepared in accordance with the Committee approved Otterpool Park Parameter Plans, Development Specification, Strategic Design Principles, Green Infrastructure Strategy and other supporting documents. These documents have set the Tier 1 requirements in terms of approved design, principles and a defined and agreed approach to historic landscape setting, topography, watercourses and settlement patterns. The proposed EHP scheme and DPD is in accordance with these documents. The proposal has been informed by the Garden Town Principles, which promote the creation of sustainable and distinctive places shaped by landscape, community and environmental stewardship. These principles encourage a balanced mix of homes, high-quality green infrastructure and strong social connections, ensuring that development delivers lasting benefits for residents while respecting and enhancing the surrounding natural environment. The overarching objective is to create healthy communities that successfully integrate the best qualities of town and country living. These principles are achieved within EHP Design Principles Document as explained below: • The proposal responds directly to the Committee approved design principles and Site's historic and landscape context through the retention and enhancement of existing hedgerows, trees, public rights of way, Hillhurst Farm and the historic Stone Street corridor.

Appendix C Responses to EHP design comments

	• The proposal promotes multi-functional open spaces, accommodating spaces for social cohesion, ecology corridors, drainage features and landscaped areas. • The Site's undulating topography has informed street alignment, development parcels, building heights and drainage design, while the landscape framework integrates water management and biodiversity enhancement into the overall masterplan. Rather than following the contours of the hill with development wrapping around the slope, the design approach has been to step the built form down the hillside. This creates a distinctive roofscape that responds directly to the Site's topography and reinforces the experience of the land rising towards the hill. In addition, the principal street has been aligned broadly along the contours to provide a comfortable and attractive route for walking and cycling. As the route approaches the station, it transitions down the slope before adopting a more meandering alignment to the south. Together, these design responses create an engaging experience of the Site's topography, allowing residents and visitors to appreciate the changing landscape as they move through the development. This approach seeks to work with the natural landform and will create a distinctive sense of place rooted in the character of the Site. The concept also establishes a transition from the more urban character associated with Westenhanger Station and the future Town Centre towards the softer rural character of the countryside edge, reflecting surrounding settlement patterns and landscape character.
The layout is too heavily influenced by roads, housing capacity and car movement, rather than by landscape structure, place-making, walking, cycling and public realm.	The movement strategy develops the principles set out in the Committee approved Tier 1 proposals. It seeks to prioritise active travel, pedestrian connectivity and placemaking above vehicular movement. The EHP DPD identifies sustainable modes of transport such as walking, cycling and public transport as the preferred means of travel and demonstrates their connection with Westenhanger Station and the existing and future destinations identified in the wider area. These sustainable modes of transport are supported by an extensive network of green corridors, shared surfaces, greenways, filtered permeability routes and pedestrian-priority environments which were defined at Tier 1 and have been refined at Tier 0. Strategic vehicular access points and routes which will connect into future phases of Otterpool Park, are positioned away from the residential core to support a walkable neighbourhood, while the street hierarchy has been designed around creating character, community interaction and safe movement rather than maximising vehicle capacity. Low-traffic neighbourhood principles have been incorporated throughout the development, discouraging through traffic and prioritising active travel experiences and streets as places principles such as – urban squares with resting spaces, pocket greens, specific lightning and public realm pavements to encourage social activities and pedestrian/cycle movement.
The transition between the rural edge, future town centre, Westenhanger Station, Stone Street and surrounding settlements has not been satisfactorily resolved.	The proposal establishes a series of carefully considered transitions across the Site: • Character areas respond to their location and context influences, with the Station Approach (north of the site) providing a denser and more urban gateway close to Westenhanger Station and the future mix-use development areas, while the Fold Yard and Oak Hythe areas (south of the site) adopt more informal and rural characteristics.

Appendix C Responses to EHP design comments

	Landscape character areas, advanced planting, green corridors and open spaces create gradual transitions between the development, Stone Street, Sandling Park and the wider countryside. This is reflected into landscape treatment and green spaces design which has been guided by the Green Infrastructure Strategy and Advance Mitigation Planting Proposals and other landscape and visual mitigation proposals which were set out in the ES. The EHP DPD has been designed to be cognisant of the need to transition from the rural edge adjacent to Sandling Park and the Kent Downs National Landscape, to a higher density moving west. The inclusion of tree lined corridor along the A20 provides a high-quality landscape gateway to the development. The inclusion of the East-West corridor and other green areas within the EHP boundaries aligns with the wider Otterpool Vision. The design principles specifically describe a progression from an urban station-focused character to a softer rural edge, reinforced through building form such as - setbacks, the degree of openness (use of apartments, terraced, semi-detached and detached dwellings to reflect the relationships with the edges and the internal hierarchy of spaces), density, building heights, public realm treatment inside the development parcels.
The reduced east-west green/wildlife corridor is a concern; both officers and the Panel consider that green infrastructure should play a stronger structuring role across the site.	The East-West corridor is a defining feature as set out on the Committee approved Open Space and Vegetation Parameter plan. It is one of the structuring landscape features of the masterplan and plays a central role in organising the development. The corridor incorporates all the elements as originally defined in the Committee approved outline proposal including a significant tree belt, ecological dark corridor, enhanced public right of way, biodiversity habitats, open space and integrated SuDS features. It is designed to support wildlife movement, habitat connectivity, biodiversity net gain and sustainable drainage, whilst also providing a major recreational and movement corridor for residents. The landscape strategy in the DPD identifies this corridor as a key structuring element of the site and reinforces its role through additional planting, habitat creation and multifunctional green infrastructure. The corridor is reduced only on a short segment at its narrowest point to a size still permitting functional integrated components (drainage, tree belt, ecology and biodiversity, active movement) and still within the thresholds set within the approved Parameter Plans. In the location where the corridor is at its narrowest the built form responds positively through bigger frontage setbacks and car-free interface with the corridor. In other areas the east-west corridor increases to 50m and over 60m in other locations. These adjustments to the East-West corridor have been considered in the Landscape and Visual and Visual Impact Assessment submitted as part of the updated application package and demonstrates that the proposed corridor dimension sufficiently mitigate the landscape and visual impacts as per the conclusion in the original application.
Stone Street should be integrated positively into the development, with homes and landscape fronting onto it rather than backing away from it.	The masterplan responds positively to the existing eclectic character of Stone Street through a combination of lower-scale buildings and a varied architectural language, focusing in achieving a transition from a formal urban character to the north (Station) towards a rural character in the south.

Appendix C Responses to EHP design comments

	This reflects the established character of the corridor and helps create a development that is rooted in its local context. The Illustrative Masterplan adopts a nuanced response, incorporating a variety of relationships between development and Stone Street, reflecting the diverse and organic pattern of development that already exists along its length. The proposed design approach, centred on a tree-lined street environment with no additional vehicular traffic, is both aligned with and supportive of the aspirations set out in the strategic documentation –i.e a proposed open space (green buffer) along its length and a cycleway character. This approach reinforces the landscape character of Stone Street, protects its ecological value and delivers a more attractive setting for walking and cycling, while remaining consistent with the Garden Town vision. Thus, as identified within wider Otterpool Park strategies, the proposal recognises Stone Street as an important historic development feature with a strong rural edge character and seeks to integrate it positively into the masterplan based on placemaking principles. The Site's western edge strategy responds directly to the character of Stone Street through landscape-led frontage treatments: • retaining and enhancing existing vegetation with structural planting, • providing a multifunctional open space acting as the spine of the street and integrating social opportunities such as - play, resting and recreational areas • creating an active setback informal frontage overlooking the green open space and the street • referencing architectural inspiration from buildings along Stone Street creating a stronger relationship between the new neighbourhood and its local context. The design seeks to create a positive frontage and landscape setting that reinforces visual connectivity between the development and the wider landscape. • considering its Roman Road heritage and walkable character by enhancing existing points of access, PROWS and pedestrian and cycle connections between Stone Street, Westenhanger Station and the Site's residential areas. • From a 'landscape & visual' perspective, creating more crossings onto Stone Street from the Early Homes Parcel (further to the two existing PROW entrances that already exist) would likely lead to loss of existing trees and other vegetation from the existing overgrown hedgerow along the road's eastern edge. This vegetation loss would result from the actual creation of a safe opening, but also from the eventual audit of how pedestrians move safely onto Stone Streets - which is likely to recommend the clearance of vegetation to create suitable visual sight lines. The loss of vegetation would create far greater intervisibility between the existing residential community of Westenhanger and the Project than originally identified in the 2022 OPA. Therefore, the recommendation is for reliance upon the two existing PROW crossings only.
SuDS and attenuation features need to be better integrated into the public realm and	The 2022 GI Strategy carefully sets out over 177 pages all the considerations which have shaped the landscape / GI framework at Otterpool and how these have been balanced to consider the special and

Appendix C Responses to EHP design comments

landscape strategy, with clearer detail on their function, usability, management and year-round character.	sensitive aspects of the site and how these can be retained and enhanced to create Otterpool Park - Green Town. The masterplan framework has been shaped primarily by the approved landscape mitigation strategy. It should be noted that no drainage infrastructure was incorporated within the Indicative Illustrative Masterplan, nor was drainage capacity accounted for in the original calculations for site capacity. As a result, the EHP DPD has adopted a practical and innovative approach with a landscape-led approach to drainage design. SuDS are conceived as multifunctional landscape features rather than engineering infrastructure. Swales, attenuation basins, wetlands, rain gardens and ponds are integrated throughout green corridors, parks, gateways and public spaces, contributing to biodiversity, recreation, visual amenity and placemaking objectives. The EHP DPD also seeks to promote "playable SuDS", public open spaces associated with drainage features, and attenuation basins that support both ecological enhancement and community use. The SuDS strategy is intended to create a continuous green-blue infrastructure network across the site. It should also be recognised that the drainage design remains at a strategic stage. As the proposals are developed further through the detailed design process, there may be opportunities to refine the drainage strategy and optimise basin requirements. This could reduce the overall footprint of the attenuation features and, in turn, release additional space for amenity and recreational use.
The proposal lacks sufficient civic spaces, meeting points, community facilities or local amenities to support early residents and establish a strong sense of community.	The Illustrative Masterplan incorporates an extensive network of public open spaces – • Within the residential parcels – a network of pocket greens and focal places intended to support social interaction, and connected through filtered permeability routes and shared spaces that promote pedestrian/cycling priority. Within the green open spaces - Hillhurst Green, the Station Approach Gateway, Otterpool Gateway and the East-West corridor are all identified as multifunctional green spaces designed as social and community destinations. In addition, a LEAP, LAPs, play-on-the-way opportunities, public art, seating, pop up activities and recreational areas are distributed throughout the development to encourage community activity and support placemaking.
Walking, cycling and wider sustainable transport connections require a more comprehensive approach to reduce car dependency and connect the parcel to surrounding destinations.	The EHP DPD includes a comprehensive active travel strategy embedded within both the movement and landscape frameworks. Direct walking and cycling routes connect homes to Westenhanger Station, future town centre facilities, bus stops, public rights of way and surrounding destinations. Green corridors function as movement corridors as well as ecological infrastructure, while filtered permeability routes prioritise cycling and walking over vehicular movement. The street hierarchy, greenways and shared-surface environments have all been designed in accordance with active travel principles and Local Transport Note guidance, encouraging residents to choose sustainable travel modes for everyday journeys. The design shows the inclusion of

Appendix C Responses to EHP design comments

	pedestrian/cycle route and demonstration of 10-minute walking and cycling distances to destinations identified as points of interest.
The architectural response needs to be of high quality and capable of setting a benchmark for later phases, with stronger reference to local character and a contemporary garden town identity.	The EHP DPD establishes the general architectural framework informed by local Kentish vernacular, traditional farmsteads, Stone Street, local landmarks and the wider landscape setting. Three distinct character areas have been developed to create varied yet coherent neighbourhoods, each responding to its context through architecture, materials, scale and public realm. The proposal combines traditional local influences with contemporary interpretation, creating a distinctive identity that reflects the objectives of Otterpool Park and has the potential to establish a benchmark for future phases. Landmark buildings, focal spaces, varied roofscapes, high-quality materials and strong landscape integration all contribute to creating a memorable and recognisable place with its own identity, as part of a wider Otterpool Park - Garden Town.

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APPENDIX D

NON RESIDENTIAL TRAJECTORY

Non-Residential trajectory

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APPENDIX E

OVERVIEW OF S106 HOTS

Appendix E: Otterpool Park S106 summary

EHP		Wider Site	
Topic	Proposed provision	Topic	Proposed provision
Transport	Junction improvements Pedestrian crossings Bus laybys Footway connections Travel Plan Provision of travel voucher	Transport	Establishment of Transport Steering Group Highways works (including junction improvements) Appointment of Travel Plan co-ordinator Financial contribution to Travel Plan monitoring Financial contribution to off-site Public Rights of Way improvements Improvements to Westenhanger Rail Station Provision of mobility hubs
Open space and recreation	Requirement to upkeep open space and play space as secured via Condition Financial contribution to Brockhill Country Park	Heritage	Establishment of Heritage Advisory Group Programme of works regarding Westenhanger Castle Archaeological Archiving and Display Strategy Archaeological Clerk of Works
Waste	Cover the cost of disposing of waste arising from the development	Open space and recreation	Provision of cemetery and burial space Provision of Leisure Centre Delivery Plan and financial contribution for off-site delivery Financial contribution to Brockhill Country Park
NHS	Calculation of contribution towards NHS	Biodiversity	Obligation to secure min of 10% net gain with target of 20%
Education and community financial contributions	Primary Education Contribution; Primary Education Land Contribution; Secondary Education Contribution; SEND Contribution; School Transport Contribution; Adult Social Care Contribution; Community Learning and Skills Contribution; Integrated Children's Services Contribution; Library Registrations and Archives Service Contribution;	Housing	Provision of site wide affordable housing Controls to ensure affordable rent
Monitoring costs	Pay the Council's monitoring costs in connection to compliance with the S106.	Waste	Establishment of Waste Resource Group Waste facilities contribution
		Water and drainage	Transfer of Sustainable Urban Drainage
		Air Quality	Air quality modelling reports

Appendix E: Otterpool Park S106 summary

		Education	Establishment of Education Review Group Identification of nursery provision Provision of 6no Primary School Sites Provision of 2no Secondary Schools Provision of 80 SEND places
		Monitoring costs	Pay the Council's monitoring costs in connection to compliance with the S106.

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APPENDIX F

SCHEDULE OF STRATEGIC INFRASTRUCTURE

Schedule of Strategic Infrastructure

Item	Method of securing/funding
Wider Site	
Highway works subject to monitor and manage	
Partial signalisation of junction and merge and diverge works: WSP ID 1: M20 J11	Developer S106 requirement
Signalisation of junction: WSP ID 7: A20 Ashford Road/Stone Street/Hythe Road (Newingreen Junction)	Developer S106 requirement
Signal optimisation: WSP ID 15: Barrow Hill Traffic Signals	Developer S106 requirement
Traffic signal improvement: WSP ID 16: M20 Junction 10a	Developer S106 requirement
Lane widening: WSP ID 21: M20 Junction 9	Developer S106 requirement
Lane widening: WSP ID 23: A292/M20 London-bound on-slip	Developer S106 requirement
Scope of mitigation to be agreed with KCC and NH: WSP ID 24: A2070 Roundabout between M20 J10 and J10A	Developer S106 requirement
Junction Improvement (scope of mitigation to be agreed with KCC): WSP ID 12: B2064 Cheriton High Street / B2063 Risborough Lane	Developer S106 requirement
Junction Improvement (scope of mitigation to be agreed with KCC): WSP ID 13: B2064 Cheriton High Street / A2043 Cherry Garden Avenue	Developer S106 requirement
Junction Improvement (scope of mitigation to be agreed with KCC): WSP ID 18, 19, 20: A260 Spitfire Way / White Horse Hill /A20 Slip Road, Alkham Valley Road / A20 Slip Road, A260 Canterbury Road / Alkham Valley Road	Developer S106 requirement
Junction Improvement (scope of mitigation to be agreed with KCC):WSP ID 11: M20 Junction 13 (Castle Hill Interchange)	Developer S106 requirement
Highways works not subject to monitor and manage	
Traffic calming measures B2067 Aldington Road between junction with Otterpool Lane and Roman Road	Developer S106 requirement
Improvements to pedestrian and cycle accessibility: B2067 Otterpool Lane between junction with A20 and B2067	Developer S106 requirement
Improvements to pedestrian and cycle accessibility: A20 Western Corridor (A20 between Barrowhill and Newingreen) - previously referred to as T1(25)	Developer S106 requirement
A20 single carriageway re-alignment, reduction of speed limit and improvements to pedestrian and cycle accessibility:	Developer S106 requirement

Schedule of Strategic Infrastructure

A20 Eastern Corridor (A20 between Newingreen and A20 Ashford Road roundabout - excluding Newingreen Junction) – previously referred to as T1(26)	
Introduction of yellow box marking: WSP ID 8: A261 London Road/Barrack Hill	S106 contribution to relevant Highway Authority
Introduction of parking restrictions: WSP ID 9: A259/Dymchurch Road/Military Road Gyratory	S106 contribution to relevant Highway Authority
Introduction of yellow box marking: WSP ID 14: A259 Prospect Road / Stade Street	S106 contribution to relevant Highway Authority
Other transport matters	
Closure of Aldington Road	Developer via S106 contribution
Closure of Harringe Lane	Developer via S106 contribution
Highways/transport contributions (transport monitoring, Travel Plans, MaaS contribution)	Developer via S106 contribution
Key Phase PRoW Strategy to include improvement plan for PRoW on-site (HE281 and HE271A) and triggers for off-site PRoW	Developer S106 requirement
Key Phase Transport Assessment to include trigger points for implementation of mitigation	Developer S106 requirement
Mobility hubs to include shared micro-mobility and car club	Developer S106 requirement
Improvements to Westenhanger Station	
Package of Improvements to accessibility at Westenhanger Station – to include car and cycle parking, bus stops, drop-off facility, improved lighting, CCTV, step-free access, station entrance enhancement, canopies on platforms and platform lengthening	S106 contribution to Network Rail/Rail Operator
PROW (off site mitigation)	
Improvement works to the following PRoW off-site: ○ HE291 ○ HE281 ○ HE359 ○ HE313 ○ HE293 ○ HB36 ○ HB32 ○ HE341 ○ HE343 ○ HE371 ○ HE357 ○	S106 contribution to relevant Highway Authority
Castle works	
Maintenance and management of Westenhanger Castle including: • Demolition of modern stables	Developer S106 requirement

Schedule of Strategic Infrastructure

• East West Barn restoration works • Tree Clearance works, vegetation removal, wall repair • Construction of Causeway Design • Relocation of overhead line • Removal of modern structures	
Open space and recreation	
Submission and approval of Open Space Delivery Programme and Key Phase Open Space Management and Maintenance Plan	Developer via condition
Submission and approval of Green Infrastructure Outputs Plan	Developer via condition
Provision of cemetery and burial space	Developer S106 requirement
Delivery of Leisure Centre (either on site or financial contribution for off-site)	Developer S106 requirement
Waste	
Waste facilities and household recycling contribution/provision of land	Developer S106 requirement
Water and drainage	
Transfer of SuDS drainage features to relevant management body	Developer S106 requirement
Air quality	
Provision of approved mitigation	Developer S106 requirement
Healthcare and community facilities	
Safeguard of land and/or floorspace for the provision of a permanent Healthcare Facility	Developer via condition
Provision of land or financial contribution in lieu of: • Library facility • Social care employment and community space • Public health integration • Community learning • Early help	Developer via condition
Education	
Provision of nursery places	Developer S106 requirement
Provision of 6no. Primary School sites	Developer S106 requirement
Provision of 2no. Secondary School sites and 6 th form	Developer S106 requirement
Provision of 80 SEND places	Developer S106 requirement
Early Homes Parcel	
Highways works	
Priority junction with ghost island right turn lane on A20 including:	Developer S106 requirement

Schedule of Strategic Infrastructure

- Upgraded footway within the extent of highways works sufficient in width to be designated as a share cycle/footway when wider A20 re-alignment comes forward; - Uncontrolled pedestrian crossing of A20 to accommodate PRow crossing - Bus laybys, including bus stop flag poles and shelters.	
Creation of emergency access on Stone Street, providing pedestrian and cycle access to the Site	Developer via condition
Provision of a footway connection from the Parcel to Westenhanger Station	Developer via condition
PROW (off site mitigation)	
Financial contribution for off-site mitigation works	Developer S106 requirement
Open space and recreation	
Provision of Open Space and Play Space	Developer S106 requirement
Waste	
Waste facilities contribution	Developer S106 requirement
Water and drainage	
Transfer of SuDS drainage features to relevant management body	Developer S106 requirement
Healthcare and community facilities	
Financial contributions:	Developer S106 requirement
- NHS - Primary Education Contribution; - Primary Education Land Contribution; - Secondary Education Contribution; - SEND Contribution; - School Transport Contribution; - Adult Social Care Contribution; - Community Learning and Skills Contribution; - Integrated Children's Services Contribution; and - Library Registrations and Archives Service Contribution. - Provision for archaeological finds including archiving, storage and display space	