



C/O 29 Honeywood Close Lympe CT21 4JS

Telephone 01303 883228

www.lympne.net

Chair- Joanne Howes

lympnepc@outlook.com

4th October 2022

Planning Department
Folkestone and Hythe District Council
Civic Centre
Castle Hill Avenue
Folkestone
Kent
CT20 2QY

Dear Sir/Madam,

**Folkestone & Hythe District Council
Planning Application No. Y19/0257/FH
Outline Application for up to 8,500 residential homes and associated
works**

Lympne Parish Council have reviewed the above application and wish to object to the application giving the following grounds for objection-

The below in its majority is a repeat of the objections sent in previously in June this year-

In order to assist the reader the modifications to the last comment are highlighted-

1- Lack of Defined Parameters for future Infrastructure, Phasing and Built Environment

OP6 Guide to the Planning Application

Section 4, paragraph 4.2 states ' The documents and plans for approval prescribe the limits and controls which would apply to any future development. It is against these that the outline planning application will be assessed. These parameters will shape future development delivered under the outline planning permission, should it be granted'.

The OPA is so written as to give no actual commitment as to how a number of key issues will be addressed. Despite the huge number of words and diagrams included within the submission no definitive and unequivocal commitment is given regarding the environment, infrastructure and built environment as well as the general well being of existing and future communities in and around the development area.

The OPA actually admits to this:

'1. Under the 3 tier planning approach adopted, Tier 1 comprises 'setting out a spatial diagram of the proposed development and the strategic design principal that guide detailed design in the later tiers'

OP16 2 Application Proposals states :

'2.5 With a large scale project such as the Proposed Development, it is inevitable that there will be changes between the preparation of the planning application and the completion of the development. It is highly unlikely that the project will be delivered precisely as originally considered. As such, the Applicant needs to ensure that the permission is flexible.

2.6 The initial OPA provides a set of prescriptive Parameter Plans and Phasing plans for approval, together with a Development Specification confirming what will be delivered within each phase. As submitted, the documents for approval include very limited spatial options.

2.7 Tier 1 (the OPA) – amended Parameter Plans and Development Specification has been prepared, whilst Phasing Plans for approval have been removed

Lympne parish Council object to the OPA on the grounds that the information provided within that application, due to the 3 tier planning format, fails to provide sufficient definitive parameters to ensure the visions and plans described in the multitude of documents which form the application will actually be provided or constructed, or in what order (phasing) they will be provided. The result of this will be harm to the local environment and the well being of local residents during a protracted (a probable minimum of 19 years) and ever changing construction period. This harm will be caused by the lack of sufficient infra structure planning, noise, light, air and water pollution, traffic congestion and environmental damage due to, various, widespread and simultaneous construction sites, each of which will be approved individually based more on 'financial' and current needs 'viability' than the original whole town vision.

2. Visual Impact

Lympne parish Council object to the OPA on the grounds that the scale and area of the application is totally inappropriate and contravenes all normal planning parameters associated with a predominantly Greenfield site located in close proximity to AONB areas to the North, East, and South. The documents detail extensive buffer and screening planting, which may provide visual barriers in some localised circumstances, but will in no way screen the mass of the development particularly when viewed from the high ground to the north, nor alter the fact that a predominantly rural landscaped has been changed to an area of extensive housing and other built structures

3. Loss of Agricultural Potential

Although in overall terms a small area, great weight has been given in the OPA to the contribution the proposed development will make to the quest for a carbon neutral Britain, and the policies of the Government to increase housing stock particularly on brown field sites (of which this is not)

Following recent world events that have brought the need for locally produced food to the fore, the UK government has indicated that new laws may be enacted in the near future to encourage the production of home grown foods, and the need to retain and improve agricultural land (of which this predominantly is)

Whilst normal planning applications can only be judged on current laws and policies, under the 3 tier application process being used regarding this project, this norm does not apply, as no application has yet been made regarding specific uses.

Lympne parish Council object to the OPA on the grounds that the information provided within that application fails to take into account the agricultural value of the proposed site, and possible changes to food production policies and laws brought about by recent world events.

4. Health & Wellbeing During Construction

The Otterpool Park project has been impacting on residents health since the proposals were first put forward. There had been no initial consultations prior to the scheme being made public, and any decision making prior to the first public announcements was kept secret, even from the locally elected Parish Councils.

Residents in or close to the proposed area have had their lives affected by worry regarding disruption to their lives and loss of property value due to property blight.

OP5 Chapter 11 and appendix 11.1 Human Health contains pages of data and assessments, mostly referring to the completed built environment of Otterpool Park.

Very little consideration has been given to the cumulative negatives effects in living adjacent to a major construction project for 19 years, and the document concedes in 11.2.26 that 'generally, there is a level of uncertainty around health effects arising from a particular intervention by virtue of the interrelationships of other factors'

In an attempt to address concerns during construction, reference is made in the Code of Construction Practice regarding mitigating effects on health and well being during the Construction phase, chapter 11: human Health follows the same pattern as the rest of the OPA by not offering any guaranteed safe guarding for example 11.4.6 discusses the Outline CoCP included in the OPA and states 'It is expected that a planning condition would be established requiring the outline CoCP to be further developed into a detailed CoCP' why is the word expected as opposed to will used?

Regarding 11.4.7 Measures included in the CoCP 50% of the bullet points contain the phrase 'where practicable'

Nowhere in the assessment of 'factors creating effect on Human health' is the Cumulative effects on the community due to a prolonged construction period assessed.

Lympne parish Council object to the OPA on the grounds that the information provided within that application fails to address the concerns of local residents that their Health and Well being will be detrimentally affected during the construction phase due to Traffic congestion, uncertainty as to how the development will proceed, Length (19 years) of the disruption, Utility supply problems, Housing Blight, Change from a rural landscape and environment to a large building site, and disruption to Health Services due to a catch up policy regarding health provision.

5. Traffic Congestion during and after build

The area adjacent to junction 11 and the A20 has long suffered from congestion during periods of disruption to cross channel traffic. Although the official Highways England diversion route is not the A20 in reality this is the preferred route.

Despite the instigation of operation Brock during the recent cross channel travel problems, the area around the A20 corridor still suffered from disruptive congestion. The traffic report concedes the capacity of the A20 has already been exceeded during certain times without the additional problems associated with protracted construction works, and ultimately a large town being built around it.

Lympne parish Council object to the OPA on the grounds that the information provided within that application fails to adequately address the road transport issues associated with the location of a large protracted construction site around a road that is critical to the local areas transport infra structure, and that the proposals regarding the road layout of the completed project ignore the realities of what the actual transport movement in the area are, and will be, which is local and non local traffic vehicle journeys will grow (due to an additional population of 30,000) and not decrease, and at times of disrupted road travel to cross channel routes large volumes of commercial traffic will not follow Highways England official diversions but use the A20 and surrounding roads as unofficial diversion routes. The document concedes that the choke point (traffic lights) where the A20 passes under HS1 cannot be modified to cope with periods of high traffic flow. Lympne Parish Council particularly object to the proposal to make a part of Aldington Road a no through route, without any consultation with LPC (this is a vital route used by residents to avoid the grid lock that sometimes occurs on the A20 around Newingreen)

6. Education & Health

The Community Development and Facilities Strategy states the following:

Education

Early Years facilities 'it is assumed that existing providers are unlikely to be able to cater for a significant amount of demand from Otterpool Park'

Primary Schools ' It is unlikely that existing local schools will have the capacity to cater for demand for primary school places from Otterpool Park, except in a relatively limited way'

'Key infrastructure, such as a new primary school should be provided in phase one of the new settlement'

Secondary Schools 'It is expected that a majority of secondary school places for Otterpool Park will be met on-site. However, considering that primary demand has now started levelling off, it is possible that the secondary school surplus will increase in the medium term. Therefore, it is possible that off-site solutions may be possible in the early phases of the development.'

There is a key footnote regarding all the above:

' however school commissioning and school funding is subject to legal and funding agreements between the Department for Education and the Academy Trust and is therefore subject to a needs assessment which may show that a school is not required this early in the development, and that school place needs can be met in existing schools for a period of time'

Healthcare

'Kent and Medway has one of the lowest GP to patient ratios in the country'

'The exact model for delivering these services will depend on the strategic plans, objectives and funding available to the CCGs at the time of detailed planning permissions and delivery'

'Provision of GP services may be provided off-site in early years potentially requiring some financial contributions'

'Provision of GP services on-site may be phased'

Lympne parish Council object to the OPA on the grounds that all school and medical provision final decisions have been deferred to later planning stages, and as a result of this existing school and medical facilities may be overloaded due to lag between assessment and build or lack of funding of assessed need, leading to the swamping of existing facilities which will be to the detriment of existing and new residents. The final decision regarding provision of all these vital services is in the hands of the relevant providers, any commitments made within the application are therefore not guaranteed being dependant on spending (or lack of it) by others.

7. Utilities

When considering provision of utilities the incumbent providers are the duty holders responsible for provision of a utility within a particular region, the OPA can make statements about Utilities but ultimately it is not the site developers who have control over utilities provision to the site.

Potable Water

The OPA claims that the current network has capacity for 1500 units based on an assumption that usage is 400l/household/day. This is the same figure as given in the original 2019 submission, but does not make clear whether recent completed and planned building

in Sellindge is included within this figure. An assumed consumption rate for the new development is given as 110l/person/day, this is an aspiration not a fact. Homes in excess of the 1500 stated in 2019 will require a new 11km water main to be installed from Paddlesworth Reservoir, which the OPA states as requiring a 4/5 year build and assumes completion

In 2029. Again the OPA does not make it clear whether the existing water network serving the area has a total capacity to service only 1500 new built houses and any other new users within the existing network area for the 10 year period 2019 – 2029. Presumably every home built in the current network area but not on the proposed Otterpool Park site during the period 2019 -29 will result in a reduction to the 1500 homes that the existing network can supply. The new water main will only have capacity to supply an additional 6000 homes, assuming that the Paddlesworth Reservoir will have sufficient resources to supply its whole receiving network.

Waste Water

The current local wastewater network is served by Sellindge WTW which does currently have some spare capacity for approximately 1000homes (total local new and upgrades not just Otterpool) but to access this a new rising main would have to be installed. There is a great deal of doubt concerning the discharge from Sellindge WTW currently regarding the impact its discharge is having on the nutrient enrichment of Stodmarsh lakes, this issue is yet to be resolved, although an upgraded and up sized Sellindge WTW would be able to serve the completed Otterpool Park.

An option for an on-site WTW is discussed in the OPA which would exclusively serve and be controlled by a company appointed by Ofwat and engaged by Otterpool Park. The standard of discharge could be carefully controlled and there may be energy generation possibilities provided by the treatment process
Lympne PC consider this to be the best option.

Electricity

The power network has currently enough capacity to serve the first 350 properties, as with the figures given for capacity in the potable water network it is not clear if this figure covers all new builds and upgrades in the area served by the 11kV network.

A network upgrade will be required for additional properties which the OPA indicates will take 2 – 4 years to deliver from the time of order. UKPN will be responsible for this work and hence the actual time to delivery cannot be determined by Otterpool Park developers.

Energy Strategy 2.4.18 states 'An assessment has been undertaken of the diversified peak electrical capacity. Although this demonstrates it is likely to be within future capacity available, some load shifting may still be required.'

The OPA states the existing 11KV network will be sufficient for the first 2 years of residential development.

Lympne parish Council object to the OPA on the grounds that the lack of spare capacity in the current Potable water, Waste Water and Electricity network, and the lag between approval and build of upgraded networks will lead to supply and

treatment issues to existing local residents already connected to those networks. The final decision regarding provision of these vital utilities is in the hands of the relevant providers, any commitments made within the application are therefore not guaranteed being dependant on spending (or lack of it) by others.

8. Westenhanger Station

In reality and despite the OPA's submission that Otterpool Park will largely be a self sustaining and short commute community, a high proportion of residents will travel off site for work.

For many, as it is for some current residents of Lymgne their preferred mode of transport will be by train via Westenhanger station.

Current access from lymgne is via the country lane off the A20.

The proposed route, as currently shown in the OPA is via the new high street.

OP5 Appendix 16.5, 7.6 Rail Provision, whilst detailing 'Rail Service Enhancement' at some length shows that no agreement to 'enhance' has been reached and are unlikely to be agreed soon, and if at all no actual actions started until 2027.

Lymgne parish Council object to the OPA on the grounds that during the protracted construction period access to Westenhanger station will be disrupted, and that if on completion the main access route will be via the new high street, this will detract from the low traffic environment for that area that the OPA is promoting.

9. Provision of Photovoltaic panels to individual dwellings

The OPA describes throughout the various documents submitted that the whole ethos behind the development is a , low to zero carbon site. However the approach to achieving this appears, more keeping up to date with current policy and regulations(which any built structure would have to do anyway) rather than a more proactive approach of identifying what current proven technology and methods can be employed in the quest for a zero carbon site.

Energy Strategy 2.1.6 states 'This document therefore sets out the overall site wide approach to energy and key commitments that the development will deliver. This document will be updated periodically to reflect changes in national policy/regulations.'

6.1.5 states 'To provide flexibility for future developers, the exact approach to energy efficient design is not prescriptive at this stage, however, low non-fossil fuel carbon heating and renewable PV where feasible, are required to be incorporated into the design'

As Photovoltaic panels are a proven technology, and as the approach as stated in the OPA is that the whole site should 'Be Green', instead not committing to any specific approach by stating 'flexibility for future developers' 'where feasible' and 'reflect changes in national policy/regulations' the OPA should state PV panels will be fitted to all suitable roofs of domestic and commercial buildings (orientation and structural considerations being the only exclusions).

LPC have a number of observations and requests regarding the consultation process to date, and future consultation practice.

The opinions of the local community (the Parish of Lympe) appear to have been totally disregarded regarding their objection to the size and location of the proposals, and even opinions attempting to mitigate the worst excesses/negative impact on their daily lives because of this development (you couldn't describe their wishes and ambitions as being met) seem to have fallen on deaf ears.

This has created hostility to the whole concept of the development, indeed to the development itself. Investment in a meaningful consultation process with local people (as opposed to highly paid consultants giving generic presentations which come over as a tick box exercise) may at least go in some way in reducing the feeling of not being heard is impacting negatively on their well-being.

A local liaison manager who can direct questions, challenges, etc. to the correct personnel, which should also include District Council and KCC personnel would be beneficial in clarifying various points of the overarching delivery management strategy (ODMS)(OPS Appendix 4.15) which are raised by the local Parish. Their views are not represented by local organisations such as F & H and KCC

Examples of issues causing concern and comment particularly regarding lack of capacity are:

appropriate housing

transport

access to Gps and healthcare in general (including hospitals)

mental health care and help, especially to children

access to quality education which meets the needs of children including those who are neurodivergent

education opportunities

A fund needs to be made available to ensure the direct involvement of the current local community who will be impacted by this development. This funding/procedures need to allow for conversations input from policy through to operations on a level playing field, hence the need for an experienced designated liaison manager. In short, it is the local community who are ideally placed to support what will work. This direct voice of what will hurt is necessary so that they can be heard, it may then be possible to feedback to the local population by the local population about any benefits that may arise from this development.

A more detailed line of questioning is illustrated by the questions below.

ODMS Section: 10 provision of 22% affordable housing across the site.

How will the current local population, who require affordable and/or social housing be included at the relevant planning stage?

Community led housing: when can we have sight of the engagement strategy? Which local people will be consulted in the drawing up of this strategy? This will be required long before occupation of each of the 2,000 homes.

What is the expected percentage of returns from the local community of the local needs survey? Which local people will be consulted with in the drawing up of this survey?

OP5 and OP5 Appendix 4.10, 4.14 and 14.1

Regarding local stake holder participation in the consultation process throughout the development of community facilities strategy which current local people who are school students of all ages, parents of school students including pre-school, patients of local GPs, recipients of social care, users of Wi-Fi network, existing business community, local workforce, local regular attenders of places of worship, local sports groups, uniform and non-uniform youth groups, etc. who's well-being will be impacted on, be engaged by the developers?

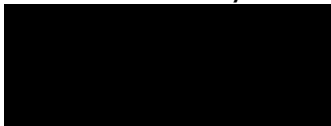
OPS 5 Transport

Will local people who use public transport participate in any impact assessment upon this service in light of the development?

Will current local walkers and cyclists be able to participate in any impact assessment on their activities in light of this development?

We hope that the above provides some useful comments and observations and would appreciate some form of feedback when this is available.

Yours Faithfully



Ms. J. Howes
Chair Lympne Parish Council