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BY EMAIL ONLY

17th March 2023

Dear James,

**Re: Otterpool Park Development Ashford Road Sellindge Kent (Ref: Y19/0257/ FH) -
outline application with all matters reserved.**

Thank you for inviting Kent County Council (the County Council) to comment on the outline planning application for the residential led, mixed-use development at Otterpool Park 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.

The County Council has provided support for the positively planned delivery of a new garden settlement at Otterpool Park supported by the timely provision of infrastructure in a truly green setting.

The County Council has worked closely with the District Council in the preparation of a submission of an Expression of Interest and the Locally-Led Garden Villages, Towns and Cities Prospectus. The County Council also engaged in preparation, examination and adoption of the Core Strategy Review, which provides detailed policies to guide this new strategic development.

This strategic location offers a unique range of opportunities to deliver a sustainable settlement of the highest quality, founded on garden city principles. Otterpool Park can offer an exceptional response to the demonstrable need for new homes by maximising the existing strengths of the area and embracing new and emerging environmental technologies to deliver a healthy, inclusive and thriving community.

The County Council has submitted four formal responses to this Outline Planning Application – 4 August 2019, 7 July 2022, 25 November 2022, 18 January 2023. The County Council would ask that commentary from these responses should be considered in the determination of the application by the Local Planning Authority. The County Council provides this additional response to provide overall consideration of the application, taking into account the application material submitted to date and the engagement between the Local Planning Authority and Applicant.

The County Council has welcomed the continued engagement with the Local Planning Authority and the Applicant and recognises that a considerable number of issues raised within its previous responses have been addressed. As set out within this response, many of the concerns of the County Council have been satisfied through the provision of planning conditions and through the Heads of Terms discussions for the Section 106 Agreement. It is of vital importance that the Applicant (Otterpool Park LLP) and the Local Planning Authority continue to engage with the County Council to ensure that the provisions and obligations which have been agreed to date are appropriately secured for the County Council to be satisfied that the necessary infrastructure provision will be delivered in a timely manner to support the proposals.

The County Council, as Minerals and Waste Authority, would continue to raise an objection to the planning application in respect of lack of provision of adequate waste facilities to support the development – referring the Local Planning Authority to the previous commentary on the matter as set out within the County Council responses to this application. The County Council, as Minerals and Waste Planning Authority, has included a proposal within this response to overcome this objection in the interest of identifying a more sustainable solution that addresses the waste arisings from this significant development and would welcome further engagement with the Local Planning Authority on this matter.

Highways and Transportation

The County Council, as Local Highway Authority, confirms that additional evidence has been provided and Section 106 Agreement provisions and Planning Conditions are being progressed which address previous concerns and objections to the proposed application. The Local Highway Authority will continue to engage with the Applicant and the Local Planning Authority as this application is progressed.

Public Rights of Way

The County Council, in respect of Public Rights of Way (PRoW), has welcomed the engagement to date in seeking to address the significant impact of the development on the PRoW network both on and off site and would refer back to the County Council's previous responses. The County Council expects this positive engagement to continue following determination of this outline planning application to ensure the routes affected and the wider area network are incorporated in line with the County Council's responses and objectives as the Local Highway Authority for Public Rights of Way as set out in the Kent County Council Rights of Way Improvement Plan (2018-2028).

Provision and Delivery of County Council Community Infrastructure and Facilities

The County Council looks forward to continuing to work with the Local Planning Authority to refine wording as part of the detailed Section 106 Agreement drafting stage to ensure that the County Council's objectives and requirements, as set out in our letter of 17 January 2023, are accommodated to ensure a sustainable and high-quality development.

The County Council has provided baseline proposals for community services to ensure that the development is sustainable and its impacts are mitigated. These are of a similar order to what is being proposed in other Garden Towns. The County Council is however happy to collaborate on innovative design solutions, which if jointly agreed can be considered for inclusion in the Section 106 Agreement. While the Applicant is proposing to directly deliver most of the infrastructure, the County Council has provided indicative costs should this not be the case.

As previously indicated, the County Council is content to adopt a "monitor, manage and review" approach in respect of the delivery of community infrastructure. It has, however, proposed triggers to provide certainty that infrastructure will be delivered in a timely way. These triggers can be varied through the monitor, manager and review mechanism subject to agreement of detailed wording.

The County Council is aware that an "Arsenal" condition may be under consideration to address the fact that Folkstone and Hythe District Council owns part of the site and may be unable to enter a S106 agreement with itself.

The County Council considers that a S106 is the most effective way of ensuring that a development is sustainable, and that key infrastructure is delivered in a timely way.

The County Council also suggests that there are ways of deploying a S106 where the LPA is also a landowner. A short-term solution, for example, might be for the District Council to enter into an agreement with KCC to assist with enforcement. An alternative option might be for another landowner to enter an agreement on behalf of others, who become signatories on the transfer of land.

Before any decision is made on the application and **WITHOUT PREJUDICE**, the County Council would welcome sight of the relevant legal advice and a discussion to understand how any risks, associated with relying on an Arsenal condition, would be mitigated and whether there might be more effective alternatives available.

Education

The County Council, as Local Education Authority, has reached agreement with the Applicant relating to the education requirements for the proposal, relating to sites, site sizes and the overall demand. This agreement will need to be secured within the Section 106 Agreement to the satisfaction of the Local Education Authority. The County Council, as Local Education Authority, seeks continued engagement with the Applicant and Local Planning Authority in regard to securing the necessary financial contributions.

The County Council recognises that the Applicant has a vision for the development, which includes education delivery – timing and design. The County Council has been in discussion with the Applicant in respect of the direct delivery of schools, however, it will be for the school itself to have the responsibility to set their vision which will hopefully align with that of the Applicant.

Minerals and Waste

Minerals

The County Council, as Minerals and Waste Planning Authority, has set out within its previous responses to this application that the development adversely affects the safeguarded economic minerals of soft sand (the Folkstone Formation) and ragstone. The County Council, as Minerals Planning Authority, notes that no further information has been submitted within the revised information provided by the Applicant to address mineral safeguarding considerations. The County Council would therefore continue to draw attention to the points raised within its previous response dated 25 November 2022. In respect of the landwon safeguarded minerals that are affected by the development, the County Council does not consider that the application adequately demonstrates an exemption from the presumption to safeguard for the above minerals against the exemption criteria of Policy DM7 of the adopted Kent Minerals and Waste Local Plan. In respect of ragstone, however, whilst a persuasive case to exempt the mineral from safeguarding has not been demonstrated, it is likely that the ragstone material is not sufficiently economically attractive and therefore a policy exemption could be made. This is not the case for soft sand. This material is a particularly important resource in the County of Kent and the wider Southeast, where it is found in the more sensitive National Parks and Areas of Outstanding Natural Beauty (AONBs). Further work is necessary to ensure that this important mineral is not

sterilised and to satisfy national and local mineral safeguarding policy. The material also has an important role to play in the delivery of the development's sustainability credentials, with the potential to be used as on-site construction material. It is noted that the application documents recognise the potential benefits of using site-won materials from a sustainability perspective and they may also support the viability of the scheme.

The Local Planning Authority and the County Council, as Minerals and Waste Planning Authority, have therefore worked proactively to address the Council's objection on mineral safeguarding and to ensure that the economic minerals are not needlessly sterilised. As a result, the County Council is satisfied that the matter may be addressed with a suitably worded condition. The Minerals and Waste Planning Authority therefore raises no objection, subject to the inclusion of a planning condition to reflect the following:

Minerals Extraction

Prior to or concurrent with the submission of the relevant phase framework submitted under condition [X] for parcels HF.1, HF.2 or HF.3 a written assessment of the potential for site won soft sand material shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall include:

- A. Quantity and quality of materials present including borehole data*
- B. An assessment of the suitability of the resource for construction purposes*

Where it is demonstrated that the mineral is suitable for construction purposes a scheme of extraction shall be incorporated into the Site Wide Code of Construction Practice setting out the proposed:

- A. Method of extraction*
- B. Noise mitigation measures*
- C. Hours of working*
- D. Plan of restoration*

The development shall proceed in accordance with the approved plan.

Reason: To avoid sterilising scarce strategic safeguarded mineral resources and in the interests of sustainable development

Waste (including Waste Management)

The County Council, as Minerals and Waste Planning Authority, has set out within its previous responses that the application has not satisfactorily addressed how the waste arisings from the development will be managed. To be acceptable in policy terms, more certainty is needed on how the necessary infrastructure will be delivered.

The submitted Environmental Statement (ES) has incorrectly assumed that this requirement could be accommodated (in the short term) at Ashford or Thanet. Whilst the ES acknowledges that a Waste Transfer Station (WTS) would be required to meet the arisings

from the development, it does not provide sufficient confidence around how that facility will be secured.

The ES refers to the County Council having a duty to provide Waste Transfer facilities, but the application is also required to mitigate the impacts of the development in a similar way that other impacts might be mitigated e.g., schools - despite the County Council also having a responsibility in this area.

The County Council, as Minerals and Waste Planning Authority, is already working in close collaboration with the Local Planning Authority and the Applicant to bring forward a new WTS to serve the District and the Otterpool Park Development. The County Council has therefore sought to take a balanced approach in respect of the application and is only seeking a **proportion** of the costs of a new WTS (in line with the Kent Developer Contributions Guide). It is also allowing for land to be transferred in lieu of a contribution rather than potentially at nil value as referenced in the Kent Developer Contributions Guide.

A development opportunity of this scale might reasonably be expected to consider the need to accommodate strategic infrastructure requirements, especially where there was a need already identified.

As no provision has been made for WTS facilities that mitigate the arisings from the development, the County Council, as Minerals and Waste Planning Authority, **objects** to the application as submitted, unless necessary planning obligations are secured to ensure that necessary waste infrastructure provision is provided to meet the arisings from the development as set out below.

The proposed obligations are designed to safeguard land within the development in the event that an off-site solution is not available. The County Council, as Minerals and Waste Planning Authority, also requires confidence on the level and timing of the required contribution in order to progress decisions in the near future and reduce the need for a fall back site option to come into play.

OTTERPOOL PARK – Extract from Heads of Terms for the Section 106 Agreement – WASTE OBLIGATION

Waste Review Group (WRG) and Waste Arisings	<ul style="list-style-type: none"> To set up WRG to include arrangements in place for its future operation - observe and perform the requirements of the WRG Terms of Reference which will support and communicate delivery plans [to be agreed] All parties to use reasonable endeavours to work collectively to secure a waste transfer station 	WRG to be established Within 6 months of planning permission	<p>Necessary</p> <p>Directly related</p> <p>Fairly and reasonably related in scale and kind</p>
Safeguarding land for a waste facility	Unless and until a site is secured for a WTS in the vicinity of the development, an alternative site	Submission of site	

	<p>e.g. Otterpool Quarry, within the commercial area or another suitable site within the development, shall be safeguarded. This “alternative site” shall be agreed before the S106 is signed.</p> <p>In the event that the “alternative site” is required, it shall be transferred to the County Council (mechanism to be agreed before S106 is signed).</p>	Transfer, if required, by occupation of 500 units or as agreed with the County Council.	
Contribution	A contribution of £1,653,000 shall be paid before the occupation of the first unit, currently index linked by BCIS General Building Cost Index from Oct 2016 to the date of payment (Oct 16 Index 328.3). Subject to the agreement of the County Council, contributions could include contributions in kind e.g. land or services	On first occupation	

The above is the County Council’s formal position. In the event that the Local Planning Authority is minded to override the objection from the County Council, as Minerals and Waste Planning Authority, and in the interest of identifying a more sustainable solution that addresses the waste arisings from this significant development, the Local Planning Authority may wish to consider the following amendments to the obligation currently under discussion.

WASTE – LPA Proposal with the County Council suggestions highlighted in yellow				
1.	Waste Review Group (WRG) and waste Arisings	<ul style="list-style-type: none"> To set up WRG to include arrangements in place for its future operation - observe and perform the requirements of the WRG Terms of Reference [to be agreed] which will support and communicate delivery plans. All parties to use reasonable endeavours to work collectively (to mean in accordance with a timeline and work programme agreed through the WRG) to secure a waste transfer station capable of accommodating the waste arisings from the development. 	WRG to be established Within 6 months of planning permission	Necessary Directly related Fairly and reasonably related in scale and kind
2.	Waste Facilities Contribution	<ul style="list-style-type: none"> Owner is required to meet the cost of disposing of waste arisings from the development (£1,653,000). Form of contribution to be agreed before S106 is signed, including contributions in kind. Provision for the land to be safeguarded and transferred on terms to be agreed subject to this being in conformity with the outline consent. 	1 st occupation (if financial contribution) or as WRG agrees	Necessary Directly related Fairly and reasonably related in scale and kind

Sustainable Urban Drainage Systems

The County Council, as Lead Local Flood Authority, generally accepts the principles for the management of surface water but would refer back to the previous comments provided in

respect of this application, including the request for the inclusion of the proposed planning conditions provided to the Local Planning Authority on 3 February 2023.

The County Council, as Lead Local Flood Authority, requests continued engagement in any matter relating to the management and treatment of surface water or ground water at Tier 2 and Tier 3 stages.

Heritage Conservation

The following sets out Kent County Council Heritage Conservation's updated advice on the planning application and reflects the further information that has been submitted and the discussion that has taken place with the Local Planning Authority and the Applicant. This includes comments provided on 28 June 2022 and 18 January 2023. The advice set out below should be read alongside the County Council's previous responses and recommendations.

Summary

Kent County Council Heritage Conservation continues to have concerns around the level of harm that will be caused to important heritage assets, including assets of the highest significance.

The County Council acknowledges and welcomes the dialogue, discussion and consultation that has continued since it last provided the Local Planning Authority with formal advice and is pleased that some of the earlier concerns have been addressed. In particular, the County Council welcomes the positive discussions that have been held on Section 106 Agreement Heads of Terms and how these can be used to secure heritage benefits.

The area of greatest concern remains the treatment of some of the barrows within the proposed development site, particularly the barrow cemetery at Barrow Hill and Barrow 44. The County Council's continued advice is that these concerns should properly be addressed by amendments to the parameter plans. It is the County Council's view that in the context of the overall development, the amendments the County Council has recommended are minor and would not fundamentally limit the wider social, cultural, economic and environmental benefits that the application seeks.

The County Council therefore suggests that it is possible that concerns might be alleviated (but not fully overcome) by the agreement of condition wording to reduce harm through control of development within the setting of the barrows. The County Council has provided the Local Planning Authority with suggested wording for such conditions but note that final condition wording has not yet been agreed, although progress has been made. In addition, the Local Planning Authority have also put forward a draft condition which seeks to safeguard the setting of Barrow 44 and the intention would be to address any residual concerns in final drafting. The County Council, in respect of Heritage Conservation, would welcome the opportunity to continue ongoing discussions on the precise wording of conditions.

The rich heritage of Otterpool Park

The proposed site for Otterpool Park possesses a rich and varied array of heritage assets. These heritage assets explain how people have lived in and shaped the landscape that we see today over several millennia. They comprise a tapestry of buried archaeological remains, earthworks, landscape-features, and built heritage assets and include assets designated because of their national importance.

These high-grade designated heritage assets include the 14th century Westenhanger Castle, a Scheduled Monument and Grade I listed building of outstanding significance; the scheduled causeway which was once the main access to the Westenhanger complex; a scheduled barrow cemetery (comprising seven barrows); and two further individual barrows which are designated as scheduled monuments. Other important archaeological assets, such as the Otterpool Park Roman villa, are not currently designated but are judged to be of a level of significance that justifies consideration for designation in accordance with the National Planning Policy Framework footnote 68.

The site's designated heritage assets include ones that have been newly identified (or whose significance is more fully understood) as a result of archaeological investigations carried out in support of the planning application. The County Council notes, however, that there are still large areas of the site that have not yet been subject to archaeological field evaluation, or where only non-intrusive archaeological evaluation works have been carried out. It remains a very real possibility that further nationally important buried archaeological remains might yet be revealed within the Otterpool Park site. It is therefore essential that archaeological investigations are carried out sufficiently early (to inform Tier 2 work) and there is sufficient flexibility to allow for the preservation or other safeguarding of future important discoveries. This provision is currently proposed to be secured via a planning condition with wording agreed by the County Council.

Impacts on heritage assets

The County Council would welcome the principle of ensuring that Otterpool Park has a clear sense of identity. The County Council agrees that the rich heritage of the area must play an important role in the identity of the new settlement. The National Planning Policy Framework (NPPF) highlights the role that the historic environment can make to sustainable communities and the positive contribution that it can make to local character and distinctiveness.

It must be acknowledged, however, that the construction of a new town at Otterpool Park will cause harmful impacts to a wide range of heritage assets. Such harm will result from physical impacts to heritage assets, or as a result of changes to an asset's setting or include both in combination. In respect of Heritage Conservation matters, the County Council previously provided the Local Planning Authority with detailed advice (dated 28 June 2022) that sets out its assessment of harm to various aspects of the site's heritage. The County Council has also previously set out positive recommendations for improvements that seek to further minimise or avoid harm, but in the view of the County Council, these have not all been fully addressed.

Westenhanger Castle and Causeway

In their advice of 16 January 2023, Historic England assessed the Otterpool Park proposals as having the potential to cause a high level of harm to the significance of Westenhanger Castle and that the harm would lie at the upper end of the range of less than substantial harm. The County Council agrees with this assessment of harm. For the associated scheduled causeway Historic England judge in NPPF terms that the harm to the causeway would again be less than substantial, this time in the middle of the range. Again, we agree with Historic England's assessment of harm.

Barrows

The treatment of the scheduled barrow cemetery at Barrow Hill and the scheduled Barrow 44 are still of particular concern. The County Council has previously advised how development within the present parameters set by the application could cause harm to these high-grade designated assets and maintained an objection on this basis.

For the scheduled barrow cemetery, the County Council considers that the harm will likely be twofold – firstly through change to its setting and secondly, and more importantly, from the severance of Barrow 131 from the rest of the scheduled cemetery. This is because the current parameters allow for development between this barrow and the other members of the monument group. In the County Council's previous advice, it judged that this harm would likely be at the upper end of the less than substantial range. The County Council notes that Historic England has reached the same conclusion as to the level of harm.

Since reaching this judgement on the level of harm, the County Council has engaged in further discussions with the LPA on how possible condition wording could be used to overcome this objection. However, the County Council remains of the view that the proper way to address these concerns is by requiring amendments to the Parameter Plans.

If the County Council concerns are to be addressed by condition, and its previous objection in respect of Heritage Conservation overcome, then the wording must require the barrow cemetery to be understood and experienced as one cemetery group within one contiguous area of open space. If the application continues to allow intervening development (other than the proposed movement corridor) between Barrow 131 and the other barrows of the scheduled cemetery, then the County Council cannot see how the NPPF requirement to avoid or minimise harm can be judged to have been fulfilled.

For Barrow 44, the County Council's concern was that development could be brought forward within the current Parameter Plans that would fundamentally change the setting of the scheduled barrow. In this respect, the Environmental Statement is clear in its assessment that the proposals will "*preserve the barrow itself and a narrow buffer and not any of its setting*". The County Council acknowledges the intention that further control is supplied through other documents submitted for approval and in particular by the Strategic Design Principles document. The Strategic Design Principles intend that the relationship with the river valley can be appreciated through landscape design, but the County Council does

not find this commitment to be sufficiently detailed to be certain of the precise and exact nature of development impacts.

Where such uncertainty exists, it is necessary and accepted that a cautious approach should be followed. The County Council judges, taking the documents as a whole, that the harm to the barrow is most likely to fall at the very upper end of the less than substantial range. The County Council notes that Historic England has reached broadly the same conclusion, but advises the potential exists for the harm caused to be substantial in NPPF terms. The County Council therefore agrees that this remains a potential 'worst case' outcome.

Due to the high level of harm that might be caused, and because that harm is caused to an asset of the highest significance, the County Council continues to advise that the correct approach would be to seek amendments to the parameter plans to reduce harm. Without such amendments, the County Council cannot recommend that harm has been adequately avoided or minimised as set out in the NPPF, nor that "great weight" has been given to the asset's conservation.

The County Council has previously discussed with the Local Planning Authority how the inclusion of a specific planning condition relating to Barrow 44 could be used to help reduce (but not fully minimise) harm. For this to be achieved, the County Council advises that it is necessary that any condition requires the developer to deliver open-space connectivity of sufficient size to allow the relationship between the barrow and the river valley to be appreciated and understood.

For both Barrow 44 and the barrow cemetery, the County Council notes the great weight that the NPPF places on the conservation of heritage assets and notes that this weight is greatest for assets of the highest significance (which includes scheduled monuments). The County Council considers if means of minimising harm remain unimplemented, this would prejudice an ability to demonstrate that great weight has been given in decision taking. The County Council also notes that Policy HE2 of the Places and Policies Local Plan 2020 (which forms part of the local adopted Development Plan) relates to archaeology and notes that "*important archaeological sites, together with their settings, will be protected and, where possible, enhanced*". It states that development which would adversely affect important archaeological sites "*will not be permitted*".

Delivering public benefit

Given the harm that will be caused to the historic environment, the County Council considers it essential that the proposed development delivers substantial benefit, and this must include a comprehensive package of heritage benefits. County Council considers that this benefit should take a variety of forms that collectively contribute to the heritage vision set out in the Otterpool Park Heritage Strategy.

Creating knowledge that answers key research questions about our past and providing sustainable long-term futures for retained heritage assets are examples of heritage benefit.

Opportunities for engagement with the heritage of Otterpool Park should be built into the development from the outset, so that new and future residents can interact with and enjoy

the heritage of the site. The County Council welcome commitments within the Environmental Statement to the creation of on-site heritage interpretation, trails and walks and these should be secured accordingly.

The County Council considers that on-site facilities for heritage interpretation should be included, either within dedicated spaces, or preferably integrated with proposed community venues, schools and public buildings. These facilities should include for the permanent and temporary public display of archaeological finds and exhibitions.

The long-delivery timetable means that new residents will be living at Otterpool Park as archaeological mitigation works progress. The County Council considers that this presents an exciting opportunity for people to become actively engaged in the site's heritage by participation in archaeological-led activities through the life of the development programme. The County Council remain of the view that this would be best delivered by the employment of a project specific community archaeologist.

The County Council welcomes the positive progress which has been made in agreeing appropriate mechanisms to secure public benefit and the welcomes the provisions set out in the emerging draft planning conditions and Section 106 Agreement Heads of Terms being progressed by the Local Planning Authority. The County Council requests continued engagement with the Local Planning Authority and the Applicant in respect of Heritage Conservation and the wording of the Section 106 Agreement and planning conditions.

Biodiversity

The County Council is satisfied that there are opportunities within the site to provide ecological mitigation and ensure that the site can result in a biodiversity net gain.

However, to ensure that this can happen there is a need to ensure that the following is implemented:

- Habitat Creation in a timely manor
- Suitable management carried out within the site
- On going monitoring to ensure that the mitigation is successful and the Biodiversity Net Gain (BNG) is being achieved.
- Management plan reviews are carried out regularly to ensure that the results of the monitoring support the ongoing management.
- Appropriate off site mitigation can be implemented for breeding birds.

The County Council has been engaging with the Local Planning Authority to ensure these considerations are included within the draft planning conditions.

In addition, there is a need to ensure that the ongoing management of the site is carried out to ensure that the ecological interest of the development footprint does not improve prior to construction. If the fields stop being farmed it's likely that the species populations within the site will expand and cause a significant problem for future phases as there may not be capacity within the site to mitigate the impact.

Country Parks

The County Council expects that the proposal will have a material impact on the use and number of users at Brockhill Country Park. The County Council has previously raised concerns relating to the impacts of the Otterpool Park development on the County Park relating to car parking capacity, and the pressure on the park facilities including paths and play spaces. It is expected that the impact on the park may be affected by the timing and delivery of the recreational and green space at Otterpool Park. It is not expected that in the immediate term, the facilities provided at Otterpool Park will be comparable to those provided at Brockhill County Park , which includes staffing and changing places facilities.

The County Council would welcome continued recognition of the opportunities for community development, educational and learning at the park and would welcome continued engagement with the Applicant and the Local Planning Authority in securing necessary contributions through the Section 106 Agreement.

The County Council would like to thank Folkestone and Hythe District Council and its officers for the continued collaborative approach they have taken to date to positively plan for the delivery of a new garden settlement at Otterpool Park that is supported by the timely provision of infrastructure. However, as this response highlights, there are a number of matters that require careful consideration. The County Council would welcome continued engagement with the applicant and the Local Planning Authority to ensure that key infrastructure and services continue to be planned for, funded and delivered to a high standard at Otterpool Park.

If you require any further information or clarification on any matter, then please do not hesitate to contact me.

Yours sincerely,

Simon Jones
Corporate Director, Growth, Environment and Transport