

[REDACTED]

From: [REDACTED]
Sent: 05 November 2019 13:26
To: [REDACTED]
Subject: FW: Folkestone & Hythe Core Strategy Review Submission Draft 2019 and Heritage Strategy public consultation [REDACTED]
Folkestone & Hythe District Council

From: [REDACTED] [highwaysengland.co.uk]
Sent: 11 March 2019 11:04
To: Planning Policy <Planning.Policy@folkestone-hythe.gov.uk> [REDACTED]

[REDACTED]

Subject: Folkestone & Hythe Core Strategy Review Submission Draft 2019 and Heritage Strategy public consultation [REDACTED]

Dear [REDACTED]

Planning Policy Manager - Folkestone & Hythe District Council
Folkestone & Hythe Core Strategy Review Submission Draft 2019 and Heritage Strategy public consultation

Highways England Ref: #6734

Thank you for your email of 24 January 2019, regarding the Folkestone & Hythe Core Strategy Review Submission Draft 2019 and the Heritage Strategy public consultation.

Highways England ("we") have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and are the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN.

We understand from your consultation email that the Core Strategy Review Submission Draft has been published for consultation under Regulation 19 of the Planning and Compulsory Purchase Act 2004 and follows the previous public consultation on the 'Preferred Options' stage in March 2018. The purpose of the Core Strategy Review is to allocate sufficient land to meet the identified development needs of the Folkestone & Hythe district up to 2037. This is the final stage of consultation prior to public examination.

As requested, our response below addresses the extent to which we consider the Core Strategy Review to comply with the legal requirements and the duty to co-operate, as well as the plan's 'soundness' as outlined in your email.

We have also reviewed the relevant content of the accompanying Sustainability Appraisal (SA) to the Core Strategy.

We understand that the Folkestone & Hythe District Heritage Strategy is an evidence document for the Places and Policies Local Plan and Core Strategy Review and it will also provide information for planning applications and funding bids.

The Heritage Strategy sets out positive objectives and priorities for the district's heritage assets and was influenced by the views of various stakeholders. It has now been published for comments to help shape the final version.

Review of Core Strategy

We have reviewed the Core Strategy and have the following comments which are only related to issues that we consider will affect the SRN:

- The Core Strategy is necessarily high-level and broad in scope. As such, it is not possible to comment in significant detail and we would therefore request to be consulted throughout the further development of schemes within the strategy.
- Generally, the direction of, and considerations within, the Core Strategy appear to be sound and to concur generally with the approach and policies of Highways England with regard to development and its impacts on the SRN.
- Policy SS5 – District Infrastructure Planning – concurs with DfT 02/13 in that it states that planning permissions will only be granted where the development aims to reduce demands on infrastructure; does not jeopardise current or planned physical infrastructure; and allows sustainable travel patterns.
- Policy SS5 primarily addresses Core Strategy Review aims under the following Strategic Needs: A, B, C and D. (Of these Strategic Needs, one of them is relevant to transport: Strategic Need D, which is “*The challenge to plan for strategic development which fosters high quality place-making with an emphasis on sustainable movement, buildings and green spaces*”, as detailed earlier in the document). Other details of Strategic Need D are also given, such as the various aims detailed in Section 3.6. We recommend that the aims of Strategic Need D should add greater emphasis on discouraging car use and encouraging modal shift. While the provision of sustainable modes is included, an additional aim should be added: to consider and manage the travel demand of new development proposals, and develop *tailored* solutions to limit car use generated by new developments.
- Figure 4.4 – Identified infrastructure upgrades – includes three ‘key highway improvements’. These are on the M20, A20 and A259. However, no more detail is given; we would like to be consulted further on these schemes as they progress.
- Critical and necessary infrastructure needed to support the spatial strategy is stated as being set out in the Infrastructure Delivery Plan. However, no more detail is given of this Infrastructure Delivery Plan; we would like to be consulted further on these schemes as they progress.

Review of the accompanying Sustainability Appraisal (SA) to the Core Strategy

The accompanying Sustainability Appraisal (SA)^[1] of the Review of the Core Strategy sets out the context and framework for the SA of the Core Strategy Review and reports the appraisal findings of growth options tested to inform the preferred Core Strategy Review policies, as well as the appraisal findings of the policies in the Proposed Submission Core Strategy Review.

We have reviewed the Sustainability Appraisal (SA) and have the following comments. Our comments are related only to issues that we consider will affect the SRN.

- The SA Review of the Core Strategy uses a framework of 15 SA objectives; of these, SA13 is most relevant to Highways England's interests. The SA13 objective is “*Reduce the need to travel, increase opportunities to choose sustainable transport modes and avoid development that will result in significant traffic congestion and poor air quality*”.

- SA2 is also relevant to our interests due to the way locations have been considered against it. SA2 is “*Support the creation of high quality and diverse employment opportunities*”. As detailed below, this has some implications for the SRN in the way it has been applied.
- The findings against these SA objectives are summarised for six “character areas”:
 - Character area 1: Kent Downs.
 - Character area 2: Folkestone and Surrounding Area.
 - Character area 3: Hythe and Surrounding Area.
 - Character area 4: Sellindge and Surrounding Area (which is further divided into four sub-areas).
 - Character area 5: Romney Marsh and Walland Marsh.
 - Character area 6: Lydd, New Romney and Dungeness.
- The character area findings for the SA objectives are given in Section 6. These are limited in detail at this stage, but appear to have a reasonable overall approach. However, a few areas for improvement are noted:
 - Paragraph 6.48, regarding SA2, suggests that access to existing strategic road infrastructure is expected to have a positive effect on this objective (the creation of high quality and diverse employment opportunities). While it is accepted that SRN access can reduce congestion on lower-order roads which are less able to accommodate heavy traffic, Highways England aims to encourage development in locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives. As such, while limiting congestion is important, this should not be achieved in a way that could potentially encourage an increase in overall car use, even if the road network could accommodate such traffic in that location.
 - Similarly, Paragraphs 6.65 and 6.66, regarding SA13, attribute a similarly positive effect to proximity to the SRN (notwithstanding that these paragraphs also attribute a positive effect to access to sustainable modes also, which is welcomed).
 - These comments also apply to the SA scoring of locations in Appendices 3 and 4.

Review of the Folkestone & Hythe District Heritage Strategy

The Folkestone & Hythe District Heritage Strategy, Version 9 (27 November 2018) is an evidence document for the Places and Policies Local Plan and Core Strategy Review and it will also provide information for planning applications and funding bids.

This is very limited in scope with regard to the SRN and therefore we do not have any comments on this document. However, we request to be consulted in the usual way if any schemes result from the strategy which may impact the SRN.

Furthermore, as stated above, all three of these documents – the Core Strategy, the accompanying Sustainability Appraisal (SA) and the Folkestone & Hythe District Heritage Strategy – are necessarily high-level and broad in scope. As such, it is not possible to comment in significant detail and we would therefore request to be consulted throughout the further development of schemes within any of these strategies. Also, we would like to comment in detail on the forthcoming Local Plan.

If you have any further queries, please contact me.

Kind regards

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^[1] LUC, 17 December 2018, Folkestone & Hythe Proposed Submission Core Strategy Review Sustainability Appraisal Report