

# CORE STRATEGY REVIEW LOCAL PLAN

Submission Draft  
Consultation Statement  
February 2020



EB 01.90

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# 1. Introduction

1.1 The National Planning Policy Framework 2019 (NPPF) requires each local planning authority to produce a local plan for its area that contributes to sustainable development while reflecting the vision and aspirations of local communities. Furthermore, the Localism Act 2011 aims to make the planning system clearer, more democratic and more effective.

1.2 The District Council is undertaking a review of the adopted Core Strategy Local Plan (2013) following the completion of an updated Strategic Housing Market Assessment (SHMA) for the district in 2016/17, which showed an increased need for housing. The Core Strategy Review Local Plan (CSR) is a planning document which sets out the development strategy for the district, for the period from 2019/20 to 2036/37. It is an update of the adopted Core Strategy Local Plan (2013) and continues to include policies for strategic development sites but also introduces proposed policies for a new Garden Settlement and additional sites in Sellindge within the North Downs Area.

1.3 The consultation statement sets out how Folkestone & Hythe District Council (F&HDC)<sup>1</sup> undertook consultation between 2018 and 2020 to inform the CSR Submission Draft document.

1.4 F&HDC carried out one Town and Country Planning (Local Development) (England) Regulations 2012 (hereafter referred to as the Regulations) consultation under Regulation 18 and two under Regulation 19, as detailed below:

- The first consultation was undertaken on the CSR Preferred Options document between **29 March** and **18 May 2018**.
- The second consultation was undertaken on the CSR Submission draft document between **25 January** and **11 March 2019**.
- The third consultation was undertaken on the CSR Submission draft Revised Housing Requirement between **2 December 2019** and **20 January 2020**.

1.5 The document has been produced in accordance with Regulation 22 (1 (C)) of the Regulations which sets out that a Consultation Statement has to be produced to show:

- Which bodies and persons were invited to make representations under Regulation 18
- How those bodies and persons were invited to make such representations,
- A summary of the main issues raised by those representations
- How those main issues have been addressed in the local plan
- The number of representations submitted at Regulation 19 stage and a summary of the main issues raised.

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<sup>1</sup> As of 1<sup>st</sup> April 2018 Shepway District Council became Folkestone & Hythe District Council

1.6 The Consultation Statement will assist the Inspector at the Examination in determining whether the District's CSR complies with the requirements for public participation and government guidance.

1.7 The report shows that the consultation carried out by F&HDC has complied with the statutory requirements set out in the Regulations. The report also shows that public involvement was carried out following the approach set out in the council's Statement of Community Involvement (2015).

## **2. Regulation 18 Core Strategy Review Local Plan – Preferred Options document**

2.1 On 30 June 2016 Cabinet agreed a Local Development Scheme (LDS) which included a commitment to the partial review of the Core Strategy (2013) in order to identify how additional housing and employment needs will be met over an extended plan period (Report No. C/16/13).

2.2 A progress report was taken to Cabinet, on 19 April 2017 (Report No. C/16/107) including updates on the various technical work streams being undertaken. The report included the finalised Strategic Housing Market Assessment (SHMA), the Sustainability Appraisal (SA) Scoping Report, an initial assessment of Core Strategy (2013) policies with recommendations for their review and a progress report on the AECOM High Level Options Report and Phase 2 Options Report.

2.3 On 17 January 2018 Cabinet were updated again on the progress of the Local Plan and subsequently approved the CSR for consultation (Report No. C/17/73).

## **Key Consultation Methods and Analysis**

### **Pre-consultation meetings**

2.4 Prior to the start of the consultation period a number of strategic planning Duty to Cooperate meetings were held in 2017/18 with key consultees, these meetings including:

- Environment Agency, Natural England and the Kent Downs AONB Unit - The meeting was held to discuss strategic planning in connection with the district's growth ambitions, the review of the Core Strategy Local Plan, technical work-streams and issues, and related nature conservation, ecology, flood risk, and landscape issues.
- Southern Water, South East Water and Affinity Water - The meeting was held to discuss strategic planning issues in connection with Otterpool Park and the council's growth ambitions and related matters.
- NHS and Emergency Services - The meeting was held to discuss detailed issues around health and well-being, the provisioning of a potential community

health hub, the emerging proposals for Otterpool Park, progress relating to the on-going review of the Core Strategy Local Plan and other related matters.

2.5 In addition to the above meetings, further Duty to Cooperate meetings were held with all neighbouring authorities, as well as Kent County Council. More detail on these meetings can be found in the Duty to Cooperate Statement Core Strategy Review (2019).

2.6 The CSR, Regulation 18 document was published for consultation for seven weeks between **29 March** and **18 May 2018** (the standard six week period was extended to allow for the Easter bank holidays).

### **Promotion of the consultation period**

2.7 The consultation was advertised through a wide variety of means. A Public Notice was placed in the KM Group newspapers and two press releases were issued, whilst it was also promoted through the council's website, social media channels on twitter and Facebook.

2.8 All interested parties were invited by email or letter to make comments (Appendix 1), these included:

- Specific statutory consultation bodies that the council consider may have an interest in the Local Plan;
- General consultation bodies (charity, community and voluntary groups) that the council consider appropriate; and
- Residents, business owners and other stakeholders who have requested to be included on the council's consultation database.

### **Consultation Events**

2.9 The consultation documents were made available to view in the council Offices at Folkestone and all public libraries (Appendix 2) within the district, during opening hours. Representation Forms were available at all the venues, from the council website or on request from the Planning Policy Team.

2.10 During the seven week consultation period a series of public consultation events were held across the district, with over 115 people signing in.

Date	Venue	Time
16.04.18	Folkestone Civic Centre	3-7pm
17.04.18	Hawkinge Community Centre	3-7pm
19.04.18	Sellindge Village Hall	3-7pm
24.04.18	Hythe South Road Pavilion	3-7pm

25.04.18	New Romney Scouts Hall	3-7pm
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Table 1: Venues, dates and timings of public consultation events for the Core Strategy Review Local Plan – Preferred Options document

2.11 The public events consisted of a number of information boards to facilitate discussions with council officers. Copies of the draft consultation documents were available to view as well as handouts to take home, explaining how to make a comment on the plan.

## Feedback

2.12 Comments could be made online via the council's Consultation Portal, which makes submitting comments easy and accessible, allowing people the time to consider what they wanted to say and in their own time. Alternatively comments could be sent:

- In writing to: Planning Policy, Folkestone and Hythe District Council, Civic Centre, Castle Hill Avenue, Folkestone Kent CT20 2QY; or
- E-mailed to: [planning.policy@folkestone-hythe.gov.uk](mailto:planning.policy@folkestone-hythe.gov.uk); or

## Results

2.13 The seven week consultation resulted in the submission of **746 comments** from **109 individuals and organisations**. All sections and policies attracted comments, including those left unchanged from the 2013 plan.

2.14 Officers reported back to Cabinet on 14<sup>th</sup> November 2018 (C/18/49). The report contained tables setting out summaries of all comments, prepared responses and suggested amendments to the plan as a result (Appendix 3). A brief summary of the key issues to emerge from the consultation are set out below.

2.15 Most comments raised objections with the plan's proposals. Frequently raised concerns were that:

- The district's infrastructure cannot cope with growth (water supply, highways, health and education were frequently raised);
- The level of development would not address local needs and new homes would not be affordable for local people;
- The level of affordable housing sought from new developments should remain at 30 per cent, as developers too often reduce the affordable housing they provide on the grounds of viability;
- The focus should be on regenerating Folkestone rather than providing a new town and the new town proposals would draw investment away from struggling areas; and
- The district's heritage is under threat.

2.16 Frequently raised concerns relating to the new garden settlement (policies SS6-SS9) were that:

- Proposals would harm the Kent Downs Area of Outstanding Natural Beauty and would urbanise the area between Ashford and the coast;
- Local infrastructure cannot cope with the level of development; and
- Insufficient attention has been provided to retail and employment provision and the social dimension.

2.17 Frequently raised concerns relating to proposals for Sellindge (policy CSD9) were that:

- Local infrastructure cannot cope with the level of development;
- Local people feel that the development is being imposed on them and proposals do not follow the previously agreed masterplan for Sellindge; and
- Sellindge needs a bypass; this should be provided as part of the garden town proposals.

2.18 As part of the consultation a “call for sites” was carried out, directed at strategic sites (250 or more homes) to identify reasonable alternatives to those allocated in the plan. In total nine sites were put forward and it is considered that none of the sites present suitable alternative or additional allocations to those currently proposed in the Core Strategy Review.

2.19 Since the conclusion of the Preferred Options consultation, council officers have continued to meet with statutory consultees and interested parties to discuss key issues. Further information on these meetings can be found in the council’s Duty to Cooperate Statement (2019). In addition officers presented to the Folkestone & Hythe Business Advisory Board on 22<sup>nd</sup> November 2018 to provide information on the CSR, including next steps.

### **3. Regulation 19 Core Strategy Review Local Plan- Submission Draft document**

3.1 On 14<sup>th</sup> November 2018 Cabinet approved the CSR (Regulation 19) Local Plan (C/18/49) prior to its second consultation.

#### **Key Consultation Methods and Analysis**

3.2 The CSR Submission Draft, Sustainability Appraisal, Habitats Regulations Assessment and an up to date evidence base were published for consultation between 25 January and 11 March 2019, over a six week period.

#### **Promotion of the consultation period**

3.3 The consultation was advertised through a Public Notice placed in the KM Group newspapers on 23 January 2019, a press release, and the council’s social media sites Twitter and Facebook with regular reminders and on the council’s website. The

consultation featured on the council’s home page, under the Latest News section throughout the consultation period.

3.4 Letters or emails were sent directly to specific and general consultees, Councillors and residents and interested parties who had submitted representations on the Preferred Options document.

3.5 Hard copies of the Plan and representation forms were made available to view at local libraries and council offices during the normal opening hours (Appendix 2). All documents were available to view on the council’s website.

3.6 Hard copies of the consultation documents were sent to each of the Parish and Town Councils within the district as well as all neighbouring Parish and Town councils. In addition, all Parish and Town Councils were offered an informal meeting with council officers to assist them with any questions they may have regarding the consultation.

## Feedback

3.7 Comments could be made online via the council’s Consultation Portal, which makes submitting comments easy and accessible, allowing people the time to consider what they wanted to say and in their own time. Alternatively comments could be sent:

- In writing to: Planning Policy, Folkestone and Hythe District Council, Civic Centre, Castle Hill Avenue, Folkestone Kent CT20 2QY; or
- E-mailed to: [planning.policy@folkestone-hythe.gov.uk](mailto:planning.policy@folkestone-hythe.gov.uk);

## Results

3.8 A total of 510 comments were received to the CSR Submission Draft from 117 individuals and organisations.

3.9 The comments have been broken down by chapter as shown in Table 2 below:

Section		Number of comments
	<b>Core Strategy Review as a whole</b>	
	<b>General</b>	<b>21</b>
<b>1</b>	<b>Introduction</b>	<b>23</b>
1.1	About the Core Strategy	15
1.2	About Folkestone and Hythe	8
<b>2</b>	<b>Strategic Issues</b>	<b>9</b>



Section		Number of comments
2.1	District Development Challenges and Potential	7
2.2	Strategic Needs for Sustainable Development	2
<b>3</b>	<b>Aims and Vision for Folkestone &amp; Hythe</b>	<b>22</b>
3.1	District Planning Aims	7
3.2	Vision for Folkestone & Hythe	15
<b>4</b>	<b>The Spatial Strategy for Folkestone &amp; Hythe</b>	<b>303</b>
4.1	District Spatial Strategy	25
4.2	Housing and the Economy Growth Strategy	29
4.3	Place Shaping and Sustainable Settlements Strategy	15
4.4	Priority Centres of Activity Strategy	14
4.5	District Infrastructure Planning Strategy	24
4.6	Strategic Allocations	196
<b>5</b>	<b>Core Strategy Delivery</b>	<b>128</b>
5.1	Core Policies for Planning	35
5.2	Areas of Strategic Change	90
5.3	Implementation	3
Appendices		<b>4</b>
Appendix 1: Monitoring and Risk		2
Appendix 2: Glossary of Terms and Technical Studies		2
<b>Total number of comments</b>		<b>510</b>

Table 2: The numbers of comments made against each section

3.10 The main issues arising from the comments have been summarised and are outlined on a chapter-by-chapter basis in Appendix 4.

## 4. Regulation 19 Core Strategy Review Local Plan-Submission Draft Revised Housing Requirement

4.1 As the review of the Core Strategy has progressed national planning policy has changed several times and a new method of calculating housing requirements has been introduced that has resulted in an increase in the number of houses the authority needs to plan for in the district to 2036/37. However it is considered that there is no

need to identify additional housing sites to allocate in the Core Strategy Review to meet the new national housing need figure.

## **Key Consultation Methods and Analysis**

4.2 A consultation on the proposed amendments to the minimum housing requirement in the Core Strategy Review, accompanying Sustainability Appraisal and Habitats Regulations Assessment ran for seven weeks from 2 December 2019 to 20 January 2020.

4.3 The council has published on its website a number of Statements of Common Ground with neighbouring local authorities and other organisations to support the Core Strategy Review, and these were also available for comment.

### **Promotion of the consultation period**

4.4 The consultation was advertised through a Public Notice placed in the KM Group newspapers on 27<sup>th</sup> November, a press release, the council's social media sites Twitter and Facebook with regular reminders and on the council's website. The consultation also featured on the council's home page.

4.5 Letters or emails were sent directly to specific and general consultees, Councillors and residents and interested parties who had submitted representations on the Preferred Options document.

4.6 Hard copies of the Plan and representation forms were made available to view at local libraries and the council's offices in Folkestone during normal opening hours (Appendix 2). All documents were available to view on the council's website. In addition hard copies of the consultation documents were sent to each of the Parish and Town Councils within the district.

### **Feedback**

4.7 Comments could be made online via the council's Consultation Portal, which makes submitting comments easy and accessible, allowing people the time to consider what they wanted to say and in their own time. Alternatively comments could be sent:

- In writing to: Planning Policy, Folkestone and Hythe District Council, Civic Centre, Castle Hill Avenue, Folkestone Kent CT20 2QY; or
- E-mailed to: [planning.policy@folkestone-hythe.gov.uk](mailto:planning.policy@folkestone-hythe.gov.uk);

### **Results**

4.8 A total of 33 comments were received to the CSR Submission Draft Revised Housing Requirement document from 24 individuals and organisations. The main issues arising from the comments have been summarised and incorporated into Appendix 4.

## **5. Duty to Cooperate**

5.1 Section 110 of the Localism Act sets out the duty to cooperate, this applies to all local planning authorities and a number of other bodies. Paragraphs 178 to 181 of the National Planning Policy Framework provide guidance on planning strategically across local boundaries and highlight the importance of joint working to meet requirements that cannot be wholly met within a single local planning area through joint working, policies and plans. The Duty to Cooperate covers a number of public bodies in addition to neighbouring authorities. These bodies are required to cooperate with councils on issues of common concern to develop sound plans.

5.2 The council has proactively sought to have discussions with relevant organisations at appropriate stages of the development of the Plan. A list of the meetings held and the matters discussed at those meetings is included in the council's Duty to Cooperate Statement.



PPCSRLP10220/V1

Folkestone  
& Hythe  
  
District Council

## Appendix 1- Local Plan Consultees

The Town and Country Planning (Local Development) (England) Regulations 2012 (Reg 18) require us to consult:

1. Such of the specific bodies as we consider may have an interest in the subject of the proposed document;
2. Such of the general consultation bodies as we consider appropriate and
3. Such residents or other persons carrying on business in the area from which we consider it appropriate to invite representations.

### Specific Consultation Bodies

A relevant authority any part of whose area is in or adjoins Shepway, namely:

Kent County Council  
Kent District or Borough Councils  
Parish and Town Councils  
Neighbouring County Councils  
Neighbouring Unitary Authorities  
Neighbouring London Boroughs  
Neighbouring Districts or Boroughs  
Neighbouring Parish/Town Councils  
Police Authorities  
The Coal Authority  
The Environment Agency  
English Heritage  
Natural England  
Network Rail Infrastructure Limited (company number 2904587)  
The Highways Agency  
Any person to whom the electronic communication code applies (under section 106(3)(a) of the Communications Act 2003)  
Any person who owns or controls electronic communications apparatus in Shepway  
Any of the following exercising functions in Shepway:  
A Primary Care Trust established under section 18 of the NHS Act 2006 or continued in existence by virtue of that section;  
A person to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989;  
A person to whom a licence has been granted under section 7(2) of the Gas Act 1986;  
Sewerage undertakers and  
Water undertakers  
The Homes and Communities agency

### **General Consultees**

Voluntary bodies some or all of whose activities benefit any part of Shepway  
Bodies which represent the interests of different racial, ethnic or national groups in Shepway

Bodies which represent the interests of different religious groups in Shepway

Bodies which represent the interests of disabled persons in Shepway

Bodies which represent the interests of persons carrying on business in Shepway

All other residents, business owners and other stakeholders who have either previously responded to a Local Plan consultation or asked to be notified of future Local Plan consultations.

## **Appendix 2 - Document Viewing Locations**

Planning Policy documents that are out for public consultation will be available to view throughout the consultation period at the locations listed below:

### **Folkestone and Hythe District Council**

**Civic Centre Offices, Castle Hill Avenue, Folkestone, CT20 2QY**

9.00am – 5.00pm (Monday, Tuesday, Thursday, Friday)

9.30am – 5.00pm (Wednesday)

(Saturday and Sunday – Closed)

### **Cheriton Library Opening Hours**

**64 Cheriton High Street, Folkestone, CT20 1HD**

9.00am – 1.00pm, 2.00pm – 5.00pm (Monday, Thursday)

9.00am – 1.00pm (Wednesday)

10.00am – 1.00pm, 2.00pm – 5.00pm (Friday)

10.00am – 2.00pm (Saturday)

(Tuesday and Sunday – Closed)

### **Folkestone Library Opening Hours**

**2 Grace Hill, Folkestone, CT20 1HD**

9.30am – 5.00pm (Monday, Tuesday, Thursday, Friday)

09.30am – 4.30pm (Saturday)

10.00am – 4.00pm (Sunday)

(Tuesday – Closed)

### **Hythe Library Opening Hours**

**1 Stade Street, Hythe, CT21 6BQ**

9.30am – 5.00pm (Tuesday, Wednesday, Thursday, Friday)

9.30am – 4.30pm (Saturday)

(Monday and Sunday – Closed)

### **Lydd Library Opening Hours**

**Skinner Road, Lydd, TN29 9HN**

11.00am - 4.00pm (Monday, Tuesday, Thursday)

Midday – 4.00pm (Friday)

9.00am – 1.00pm (Saturday)  
(Wednesday and Sunday – Closed)

## **Lyminge Library Opening Hours**

**Station Road, Lyminge, CT18 8HS**

10.00am – 2.00pm (Monday, Wednesday, Friday)

Midday – 5.00pm (Tuesday)

10.00am – 5.00pm (Thursday)

9.00am – 1.00pm (Saturday)

(Sunday – Closed)

## **New Romney Library Opening Hours**

**82 High Street, New Romney, TN28 8AU**

9.00am – 2.00pm (Monday, Friday)

1.00pm – 5.00pm (Tuesday)

9.00am – 1.00pm (Wednesday, Saturday)

10.00am – 4.00pm (Thursday)

(Sunday – Closed)

## **Sandgate Library Opening Hours**

**Sandgate High Street, Sandgate, CT20 3RR**

9.30am – 1.00pm (Monday, Friday, Saturday)

9.30am – 5.00pm (Tuesday, Thursday)

(Wednesday and Sunday – Closed)

## **Wood Avenue Library Opening Hours**

**Wood Avenue, Folkestone, CT19 6HS**

10.00am – 1.00pm, 2.00pm – 4.30pm (Monday, Thursday, Friday)

9.30am – 1.00pm (Wednesday)

10.00am – 1.00pm (Saturday)

(Tuesday and Sunday – Closed)





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# FOLKESTONE & HYTHE DISTRICT CORE STRATEGY REVIEW REGULATION 18 DRAFT

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## Summary of Consultation Comments

JULY 17, 2018

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## 1. Introduction

- 1.1. The Folkestone & Hythe District Core Strategy Review Regulation 18 Version was published for consultation between **29 March** and **18 May 2018**.<sup>1</sup>

### Breakdown of comments by section

- 1.2. A total of **746 comments** were made to the Core Strategy Review (including Appendices) from 109 individuals and organisations. The representations were broken down by section as shown in Table 1.

<b>Section</b>		<b>Number of comments</b>
	<b>Comments on the plan as a whole</b>	1
<b>1</b>	<b>Introduction</b>	
1.1	About the Core Strategy	39
1.2	About Folkestone and Hythe	46
<b>2</b>	<b>Strategic Issues</b>	
2.1	District Development Challenges and Potential	69
2.2	Strategic Needs for Sustainable Development	29
<b>3</b>	<b>Aims and Vision for Folkestone &amp; Hythe</b>	
3.1	District Planning Aims	26
3.2	Vision for Folkestone & Hythe	31
<b>4</b>	<b>The Spatial Strategy for Folkestone &amp; Hythe</b>	
4.1	District Spatial Strategy	54
4.2	Housing and the Economy Growth Strategy	23
4.3	Place Shaping and Sustainable Settlements Strategy	20
4.4	Priority Centres of Activity Strategy	17
4.5	District Infrastructure Planning Strategy	23
4.6	Strategic Allocations	196
<b>5</b>	<b>Core Strategy Delivery</b>	
5.1	Core Policies for Planning	62
5.2	Areas of Strategic Change	103
5.3	Implementation	2
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<sup>1</sup> After the consultation opened, on 1 April 2018, the local planning authority changed its name from Shepway District Council to Folkestone & Hythe District Council.

<b>Section</b>	<b>Number of comments</b>
Appendix 2: Glossary of Terms and Technical Studies	2
<b>Total number of comments</b>	<b>746</b>

### **Breakdown of comments by policy**

- 1.3. Policies for the new garden settlement (SS6-SS9) received the most responses (105 in total) along with Policy CSD9: Sellindge Strategy (27 comments).
- 1.4. Numbers of comments received against each policy are set out in Table 2. (This table does not include numbers of comments made against the supporting text of the policies; these are detailed in the sections that follow.)

<b>Title</b>	<b>Number of comments</b>
Policy DSD: Delivering Sustainable Development	7
Policy SS1: District Spatial Strategy	13
Policy SS2: Housing and the Economy Growth Strategy	11
Policy SS3: Place-Shaping and Sustainable Settlements Strategy	8
Policy SS4: Priority Centres of Activity Strategy	6
Policy SS5: District Infrastructure Planning	8
Policy SS6: New Garden Settlement – Development Requirements	48
Policy SS7: New Garden Settlement – Place-Shaping Principles	19
Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles	18
Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management	20
Policy SS10: Spatial Strategy for Folkestone Seafront	8
Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone	7
Policy CSD1: Balanced Neighbourhoods	10
Policy CSD2: District Residential Needs	5
Policy CSD3: Rural and Tourism Development	1
Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation	6
Policy CSD5: Water and Coastal Environmental Management	3
Policy CSD6: Central Folkestone Strategy	4
Policy CSD7: Hythe Strategy	4

Policy CSD8: New Romney Strategy	8
Policy CSD9: Sellindge Strategy	27

### Comments on accompanying documents

- 1.5. In addition to the comments on the Core Strategy Review itself, **eight comments** were received on the accompanying documents, as shown in Table 3.

<b>Title</b>	<b>Number of comments</b>
Core Strategy Review Sustainability Appraisal	6
Core Strategy Review Habitats Regulations Assessment	2
<b>Total number of comments</b>	<b>8</b>

## 2. Comments on the Plan as a Whole

- 2.1. One comment was received against the plan as a whole. This states that the National Grid has reviewed the plan and has no comments to make.

### Part 1 – Introduction

## 3. Section 1.1: About the Core Strategy

- 3.1. 39 representations were received relating to Section 1.1. These raise the following issues:
- Keen to ensure that the historic environment is taken into account (Historic England);
  - Kent County Council supports the council's growth ambitions and supported its expression of interest for the locally-led garden villages, towns and cities prospectus for Otterpool Park;
  - Concerned that the Core Strategy Review does not contain a policy for London Ashford Airport (London Ashford Airport);
  - Canterbury Diocese has a key role to play in the formation of communities and is keen to work with the council;
  - A single local plan document would be clearer and more consistent for the development industry;
  - The relationship between the Places and Policies Local Plan and Core Strategy Review is unclear and the production of the plans is out of sequence;
  - The council should undertake a complete review of the Core Strategy rather than a partial review;
  - The vision for the district is not ambitious enough;
  - The evidence base is incomplete and needs to be updated;
  - The housing market area should include Ashford;
  - Lack of justification for the increase in housing – the council should challenge government requirements;
  - Empty buildings should be taken into account;
  - More truly affordable homes are needed;
  - Community Infrastructure Levy (CIL) should be payable over the whole district;
  - Support amendment to exclude the garden settlement from the application of CIL (Quod on behalf of landowners);
  - Object to the despoliation of the Area of Outstanding Natural Beauty (AONB), destruction of wildlife, increased light pollution, disruption due to building works, impacts on property values, impacts on mental health, increased crime and loss of community cohesion;
  - Publicity for the plan has been poor and the consultation portal is inadequate; residents cannot respond to the revised National Planning Policy Framework and Core Strategy Review at the same time;
  - Proposals in the Core Strategy Review are unsustainable, undeliverable, unpopular and divisive;
  - Houses will only be for out-of-town buyers and second-home owners; and
  - Infrastructure cannot cope (water, roads and health infrastructure).

#### 4. Section 1.2: About Folkestone & Hythe

4.1. 46 representations were received relating to Section 1.2.

4.2. 41 representations were received relating to the text. These raise the following issues:

- There is no mention of the district's historic defensive role over centuries, including at Seabrook and Shorncliffe;
- The Royal Military Canal is under threat of development;
- Cultural heritage is a strength and should be recognised in Table 1.1: Folkestone;
- The plan does nothing to address deprivation in inner and north Folkestone;
- The creative industries and Folkestone Triennial benefit incomers rather than residents;
- The constraints in Table 1.3: Romney Marsh are 'strengths' not 'weaknesses', as they inhibit development;
- Romney Marsh needs its own tourism strategy;
- Strengths of Romney Marsh include agricultural industry, tourism and balanced towns and villages; weaknesses include housing inappropriate for local needs and isolated developments;
- Flood risk is not limited to coastal flooding – fluvial flooding is also a risk;
- Local roads are inadequate, particularly the A259, and access to London Ashford Airport is poor;
- There should be a specific policy to support the expansion of London Ashford Airport as an opportunity location to build on the district's economic strengths;
- The 'weaknesses' of the North Downs (Table 1.4: North Downs Area) help to preserve its 'strengths';
- The potential despoliation of the AONB is the reason planning inspectors have refused development at Lympne;
- A good, integrated public transport system needs to link to Ashford railway station to give access to the high speed railway service;
- Water, sewerage, broadband and power infrastructure is poor; and
- The high speed route is nearing capacity and any additional stops would add to the journey time for Folkestone and Dover residents.

4.3. An additional five representations put forward site submissions:

- Booker Wholesale, Park Farm Industrial Estate, Folkestone;
- Three Acre Estate and Five Acre Estate, Park Farm Road, Folkestone (two sites);
- Land North of Cockreed Lane, New Romney – states that this represents a sustainable location and should be included as part of Policy CSD8;
- The Piggery, Ashford Road, Sellindge<sup>2</sup>; and
- Land adjoining Etchinghill Nursery, Etchinghill.

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<sup>2</sup> Part of area allocated in Regulation 19 Places and Policies Local Plan



## Part 2 – Strategic Issues

### 5. Section 2.1: District Development Challenges and Potential

5.1. 69 representations were received relating to Section 2.1. These raise the following issues:

- There is implacable resistance to house building on anything other than a very modest local scale;
- The council should be spending its limited funds on deprived communities and not engaging in property development;
- The growth strategy is inconsistent with the district's constraints;
- The figures for housing growth need timescales to be meaningful;
- The assumption that the district's spatial strategy should be underpinned by a garden town requires further testing;
- The M20 is already at capacity and the road network cannot cope with the extra traffic generated by 10,000 new households at Otterpool Park;
- B2068 Stone Street to Canterbury will assume greater importance with Otterpool Park;
- Another station at Westenhanger will add to the journey times for Folkestone and Dover residents;
- The benefits of high speed rail are unquantified and a stop at Westenhanger is not guaranteed;
- The area is one of the most water-stressed in the UK;
- From the point of view of water efficiency, the whole of the south east of England is classified as being of "serious" water stress (Environment Agency);
- The water consumption target of 90 litres per person per day is unrealistic when average consumption is currently around 155 litres;
- The Environment Agency's revised flood zones need to be reflected in the plan;
- Development is to serve people migrating from London;
- Infrastructure is inadequate (roads, public transport, healthcare, retail, education and social facilities);
- The solution to 'Operation Stack' may involve additional infrastructure in the district;
- Transport connections need to identify Folkestone West railway station;
- The Folkestone Seafront development should incorporate council-owned car parks to create sufficient car parking;
- Development should be locally-led, with Section 106 requirements for local employment and skills training, with a focus on young people;
- The claim that new house-building brings employment is a fiction;
- The district needs a vibrant popular youth culture, music scene and night-time economy if younger people and cultural creators are to be attracted. The council must provide reasons for generations to stay and build lives in the district;
- The council should encourage higher education institutions;
- More community events, sports, leisure and social activities are needed to bring different generations and people of different backgrounds together; and

- Figures for growth in Canterbury need amending (Canterbury City Council).

## 6. Section 2.2: Strategic Needs for Sustainable Development

6.1. 29 representations were received relating to Section 2.2 (22 comments to the text and seven comments to Policy DSD).

6.2. Comments on the text raise the following issues:

- Welcome reference to improving educational attainment (Education and Skills Funding Agency);
- Further education is under-supported;
- Economic and social development have to run together to be sustainable;
- The arts must coexist alongside social and leisure facilities, music and late night culture. There need to be reasons for the current and next generation to stay in the area;
- Sustainable development needs the involvement of the community. Investment should be in people as well as buildings;
- More should be made of tourism, working with local trusts, amenity and history societies;
- Heritage assets are undervalued;
- The provision of healthcare is a major concern and the population increase would place overwhelming demands on services;
- Otterpool Park is not needed to meet local housing needs; and
- Affordable housing contributions should be raised to 30 to 50 per cent and not be subject to viability considerations.

### Policy DSD: Delivering Sustainable Development

6.3. Seven representations were received relating to Policy DSD. These raise the following issues:

- The Education and Skills Funding Agency recommends the approach of the London Borough of Ealing in planning for school expansions and new sites, and providing development management policies for schools;
- Support the commitment to collaborate through the Duty to Cooperate (Dover District Council);
- The policy should be rewritten to include the transparent and full involvement of local communities;
- The policy should prevent occupation of developments until the required infrastructure is in place;
- The term “sustainable” needs to be defined and reference to “out-of-date” policies should be replaced by “superseded by national policy” (CPRE Shepway);
- It is not clear how proposals will be assessed to ensure that they improve “the economic, social and environmental conditions in the area”; and
- The plan’s policies will destroy social infrastructure and the natural environment.

## **Part 3 – Aims and Vision for Folkestone & Hythe District**

### **7. Section 3.1: District Planning Aims**

7.1. 26 representations were received relating to Section 3.1. These raise the following issues:

- There is no evidence to support the sustainability of the aspirations or to demonstrate that the challenges will be met;
- Documents do not cover transport, roads and parking;
- Concerns regarding the aim to provide capacity for housing beyond the plan period (Kent Downs AONB Unit);
- The aim to provide innovative and distinctive architecture has not been met at Shorncliffe, Princes Parade and Folkestone Seafront;
- Support for the cultural and creative aims - recommend engagement with the trust should proposals for performing arts facilities come forward (Theatres Trust);
- Add the aim to increase prosperity by capitalising on the district's heritage assets;
- Existing popular music culture must be respected alongside other cultural offerings as it attracts all ages and classes, with support for a vibrant social scene and night-time economy;
- Historic venues (Leas Pavilion and Dance Easy) and sites (Royal Military Canal and Shorncliffe Garrison) are not being protected;
- The term "viable" needs to be explained or removed from paragraph 3.5(1) as financial viability can be manipulated (Theatres Trust);
- The aim should be to "conserve and enhance" not "manage" the AONB (Kent Downs AONB Unit);
- Otterpool Park and Folkestone town centre should be used together to improve tertiary education facilities (Go Folkestone Action Group);
- The Otterpool Park proposals are far too extensive to be sustainable – smaller scale, truly affordable housing is needed to suit the rural character of the North Downs;
- Healthcare facilities are insufficient to serve Otterpool Park;
- The Royal Victoria Hospital site should be used for elderly people (Go Folkestone Action Group); and
- A policy is needed for London Ashford Airport (London Ashford Airport).

### **8. Section 3.2: Vision for Folkestone & Hythe District**

8.1. 31 representations were received relating to Section 3.2. These raise the following issues:

- The section lacks substance on delivery and is based on aspirations (e.g. high speed railway serving Westenhangar);
- Healthcare facilities are inadequate;
- Support the vision for Folkestone & Hythe, including a new garden settlement (Quod on behalf of landowners);
- Otterpool Park will not address the lack of affordable homes locally;

- The garden town would not just be visible from the North Downs ridge but from the entire escarpment, much of which has public access (Kent Downs AONB Unit);
- The garden town would pull the population centre away from Folkestone leaving the central area deprived;
- There is no environmental capacity for the garden town;
- Lympne will not be able to maintain its distinct character - proposed mitigation is wholly inadequate;
- Jobs growth will not match population growth in the garden town;
- The garden town will be developer-led rather than community-led;
- Welcome the aspiration for water neutrality, but this needs to be applied at a large scale rather than for individual homes. New water consumption needs to be balanced by reductions elsewhere (Environment Agency);
- It will be difficult to achieve water neutrality; development should aim to be highly water efficient with an aspiration for water neutrality (Quod on behalf of landowners);
- Strongly object to proposals for housing and sports facilities adjacent to the Royal Military Canal, Hythe<sup>3</sup> (Historic England);
- Too much development in Hythe will detract from the vision; and
- Hawkinge is a town not a village and it doesn't blend into the landscape as is claimed.

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<sup>3</sup> An allocation in the Places and Policies Local Plan, Policy UA18.

## Part 4 – The Spatial Strategy for Folkestone & Hythe District

### 9. Section 4.1: District Spatial Strategy

9.1. 54 representations were received relating to Section 4.1 (41 comments to the supporting text and 13 comments to policy SS1).

9.2. Comments on the supporting text raise the following issues:

- The appeal of the district will be lost when villages around the new town merge with Otterpool, losing their identity;
- The development of Otterpool Park has nothing to do with meeting local need and everything to do with creating a commuter town. Building housing promotes immigration which creates problems;
- It is not clear how building a garden settlement will promote social mobility;
- Proper evidence is needed of what housing is required, and where, to avoid creating misplaced communities;
- The remaining coastline should be preserved;
- Could further education provision be used to address the balance between the older and younger population?;
- Figures for housing completions and housing targets are confusing;
- The housing targets are nearly double those of the previous Core Strategy and more than the government requires;
- A legitimate case could be made for the district not to meet its housing need (Kent Downs AONB Unit);
- Object to unrealistic and unsustainable housing targets (CPRE Shepway);
- It is extraordinary that the Strategic Housing Market Assessment does not include Ashford;
- Research is self-serving, unconvincing and incomplete;
- Targets are based on assumptions about in-migration from London which may or may not continue;
- Concern that the plan proposes housing delivery beyond the plan period – there is no justification for this (Kent Downs AONB Unit);
- The council will need to fully consider its housing need when the standard methodology and revised NPPF are formally published. This will likely be supported by new household projections scheduled for release in September 2018 (Gladman Developments Ltd.);
- The increase in housing growth will place significant additional pressure on education facilities – the plan will need to meet infrastructure requirements (Education and Skills Funding Agency);
- Categorising employment as “supporting infrastructure” betrays a “housing first” attitude;
- There is not enough detail about measures to increase employment;
- The town centre needs to be developed to provide opportunities for the daytime and night-time economies;
- An ambitious strategy is needed to improve deprived areas and develop brownfield sites;
- The council proposes to pursue a nuclear waste facility on Romney Marsh against local people’s wishes – this is a major strategic issue and should be subject to consultation;
- The council needs to be open about how the water supply will be dealt with;

- Support the intention that development elsewhere in the AONB will be limited, but this should be explicitly set out (Kent Downs AONB Unit);
- The area between Folkestone and Ashford should not be allowed to join up;
- The plan should be clear and consistent about what is proposed for the rest of the North Downs and AONB;
- If a new railway station is built, Folkestone will be more than one hour from central London;
- Sustainable construction techniques should not only be applied in the Urban Area; and
- The plan should recognise the scope of London Ashford Airport to expand beyond the current capacity, within the plan period.

### **Policy SS1: District Spatial Strategy**

9.3. 13 representations were received relating to Policy SS1. These raise the following issues:

- Evidence suggests that there are significant upwards pressures on housing need which the plan will need to address (The Crown Estate);
- The principle of the creation of a garden settlement is supported (The Aspinall Foundation);
- Support the spatial strategy and the focus on Folkestone Seafront (The Trustees of Viscount Folkestone);
- The spatial strategy based on a new town and the expansion of Sellindge is not supported (Kent Downs AONB Unit);
- There was no meaningful consultation with local residents before the garden town bid was submitted;
- There is no genuine local consent for a garden town; design parameters and infrastructure will be watered down; targets for housing delivery will not be met due to lack of capacity in the housebuilding industry (CPRE Shepway);
- The Kent Downs and Romney Marsh areas are unique and can easily be overdeveloped and spoiled with traffic and pollution;
- The development of a garden town will starve Folkestone of retail and business trade;
- Object to failure to include provision for housing in North Downs rural settlements outside Sellindge and Otterpool (E. Charlier and Sons Ltd.);
- The plan should focus on the harder areas to resolve within Folkestone east and north where the greatest benefits will be found;
- London Ashford Airport should be identified within the policy (London Ashford Airport); and
- References in the policy to “new development” and “commercial development” are too general (CPIII Shopping Folkestone S.A.R.L.).

9.4. Of these 13 comments, five comments promote the development of sites and areas:

- Booker Wholesale, Park Farm Industrial Estate, Folkestone - Park Farm Industrial Estate is changing in nature and appropriate development should be directed there;
- Land north of Aldington Road (zoo car park);

- Land adjoining Etchinghill Nursery, Etchinghill;
- Land at Brookland can assist in meeting development needs; and
- London Ashford Airport.

## 10. Section 4.2: Housing and the Economy Growth Strategy

10.1. 23 representations were received relating to Section 4.2 (12 comments to the supporting text and 11 comments to policy SS2).

10.2. Comments on the supporting text raise the following issues:

- Support the housing provision set out in Table 4.2 (Quod on behalf of landowners);
- There are so many houses being built in and around Folkestone and Hythe – we do not need any more;
- There is a lack of credibility over the housing figures – Otterpool was first planned for 12,000 homes, then 10,000, now 5,500 up to 2036/37;
- The figure of 5,500 new homes for the garden settlement provides the minimum that could be expected to be delivered from the development (Quod on behalf of landowners);
- The priority should be to create jobs for existing residents rather than built houses for migrants;
- Housing does not contribute to employment, other than through relatively few construction jobs;
- Without a policy to support London Ashford Airport the plan will not be effective in delivering economic growth in an area;
- There is no strong evidence on the drawbacks of existing employment allocations – this risks losing existing employment land to speculative mixed-use developments;
- The masterplan should be informed by the Employment Opportunities Study rather than be required to reflect it (Quod on behalf of landowners);
- The plan focuses on long-term delivery only, through a garden town. This is an excessive spatial focus given uncertainty over the timescale for completions – the plan should look at short-term delivery; and
- A further 900 homes should be delivered in the North Downs area to ensure that housing needs are met while the difficult task of delivering the garden settlement is achieved.

### Policy SS2: Housing and the Economy Growth Strategy

10.3. 11 representations were received relating to Policy SS2. These raise the following issues:

- The intention to meet the locally identified housing need of 633 dwellings a year on average is supported (The Aspinall Foundation);
- Support the recognition of the garden settlement as an important element of housing provision (Quod on behalf of landowners);
- The plan will need to demonstrate that it is providing a wide range of sites in a wide range of locations to encourage the widest possible range of housebuilders (Gladman Developments Ltd.);

- The plan needs to include figures for the provision of floorspace for retail and other main town centre uses (CCPIII Shopping Folkestone S.A.R.L.);
- Figures for housing need are not substantiated by evidence of employment opportunities; provision for community facilities is omitted;
- Park Farm Industrial Estate is changing in nature, and this should be reflected in the strategic policy to ensure that previously developed land is utilised;
- The credibility of the plan has been undermined by the decision to promote Otterpool Park before the Core Strategy Review has been completed;
- Concerns over the proposed housing need in view of changes to the government's methodology and spatial implications for the North Downs area (Kent Downs AONB Unit);
- The varying figures for housing need are inconsistent and lack credibility; and
- It is essential that proper consideration is given to water, drainage, schools, medical facilities and roads. Affordable housing should be provided – agreements are often made but not kept. The Kent Downs and Romney Marsh areas are unique and can easily be overdeveloped.

## **11. Section 4.3: Place Shaping and Sustainable Settlements Strategy**

11.1. 20 representations were received relating to Section 4.3 (12 comments to the supporting text and eight comments to policy SS3).

11.2. Comments on the supporting text raise the following issues:

- It is not the case that there is spare capacity in existing infrastructure;
- Text about rural and primary villages is too open-ended and lacks clarity; it seems to indicate that “piecemeal” development will continue regardless of “strategic” development at Otterpool;
- Object to the assertion that the area of the proposed Otterpool development is lower quality than other parts of the region;
- The text needs to make it clear that a sequential approach will be undertaken to ensure that sites at lowest risk are considered first (Environment Agency);
- Paragraphs relating to the sequential approach (paragraph 4.73) and strategic needs and flood risk (paragraph 4.75) should be deleted as they provide get-outs for inappropriate development;
- Tidal flooding is not the only flood risk;
- Reference to the Water Resources Management Plan needs to be updated (Kent County Council);
- The plan should refer to the need to follow the Kent Downs AONB Management Plan and associated Design Guidance (Kent Downs AONB Unit);
- Safeguards are needed over and above planning controls (such as community ownership) to ensure that the highest quality is achieved (CPRE Shepway);
- Welcome the aim to achieve water-neutral development, but this needs to be applied at the large-scale and is not something that can be achieved at



the scale of an individual self-build or custom-build home (Environment Agency); and

- Achieving carbon and water neutrality is challenging. The text should be amended to refer to the aim for the garden settlement to achieve the highest possible standards of energy and water efficiency with an overall aspiration towards carbon and water neutrality (Quod on behalf of landowners).

### **Policy SS3: Place-Shaping and Sustainable Settlements Strategy**

11.3. Eight representations were received relating to Policy SS3. These raise the following issues:

- The principle of creating a garden settlement is fully supported (The Aspinall Foundation);
- Support reference to the garden settlement within the policy (Quod on behalf of landowners);
- The policy to create a garden settlement is noted (Diocese of Canterbury);
- It is not clear whether the policy applies to cultural uses – it should be amended to read “community, cultural, voluntary of social facilities” (Theatres Trust);
- All flood risk criteria should apply (bullet points (c) (i), (ii) and (iii)) (CPRE Shepway);
- Historic features of conservation interest have not been respected at Shorncliffe Garrison and the Royal Military Canal;
- There should be some form of continuous assessment between the local planning authority and developer to see when remedial action is needed to address the impacts of development; and
- The development of previously developed land is likely to be acceptable wherever it lies, not just within “defined settlements”.

## **12. Section 4.4: Priority Centres of Activity Strategy**

12.1. 17 representations were received relating to Section 4.4 (11 to the supporting text and six comments to policy SS4).

12.2. Comments on the supporting text raise the following issues:

- Support identification of a major employment site and town centre within the garden settlement in Table 4.4 and support identification of a proposed strategic town in Figure 4.3 (Quod on behalf of landowners);
- Reference in the text to an “over-arching approach” to town centres should be reinstated;
- A full and robust town centre assessment is needed before a policy promoting these uses in the garden settlement can be found sound. References relating to the garden town not competing with other centres are insufficient to stop significant amounts of retail floorspace coming forward in this location (CCPIII Shopping Folkestone S.A.R.L.);
- The Policies Map needs to be updated to include Primary Shopping Areas for the district’s main town centres, including Folkestone;

- Residents from the garden settlement will not shop at Folkestone, they will go to Ashford;
- The economic survival of Hythe is dependent on their being sufficient car parking space for the town centre;
- The plan does not reflect the surplus, uncertainties and lack of demand for industrial space;
- Providing more employment land will not necessarily lead to more investment or jobs;
- Concern over proposals to provide major employment sites within the new garden settlement and at Hawkinge (Kent Downs AONB Unit); and
- The provision of another railway station will diminish the advantages of High Speed 1 to Folkestone businesses.

#### **Policy SS4: Priority Centres of Activity Strategy**

12.3. Six representations were received relating to Policy SS4. These raise the following issues:

- Request that the Policies Map is updated to show the garden settlement as a Priority Centre of Activity (Quod on behalf of landowners);
- Concerns at proposals to provide major employment sites within the garden settlement and at Hawkinge (Kent Downs AONB Unit);
- The policy should state that mixed-use developments will be acceptable where they provide a net gain of suitable local job opportunities (Ravensbourne Investments Ltd.);
- The policy should state that a preference will be given to out-of-centre sites that are accessible by a range of modes of transport other than the car and include consideration of the impact on town centres (CCPIII Shopping Folkestone S.A.R.L.);
- The policy does not provide sufficient flexibility in requiring no net loss of B Class and sui generis employment uses; and
- Work is required to existing towns before a new town is constructed.

### **13. Section 4.5: District Infrastructure Planning Strategy**

13.1. 23 representations were received relating to Section 4.5 (15 to the supporting text and eight to policy SS5).

13.2. Comments on the supporting text raise the following issues:

- National policies relating to the provision of school places should be referenced (Education and Skills Funding Agency);
- The Education and Skills Funding Agency (ESFA) welcomes references to improving educational attainment and the need for development to facilitate improvements. Emerging ESFA proposals for funding schools as part of large residential developments may be relevant;
- A strategy for higher education is missing (CPRE Shepway); and
- Local demands for tertiary education should be examined – the Kent College site could be combined with provision at Otterpool (Go Folkestone Action Group).

- Following work currently being undertaken, look forward to working with the district council to secure essential highway improvements (Kent County Council);
- The omission of a policy dealing with London Ashford Airport is not justified - a policy is needed which supports the airport's continued enhancement and expansion, subject to impacts being acceptable;
- Reference to there being "no adverse environmental consequences" is too onerous – environmental impacts need to be balanced against economic growth in planning decisions;
- Infrastructure in east Folkestone is the priority, rather than Westenhanger station;
- Grave reservations about the ability of roads around the garden settlement to cope with increased traffic, particularly: heavy goods traffic; through-traffic in Sellindge; the increased draw of Westenhanger station; and routes to Hythe and the Marsh;
- Current A20 improvements in Sellindge have not included cycle paths, contrary to the encouragement in the plan for sustainable living; and
- Improvements to Folkestone's one-way system are needed that provide for more two-way traffic; railway lands near Tram Road need to be used for road-widening and car parking; support should be given to the Leas Lift (Go Folkestone Action Group).

### **Policy SS5: District Infrastructure Planning**

13.3. Eight representations were received relating to Policy SS5. These raise the following issues:

- Broadly support the policy (Education and Skills Funding Agency);
- The policy should be amended to ensure that Section 106 negotiations not only take account of viability, but also contributions through the Community Infrastructure Levy (Taylor Wimpey);
- Developments may have the capacity to bring forward new infrastructure that could work alongside existing infrastructure to improve capacity (The Trustees of Viscount Folkestone);
- The creation of new communities may involve reshaping organisations and redrawing boundaries, as well as new resources – the Diocese needs to be fully involved in these plans (Diocese of Canterbury);
- It is not clear what the needs for water, roads, highways, schools and community facilities are;
- The policy needs to be more robust and a more suitable funding model is needed as Section 106 and Community Infrastructure Levy are ineffective;
- There are significant problems with the provision of healthcare; and
- The Infrastructure Delivery Plan should be published.

## **14. Section 4.6: Strategic Allocations**

14.1. 196 representations were received relating to Section 4.6 (76 comments to the supporting text and 120 comments to policies SS6-SS11).

14.2. 19 comments on the general supporting text raise the following issues:

### New Garden Settlement

- The site at Otterpool will destroy local communities and continue to develop the area between Folkestone and Ashford;
- The scale of development is unsustainable given constraints and the impacts of growth in Ashford;
- Proposals do not show the context of the settlement regarding the district or wider region;
- Focussing on the garden town is a long-term strategy only; the plan needs to be redrafted to focus on short-term delivery;
- The proposals leave no buffer between the homes in Barrow Hill and the proposed housing development – a clear boundary is needed;
- Development west of Otterpool Lane is too far away from the proposed new town high street and transport/community hub;
- The development will have negative impacts on residents in Barrow Hill through increase traffic;
- The footpath under the Grove Bridge should not be removed just to allow better flow of traffic; and
- Land north of Westenhanger and north west and east of junction 11 should be included – the high street and transport hub would then be in the middle of the new town.

### Growth Options Study

- The Growth Options Study is a reiteration of the strategic corridor approach that was soundly rejected by the Inspector at the last Core Strategy process;
- The Growth Options Study includes assumptions that cannot be challenged until detailed plans are available – it needs to be revised;
- Strongly question the study's findings that development in the area to the east of Westenhanger is acceptable and that high density development between Stone Street and the A20 to the east of Westenhanger is justified (Kent Downs AONB Unit);
- The area identified in the Phase Two report is open farmland and cannot be described as “suitable for residential development”;
- The Phase Two report does not detail the necessary improvements to road infrastructure; and
- The Phase Two report does not define what is meant by a “critical mass” – this lends itself to high-density housing on light assumptions.

### A Charter for Otterpool Park

- It is disingenuous to state that community involvement has been encouraged from the outset;
- Stakeholder consultation did not include local residents;
- The garden town is supposed to be locally-led but less than two per cent of local residents support it (Monks Horton Parish Meeting and Sellindge and District Residents' Association); and
- The town needs to build on the existing history of the place (Historic England).

### **Policy SS6: New Garden Settlement – Development Requirements**

14.3. 13 comments were made to the supporting text to Policy SS6 and Figure 4.5: Garden Settlement North Downs – Indicative Strategy. These raise the following issues:

- A bypass is needed for Sellindge to accommodate traffic from the new town, improve movements when the M20 is closed and access land west of Harringe Lane;
- A higher percentage of self-build needs to be included; a number of self-build dwellings should be specified;
- The employment study for Otterpool Park has only recently been published;
- Paragraph 4.163 contains aspirations rather than policies;
- A new paragraph is needed to state that the delivery of school places will be managed over the course of construction to be delivered at appropriate points in line with housing (Quod on behalf of landowners);
- The following comments were made relating to Figure 4.5:
  - The notation should be amended to allow for greater flexibility in the location of the town centre (Quod on behalf of landowners);
  - The figure contains errors and needs to be aligned with the draft masterplan;
  - Concern about the use of zoo land, particularly the car park;
  - The use of grey triangles to identify heritage assets is misleading – it only identifies listed buildings, not other types of asset. The grade II listed Royal Oak public house, grade II registered Sandling Park and archaeological remains are not shown (Historic England);
  - Should show the southern entrance to the castle being reinstated and a sufficiently large undeveloped area retained between the A20 and the castle (Historic England); and
  - Currently the plan is just a number of separate housing developments around the villages of Sellindge, Lympne and Westenhanger.

14.4. 48 representations were received relating to Policy SS6. These raise the following issues:

- There has been a lack of consultation with local residents;
- The scale of development is unacceptable and would destroy the character of the area. It would not be in keeping with the Area of Outstanding Natural Beauty and would lead to the loss of agricultural land;
- The council is preparing for a new conurbation, absorbing the local villages and encroaching on Hythe, Folkestone and Saltwood;
- The development is in the wrong place – homes should be built on brownfield sites within Ashford and Folkestone;
- Large communities living close to deprived areas are more prone to antisocial behaviour and a reduced quality of life – small clusters of development would have less impact (Stowting Parish Meeting);
- The garden town is a real opportunity to create a great place to live, rather than extending the urban sprawl of Ashford or Folkestone;
- We must not build another centre of growth so close to Ashford – it will result in a built-up area from Ashford to the coast, mainly consisting of dormitory settlements for people working in London;

- To maintain Lympne as a separate, vibrant village it needs some new houses and space between Lympne and Otterpool;
- The William Harvey hospital and doctor's surgeries are already over-stretched;
- There is insufficient water, sewerage, road or primary health care infrastructure;
- There is the possibility of flooding;
- A bypass is needed for Sellindge – this would help Sellindge residents, the Otterpool development and through-traffic;
- The development will lead to increased congestion in and around Hythe – Hythe will be swamped;
- The amount of development has nearly doubled from the existing Core Strategy and is more than the government requires;
- Plans need to be rethought – no one in Sellindge, Stanford and Lympne wants the development;
- The development will put a huge strain on the water supply in what is already a water-scarce area;
- Not convinced that the aspiration of one job per dwelling will be achieved. The employment opportunities are overstated;
- Homes would not be affordable. It is a common ploy of developers to lower the number of units when permission is granted;
- The affordable housing proportion should be 30 per cent (CPRE Shepway);
- Support the policy, but amendments should be made to:
  - Identify water and carbon neutrality as an aspiration;
  - Provide greater flexibility regarding the mix of housing;
  - Provide greater flexibility in the phasing of development;
  - Provide clarity on the requirement to “meet the needs of the elderly”;
  - Provide greater flexibility regarding the provision of self-build plots;
  - Remove a fixed target for school provision with a requirement to monitor and manage provision over the course of construction and occupation of homes (Quod on behalf of landowners);
- Support the specification of anticipated requirements for new schools – it needs clear explanation how this has been calculated (Education and Skills Funding Agency);
- Insufficient attention has been given to the retail and town centre offer – it could cause significant harm to town centres in the district and beyond (CCPIII Folkestone Shopping S.A.R.L.);
- Object to the proposed allocation; however if it comes forward, it is essential that potential harm to the Area of Outstanding Natural Beauty is addressed in this policy (Kent Downs AONB Unit);
- Welcome the ambition to create a water-neutral development, but this would need to be applied at a large scale, not in the context of individual homes or even a larger new development (Environment Agency);
- Kent County Council has commented as follows:
  - The Rights of Way Improvement Plan should be referenced. This will enable joint working to deliver improvements;
  - The public right of way network can provide opportunities for leisure and recreation within the site and provide access to the wider network;
  - Support criteria related to connectivity (1(d)) and 1(e)) – good connectivity will reduce car reliance from the outset;

- Reference to “community facilities” (criterion 4(a)) is left undefined – this should include provision for the elderly, young people, faith groups, libraries, social care, etc;
- Detailed amendments are suggested to wording relating to education provision; and
- An assessment is needed to determine whether the strategic allocation would be compatible with the permitted waste recovery facility at Otterpool Quarry;
- Canterbury City Council has commented as follows:
  - Further emphasis is needed on the delivery of employment development as part of each phase;
  - Query whether any work has been done to assess the impacts on key routes to Canterbury (Stone Street and Nackington Road) which are already subject to congestion; and
  - Would support the provision of a frequent, high quality bus service between Otterpool and Canterbury connecting to the fast bus route from South Canterbury/Nackington Road to the bus station;
- The settlement will be clearly visible from the escarpment to the north and North Downs Way National Trail. There are potential impacts but also opportunities for enhancement for the Otterpool Quarry and Lympne Escarpment Sites of Special Scientific Interest. There is the opportunity for an ambitious green and blue infrastructure strategy to mitigate impacts and provide net gain. Policy wording should be strengthened to achieve biodiversity gains (Natural England);
- The second paragraph does not reference the historic environment – it should state that the town’s townscape and landscape will be informed by the historic character of the area (Historic England);
- Support the principle of a new garden settlement. A degree of flexibility is needed to enable some peripheral sites to be brought forward earlier in the plan period. The affordable housing contribution should be expressed as a target, rather than a minimum (The Aspinall Foundation);
- The requirement to make stakeholders central to the masterplanning is welcomed (Diocese of Canterbury);
- The delivery of garden settlements is incredibly challenging and will take significant time – a cautious approach is needed to delivery, given the experience of proposals in North Essex (Gladman Developments Ltd.); and
- Strategic scale development must be balanced against the delivery of a range of sites so that smaller housebuilders, as well as national operators, can work together.

### **Policy SS7: New Garden Settlement – Place Shaping Principles**

14.5. 13 comments were made to the supporting text to Policy SS7. These raise the following issues:

- Bridlepaths, footpaths and cycle paths must feature heavily in the new development and be part of phase one;
- Paragraph 4.164 fails to reference the historic environment. It would be better to also reference how other heritage assets (designated or not) can inform the character of the new settlement (Historic England);

- More landscaping is required between the current homes in Barrow Hill and the proposed new estates to ensure existing communities do not lose their identity;
- Doubt whether the new high street will be commercially viable due to lack of footfall;
- Alternatives to a high street should be considered with different layouts such as squares;
- A large town is going to have a town centre that competes with neighbouring towns – look to Marlborough and Poundbury for inspiration;
- A high speed train stopping at Westenhanger would be at the expense of commuters travelling from Folkestone;
- Kent County Council suggests amendments in relation to train operating companies; and
- There should be 40 per cent green space in the development.

14.6. 19 representations were received relating to Policy SS7. The raise the following issues:

- Lympne should not be destroyed as a separate, historic village in order to create a “vibrant new town”;
- There is a lack of clarity regarding revisions and amendments to delivery;
- To overcome traffic congestion in Sellindge, a through-road from the A20, next to Otterpool Lane should be built to access the new development west of Otterpool Lane and west of Barrow Hill. This could then come out onto Harringe Lane and then back onto the A20;
- New rights of way should be in place during the first stage of development;
- Harringe Lane would be more suited to becoming an access-only road to the residents and form part of the new bridlepath and cycle path network;
- Broadly support the policy, but suggest that the term “village” should be removed when describing neighbourhoods (Quod on behalf of landowners);
- A full assessment of the retail requirements of the garden settlement is required before any sound retail and town centre policy can be put forward (CPIII Shopping Folkestone S.A.R.L.);
- It is important that policies relating to retail provision in the new settlement are clear as to the scale and form of facilities required and that they will not be greater than required to meet the day-to-day needs of the new community;
- Criterion 1(a) should require a landscape-led approach that respects historical character;
- Westenhanger Castle should be made part of the project to complete its conservation and be an integral part of the new settlement and should be included within the allocation boundary;
- Historic England suggest amendments to paragraph (d) of SS7 in relation to archaeological and heritage assets;
- The newly discovered Roman Villa should play a major part in shaping the new town, along with the Castle at Westenhanger;
- Kent County Council suggests:
  - Additional text in relation to public rights of way within Policy SS7(1)(v). The Rights of Way Improvement Plan should be referenced;



- High quality, traffic-free walking and cycling routes should be provided within new developments that integrate with the wider transport network (Policy SS7 (6)(e));
- Amendments to Policy SS7(6)(g) in relation to train operating companies;
- Provisions on sustainable access and movement are supported;
- An assessment is needed to demonstrate whether or not the development would be compatible with waste recovery facility at Otterpool Quarry;
- Any upgrades to Westenhanger Station should not impact or degrade the existing high speed provision in Dover (Dover District Council);
- Community formation should be given more prominence to ensure the social dimension of sustainable development has as much priority as economic and environmental aims and objectives (Diocese of Canterbury);
- 40 per cent green infrastructure is missing from this document (CPRE Shepway);
- Natural England advises that the policy should include more reference to the AONB, Green Infrastructure (GI), and long-term stewardship of the GI estate; and
- Kent Downs AONB Unit advises that:
  - The policy fails to incorporate sufficient safeguards to ensure development would mitigate the impacts of the proposal on the Kent Downs AONB;
  - A requirement to improve important gateways into the new town should be included; and
  - The orientation of streets and building heights should be included within the policy to minimise any impact on the AONB.

### **Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles**

14.7. Six comments were received to the supporting text of Policy SS8. These raise the following issues:

- Correction to wording to state “serious water stress” rather than “severe” (Environment Agency);
- The environmental dimension of sustainability includes the historic environment and this should be reflected here (Historic England);
- Affinity Water South East region has neither the infrastructure nor water resources to support a new town, which would be twice the size of Hythe (Monks Horton Parish Meeting and Sellindge & District Residents’ Association);
- There is insufficient detail on water use; and
- Safeguarded minerals are not correctly identified (Kent County Council).

14.8. 18 representations were received relating to Policy SS8. These raise the following issues:

- A site-wide heat and power network has the potential to be particularly harmful to the landscape of the AONB (Kent Downs AONB Unit);

- Would like early discussion with the council and other stakeholders to address cross-boundary water supply and quality issues (Dover District Council);
- Insufficient attention has been given to the provision of retail and town centre space – this could cause significant harm to town centres within the district and beyond (CCPIII Shopping Folkestone S.A.R.L.);
- Support ambition for water efficiency and BREEAM standard for non-residential development. Welcome ambition to create a water-neutral development; however this concept should be applied at a large scale, not that of individual homes or even larger developments (Environment Agency);
- The water efficiency target is not achievable;
- The following amendments should be made:
  - The requirement to achieve BREEAM ‘Outstanding’ standard should be replaced by the requirement to achieve ‘Very good’ standard with the aim to meet ‘Excellent’ standard;
  - Water neutrality should be expressed as an “aspiration” rather than an “aim”;
  - Zero carbon standards for community buildings should be an aspiration (Quod on behalf of landowners);
- Kent County Council has commented as follows:
  - The policy refers to achieving water neutrality as an “aim” but elsewhere it is referred to as an “aspiration” – to achieve water neutrality a large proportion of the existing housing stock in the district would need to be retrofitted;
  - The importance of maintaining the “integrity of water quality” should be referred to in the policy, as well as the text;
  - The requirement for non-residential buildings to achieve BREEAM “outstanding” standard will lead to large increase in the build costs of schools, which must be met by the development;
  - In relation to a minerals assessment, particular reference should be made to Policy DM7 of the Kent Minerals and Waste Local Plan 2013-30; and
  - Consideration should be given to the impact of the development on non-motorised users along rural lanes, as these routes provide connections for horse riders and cyclists travelling between public rights of way;
- The formation of communities could be given more prominence – this should be given as much priority as economic and environmental aims and objectives (Diocese of Canterbury); and
- Support the aim for construction to be soil neutral, but some movement of soils may make sense (CPRE Shepway).

### **Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management**

14.9. 13 representations were received to the supporting text of Policy SS9. These raise the following issues:

- Ashford borough residents affected by the development have not been consulted;

- Education contributions by developers need to be sufficient to deliver school places if the plan is to be deliverable;
- Kent County Council has commented as follows:
  - The text will need updating following the announcement on the Housing Infrastructure Fund;
  - The text should refer to informal pedestrian and cycle pathways;
  - The achievement of water neutrality should be an aspiration rather than an aim;
  - Letter received from Kent County Council setting out its General Site Transfer Requirements;
- Large developments should not be 'zero-rated' for the Community Infrastructure Levy (CIL) – CIL should be captured alongside Section 278/Section 106 contributions;
- Support the amendment to exclude the garden settlement from CIL (Quod on behalf of landowners);
- Question why a "tariff-based approach" depends on securing Housing Infrastructure Fund monies;
- Question whether all archaeological studies have been carried out, and if new features are found (e.g. a Roman settlement) how will this affect the design of the town;
- The provision of good broadband services should be delivered, but may be costly over such a wide area; the words "where feasible" should be removed; and
- Some members of the group regard the area as Green Belt, and most believe that water supply will be a problem (Go Folkestone Action Group).

14.10.20 representations were received relating to Policy SS9. These raise the following issues:

- Strongly disagree with the strategy for housing development in rural areas, particularly in respect of Otterpool Park;
- Object that there is no mention of how infrastructure will be funded. Concern that infrastructure costs will exceed funds;
- There needs to be more joined-up thinking between organisations covering emergency services, hospitals and education;
- Nearby villages that fall within Ashford borough should also benefit from Section 106 funding, as they will be directly impacted;
- Insufficient attention has been given to retail and town-centre policies – inappropriate development could cause significant harm to town centres in the district and beyond (CCPIII Shopping Folkestone S.A.R.L.);
- Contributions and improvements should be secured towards the costs of managing increased visitor impacts on the Area of Outstanding Natural Beauty (Kent Downs AONB Unit);
- Support the emphasis on early delivery of critical infrastructure, particularly primary education, and the approach of prioritising Section 106/Section 278 agreements to secure delivery. This will need to be planned carefully to work within pooling constraints (Education and Skills Funding Agency);
- Southern Water has commented as follows:
  - The site is within Southern Water's wastewater service area network – reinforcement will be required at the "practical point of connection";

- There is no provision to support the delivery of wastewater infrastructure which is funded through mechanisms other than CIL or Section 106 agreements;
- Any upgrades to wastewater treatment works would be funded and delivered through the water industry's five yearly price review process;
- Network improvements will be provided through the new infrastructure charge but Southern Water will need to work with the site promoters to understand the development programme;
- Southern Water has limited powers to prevent connections to the sewerage network even when capacity is limited – planning policies and conditions play an important role in coordinating development and infrastructure;
- Southern Water's infrastructure crosses the site and easements will be required as well as buffers around wastewater pumping stations;
- In relation to a Community Trust, there is a need to make provision for a heritage facility, such as a museum/archive storage (Historic England);
- Kent County Council has commented as follows:
  - An assessment is needed to demonstrate whether or not the development would be compatible with the waste recovery facility at Otterpool Quarry;
  - Reference should be made to the county council's Rights of Way Improvement Plan;
  - Criterion 1(a) should include community and waste facilities;
  - Support for criterion 2(a) – this will prevent the need for retrospective installation of fibre to the cabinet;
  - Support for provision for ducting in criterion 2(d) – this will ensure that impacts on the highway are kept to a minimum as a result of maintenance and repairs;
  - In relation to Criterion 3(a) any route that is not a Public Right of Way or cycle route which is adopted highway will not be maintained by the County Council;
  - Criterion 3(b) – the strategy for stewardship could include street furniture and public art;
  - Criterion 3(b)(vi) – in some cases there may be an opportunity for surface water drainage systems to be adopted by the sewerage undertaker; and
- Social infrastructure provisions should be strengthened. The social dimension should have at least as much priority as economic and environmental objectives. The Diocese has the skills to work with the local planning authority to improve the policy and ensure delivery (Diocese of Canterbury).

### **Policy SS10: Spatial Strategy for Folkestone Seafrost**

14.11. Nine representations were received relating to the supporting text of Policy SS10. These raise the following issues:

- Renumbering policies is confusing. Policies should be reviewed where circumstances have changed;
- The policy should remain until the project is complete;

- Any development must recognise that this area has a long history as a place with a nightlife;
- Support the retention of the Harbourmaster's House and the Princess Royal. Would like to see the Fishermen's Museum continue (Go Folkestone Action Group);
- The Seafront scheme will need to complement the town centre shops; the Leas Lift is vital to connect the seafront;
- Support the statement that local partners should work together to improve connectivity between the seafront and town centre;
- Transport links in the harbour area need to be rethought; and
- The proposal to redirect the England Coastal Path along the road was rejected.

14.12. Eight representations were received relating to Policy SS10. These raise the following issues:

- Questions whether the policy is still valid;
- Support the 90 litres/person/day target for water efficiency, but reference to the Code for Sustainable Homes should be deleted (Environment Agency);
- Folkestone and Dover is the most water-stressed area of the UK;
- The policy will need to be updated given the current scheme for the seafront;
- The focus on Folkestone seafront is supported;
- Support the policy and the statement that local partners should work together to improve connectivity; and
- Renumbering the policy is ridiculous. 'Sui generis' and 'A' use classes should be removed. The policy was ignored when granting permissions.

### **Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone**

14.13. Three representations were received relating to the supporting text of Policy SS11. These raise the following issues:

- Adjustments should be made to reflect the consented scheme (removal of the provision of allotments and adjustment of green space at the stadium) (Taylor Wimpey);
- Reference to listed buildings is out-of-date, as four buildings/structures are now grade II listed (The Racquets Court, Concrete Barrack Block, Sir John Moore Library and Risborough Gates) (Taylor Wimpey); and
- Tourism could be greatly improved if the developer was encouraged to retain the last remaining stable block; unfortunately this is destined for demolition.

14.14. Seven representations were received relating to Policy SS11. These raise the following issues:

- The focus on Shorncliffe Garrison is supported;
- The policy should be updated to reflect consented development and national guidance, in particular affordable housing provision and reference to the Code for Sustainable Homes (Taylor Wimpey);

- Support the 90 litres/person/day target for water efficiency, but reference to the Code for Sustainable Homes should be deleted (Environment Agency);
- There is no mention of heritage – the site contains heritage artefacts. Reference should also be made to the Seabrook Valley;
- The National Planning Policy Framework has not been adhered to when it comes to delivering historic interpretation; and
- Renumbering the policy is ridiculous. Heritage features of the site are not being preserved or investigated properly – the policy has not safeguarded these features.

## Part 5 – Core Strategy Delivery

### 15. Section 5.1: Core Policies for Planning

15.1. 62 representations were received relating to Section 5.1. These comprise 37 comments on the supporting text and 25 comments on the policies (CSD1-5).

15.2. Comments on the supporting text raise the following issues:

- More homes should be developed in Folkestone town centre alongside new parking for residents and shoppers – the decline in shopping space needs to be managed (Go Folkestone Action Group);
- Affordable housing targets should remain at 30 per cent;
- The Royal Victoria Hospital site should be used for the elderly;
- Creating travellers' sites is concerning;
- There is a serious lack of public toilets;
- The Heritage Strategy is still in draft and the Destination Management Plan has not been adopted;
- A local list of heritage assets is needed;
- Heritage assets are not being considered positively (Royal Military Canal, Shorncliffe Garrison);
- The windmill at Stanford (Grade II\*) needs to be included on Figure 5.2;
- Assessing the suitability of future development must consider the impact on the Kent Downs (e.g. Port Lympne) (Kent Downs AONB Unit);
- Adequate parking needs to be provided for the coastal park;
- Reference to “special water scarcity status” need to be updated (Environment Agency);
- The strategy for water supply and management needs to be comprehensively reviewed and supported by detailed independent studies;
- The draft Water Resources Management Plan currently out for consultation does not cater for the housing growth proposed;
- The district falls within one of the most water-stressed areas of the UK with less fresh water per person than Morocco;
- The use of grey water can play a significant role in new developments;
- The updated Water Cycle Study is needed now;
- Welcome the aspiration for water neutrality, but this needs to be applied at a large scale rather than for individual homes. New water consumption needs to be balanced by reductions elsewhere (Environment Agency; Kent County Council); and
- Occupation of developments needs to be aligned with the delivery of the requisite sewerage infrastructure (Southern Water).

### Policy CSD1: Balanced Neighbourhoods

15.3. 10 representations were received relating to Policy CSD1. The representations raise the following issues:

- Smaller scale housing development around Lympne, Westenhanger and Sellindge is needed which suits the rural character and is truly affordable;
- The housing market area should include Ashford (CPRE Shepway);

- House-building should only be allowed where sufficient affordable housing is included;
- The proportion of affordable housing should be maintained at 30 per cent;
- On the Romney Marsh and the AONB the affordable target should be set at 30 per cent with a further 20 per cent for retirement homes;
- The requirement for a 30/70 shared equity/affordable rent-social rent split will be inappropriate for a number of allocations;
- Support the provision of 22 per cent affordable housing, subject to viability and welcome the acknowledgement that the split of tenures is a starting point (Quod on behalf of landowners);
- Support the lower threshold for affordable housing provision in the AONB (Kent Downs AONB Unit);
- There should be more one- and two-bedroom terraced, semi-detached, flats and maisonettes for first-time buyers;
- The policy does not reflect the broader range of affordable housing (starter homes, discounted market sales, shared ownership and rent-to-buy) in the consultation National Planning Policy Framework (NPPF) (Taylor Wimpey); and
- Reference to rent-to-buy should be made within the policy as well as the text (Rentplus Ltd).

### **Policy CSD2: District Residential Needs**

15.4. Five representations were received relating to Policy CSD2. The representations raised the following issues:

- The policy should be updated to reflect the broader definition of affordable housing in the draft NPPF. Requirements for housing mix and tenure should be amended to avoid unnecessary prescription. It is not clear how the policy will be monitored (Taylor Wimpey);
- The housing mix is difficult to forecast too far ahead;
- Units for older people should not be limited to the garden town and Sellindge (CPRE Shepway);
- The policy should indicate what will be done to house the older population;
- The mix at Otterpool Park will look to meet the target mix, dependent on viability and deliverability and ensuring flexibility between phases. Amendments should be made as follows:
  - The requirement for sizes of houses to be split by tenure is too prescriptive; it should be expressed as a maximum percentage of one bed dwellings and a minimum percentage of three bed dwellings;
  - The requirement for specialist units for older people should be widened to include Use Class C2, in addition to Class C3(b) (Quod on behalf of landowners);
- Rents should be capped to help people in low paid jobs; and
- An excess of new property risks creating a stagnant property market.

### **Policy CSD3: Rural and Tourism Development**

15.5. One representation was received relating to Policy CSD3. This states that the policy needs to incorporate the findings of the Heritage Strategy and Destination Management Plan.



### **Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation**

15.6. Six representations were received relating to Policy CSD4. These raise the following issues:

- Development that would involve the loss, or prejudice the use, of playing fields is strongly resisted (Sport England);
- References to encouraging healthy living and active lifestyles are welcomed and could be strengthened by referencing Sport England's Active Design Guidance;
- The focus on the natural environment and policies to protect and enhance biodiversity are welcomed (Environment Agency);
- Support the development of a robust strategy for mitigating recreational disturbance to European-designated sites (RSPB);
- The wording and principles should be strengthened to ensure that net gains in biodiversity can be achieved (Natural England); and
- The location, scale and complexity of the garden settlement means that there are significant environmental implications, but the development offers the opportunity for an ambitious blue and green infrastructure strategy for people and wildlife (Natural England).

### **Policy CSD5: Water and Coastal Environmental Management**

15.7. Three representations were received relating to Policy CSD5. These raise the following issues:

- The policy could refer to the Water Framework Directive, as is referenced in the text (Environment Agency);
- Adequate foul sewer capacity must be provided in line with development. Brownfield development must address contamination, however, this can lead to conflicts with sustainable drainage, as infiltration drainage is not always appropriate (Environment Agency); and
- The target for water consumption should be reduced to 90 litres/person/day.

## **16. Section 5.2: Areas of Strategic Change**

16.1. 103 representations were received relating to Section 5.2. These comprise 60 comments on the supporting text and 43 comments on the policies (CSD6-9).

16.2. Six comments were received on the general supporting text. These raise the following issues:

- Support for priority areas of regeneration (Table 5.1);
- Welcome references to improving educational attainment and the need for development to facilitate improvements to education (Education and Skills Funding Agency);
- The text should state that the council will support development proposals associated with the decommissioning of Dungeness 'A' (Nuclear Decommissioning Authority);

- Consents for London Ashford Airport should not be seen as a limit of future expansion, but as an opportunity for further investment in the district and to improve links between the UK and mainland Europe. Planning policy will not be effective without a policy to support this (London Ashford Airport); and
- The Sellindge Strategy must also incorporate the A20 Barrow Hill, which is over one third of the village of Sellindge.

### **Policy CSD6: Central Folkestone Strategy**

16.3. 13 comments were submitted to the supporting text to Policy CSD6. These raise the following issues:

- A university or tertiary education facility should be created, using a combination of development arc, Kent College and Otterpool Park, joined by rail links (Go Folkestone Action Group);
- The University Centre Folkestone is now the Sixth Form Centre;
- The harbour development has failed to make use of the town's coastal location to attract tourists and will harm the setting of The Leas;
- Investment in the restoration of the Leas Lift should be a priority within the first phase of the plan period rather than "over the plan period";
- While Figure 5.5 recognises the cliff as a barrier to movement in Folkestone, the road and rail system also restricts access;
- Folkestone town centre needs new buildings (including large shops and car parks) with appropriate tourist and boutique shops on the seafront and 'click and collect' and retail warehouses at Park Farm (Go Folkestone Action Group);
- Fail to see any contribution by the harbour owner to reintegrating maritime activities;
- Support improved connections to the sea and visitor attractions from the town, but these cannot be delivered by the land at Folkestone seafront alone; and
- While cycling in Folkestone is supported, there are considerable differences in level between the town and the seafront.

16.4. Four representations were received relating to Policy CSD6. These raise the following issues:

- References to meeting needs for education infrastructure are supported; the next version of the plan should include more detail. The Education and Skills Funding Agency would like to be included in discussions on potential site allocations;
- More needs to be done to provide a supportive framework for creative and digital industries (The Creative Foundation);
- Support requirement for new development to improve connectivity to and within the town centre; and
- Heritage policies are too late to avoid destruction of heritage assets.

**Policy CSD7: Hythe Strategy**

- 16.5. One representation was received relating to the supporting text to Policy CSD7. This raised the following:
- Problems at the A259/A261 junction will be exacerbated by additional traffic from the Martello lakes development and Otterpool Park.
- 16.6. Four representations were received relating to Policy CSD7. These raise the following issues:
- Welcome references to the need for development to improve education facilities. The next version of the plan should clarify requirements, sites and timescales, while retaining a degree of flexibility (Education and Skills Funding Agency);
  - Welcome plans to improve bus links to railway stations, but question the deliverability of this, given that the bus company is privately owned; and
  - Priorities for investment should be identified.

**Policy CSD8: New Romney Strategy**

- 16.7. Eight representations were received relating to Policy CSD8. These raise the following issues:
- Romney High Street is congested, schools are overcrowded and health facilities are in crisis – developers should be improving infrastructure rather than creating problems and walking away;
  - Impacts on the High Street and public safety need to be seriously considered – provision of a southern by-pass road is fundamental;
  - There is only one road that all residents must use to vacate the whole of Littlestone, Greatstone and Lydd-on-Sea;
  - Romney Marsh should not be seen as suitable for large-scale development;
  - Proposed development in Cockreed Lane, New Romney should be cancelled;
  - Occupation of the development should be aligned with the delivery of sewerage infrastructure, ensure future access to infrastructure and include a buffer between housing and pumping stations (Southern Water);
  - Support policy but question the need for a masterplan, given that parcels already have planning permission (Gladman Developments Ltd.); and
  - Land north of Cockreed Lane should be included within the policy (Christ Church College).

**Policy CSD9: Sellindge Strategy**

- 16.8. 40 representations were received relating to the supporting text to Policy CSD9. These raise the following issues:
- Ashford and Canterbury hospitals will not cope with all development. Sellindge surgery cannot recruit doctors and serves ten other villages. Concern that a new health centre at Otterpool will also be for the residents of Sellindge but it is not clear when it will be built;

- Barrow Hill is a very valued part of Sellindge village, despite being severed by the motorway and railway bridges (Sellindge Parish Council);
- The description of Barrow Hill as being “severed” with a “poor sense of place” is inaccurate. Barrow Hill must have the same traffic-calming as the rest of the village;
- Existing planned development should be built before considering even more;
- Object to Rhodes House/Homelands Close development;
- The development of high grade agricultural land should be a last resort;
- Development will ruin the rural character of the village;
- Any new homes should be no more than two storeys in height;
- Future development must have the same amount of community engagement as the previous proposals did (they were supported). Community feel that the additional development is being imposed on them. The facilities and infrastructure should be provided for the additional 600 dwellings – residents should not have to travel elsewhere (Sellindge Parish Council);
- Excellent opportunity to have an all-weather footpath/cycleway to Westenhanger station;
- Improved connection to Swan Lane must be a pedestrian/cycleway, not a vehicular link (Sellindge Parish Council);
- Key time to plan a Sellindge bypass as part of the access road into Otterpool, West of Otterpool Lane and the A20, coming out west of Sellindge Church;
- With Brexit the A20 and M20 could be gridlocked with port traffic;
- Having large delivery lorries accessing the site would not be safe;
- A contraflow capability is needed during motorway incidents, maintenance and Operation Stack, to ensure that the M20 can remain operational without having to divert motorway traffic along the A20;
- Woodland planting should be used to the north boundary of Bucknell Trust land and development should only be on land between the A20 and M20 to mitigate any impacts (Sellindge Parish Council);
- The boundary should be heavily landscaped in all locations;
- Land between the M20 and fast rail link, East of Grove Bridge, Barrow Hill, also has significant fauna, flora and habitat. This must be protected (Sellindge Parish Council);
- Support for the use of new technologies to achieve low carbon and low waste with aspiration for carbon neutrality (Sellindge Parish Council);
- Picture 5.8: Sellindge Strategy should identify Places and Policies Local Plan allocations;
- The Taylor Wimpey site (The Lees) is a welcome addition to Sellindge; and
- Proposals that fail to deliver community infrastructure should be resisted (Sellindge Parish Council).

16.9. 27 representations were received relating to Policy CSD9. The representations raised the following issues:

- 600 dwellings represents a major expansion of strategic scale in the rural North Downs area within the Kent Downs AONB and would have potential

- cumulative impacts with the garden town of Otterpool (Kent Downs AONB Unit);
- The building of 1,300-1,600 homes is not sustainable;
  - The big increase in population can only lead to massively increased congestion, noise, pollution and increased consumption of natural resources;
  - The existing masterplan for Sellindge, arrived at through a democratic process, should not be overridden;
  - The northern part of this proposal has already been granted consent, without the grace to wait for this consultation to conclude;
  - Plans should not be expanded from what was originally planned (250 homes) - it will swamp the village out of all recognition;
  - Object to the allocation around Grove House or any site that will turn the village into an ugly suburban settlement;
  - Barrow Hill should be incorporated into the policy, along with the allocated site in the Local Plan<sup>4</sup>. Taking the footpaths away from under Grove Bridge will cause extreme danger to life - Kent County Council state that there is not enough room for two-way traffic and a path. A Sellindge bypass must be considered which would reduce congestion and benefit Otterpool Park (Sellindge Parish Council);
  - Much of the traffic will use the A20 which will be inadequate, particularly at peak times. Those wishing to travel to Canterbury will use the B2068 which has been an accident blackspot for many years;
  - Concern about road safety with more traffic on single track lanes;
  - Key time to plan a Sellindge bypass as part of the access road into Otterpool, West of Otterpool Lane and the A20, coming out west of Sellindge Church;
  - Water supply struggles to meet existing demand - there is a risk of water shortages if there is a substantial increase in housing stock;
  - Strategic-scale sites must be balanced against housing delivery and providing choice so that smaller housebuilders, as well as national operators, can work together;
  - Reference to education infrastructure is welcome but the plan should provide site-specific policies (Education and Skills Funding Agency);
  - Criteria need to be amended to ensure occupation is phased to align with delivery of sewerage infrastructure and ensure future access for maintenance and improvement (Southern Water);
  - Support from landowners of allocated sites;
  - The requirement for a masterplan is unrealistic. The policy should be amended to: refer to 20 per affordable housing; remove reference to the provision of allotments; and refer to payment towards improvement of the doctor's surgery, rather than "expansion" (Taylor Wimpey);
  - Object to the allocation of the land to the west of Sellindge over the more sustainable site of land at Elm Tree Farm to the rear of Sellindge Primary School for the delivery of 188 dwellings (Quinn Estates);
  - Object to the 'double pooling' of the financial contributions and that the development should be CIL exempt (Quinn Estates);
  - Kent County Council:

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<sup>4</sup> Places and Policies Local Plan, Policy ND5: General Sellindge Policy

- Supports criteria for bridleways and cycle routes but would expect the improvements to be fully funded by development contributions;
- Expects improvements to traffic-calming features at key locations and suggests that an off-site shared-use pedestrian and cycle route is considered to provide a realistic alternative to the car, encouraging active travel;
- Suggests amendments with regard to water usage and fibre-to-premise broadband;
- Supports the inclusion of a village green/common and pedestrian and cycle enhancements, but there should be a focus on improving cycle infrastructure within large developments and creating attractive routes between larger settlements; and
- Natural England concurs with the findings drawn in the Sustainability Appraisal regarding Sellindge.

## **17. Section 5.3: Implementation**

17.1. Two representations were received relating to Section 5.3. These raise the following issues:

- Budget constraints are a major risk to the plan; and
- The monitoring of retail provision and the health of centres is essential; however, it is equally important to monitor regularly how changes in the retail sector and the economy may be affecting the demand side (CCPIII Shopping Folkestone S.A.R.L.).

## **Part 6 – Appendices**

### **18. Appendix 1: Monitoring and Risk**

18.1. Three representations were received relating to Appendix 1. These raise the following issues:

- Reference to achieving national Creative Enterprise Zone status should be included (The Creative Foundation);
- The use of vacancy rates to monitor the health of town centres is inadequate – monitoring should be expanded to include changes in retail occupancy, mix of uses and the proportion of national multiple stores, at the very least (CCPIII Shopping Folkestone S.A.R.L.); and
- Risk factors relating to the health of the national economy and the local housing market should be identified as “high” rather than “low”; development should be scaled-back and Otterpool Park abandoned.

### **19. Appendix 2: Glossary of Terms and Technical Studies**

19.1. Two representations were received relating to Appendix 2. These raise the following issues:

- Lack of evidence invalidates the consultation – the period for responses should be extended or consultation repeated; and
- The local list is not mentioned and references to “Shepway” are outdated.

## 20. Core Strategy Review – Sustainability Appraisal

20.1. Six representations were received relating to the Sustainability Appraisal. These raise the following issues:

- Without knowing what mitigation is proposed, it is impossible to say if the Core Strategy Review is sustainable;
- The impacts of strategic-scale development on Objective 3b: Landscape are significantly underestimated (Kent Downs AONB Unit);
- Several of the objectives are contradictory and not achievable:
  - SA1 – the area needs more truly affordable housing;
  - SA3 – development would cause significant harm to the district's landscape;
  - SA4 – nothing in the plan takes Folkestone's heritage into account;
  - SA6 – a large area of greenfield land is to be developed, but this is not mentioned under SA6. Positive effects under SA6 do not match the negative effects for all options for Sellindge;
  - SA7 – does not identify the severity of impacts on agricultural land quality, contaminated sites or the decommissioning of the nuclear power station;
- Reference to the Water Resources Management Plan needs to be updated (Kent County Council);
- With regard to the garden settlement, net biodiversity gains could be achieved if net gain can be secured over and above any residual losses – the policy wording should be strengthened in this respect. Beneficial effects will depend on long-term stewardship (Natural England); and
- The garden settlement will have significant impacts on views from the escarpment – substantial and innovative avoidance and mitigation will be required; not just structural landscaping, but also the design of walls and roofs and the use of 'green' roofs and walls. Possible major negative impacts should be recorded for SA3 (Natural England).

## 21. Core Strategy Review – Habitats Regulations Assessment

21.1. Two representations were received relating to the Habitats Regulations Assessment (HRA). These raise the following issues:

- In relation to in-combination assessment, whilst the Places and Policies Local Plan has been included in terms of air quality, it is less clear whether other impacts, principally recreation pressure, have been included. Also, it is not clear what level of housing has been assessed. Policy SS6 states a minimum of 5,500 homes within the plan period with potential future growth up to 10,000 homes beyond, within the proposed allocation area. We advise the upper limit of 10,000 homes for the garden settlement, in addition to the Sellindge extension, forms the basis of the HRA. Notwithstanding this, Natural England concurs with the findings of the HRA, subject to caveat (Natural England); and
- The HRA is difficult to understand, digest and comment on.





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# FOLKESTONE & HYTHE DISTRICT CORE STRATEGY REVIEW SUBMISSION DRAFT (REGULATION 19) AND SUPPLEMENTARY REVISED HOUSING NEED CONSULTATIONS

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Summary of Main Issues

MARCH 6, 2020

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## 1. Introduction

- 1.1. The Core Strategy Review Submission Draft (Regulation 19) was published for consultation between 25 January and 11 March 2019.
- 1.2. Following Government changes to the standard method for calculating housing need, a supplementary consultation on a revised minimum housing need figure ran between 2 December 2019 and 20 January 2020.

## 2. Summary of Main Issues

- 2.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 require local planning authorities to prepare ‘a summary of the main issues raised by the representations’. What constitutes a ‘main issue’ is not defined in legislation or guidance but it is generally accepted to mean an issue that goes to the heart of the soundness of the plan.

### Breakdown of comments by chapter

- 2.2. A total of 510 representations were received to the Draft Core Strategy Review from 117 respondents (different individuals and organisations). A further 33 representations from 24 respondents were received to the 2019-20 supplementary consultation on the revised minimum housing need.
- 2.3. The numbers of representations made against each section of the plan are shown in Table 1.

<b>Section</b>		<b>No. of representations (CSR)</b>	<b>No. of representations (CSR-H)</b>
	<b>Core Strategy Review as a whole</b>	<b>21</b>	
	<b>Foreword</b>	<b>0</b>	
<b>1</b>	<b>Introduction</b>	<b>23</b>	
1.1	About the Core Strategy	15	
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<b>Section</b>		<b>No. of representations (CSR)</b>	<b>No. of representations (CSR-H)</b>
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4.1	District Spatial Strategy	25	1
4.2	Housing and the Economy Growth Strategy	29	26
4.3	Place Shaping and Sustainable Settlements Strategy	15	
4.4	Priority Centres of Activity Strategy	14	
4.5	District Infrastructure Planning Strategy	24	
4.6	Strategic Allocations	196	5
<b>5</b>	<b>Core Strategy Delivery</b>	<b>128</b>	
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5.2	Areas of Strategic Change	90	
5.3	Implementation	3	1
Appendices		<b>4</b>	
Appendix 1: Monitoring and Risk		2	
Appendix 2: Glossary of Terms and Technical Studies		1	
Appendix 3: Indicative Housing Trajectory		1	
<b>Total number of comments</b>		<b>510</b>	<b>33</b>

### Comments on accompanying documents

2.4. Numbers of comments to the accompanying documents are shown in Table 2.

<b>Title</b>	<b>No. of representations (CSR)</b>	<b>No. of representations (CSR-H)</b>
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Submission Draft Core Strategy Review Sustainability Appraisal	13	5
Submission Draft Core Strategy Review Habitats Regulations Assessment	3	3
Submission Draft Core Strategy Review Historic Environment Assessment	1	
<b>Total number of comments</b>	<b>17</b>	<b>8</b>

- 2.5. The main issues raised by the representations are outlined section-by-section in this summary.
- 2.6. Where comments have been made against paragraphs of supporting text to a particular policy, they are summarised under the policies they relate to. Where comments do not directly relate to a specific policy, but make general points or relate to a named settlement, they are summarised separately against the most relevant part of the plan.
- 2.7. Comments to the 2019-20 supplementary consultation on the revised housing requirement are summarised with the other representations at the point in the plan against which the comments were made. The text highlights that that these were made to the supplementary consultation.

### 3. Comments on the Core Strategy Review as a Whole

- 3.1. 21 comments were received to the Core Strategy Review as a whole. These raised a number of issues, some general and others relating to specific areas or sites:
- CPRE query whether the set local housing need figure is achievable.
  - Cross-border issues with neighbouring authorities appear to have been addressed; but there is no evidence of any specific agreements.
  - Development proposals will have a huge impact on the residents of Smeeth/Sellindge
  - The district has experienced significant levels of development. Further development will result in over-stretching the local infrastructure (including water, roads, public transport, healthcare); and the loss of quality Grade 1 agricultural land.
  - The proposed garden settlement should be developed in an area that needs extra housing and has the appropriate supporting infrastructure;
  - Development will place huge strain on the roads around Barrow Hill and Sellindge. A by-pass needs to be created to alleviate this before any works commence.
  - The proposed strategy will encourage accommodation for London overspill;
  - There should be a greater focus on developing brownfield rather than greenfield sites.
  - Concerns raised that the Heritage Strategy has not been adopted.

- The impact on tourism through the loss of countryside has not been adequately considered;
- Will the aspirations to protect and enhance the landscape and natural environment reconcile with the desire for economic growth and prosperity;
- There has been a lack of local engagement in regards to the new development at Otterpool Park; in particular Sellindge residents who were told that no further development of their village would occur.

#### **4. Foreword**

- 4.1. No comments were received to the foreword.

### **Part 1 – Introduction**

#### **5. Section 1.1: About the Core Strategy**

- 5.1. 12 representations were received relating to Section 1.1. These raised the following key issues:
- The scale of the development required should have been dealt with through a new Core Strategy, not a review;
  - Building on the scale proposed will have unacceptable impacts on residents, landscape, wildlife, traffic and infrastructure;
  - The Home Builders' Federation states that under-delivery of housing in Rother District should be taken into account in Folkestone & Hythe District;
  - Highways England concurs generally with the CSR's approach and policies with regard to impacts on the strategic road network;
  - Concerns raised about heritage assets within the district; and the current status of the emerging Heritage Strategy; and
  - There has been insufficient publicity and time given to comment on the document. The consultation portal is difficult to navigate and use.

#### **6. Section 1.2: About Folkestone & Hythe**

- 6.1. 11 representations were received relating to Section 1.2. These raised the following issues:
- There is no capacity for a high-speed services at Westenhanger. An additional stop would increase journey times to London from Folkestone, Dover and Thanet;
  - High-speed services are more than adequate at Ashford, Folkestone, Dover and Canterbury;
  - The highways infrastructure is inadequate and high-speed trains cannot stop at Westenhanger because there is no disabled access;
  - Healthcare provision in the area is a weakness, not a strength, and additional facilities are needed before any development takes place.
  - The Heritage Strategy has not been given due consideration in preparing the document; and

- Cozumel Estates Ltd supports proposed amendments to exclude the garden settlement from the application of CIL; and would like confirmation of the boundary of the exemption area.

## **Part 2 – Strategic Issues**

### **7. Section 2.1: District Development Challenges and Potential**

7.1. 7 representations were received relating to Section 2.1. These raised the following issues:

- The CSR is not being prepared to address local housing needs.
- There are no platform facilities for high-speed services at Westernhanger;
- The provision of a high-speed rail service at Westernhanger would not benefit local employment;
- Older residents moving into the district may need greater health and social care, placing more pressure on existing services;
- Kent County Council supports reference to enhancing leisure opportunities encouraging healthy lifestyles and the provision of open spaces, sports pitches and recreational facilities; and
- The water aquifer is not able to support continuing development and water rationing will be needed.

### **8. Section 2.2: Strategic Needs for Sustainable Development**

8.1. 2 representations were received relating to Section 2.2. These comments raised the following issues:

- The housing needs of the district can be met without the need for a garden settlement; and
- There is little evidence that younger people will be attracted and developers will provide the necessary leisure and entertainment facilities required.

## **Part 3 – Aims and Vision for Folkestone & Hythe District**

### **9. Section 3.1: District Planning Aims**

9.1. 6 representations were received relating to Section 3.1. These raised the following issues:

- The creation of a garden settlement would have a detrimental impact on air quality in the area;
- The garden settlement will not meet local needs but will become a dormitory town. There are enough brownfield sites to meet development needs;
- The plan needs to be set within the context of the Paris Climate Change Agreement and United Nations' Sustainable Development Goals;
- Natural England supports revised wording that emphasises the enhancement rather than just protection, of the natural environment;



- Historic England broadly supports the Aims & Vision for Folkestone & Hythe, especially the challenge to enhance management and maintenance of natural and historic assets; and
- Kent County Council states that it is essential that the advice of the Heritage Strategy is accepted, and the priorities it identifies are followed.

## **10. Section 3.2: Vision for Folkestone & Hythe District**

10.1. 15 representations were received relating to Section 3.2. These raised the following issues:

- A new settlement is unnecessary to meet local needs. Furthermore, public-sector investment in the garden settlement, to serve commuters and benefit a limited number of people, is morally indefensible;
- The creation of a garden settlement will draw resources away from Folkestone Town Centre;
- CCPIII Shopping Folkestone SARL states that it is essential that the Core Strategy Review has a commitment to preparing a masterplan for Folkestone Town Centre to ensure support for the Priority Centres of Activity (Policy SS4);
- Lyminge should be protected due to its location in the Kent Downs Area of Outstanding Natural Beauty and any further enlargements of settlements in the parish should be resisted;
- Water capacity, highways and health infrastructure are inadequate.
- An additional stop for high-speed rail at Westenhanger will affect all other stops on the line and there is limited capacity at St Pancras. There is already a link at Westenhanger to high-speed services departing from Ashford. Adding a transport link for commuters will not create local jobs;
- It is not clear how Westenhanger station will be improved, nor how road access to the station and car parking will be provided; and
- Any large-scale development will generate traffic on the A20 to the north of Sellindge and also on minor roads, such as the B2067 which connects to the A2070 south of Ashford, a much quicker route to Ashford International Station than the M20 from J11 to J10/10A.

## **Part 4 – The Spatial Strategy for Folkestone & Hythe District**

### **11. Section 4.1: District Spatial Strategy**

11.1. 14 representations were received relating to the supporting text in Section 4.1. These comments raised the following issues:

- CPRE states that setting ever higher numbers will not increase the rate of delivery of new homes. The rate is determined by the capacity of housebuilders to build houses and their need to provide a return to their shareholders;
- The Home Builders' Federation states that it has reservations about the reliance on the new settlement to meet housing needs and the rates of delivery that have been assumed;

- Taylor Wimpey states that changes to national policy regarding housing provision mean that the district's housing requirements have increased to 14,345 dwellings for the plan period, or 755 homes a year;
- The plan fails to recognise the role that new homes can play in revitalising town centres. As demand for office accommodation is falling and the focus on leisure is at the harbour and seafront, residential uses can be introduced into Folkestone town centre to support shops and services;
- Any new homes should be spread across the region, in small sustainable developments. A new town of this size will obliterate a large part of the countryside and destroy local communities;
- The site is unsuitable and will put massive strain on resources.
- It is unwise to commit to a new town in the context of Brexit, when other regions may become the focus for growth.
- Brexit will make it impossible to live or work in the area. It will be detrimental to air quality, landscape, water supply, policing, traffic, healthcare and other infrastructure;
- This area could be at the forefront of food production after Brexit, preserving its 'garden of England' status;
- The garden town will create houses, not jobs, and will divert investment from deprived parts of Folkestone;
- It has yet to be established whether water companies will be able to meet the demands of the new town;
- There is unprecedented pressure on green spaces between Ashford and Folkestone; the towns need to have a boundary that prevents expansion;
- The plan should have clear reference to marine planning.

11.2. A further representation was received to the 2019-20 supplementary consultation on the revised housing requirement. This raised concerns about decisions being taken in haste, the accuracy of reports compiled on behalf of the council and the potential to meet targets.

### **Policy SS1: District Spatial Strategy**

11.3. 11 representations were received relating to Policy SS1. These raised the following issues:

- Contrary to the Government's criteria for garden towns; there is no local support for the proposal; it is not on brownfield land; it is not away from existing settlements; nor is it a 'transformational' development.
- Taylor Wimpey states that it supports the identification of Sellindge as one of the more sustainable settlements within the district capable of accommodating new development;
- The Kent Downs AONB Unit states that it is unjustified to promote this level of development in the rural North Downs area, as the proposals would have a significant impact on the setting of the AONB and they are not capable of being mitigated satisfactorily;
- The Crown Estate states that Policy SS1 needs to give sufficient weight to rural housing needs; it supports the identification of Brookland as a Primary Village within the District Settlement Hierarchy with the potential to grow;

- The CSR must provide a clearer framework for the distribution of development within the AONB and Romney Marsh. Developers will target other areas and, if delivery is not keeping pace, applications will be approved in sensitive areas around towns and villages. Romney Marsh in particular cannot be regarded as the default pool of housing;
- There is a failure to recognise the role that new homes can play in revitalising town centres. As demand for office accommodation is falling and the focus on leisure is now at the harbour and seafront, residential uses can be introduced into Folkestone town centre to support shops and services;
- Further reference should be made to supporting mixed-use developments at existing employment sites which widen the definition of alternative acceptable commercial uses. This will ensure sites remain viable and avoid prolonged periods of vacancy;
- Natural England states that reference to further expansion at Lydd Airport needs to be strengthened to state that it will only be permitted where direct and indirect impacts can be avoided or fully mitigated; and
- Lydd Airport Action Group states that reference to the airport in Policy SS1 is inappropriate and that the council has succumbed to pressure from the Airport.

## **12. Section 4.2: Housing and the Economy Growth Strategy**

12.1. 16 representations were received relating to the supporting text in Section 4.2. These comments raised the following issues:

- CPRE consider that the housing delivery targets are not justified and unachievable;
- Housing figures have been deliberately skewed to favour the building of a new town. A strategy of mixed use urban extensions should be tested before any consideration of a new town;
- Cozumel Estates Ltd states that more flexibility is needed in employment floorspace requirements. The employment market may be subject to change over the plan period, which could have an implication on the floorspace requirements;
- There is a disproportionate focus on providing houses rather than jobs. A strategy of continuing at the current jobs density, will maintain the existing pattern of net out-commuting, contrary to the aims of new garden settlement;
- It is considered that commercial and industrial floorspace need to be delivered in advance of more houses; and
- CCP III Shopping Folkestone SARL is concerned that the updated retail assessment significantly overstates retail capacity in the Folkestone and Hythe area;

### **Policy SS2: Housing and the Economy Growth Strategy**

12.2. 13 representations were received relating to Policy SS2. These comments raised the following issues:

- Ashford Borough Council and Rother District Council support the overall strategy of meeting the district's housing need within the district;

- Gladman Developments Ltd states that the council is required to use the 2014 projections to calculate its housing need, using the most up-to-date information on affordability;
- Quinn Estates states that the government identifies a local housing requirement of 751 dwellings a year. A 5 per cent uplift should be applied in order to negate the likelihood of sites not coming forward, and the role of Sellindge should be strengthened;
- The Home Builders' Federation states that the minimum number of homes the council needs to plan for is 751 homes a year, a total of 14,269 homes over the plan period;
- Taylor Wimpey states that the council needs to plan for 755 homes a year, and that the current plan would result in a shortfall of 1,185 dwellings;
- Housing numbers should be expressed as 'maximums' rather than 'minimums';
- The council is compromised by being landowner in relation to the garden settlement. The council should explore meeting unmet need with Ashford Borough Council. The development is opposed by the majority of people in the district;
- Cozumel Estates Ltd states that it supports the Otterpool garden settlement as an important part of how the council will meet its housing needs;
- The Crown Estate states raises concerns regarding the ability of the garden town to deliver new homes at pace and scale. To save placing reliance on one large option, the plan should allocate a mix of sites, including sites in settlements such as Brookland;
- The Kent Downs AONB Unit consider that, given the significant harmful impacts on the AONB that would result from the proposed strategic allocations at Otterpool and Sellindge, should other less environmentally-sensitive land not be available, then a legitimate case can be made for not meeting the district's housing need;
- CCP III Shopping Folkestone SARL states that there may not be sufficient capacity at specified times during the plan period to support retail and food and beverage development in all locations. The plan needs to consider the phasing and location of provision, not just the quantum of space; and
- It will not be possible to meet the need for retail floorspace within existing centres or the new settlement. There should be flexibility for the provision of appropriate trade counter retail floorspace within industrial estates across the district.

12.3. A further 26 representations were received to Policy SS2 during the 2019-20 supplementary consultation on the revised housing requirement. These comments raised the following issues:

- The increase to the minimum housing needs requirement should be subject to a statutory consultation of 12 weeks;
- The Home Builders' Federation (HBF) raised concerns regarding the decision to reduce the plan period by a year. The NPPG suggests that under-delivery 'may need to be considered' where a plan is being prepared part way through a plan period. The council is part way through its proposed plan period but has not accounted for under-delivery – therefore a minimum of 14,022 homes is required;

- HBF suggest that the point at which the garden settlement starts delivering new homes is pushed back beyond the first five years and that additional smaller sites are allocated. There is a minimal supply buffer of 230 homes. This does not take account that development is unlikely to be delivered as expected, nor the requirement to prepare flexible plans - a 20 per cent buffer should be added;
- Gladman support the proposed revision to the housing requirement. A robust evidential basis is needed for a windfall allowance of 95; an over-reliance should not be placed on windfall delivery. Developments of five to nine houses should be allocated and not included as windfalls;
- East Kent College (EKC) are supportive of the revised housing need figure as housing is critical to ensuring retain talent and potential within the district;
- Rother District Council considers that there is flexibility in the housing supply as the council has stated its ability to over-deliver against the identified need of 13,284 units assessed through the standard methodology;
- The number houses profiled exceeds by a difference of 231 units. This increases the risk of under-delivery;
- Camland Hythe Ltd also raise concern that the decision to reduce the plan period by a year has resulted in an uplift of 439 houses, rather than 1,116 houses to be delivered up to 2036/37. By choosing not to allocate additional sites for development or increasing densities of existing allocations, jeopardises the CSR's deliverability and flexibility.
- It is also unknown what quantum of housing has been delivered against the Standard Method requirements for the 2018/19 financial year.
- Camland Hythe Ltd requests that the Council demonstrate deliverability through the publication of its housing trajectory.
- London Ashford Airport object to the lack of consideration to the infrastructure requirements associated with the increased housing need over the Plan period. LAA provides much needed employment opportunities and should be given significant weight via a standalone policy in the CSR.
- SGN consider that the revised housing figures raise no areas of significant concern, which would result in the requirement of network reinforcement.
- The Policy has been amended to include both C2 and C3 uses as part of the growth strategy; however, associated policies elsewhere i.e. [Policy CSD2] have not been reviewed or updated to reflect the proposed changes.
- The district already exceeds the amount of housing required and thus these adjustments are not warranted
- The rate of development on Romney Marsh must be slowed down and stronger policies introduced to restrict development.
  - There has been no attempt to argue a lower housing requirement using policies available in the NPPF.
  - The reduction of housing to be delivered by the garden settlement over the plan period will result in an increase in housing (windfalls) in the contested locations.
  - The CSR resets the and increases the base line for housing without taking into account historic, under and over, performance from the respective character areas. Consequently, the Romney Marsh, which delivers housing more rapidly, locks in a higher level of housing development than prescribed relative to other areas.

### **13. Section 4.3: Place Shaping and Sustainable Settlements Strategy**

13.1. 5 representations were received relating to the supporting text of Section 4.3. Comments raised the following issues:

- It is suggested that the council should challenge national policy in regards to its housing requirement;
- The creation of Otterpool Park will increase levels of traffic and air, noise and light pollution. Public transport is minimal and so private cars will be essential;
- Quinn Estates states that the settlement hierarchy is unsound. Sellindge should be re-designated as a Service Centre;
- As demand for office accommodation is falling and the focus on leisure is now at the harbour and seafront, residential uses can be introduced into Folkestone town centre to support the shops and services which remain; and
- The Environment Agency states that, while tidal flood risk is highlighted, the plan should make it clear that the sequential approach should take into account all forms of flooding.

#### **Policy SS3: Place-Shaping and Sustainable Settlements Strategy**

13.2. 10 representations were received relating to Policy SS3. These raised the following issues:

- The Theatres Trust supports the policy for retained valuable facilities where a need for them remains;
- The Diocese of Canterbury is keen to work with the council as it has connections and facilities within the area offering close links to worshippers, schools, landowners and housing communities;
- The Crown Estate has raised concern over flood risk being taken into consideration when looking at sites. A FRA has been raised with regard to land on Romney Marsh with no objection from The Environment Agency with this being included as the site benefits from coastal defences;
- Quinn Estates raised settlement hierarchy not sound as Sellindge has been designated a Rural Centre – should be elevated to a Service Centre;
- Taylor Wimpey requests clarification respecting historic features and sustainable construction measures and cites conflict with the national and local plan policies;
- Kent County Council requests an amendment to wording on flood risks to ‘a site-specific flood risk assessment may be required for other sources of flood risk as identified within EA surface water flood mapping’;
- CCPIII Shopping Folkestone S.A.R.L. welcome the recognition that town centres have critical role to play in establishing the character and economy of settlements but would like the word “potential” removed from paragraph 4.97.

### **14. Section 4.4: Priority Centres of Activity Strategy**

14.1. 10 representations were received relating to Section 4.4 in general and stated that:

- Cozumel Estates Ltd supports the new garden settlement to include a major employment site to provide further industrial premises, town centres to accommodate the needs for retail, office and leisure uses and local centres to protect crucial services and accommodation development that maintains their viability for residents and visitors;
- Concerns have been raised on the infrastructure to support the development including fresh water supply, health and capacity on the M20;
- Concerns expressed over the need for a new garden settlement and the need for regeneration of Folkestone Town;
- CCPIII Shopping Folkestone S.A.R.L. have concerns over the retail offer being pulled away from Folkestone Town Centre to the new settlement and the impact on floorspace;
- Concerns raised over the viability of developing Westenhanger Station in terms of capacity and infrastructure;
- Quinn Estates request clarification on the proposed amendments to the CIL exemption areas at Strategic and Key Development Sites.

#### **Policy SS4: Priority Centres of Activity Strategy**

14.2. 4 representations were received relating to Policy SS4. These raised the following issues:

- Cozumel Estates Ltd considers that the map should be amended to show where the Priority Centre of Activity should be located within the garden town;
- Clarification is needed on the use of mixed-use employment sites within the plan, such as Park Farm Industrial Site;
- CCPIII Shopping Folkestone S.A.R.L considers that Policy SS4 conflates employment and town centre policies – these should be dealt with separately to avoid main town centre uses being treated as employment-generating uses.
- Cozumel Estates Ltd considers that the Policies Map should be amended to show where the Priority Centre of Activity should be located within the garden town.

### **15. Section 4.5: District Infrastructure Planning Strategy**

15.1. 12 representations were received relating to Section 4.5.

15.2. Four representations related to the section in general and raised the following issues:

- Consideration should be given to the Government's Clean Growth Strategy 2018 and Clean Air Strategy 2019 for cleaner energy and fuel sources and on-site generation of low emission energy supplies;
- There are no plans to upgrade the A20 near the new garden town and no improvements to health to support the population, including GPs' surgeries and primary and secondary healthcare; and
- Concern over the ability to support the number of new residents in terms of clean portable water and transport, particularly bus services and the development of Westenhanger, turning the new town into a dormitory town for London overspill community;

15.3. Eight other representations related to specific policies and are summarised below:

- Highways England would like to see more information on encouraging a modal shift from using cars, upgrades to highways and motorways;);
- Certain identified infrastructure upgrades appears to be missing from Figure 4.4 such as schools and flood protection; and
- Kent County Council consider the approach to broadband and fibre to be suitable for the future fibre to the premises (FTTP).

#### **Policy SS5: District Infrastructure Planning**

15.4. 12 representations were received relating to Policy SS5. These raised the following issues:

- Concern at the impact of the new settlement on road infrastructure near Canterbury, especially in line with the development of the new hospital;
- Infrastructure concerns including water, flooding, transport, including comments from CPRE;
- Stanford Parish Council raise concern regarding impact on and understanding of lorry park development;
- –Clarification is sought on what CIL Reg123 infrastructure for services – what will it be paying for including waste disposal?
- Kent County Council are concerned at the need for land for education facilities to ensure delivery at point of impact and support sustainable travel patterns
- Highways England question the infrastructure upgrades, and the need for more emphasis on sustainable travel ;
- The Diocese of Canterbury supports the development and would like to be involved in supporting the ‘social infrastructure’; and
- KCC requests the use of developer contributions/CIL to ensure that any archeologically/heritage assets/findings are archived locally due to the lack of museum space within the region.

### **16. Section 4.6: Strategic Allocations**

16.1. 196 representations were received relating to Section 4.6.

16.2. 11 representations related to the section in general. These raised the following issues:

- Kent County Council recognises that the development will make a significant contribution to the housing requirements
- Object to the proposals for a new garden settlement because of concerns with water supply, health infrastructure, employment, transport, over-population, location and environmental issues
- Camland Hythe Ltd states the garden settlement strategic allocations does not fall within previously developed land and the CSR should include sites at Nickolls Quarry;



- The Environment Agency supports the high standards set for water efficiency in the new developments;
- Historic England seeks assurance that heritage assets are protected, integrated and enhanced where possible;
- Kent County Council states that reference should be made to the need for mineral and waste safeguarding for all sites;
- Natural England states that detailed assessments will be needed to assess the potential effects and options for mitigation which will have implications for location, density and height of built development; and
- Southern & Regional Developments seek to promote land adjacent to the Martello Lakes development and state that the identified flood risk can be mitigated through the raising of ground levels.

16.3. 10 other representations related to specific policies and are summarised below:

### **New Garden Settlement**

- There is concern that Folkestone & Hythe District Council's land interests at Otterpool Park creates a perceived conflict of interests.
- The Kent Downs AONB Unit disagree with the Growth Options Report regarding landscape impacts of the proposed garden town at Otterpool on the setting of the Kent Downs AONB.;
- Objections were raised to the proposed garden settlement because of the potential impacts on transport infrastructure, health and social care, waste management, water supplies; not being able to support the increase in local population;
- The statement that 'the creation of a new town can provide substantial new infrastructure and facilities' ignore current national trends. There is no evidence to show how shortages of doctors, dentists, nurses, carers and teachers will be reversed;
- Concerns raised as to how the rural road network will be affected in neighbouring areas, such as Aldington, and what mitigation will be provided;
- Historic England supports amended text that places greater emphasis on heritage assets making a contribution to creation of a strong sense of place; and
- Unhappy with engagement with adjoining villages; and those in Ashford Borough;

### **Figure 4.5 Garden Settlement North Down – Indicative Strategy**

4 representations were received relating to Figure 4.5, the Indicative Strategy for the Garden Settlement:

- CPRE identify differences between the areas of land deemed 'suitable' for development in the Phase 2 Growth Options Report; and the areas shown in Figure 4.5, especially around Lympne Airfield. The council need to justify this departure from their consultants' recommendations;
- CPRE also have concerns about the depiction of the proposed town centre within the garden settlement, including the height of some of the buildings;
- Historic England is concerned about the entrance to Westenhanger Castle and that other heritage assets are not shown.

## **Policy SS6: New Garden Settlement – Development Requirements**

16.4. 53 representations were received relating to Policy SS6. These raised the following issues:

- Infrastructure concerns raised including roads, traffic, sewage, water, schools, waste disposal, pollution, health services (including GP surgeries and primary care services) and transport services, including buses.
- Concerns raised about perceived lack of time to comment, lack of local consultation and engagement. Lack of co-operation with FHDC, Ashford BC and other local parish councils;
- Concerns raised about the lack of protection of existing villages and the amount of civil works causing disruption for local residents. Concern that development will join three existing parishes and effectively urbanise the entire area;
- The 'requirement' is for 6,375 homes yet the planning application is for 8,500-10,000. There is no justification for the figures contained within the planning application and this illustrates that Otterpool Park is not being driven by local needs;
- Concern raised for the loss of farmland;
- Concerns raised relating to the commitment to achieving 22% percent of affordable homes;
- Ashford Borough Council consider that the policies do not contain enough details to ensure cross border matters can be addressed appropriately i.e. provision of secondary schools and their phasing and locations within the new development;
- Environment Agency requests that the aspiration for “carbon and water neutrality” is amended to “low carbon and high water efficiency”.
- Homes England in general supports Otterpool Park although there maybe inconsistencies between the PPLP and the Core Strategy with the land adjacent to the west of Lympne;
- Concern raised for the protection of archaeological sites, particularly in Newingreen and the site of the Roman Villa at Upper Otterpool;
- Kent County Council supports aspirations to encourage modal shift from the outset of the development and to encourage sustainable development and the intention for the settlement to be a beacon of best practice environmentally;
- Kent Wildlife Trust supports the sentiment that “Otterpool Park will be a beacon for best practice” however to meet the aspirations the proposal should be enhancing and integrating biodiversity into the development in accordance with the NPPF.
- Home Builders Federation do not consider the requirements in each of the allocations policies for each dwelling not to exceed 90 litres per day to be consistent with the national policy. There is sufficient evidence that standards of 110 litres per person per day can be achieved;
- Natural England supports wording referring to the mitigation of impacts on the Kent Downs AONB; although suggest reinstating the aspiration for water and carbon neutrality;
- The Canterbury Diocese supports the CSR and the incorporation of a requirement to make stakeholders central to master planning; and

- The Kent Downs AONB wraps around 3 sides of the proposed Garden Settlement. Otterpool Park will be visible from the AONB.
  - The scale and extent of the development proposed would wholly and fundamentally alter existing views out from AONB to the north from a largely undeveloped rural site to a high density built form;
  - To be determined will be the impact of lighting resulting in a loss of dark night skies, noise movement and increased activity, use of roads and added recreational pressure on the adjacent AONB.
  - Business and Town Centre uses on land between Stone Street and the A20 to the east of Westenhanger are likely to necessitate larger buildings, both in terms of height and footprint which makes their effects harder to mitigate. This would be wholly inappropriate and does not represent a 'Landscape-led development' as is being suggested, nor does it comply with proposed policy wording for the allocation.

A further 5 representations were received relating to Policy SS6 as part of the revised minimum housing needs requirement consultation. These comments raise the following issues.

- F&HDC & Cozumel Estates supports the vision of the CSR that the new garden settlement shall provide for a minimum of 5,925 new homes in a phased manner within this plan period (2019/20 to 2036/37). F&HDC & Cozumel Estates are also confident that, subject to the grant of outline planning consent, the overall the delivery rates envisaged could be achieved.
- Homes England believe there is an opportunity to accelerate delivery of the garden settlement to allow a greater number of neighbourhoods to come forward in parallel.
- EKC are supportive of the revised housing need figure as housing is critical to ensuring retain talent and potential within the district.
- Concerns raised about the potential impacts on an Area of Outstanding Natural Beauty and on local wildlife, infrastructure; and council financial borrowing.

### **Policy SS7: New Garden Settlement – Place Shaping Principles**

16.5. 37 representations were received relating to Policy SS7. These raised the following issues:

#### *General*

- Infrastructure concerns including water supply, healthcare services (especially over stretching GP services in Sellindge), transport links, loss of valuable farmland, environmental impact, air quality, road networks (especially when M20 is closed) and schools;
- Concern over the extent of more building on top of the current developments in Sellindge and the creation of a dormitory town;

- Ashford Borough Council consider that the CSR does not contain enough detail and is not precise enough to ensure that the cross border matters will be addressed appropriately (suggested amendments below).
- Concern that development would obliterate views of the AONB, destroy any natural beauty and have a detrimental impact on surrounding area, especially small villages within the Saxon Shore.

### *(1) Landscape- led approach*

- KCC appreciates that a landscape led approach has been utilised when planning for the development area & welcomes the access strategy that seeks to protect and enhance public rights of way;
- Ashford Borough Council requires amendments to the integrated water management to avoid increased flood risk downstream.
- Kent Wildlife Trust support broad statements for the ecology but are concerned that little thought has been given to how this will be achieved in practice, the impacts to the wider habitat networks or how to engage the local community to support it as an on-going process. Given scale of development greater consideration is required prior to initial masterplanning;
- Natural England - welcomes the amended wording which reflects the need for proposals to mitigate impacts on views from the Kent Downs AONB and suggested minor working amends to strengthen the engagement of the GI strategy within the plan.
- Kent Downs AONB Unit – Request that for provision of structured areas of landscaping integrated into the proposed development with space for the trees to mature and densities which allow for the planting of trees that can establish large crown between buildings. Supporting the high quality palette of materials but is imperative that building materials are chosen to mitigate impact in views from the North Downs scarp. There also concerns that there is no mention of densities for buildings other than town centre or height and scale of the buildings;

### *(2) A vibrant town centre*

- Ashford BC - Concern over cross border consultation in relation to comparison retail in terms of format, scale and location. The policy should be more explicit about the role and function of the town centre and retail provision and impact on other centres;
- Support in principle the development but requires clarity on the quantitative needs for size of units, their location and phasing.

### *(3) Village neighbourhoods*

- KCC LHA – support for the statement “neighbourhoods and town centre shall be connected by a legible network of active streets, footways, cycle ways and open space”;
- Suggested amendments by Cozumel Estates Ltd including the removal of the word “village” when describing neighbourhoods.

- Diocese of Canterbury - Community formation could be given a good more prominence and would like to be involved in working with communities to deliver this;

#### *(4) A high townscape*

- KCC supports the ambition to design a high-quality townscape and encourages early involvement of KCC and other partners of Design Codes to deliver high quality design for long term;
- CPRE support limit on light pollution but concerns raised that development will intensify this;
- Diocese of Canterbury - recognises that high quality place making will be very important and that sustainable development principles must be adopted throughout. Community formation could be given a good more prominence and they would like to be involved in working with communities to deliver this;

#### *(5) Enhancing heritage assets*

- Historic England – support for strategic open space that embraces historic landscape setting of Westenhanger Castle and the commitment to a Heritage Strategy and the changes in paragraph ‘e’ but would like to see more information on the “master plan”.
- KCC – Suggested new text to ensure both masterplan and planning application for the Garden Settlement should respect the existing heritage of the area (including Westenhanger Castle) in line with the NPPF;
- CPRE question why only the coalescence of Lympne is to be avoided.

#### *(6) Sustainable access and movement*

- KCC LHA – Part c should be amended to include Newingreen Junction as this is detailed as a key highway improvement Fig 4.4;
- KCC – Part d & h – suggest addition of improvements to offsite public rights of way to link with the new onsite network and improve the frequency of the service to upgrade to bus services, funded through developer contributions
- Dover District Council - concerns on the impact of Westenhanger Station development, should be phased to come into service at an appropriate time and not before demand is sufficient. The service will not be to the detriment of the journey times of the High Speed Service from Dover.
- Concerns raised over timings, access and viability of the development of a high speed service at Westenhanger and capacity at Ashford;
- Ashford BC - More explanation is required on key junction improvements especially to M20 Junction 9 and the impact on traffic levels;
- More clarification on Junction 11, M20 works and where the funding will come from.
- Regarding bus service needs to be detailed in line with existing services and extra links to what areas.

9 other representations related to specific policies and are summarised below:

- Historic England welcome the additional references in Paragraphs 4.177 and Paragraph 4.176.;
- Music Events at Port Lympne and Lympne Industrial Estate can have an impact on the views (from Fiddling Lane, Monks Horton and other places) from the AONB so a complete new town will not be disguised ;
- Concerns over the development of the station at Westenhanger including;
  - Not objectively addressed and will make Otterpool Park a dormitory town for London commuters;
  - Questionability of financial return and viability of completing this upgrade with questions on involvement of Network Rail;
  - HS1 timetable already running at capacity with added journey time and no capacity at London Terminals;
  - Who are being engaged to deliver the upgraded station and how will the local roads manage the increased traffic flow;
  - Aldington & Bonnington Parish Council suggest wording change from “railway station upgrade and hub will potentially deliver” to “could potentially deliver” and concern relating to the timings for the work to be completed. Have discussions take place with cross border partners on a joint working strategy; and
- Concern raised in relation to equestrian safety with a new town’s worth of traffic using the local lanes, especially when the M20 is closed.;

Other representations related to specific policies and are summarised below:

### **Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles**

16.6. 26 representations were received relating to Policy SS8. The representations raised the following issues:

- General concerns raised in relation to water supply, healthcare provision, air pollution, transport infrastructure, and archaeology to support the level of development along with the development destroying an area of outstanding beauty;
- Concern raised for the need to review the sustainability principles to cover economic, social and environmental as well as water and energy;
- Concerns raised over the ability of Affinity Water to be able to support the fresh water supply to the new development and a possible desalination plant being introduced. Question whether the potable water target can be achieved;
- Concern raised in relation to the Otterpool development encroaching onto Sellindge with no strong justification for the delivery in the chosen area with little consultation;
- Ashford Borough Council would like an amendment to show explicit requirements for waste water including phasing in relation to the proposed development to avoid harm to water quality within the surrounding area.
- Ashford Borough Council considers that amendments are required to the policies which make it clear that the use of SuDS should be designed and

- implemented to reduce flood risk downstream, especially in line with requirements of SS7;
- Southern Water amendment suggested to Policy CSD8 to ensure network reinforcement will be required at the site's "practical point of connection";
  - Dover District Council - would like to discuss in more detail the cross border water supply and quality issues in line with a Water Cycle Strategy;
  - Environment Agency are happy with the inclusion of the high standards set for water efficiency in the New Garden Settlement;
  - Cozumel Estates Ltd would like to remove reference to the 'outstanding' in the BREEAM rating as this is a particularly challenging rating and have suggested new wording;
  - KCC would like a reference to energy efficiency included in the strategy, especially with the Governments possible phased withdrawal of solid state fuels for heating and a move towards electric heating systems such as heat pumps;
  - Natural England - welcome *principle 1 a)* which includes strengthened wording for the energy strategy, which will include potential heat, power and energy networks, to take into account the AONB and its setting;
  - KCC the development of a site waste strategy will need to secure land for waste disposal and this should be at nil cost to the County;
  - KCC welcomes the inclusion of the proposals to be accompanied by a Minerals Assessment but would like the wording strengthened to include an Infrastructure Assessment;
  - Historic England state the definition of sustainable development should also include the historic environment;
  - Kent County Council is pleased to see the inclusion of section 2(iv), in which it is stated that '*sustainable access and transport shall be promoted in accordance with Policy SS7 (6)*'; and
  - Kent Wildlife Trust recommend greater and more detailed attention be given to identifying, mapping and safeguarding priority ecological networks, habitats and species in accordance with paragraph 174 of the NPPF. Need to work with relevant partners from the onset to maximise benefits to wider ecological networks that an explicit commitment to improving connectivity between designated sites and meeting BOA (Biodiversity Opportunity Area) targets for habitat creation.

7 other representation related to supporting text are summarised below:

- Concern raised over the effects of the new development on surrounding villages including road networks and dark skies policy;
- Concern raised as to how new GP's are recruited to support new surgeries and whether there will be NHS provision to support the numbers of potential residents as the development is built;
- Historic England - the definition of sustainable development should include historic environment (NPPF para. 8c); and
- KCC - welcomes considerations (4.188) to assess new development against the County Council mineral safeguarding policies as set out in the KMWLP but suggest an amendment to clarify that Policy DM8 relates to KMWLP regarding waste management policy.

## **Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management**

16.7. 19 representations were received relating to Policy SS9. These raised the following issues:

- General infrastructure concerns raised include roads, traffic, fresh water supplies, transport links, schools, environmental issues, air quality, loss of quality agricultural land, loss of views with outstanding beauty and the lack of time available for local communities to respond to the plan;
- Policy totally ignores National trends concerning the availability of healthcare and education staff and gives no evidence of how these trends are to be reversed. The plan does not offer a solution to how the fresh water supply will be managed to the new development;
- Policy fails to address in enough detail, the infrastructure support that this development is prepared to give areas outside FHDC;
- The Plan does not set out what the housing requirement is, by when, where it should be, and how many homes go to each allocation;
- Otterpool Park was never mentioned in previous plans for Sellindge;
- Ashford Borough Council - more detail should be added to the policy regarding the requirements for wastewater infrastructure and its delivery to ensure that cross boundary matters are addressed;
- Ashford Borough Council – concern raised over secondary school provision. Policy SS9 (1) is very generic, and there are no specific requirements regarding the amount, timing or location of secondary education provision within the development;
- Ashford Borough Council – The current requirements for phasing and delivery of infrastructure set out in the policy is vague, and does not include any specific requirements or parameters around the details of what infrastructure will be required and when.
- Aldington & Bonnington Parish Council – request to be included in the infrastructure developments;
- Historic England - Welcomes the inclusion of a requirement for the Community Trust or elected body responsible for the future management of the new settlement to make specific provision for a heritage facility such as museum/archive storage;
- KCC state the education need is likely to consist of up to 13FE of secondary provision and 2FE of primary provision provided on site. With the scale of developer contributions for KCC-delivered services, KCC fully expects to be included as a S106 signatory (as set out in Section 13.6 of the Otterpool Park Planning Performance Agreement);
- KCC state working collaboratively to ensure an understanding of what waste provision will look like. Pleased to note the inclusion of informal pedestrian and cycle pathways in the plan and that the proposed approach to broadband provision is suitable and adequate to deal with the necessary provision of fibre in the future; and
- Kent Wildlife Trust do not object in principle to the development of a new garden settlement at Otterpool Park but concerned that aspects of the Core



Strategy Review specific to Otterpool Park do not sufficiently take account of biodiversity to meet the requirements of paragraph 174 of the National Planning Policy Framework (NPPF).

5 Other representation relating to the supporting text are summarised below:

- Given the uncertainties that the UK faces currently, and the fact that this Plan depends entirely on private investment, the assumption that it is deliverable is extremely questionable;
- The Council's Community Infrastructure Levy (CIL) Charging Schedule will shortly be updated and the amendments will confirm that the garden settlement will be excluded from the application of the CIL. The parties would welcome further discussion regarding the boundaries of the exemption area;
- Concerns raised about the loss of valuable and beautiful countryside and farmland needed for local food supplies; and
- Aldington should be added to the opportunity for the "Smart Town" infrastructure along with the other villages listed. Other villages local to the area but in Ashford Borough should be able to benefit from the new technology and should be considered in line with cross border districts.

#### **Policy SS10: Spatial Strategy for Folkestone Seafront**

16.8. 4 representations were received relating to Policy SS10. These raised the following issues:

- Kent County Council suggest revision of the working to ensure the heritage policy ensures that both the key archaeological features and their settings are preserved ; and
- The Environment Agency supports that the "Special Water Scarcity Status" in paragraph 5.57 has been clarified; and the high standards set for water efficiency in the New Garden Settlement, the Seafront, Shorncliffe and Sellindge developments, and more widely across the district. .

Other representations (2) related to specific policies are summarised below:

- Folkestone Harbour Limited would like Figure 4.6 amended to show the Sea Sports Facility already provided within the red line of the application within the immediate vicinity of The Stade to be retained; and
- A review of the planned green cycle route is required due to the topography.

#### **Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone**

16.9. 5 representations were received relating to Policy SS11. These raised the following issues:

- It is suggested that the design and layout of the development should draw upon the military character of the place, and not just the scale and pattern of surrounding development. This would ensure that the new development

- makes a positive contribution to local character and distinctiveness in line with the objectives of the NPPF;
- There is concern locally that the heritage features of the site are not being preserved and that proper archaeological investigation is not being carried out;
  - The Environment Agency supports that the "Special Water Scarcity Status" in paragraph 5.57 has been clarified; and the high standards set for water efficiency in the New Garden Settlement, the Seafront, Shorncliffe and Sellindge developments, and more widely across the district; and
  - Taylor Wimpey would like paragraph i) to be amended to refer to provision of 18% affordable housing in line with outcomes of the agreed viability assessment. Reference to 30% affordable, further fails to accord with CS Policy CSD1 which amended it to 22%. .

Other representations (4) related to specific policies are summarised below:

- Taylor Wimpey seek to amend Figure 4.7 to reflect the consented planning application Reference to the provision of allotments should also be removed and the area of green space at The Stadium should also be adjusted to reflect the consented scheme;
- Taylor Wimpey also question the additional statements covering the possibility of further heritage assets following the work carried out previously by Historic England for the Hybrid planning application (Y/14/0300/SH) where relevant sites were identified; and the need to provide a "significant proportion" of homes to be flexible to the needs of residents as they age. The Council has not produced an appropriate evidence base to justify the imposition of additional requirements; and there is no requirement within the Hybrid planning permission for the delivery of any such units.

## **Part 5 – Core Strategy Delivery**

### **17. Section 5.1: Core Policies for Planning**

17.1. 128 representations were received relating to Section 5.1.

17.2. 3 representations related to the section in general. These raised the following issues:

- CPRE agree that that the assessed requirement for affordable housing translates to about 22% of the housing target over the plan period, in order to achieve 139 homes per year, however they suggest this target should be raised to 30% over the first five years of the plan;
- The stated percentage of affordable housing should be increased to meet the needs of the population from East Folkestone; and

### **Policy CSD1: Balanced Neighbourhoods**

17.3. 9 representations were received relating to Policy CSD1. These raised the following issues:

- Cozumel Estates and Quinn Estates does not object to Policy CSD1 in its current form. The policy seeks a minimum of 22% affordable housing on sites over 0.5Ha or 15 dwellings.
- Alternatively, it is widely considered that the percentage of affordable housing should remain at 30% and not reduced to 22%;
- The Kent Downs AONB Unit supports the proposed lower threshold for affordable housing provision on sites proposing 5 to 10 dwellings within the Kent Downs AONB;
- Home Builders Federation has concerns over the minimum requirements for affordable housing as this would be difficult for developers to cost their schemes easily. .
- Taylor Wimpey note that CSD1 has been updated to reflect the range of affordable housing products. They support reference to the portfolio of affordable products which would aid in the delivery of mixed and balanced communities to meet the needs of a broad range of residents. However they have concerns should the target rise it will create uncertainty for developers; and
- The policy should include 'rent to buy' as part of the range of affordable housing tenures that the Council supports;

### **Policy CSD2: District Residential Needs**

17.4. 6 representations were received relating to Policy CSD2. These raised the following issues:

- Taylor Wimpey would like wording to be amended on the mix of housing to have the ability to deliver lower proportions of 1-bed and 4+ bed houses based on working with Registered Providers should it be found they are in less demand. The Home Builders Federation supports aspirations to provide

a range and choice of homes to meet the needs of the district. However, the findings of the SHMA should not be translated into policy, rather the mix of houses should be left to the developer depending on the needs of the local area. The threshold for consideration should be increased from 15 to 50 dwellings;

- Any requirement for M4(2) compliance should be supported by sufficient evidence to justify each of the standards, with adequate flexibility to take account of site specific circumstances, such as viability. Object to the implication that all dwellings would be required to be built to M4(2) standards as it would constitute an unreasonable and inflexible approach;
- Kent County Council consider that the policy should take into account the Kent Social Care Accommodation Strategy (2014); and
- Cozumel Estates Ltd acknowledges that the policy sets aspirational targets for a range of dwelling sizes but these need to reflect the latest housing requirements for the Otterpool development. It is also requested that the provision of older person accommodation is widened to include specialist units (Class C2 and C3 (b) for the garden settlement.
- Specialist units for older people, particularly in Sellindge, will exacerbate the pressure on a GP practice that is already struggling to meet demand. It seems to be contradictory to the aim at sub-para (a);

### **Policy CSD3: Rural and Tourism Development**

17.5. 2 representations were received relating to Policy CSD3. These raised the following issues:

- CPRE consider that the wording in relation to the conversion of existing buildings that contribute to the character of their location, to be ambiguous and that further clarification is required; and
- The policy fails to comply with NPPF (para 83) in respect of the conversion of existing buildings. Acceptability should not only be dependent on the character of their location but also take account of the diversification of agricultural businesses; and the creation of rural tourism and leisure development.

One representation related to the section in general. This raised the following issue:

- The indication that Westenhanger and Lympne Castles are tourist facilities is not correct as they are for hire businesses and are not open to the public; therefore development will not increase tourism in the area.

### **Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation**

17.6. 4 representations were received relating to Policy CSD4. These raised the following issues:

- The policy needs to be more specific in its wording of features which contribute to 'diverse local landscapes' i.e. coppiced woodland, hedgerows, ponds, walkways and ancient meadows (especially where these support the AONB) and must reflect the need for attractive and high quality open spaces throughout the district;
- Kent County Council requests adding more specific information regarding no net loss of biodiversity and would like to see ecological surveys to be carried out and submitted with any planning application.
- Kent Wildlife Trust feel that more of the biodiversity principles set out in the policy need to be integrated into policies SS6-9. Some of the aspects of the CSR in respect to Otterpool Park do not take into account sufficiently biodiversity to meet requirements of Para. 174 of the NPPF.
- KWT also widely supports that Otterpool Park will be a beacon for best practice for enhancing and integrating biodiversity into the development, however comparable priority should be given to landscape quality of life and sustainability. It is recommended that attention is given to identifying, mapping and safeguarding priority ecological networks, habitats and species in accordance with the NPPF and working with partners and conservation professionals from the outset to address a number of issues; and
- Natural England strongly support the policy's commitment to incorporate and improve GI throughout the district in a long-term and meaningful way. It is suggested further information of GI and biodiversity net gain could be provided through development of a Supplementary Planning Document (SPD) in collaboration with other Kent local authorities

### **Policy CSD5: Water and Coastal Environmental Management**

17.7. 5 representations were received relating to Policy CSD5. These raised the following issues:

- CPRE questions how the policy will address existing drainage problems, especially on the Marsh, such as the foul drains around Brenzett;
- The policy ignores the reality of the actual situation in the South East where the natural aquifer has been identified as being able to only support limited development. Since the publication of the Geological Survey Report this has continued to be drawn on – how will the proposed other technologies be implemented;
- The Environment Agency supports that the "Special Water Scarcity Status" in paragraph 5.57 has been clarified;
- Concerns raised on the potable water supply for the new development;
- The "Water Cycle Study" for Otterpool Park has not been completed.
- Kent County Council are supportive of the policy for the management of surface water, referencing inclusion of Sustainable Drainage Systems ensuring that flood risk must not be increased including reference to integration of water management.

5 other representations related to the section in general. This raised the following issues:

- Concern raised over the amount of water needed to supply all the new homes planned ;
- The Environment Agency welcomes the additional information on the district falling within a “designated Water Scarcity Status Area” which will result in efforts to reduce average domestic consumption;
- What specific measures does FHDC intend to implement to reduce the per person water usage by, an average of, 34% per person from the usage experienced by Southern Water and 18% below that defined in the Building Regulations for a Water Scarcity Status Area?; and
- The Environment Agency request paragraph 5.72 is amended to "Most of the district's water supply comes from groundwater sources". Water resources must be maintained and proposed developments must not have a negative impact to public water supplies or their associated Source Protection Zones. Pollution prevention measures are required in areas of high groundwater levels and/or vulnerability.

## **18. Section 5.2: Areas of Strategic Change**

- 18.1. 90 representations were received relating to Section 5.2.
- 18.2. 1 representations related to the section in general. This raised the following issue:
- CPRE raise that they couldn't find the Transport Strategy referred to in para 5.81 and requests that there needs to be an over-arching summary of the various studies and other reports presented as the evidence base in order to resolve any ambiguities between them.
- 18.3. Other representations related to specific policies and are summarised below.

### **Policy CSD6: Central Folkestone Strategy**

- 18.4. 3 representations were received relating to Policy CSD6. These raised the following issues:
- Theatres Trust support the promotion of cultural venues articulated throughout the policy;
  - The CSR fails to recognise that residential development plays an important role in the vitality of town centres in accordance with NPPF para 85(f). The emphasis is on the harbour and sea front area, and, whilst welcomed does not provided a clear lead for the town centre itself.
  - Support the guidance set out in the policy but would like a commitment to prepare a vision and masterplan for Folkestone Town Centre to co-ordinate its long-term development and ensure maximum integration with, and the complementary development of the Seafront area.

### **Policy CSD7: Hythe Strategy**

No representations were received relating to Policy CSD7.

### **Policy CSD8: New Romney Strategy**

- 18.5. 2 representations were received relating to Policy CSD8. These raised the following issues:
- Pentland Homes consider that the regeneration of Romney Marsh could be enhanced through sustainable development and infrastructure improvements at New Romney, over and above the objectives set out in Policies. Suggest a comprehensive residential led, mixed use development, which would facilitate significant infrastructure improvements, including a new 'By-pass' around the Eastern and Southern edge of the town; and
  - Gladman Developments support growth north of the town centre, but question the need for a single masterplan given the recent planning history of the allocation.

3 other representations related to supporting text and figures are summarised below:

- Nuclear Decommissioning Authority support the Core Strategy's position on Dungeness 'A' but suggests that a clearer reference is made to support both the decommissioning and remediation of the Dungeness 'A' site, together with employment (B1/ B2/ B8) uses and development associated with energy generation.
- Natural England suggest additional wording to strengthen text relating to Lydd Airport expansion (5.121) to ensure that there are no detrimental impacts to the Dungeness designated sites; and
- Figure 5.6 Pentland Homes fully support the identification of New Romney as a "Town Centre" and feel that a comprehensive residential led development could facilitate significant infrastructure improvements including a proposed "by-pass" around the Eastern and Southern edge of the town.

### **Policy CSD9: Sellindge Strategy**

18.6. 31 representations were received relating to Policy CSD9. These raised the following issues:

- Infrastructure concerns, including roads, water, healthcare services especially the GP surgery, local school capacity, cycle, pedestrian and bridle ways potential loss of areas of historic interest, green belt and landscaping, traffic, air quality and loss of valuable farmland;
- Quinn Estates believe that 600 dwellings should be the minimum housing figure and that Elm Tree Farm should come forward before other sites in Sellindge ;
- Taylor Wimpey suggest that the policy should split the allocation of Site A and Site B to provide separate requirements for each one. There is no supporting evidence to justify C2 uses on the site. Other considerations are on the lower target on water uses, sewage requirements, energy efficiency standards, landscaping and the AONB, the upgrading of the primary school, upgraded sports facilities within the village;
- Taylor Wimpey believe the percentage of affordable housing should be amended to 20%; that the provision of allotments be removed, and that the criteria for improvements to the doctor's surgery be amended;
- Concerns raised over the impact on the countryside and urbanisation on rural areas;
- There is not adequate information of the phasing and numbers of dwellings that will be built in the development of Otterpool Park.
- The requirement for 22% affordable housing is not enough;
- Some land in Phase 2 is not available for development. There are concerns over the achievement of Phase 2 with the Section 106 agreement showing no provision for a new village hall, cycle/pedestrian access and traffic calming;



- Kent County Council request that consideration is given to requirements needed for school places and expansion to Sellindge Primary School, developer contribution and the planning permission on any land used;
- Kent County Council would like focus to be put on increasing cycle pathways, and improvements to informal traffic calming and a pedestrian and cycle routes to access Westenhanger Station;
- Concerns about the overdevelopment of Sellindge which will jeopardise the habitat it supports;
- Kent Downs AONB Unit suggest that a further criterion be included in Policy CSD9 to address the issues raised in paragraph 5.158, in addition to criterion h in Policy CSD9 which only relates to design;
- Environment Agency endorse the wording used in the policy to highlight Special Water Scarcity Status;

38 other representations related to specific policies and are summarised below:

There were a number of similar representations on Sellindge in paragraphs 5.150 and 5.162:

- Concern over the amount of traffic using the A20 through Sellindge as a result of Otterpool Park being developed in terms of air pollution, noise, mix of vehicles, especially HGV's where the road narrows within the centre of the town. Need to reconsider diverting the traffic away from Sellindge via a through road for the A20 west of Otterpool Park. The road plan for CDS9 is now incorrect;
- Linear villages are widespread within the UK and the absence of a central core is not detrimental;
- Sellindge Parish Council concerned over the delay in seeing plans for the school extension even though the land has been cleared;
- Industrial units need to be placed closer to the M20 Junction 11 and not in the village. Green space required to keep Sellindge/Barrow Hill separate from the Otterpool Park development;
- Aldington & Bonnington Parish Council questions the expanded new facilities and infrastructure to support the increase in the number of new houses in Sellindge, but there has been no consultation with neighbouring parishes and planning authorities on what impact this will have on them;
- Phase 1 of development agreed that the GP surgery would be extended and no further development would commence until this was completed. New residents will have to use other local surgeries and the possibility of new medical centres being developed for Otterpool Park will mean that the local one in Sellindge may close;
- Any 106 development funds coming from housing development must be invested in the village of Sellindge. If Newingreen are having a diversion of the A20 around them, why not Sellindge? The village is the community most impacted negatively through traffic as a result of the plans from the Core Strategy;
- Concern over the need to meet the provision of staff for an expanded surgery and primary school when the National trend is the reverse;

- Aldington & Bonnington District Council has concerns over the Growth Options Study regarding local traffic hot spots and M20 incidents;
- Sellindge is not in the Kent North Downs AONB but it lies on three sides of the village so any development must follow the AONB guidelines;
- The land close to SSSI Gibbins Brook has proposed development plans in CSD9 and is an area of special scientific interest. The expansion of Sellindge will impact the dark skies around the area;
- The listed buildings (Rhodes House, Little Rhodes) mentioned and building of local interest (Grove House, Potten Farm) should be protected and mature trees should be given Tree Preservation Orders;
- Why develop the land for employment within Sellindge when Lympe Industrial Estate is just over a mile away, which will cause an excess of HGV and van movements; and
- There is no evidence to show that technologies will be able to negate the carbon footprint produced from the CSD9 development including traffic movements and water consumption.

12 further representations were received relating to Paragraphs 5.163 – 5.166, & Figure 5.7:

- The connectivity between Phase 1 and site A is only presumed;
- The new developments at Sellindge and Otterpool Park will not benefit the local population; and
- Phase 2 will not be able to meet the criteria of meeting community needs so the development should not be supported

### **19. Section 5.3: Implementation**

19.1. 3 representations were received relating to Section 5.3. These raised the following issues:

- The Authority Monitoring Report (AMR) is not sufficiently robust as it does not show the distribution of housing across the three character areas. This is vital information for all stakeholders to make informed responses to development proposals and policy consultations The North Downs Character Area should be split into the AONB vs the Rest of the Area; and
- CCPIII Shopping Folkestone S.À.R.L would like to suggest an amendment to Para. 5.189 “The retail needs of an area should be updated on a regular basis to reflect changes in local provision and wider changes in the retail sector and economy”. This applies especially to Folkestone Town Centre.
- Historic England consider that the reference to a garden town with “its very own heritage” needs to build on the existing history of the place

A further 1 representation was received as part of the revised minimum housing needs requirement consultation. The comments raise the following issue.

- Windfall sites account for 10.5% of all dwellings. It is questionable whether this represents a cautious estimate or is deliverable?

## **Part 6 – Appendices**

### **20. Appendix 1: Monitoring and Risk**

20.1. 2 representations were received relating to Appendix 1. These raised the following issues:

- Table 6.1 does not show affordable home defined by area. The focus on Otterpool is taking attention away from the needs of Folkestone and Romney Marsh); and
- Table 6.6 – the possibility of the event (Place Competition) should be increased from ‘low’ to ‘high’. Ebbsfleet is at a more advanced stage of delivery and is a more attractive place for London Commuters to live, than Otterpool.

### **21. Appendix 2: Glossary of Terms**

21.1. 1 representations were received relating to Appendix 2. Representations raised the following issues:

- Concern over the change of the title from “Glossary of Terms and Technical Studies” to Glossary of Terms - this should be reinstated and what has happened to the table of Technical Studies?

### **22. Appendix 3: Indicative Housing Trajectory**

22.1. 1 representations were received relating to Appendix 3. Representations raised the following issues:

- It is considered that the targets presented in the bar graph are unrealistic. It is questioned whether the demand for properties will meet the anticipated schedule of delivery over the plan period.

## 23. Submission Draft Core Strategy Review – Sustainability Appraisal

23.1. 13 representations were received relating to the Sustainability Appraisal. Representations raised the following issues:

- Natural England concurs with the wording for the garden settlement policies in particular to mitigate views from the AONB, and the conclusions drawn in the Sustainability Appraisal;
- Concerns raised that the Growth Options Study is flawed in terms of transport infrastructure and capacity i.e. it fails to consider commuting patterns and travel to work areas. There is emphasis on the A20 towards Folkestone and Hythe and the B2068 to Canterbury. There is no evidence that any Growth Study Option was carried out on the A20 towards Ashford or the B2067 which links Lympe to the A2070 south of Ashford;
- The Sustainability Appraisal does not reference the neighbouring parishes adjoining Sellindge and the impact on them by the proposed developments;
- Concerns that the traffic modelling has not taken into account the parishes that border with Ashford and the impact on them with respect to traffic congestion and air quality. Aldington is not mentioned in the document. A full appraisal is required to look at the impact on all adjoining neighbourhoods;
- Paragraph 6.48 suggest that access to existing strategic road infrastructure is expected to have a positive effect on SA2 - 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 encourage an increase in overall car use, even if the road network could accommodate such traffic in that location.
- Highways England is supportive of Paragraphs 6.65 and 6.66 which attribute a positive effect on SA Objective 13 - access to sustainable modes;
- The Kent Downs AONB disagrees with many of the scores assigned in relation to the North Downs Character Area and the impacts of strategic scale development on SA Objective 3.
- The Kent Downs AONB disagrees with the SA score for Table 6.2, sub-area B of Character Area in respect of SA Objective 3 (Landscape), where proximity to and visibility from the AONB means that much of this sub area would be highly visible from the nationally protected landscape of the Kent Downs AONB. As such, it is considered that a significant negative effect would be more appropriate than the minor negative effect that has been assigned to Area B;
- The Kent Downs AONB disagrees with the SA scores for Table 7.1, Otterpool Spatial Options A & B in respect of SA Objective 3. It is considered that both Otterpool Spatial Options A & B would have negative effects in view of the visibility of the site from the highly sensitive Kent Downs landscape;
- The Kent Downs AONB disagrees with the SA scores for Table 8.2 - summary of effects following reappraisal, Policies SS1-SS4, in respect of

SA Objective 3. Allocation large scale development on land in the setting of the Kent AONB is likely to result in detrimental effects to the landscape;

- Kent County Council welcomes reference in Appendix 2, to the Energy White Paper<sup>1</sup> which aims to reduce carbon emissions. However, it is advised the target has changed to 80% by 2050 and may yet drop to 0% by 2050; and
- Sellindge Parish Council comments that Sellindge B (Appendix 4, Sellindge Spatial Options) should not be considered until after 2050. Furthermore, Sellindge Spatial Options C & D are totally unacceptable as it includes the nature reserve provided by Site B in Policy CSD9.

#### **24. Submission Draft Core Strategy Review – Historic Environment Assessment**

24.1. 1 representations were received relating to the Historic Environment Assessment accompanying the Sustainability Appraisal. These raised the following issues:

- Concern that the Roman Villa unearthed at the Otterpool Park development site will not be conserved and separated from the development.

#### **25. Submission Draft Core Strategy Review – Habitats Regulations Assessment**

25.1. 3 representations were received relating to the Habitats Regulations Assessment. These raised the following issues:

- Natural England (NE) would like minor amendments to the reference of Regulations<sup>2</sup>. The CSR and HRA should emphasise that future planning applications for the garden settlement will need a project-level HRA. The CSR HRA should make clear that the PPLP has been assessed in combination for all impact pathways (air quality and recreation pressure on European sites);
- Natural England concurs with the findings of the HRA of no likely significant effect in relation to air quality and recreational impact on the named European sites in Table 2.2. Regarding Dungeness protected sites, as the garden settlement is some distance away and will provide onsite greenspace; it will have little impact on the Dungeness protected sites. NE suggest funding for SARMS should be addressed through a tourism growth plan; and
- Natural England concurs that there are no adverse effects on the Folkestone to Etchingill Escarpment SAC for the CSR alone and in combination with air quality. NE support the commitment by the Council to undertake monitoring of air quality along the A20 close to the SAC and to review this in conjunction with Natural England.

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<sup>1</sup> Our Energy Future 2003

<sup>2</sup> Conservation of Habitats & Species Regulation 2010 (para 2.6) should be amended to 2017