

## Comments for the Inspector with regard to soundness and legal compliance relating to Matters: 1, 2, 3, 4 and 6

### Housing numbers and distribution and Climate Change

**Section 19** of the 2004 Planning and Compulsory Purchase Act, as amended by Section 182 of the Planning Act 2008 states: *'Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.'*

Despite Folkestone and Hythe Council (FHDC) declaring a climate emergency, it is not clear how the Core Strategy contributes to the targets established by the Climate Change Act as there is no roadmap setting out the mitigating policies and how they will collectively offset the inevitable emissions associated with the growth in population emanating from the material increase in dwelling numbers – singularly and in combination with other districts/boroughs, particularly Ashford. In addition, there has been a total failure to take into account carbon sinks and their contribution to reducing emissions plus the impact population growth will have on them.

The district has a large proportion of protected habitats particularly on Romney Marsh which can act as carbon sequesters<sup>1</sup>. Even well managed farm land can act as viable carbon sinks<sup>2</sup>. More human activity means greater pressure to allow development in protected areas (the all too frequent meaningless mitigation), more emissions and the greater likelihood of physical damage.

- (1) Folkestone & Hythe District Council has recognised the constraints the district faces in terms of flood risk and the scale of land given special protections<sup>3</sup>, yet has failed to promote these special protected habitat as valuable carbon sinks which can help in mitigating emissions.
- (2) The value of these carbon sinks and the need to protect them provided an arguable case for lower housing numbers for the district than the target predicated by the Housing Needs Test, yet the evidence shows that their value was never considered.
- (3) As highlighted in my submission of January 16, 2020 an analysis of the housing figures shows: (a) that Otterpool is not the main source of housing for the district – contrary to the narrative from FHDC which sold the new town as the source that

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<sup>1</sup> **Protecting Ecosystems:** Roughly 72% of ice-free land is affected by human activity. Keeping wild areas wild and free from human pressures is crucial for saving biodiversity and drawing down emissions. - <https://unfoundation.org/blog/post/key-takeaways-from-the-ipcc-special-report-on-climate-change-and-land/>

<sup>2</sup> <https://climatechange.ucdavis.edu/news/grasslands-more-reliable-carbon-sink-than-trees/>

<sup>3</sup> Environmental designations: SSSIs, SACs, SPAs, Ramsar sites plus the landscape protection through the North Downs AONB. Although the latter is a landscape designation it retains high quality grassland and woodland habitats which act as carbon sinks.

will alleviate pressure on other more sensitive areas of the district - and (b) that the number of dwellings to be accommodated by Romney Marsh is disproportionately high, given the very considerable constraints this area faces.

The analysis shows: (a) that Romney Marsh is expected to deliver 67% of its allocated housing supply for 18 years within the first five of the plan, compared to 17% in the North Downs character area including Otterpool and (b) that there are no policy constraints related to Romney Marsh and elsewhere to ensure Otterpool Park will take up the slack in later years. Since historically Romney Marsh has “punched” well above its weight in terms of housing delivery, relative to targets, this suggests that housing delivery is not going to drop back to a rate of 22 dwellings per year for the final 13 years of the plan, after a rate of 115 per year in the first five years.

This is unsound. Romney Marsh has the highest proportion of protected natural habitats of the three character areas – the carbon sinks – and is on the frontline of the flooding consequences of climate change. The environmental assessments cannot possibly have assessed the adverse impact of these housing numbers on the protected habitats for although the basic data was available, I am unaware of a parallel assessment of the breakdown of housing by character area, let alone any sensitivity analysis.

In addition to the possible damage to the carbon sinks, there has been no assessment of the adaptations required on Romney Marsh to accommodate climate change and secure the safety of the residents in the face of greater flood risk.

- (4) The duty to co-operate statement between Ashford Borough Council (ABC) and FHDC is the product of a retrospective box ticking exercise between two competing councils and has little merit. It also does not take into account the collective obligation to reduce emissions.

As the Common Ground statement between these two councils states (para 2.9) FHDC did not seek any assistance from Ashford in meeting identified housing needs, instead choosing to develop another new town on the next junction of the motor way. Despite the irrationality of having two new towns/cities on successive motor way junctions (9, 10, 10a for Ashford and 11 for Otterpool) and the collateral strain it will put on the social and environmental infrastructure of the whole region, there is no road map delineating how the emissions associated with the enormous collective boost in population will be offset to achieve the type of reductions required by the Climate Change Act.

## What is required?

Lower housing numbers overall and on Romney Marsh, plus more precise policies to ensure the protection of Romney Marsh, the AONB in the North Downs and all other recognised natural habitats outside these areas.

## Lydd Airport

The narratives and policies related to Lydd airport are illogical and therefore unsound. I refer to the narrative in paragraph 5.121 and the last sentence of Policy SS1.

Para 5.121 is obsolete. It states: *Lydd Airport has been significant in the area for more than 50 years and, **by 2019 (my emphasis)**, is expected to have implemented planning consent for extended runways and a new terminal building, to allow passenger flights using aircraft the size of Boeing 737 or Airbus 319, thereby creating up to 200 jobs locally. Should development proposals come forward for the further expansion of London Ashford Airport, the council will work with the airport, local community and other stakeholders to prepare an Action Area Plan for the site.*

Lydd Airport has not implemented its planning permission for a runway extension and new terminal to accommodate 500,000ppa granted in April 2013 and it is now June 2020. The fact that the airport is committed to continued music raves suggests that it is no closer to implementing the permission. Regional airports do not house music festivals on their runways and holding areas. (<https://www.kentonline.co.uk/romney-marsh/news/12-hour-dance-festival-to-return-for-2020-224008/>).

Policy SSI gives too much focus to Lydd Airport, relative to other employment generating entities. This is illogical given its lack of progress and importance. Its existence should only be acknowledged in the narrative along with the other employment generating entities in the area. Further, the wording of SS1 (final sentence) gives the impression that the Core Strategy supports continued passenger growth of the airport. The airport has not implemented its 2013 permission. If it is to be included (which no doubt it well as comments from the public have been entirely ignored) the wording must be more precise: *Should development proposals come forward to complement or replace existing activity, the council will work .....*

To put the Lydd Airport situation into context, the level of passenger activity is now lower than it was when the Airport submitted its planning application in 2006 – leaving aside the helicopter search and rescue business which has operated from the site since 2016, transferring from Manston Airport when it was closed down. The CAA figures show that the airport is still dominated by light aircraft activity with passenger numbers down to 39 in 2019 from 2,754 in 2006 when its planning application was submitted for the expansion of numbers to 500,000ppa. The latest accounts (to December 2018) show losses of just under £1m and accumulated losses of £24m, with the number employed down to 29. This

compares to 37 people employed by Littlestone Golf Club (year to December 2018) and 68 by the Romney Hythe & Dymchurch Light Railway (December 2018).

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[REDACTED]  
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[REDACTED]

2/7/2020