



# Folkestone and Hythe Hearing Statements

## Matter 1 – Procedural / Legal Requirements

Iceni Projects Limited on behalf of  
Quinn Estates

July 2020

ICENI PROJECTS LIMITED  
ON BEHALF OF QUINN  
ESTATES

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***\*Note: Quinn Estates only wish to comment on the above questions of this Matter.***

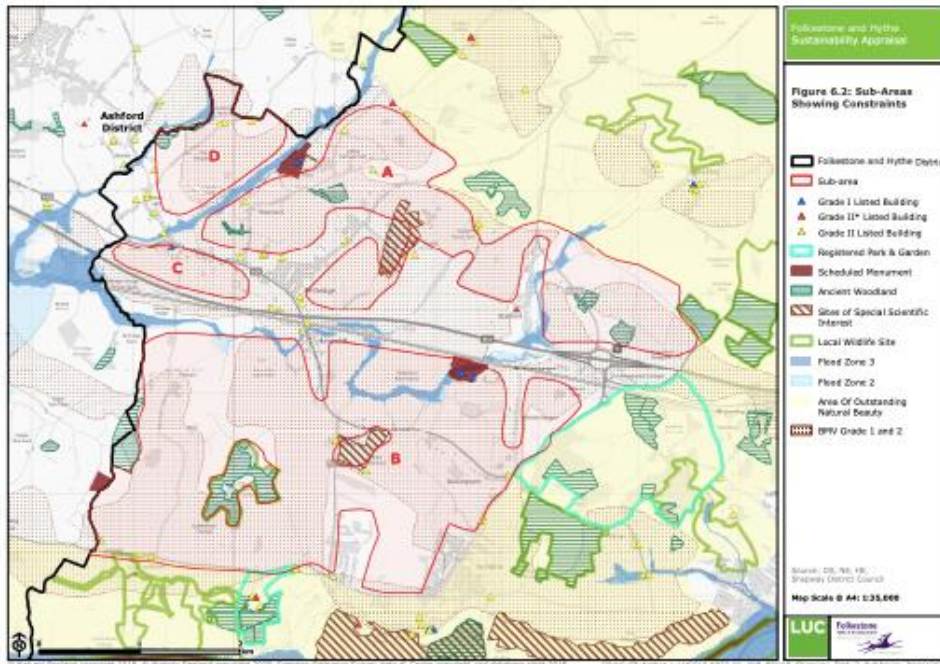
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## 1. QUESTION 7

**Has the methodology for the SA been appropriate? What concerns have been raised and what is the Council's response to these? Have the requirements for Strategic Environmental Assessment been met?**

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- 1.1 The Sustainability Appraisal for the Core Strategy Review drew heavily on the growth assessment studies undertaken by AECOM. The study identified Character Area 4 (Sellindge and Surrounding Area) as the only area within the District suitably free from strategic constraints to accommodate new development at a strategic scale.
- 1.2 Four sub-areas were then identified within Character Area 4. This included Sub-Area A: North and East Sellindge, within which Quinn Estates' two landholdings at Sellindge are located.
- 1.3 As outlined in Figure 6.2 of the Sustainability Appraisal Regulation 19 Version (EB 02.40), Sub Area A is a large swathe of land that includes areas lying adjacent to the AONB, with the identified area running to the boundary of the AONB. There was no attempt to define a sub-area based on potential development areas, despite the obvious potential of land adjoining Sellindge to be brought forward for appropriate extensions to the settlement, and this skewed the subsequent SA assessment against Sub-Area A.
- 1.4 This approach diverted the assessment away from prospective development areas within Sub-Area A and led to assessment of a wide amorphous area that bordered extensive areas of AONB. Consequently, when SA was undertaken and the 4 sub-areas were assessed, Sub-Area A was identified as having a significant detrimental landscape impact on the AONB.



- 1.5 The next phase of the options testing work identified four spatial development options for Sellindge (A,B,C and D). Option C tested Quinn’s Rhodes House landholding, which falls within Sub-Area A. However, none of the options considered growth to the north of the settlement on Quinn Estates’ Elm Tree Farm landholding. This landholding should have been tested as an option given the opportunity that the option provides to unlock additional school capacity necessary to support the identified growth at Sellindge, and the potential to deliver a high-quality sustainable extension with limited/low environmental harm.
- 1.6 The only conceivable reason for not testing Elm Tree Farm as an option would be its proximity to Listed Buildings and potential risk to heritage assets by virtue of its proximity. However, it is evident from the Heritage Considerations note attached to this statement that heritage harm can be negated and that moreover, there could be opportunities to enhance the significance of the two listed buildings at Elm Tree Farm by introducing enhancements to their setting. Accordingly, Elm Tree Farm should have been assessed as an option and it should have scored highly.
- 1.7 The SA also fails to appraise how much development could be accommodated at Sellindge. The AECOM Growth Options Report, which was produced prior to the SA in December 2016 (EB 04.10) highlights that Sellindge and Surrounding Area (Character Area 4) was the only area of the District considered to have potential for strategic-scale growth. If this was the conclusion, the SA should have considered the potential of Sellindge to accommodate growth based on its sustainability credentials and its environmental capacity to accommodate growth sustainably. However, the SA highlights that reasonable alternatives were informed by a range of factors, including the position of Sellindge within the settlement hierarchy and it is not considered appropriate to restrict the growth assessment based on the settlement’s historic position in the settlement hierarchy.

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- 1.8 As we set out within Matter 7, we do not consider that the historical Settlement Hierarchy should have restricted the growth to be accommodated at Sellindge, and this seems to have been the case based on the findings presented in both the Growth Options Report (EB 04.10) and the Sustainability Appraisal.
- 1.9 Quinn Estates considers that the Sustainability Appraisal could and should be updated to consider the suitability of development to the north of Sellindge at Elm Tree Farm, as an alternative or an additional development allocation to the development allocation identified within Sub-Area C.