

Matter 2 – The duty to co-operate

Issue

Whether the Council has complied with the duty to co-operate in the preparation of the Core Strategy Review.

Housing needs, the housing requirement and housing provision

Question 2: What are the inter-relationships with other authorities in terms of migration, commuting, housing markets and service provision?

Housing:

There appears not to be any stated position with adjoining authorities as to whether the local housing need at Folkestone & Hythe can be accommodated in adjoining Districts, bearing in mind the impact of the suggested housing numbers on the Kent Downs AONB and the constraints of the Romney Marsh SPA and Ramsar site, in accordance with footnote 6 to paragraph 11(b) of the NPPF.

Service provision:

EX.13.10 (Statement of Common Ground with KCC) states at paragraph 2.20 that the Council (and other east Kent authorities) and KCC will lobby DfT for increased capacity in High Speed rail services, concluding this “*will ensure* capacity exists to serve additional demand from development” (Council emphasis). This issue is discussed in more detail in our Matter 7 statement (question 22).

While there may be agreement between the Council and KCC, it is in terms of aspirations. Provision of increased capacity of rail services is beyond the remit of either authority. To offer the degree of certainty the DfT (and Network Rail) should be joint signatories in respect of rail services.

Similar issues arise in respect of bus services. While there are laudable aspirations for sustainable transport no specific agreement appears to have been reached with Stagecoach East Kent (see also Matter 7, question 22).

CPRE Kent queries the statement at paragraph 2.14 of the Statement of Common Ground with Dover District council (EX.13.30). It states that Affinity Water “has confirmed that planned growth across Folkestone & Hythe District ... has been accounted for within their Water Resource Management Plan 2019.”

In terms of potable water supply Affinity Water confirms at paragraph 7.12 of the IDP (EB.05.10) and at Appendix 1 of EB.13.60 that (only) 1,500 properties can be supplied with water without the need for strategic infrastructure – which addresses the build rate to 2025/26. While Affinity Water has confirmed that planned growth has been accounted for within its Water Resources Management Plan 2019, CPRE Kent is concerned that it’s not

clear whether these resources will be available at the right time. If not enough water can be supplied from within the catchment, or the neighbouring Dover catchment, where will it come from?

The Statement of Common Ground with Affinity Water EB.13.60 at Appendix 1 refers to Affinity Water's consultation response to the Core Strategy Review Regulation 18, dated November 2018, and Appendix 2 refers to correspondence in September/October 2018. The Regulation 18 Core Strategy Review (EB.01.50) published in March 2018 made provision for an additional 12,030 new homes 2018/19 to 2036/67 (633 per annum). This has risen to 13,284 for the period 2019/20 to 2036/37 (now 738 per annum). There is no evidence of correspondence since then.

As such, it is unclear whether the Affinity Water (and other utility providers) have been properly appraised of the plan to increase housing delivery rates to this extent. Affinity Water appear to have been given only the requirements for the new garden settlement (EB.13.60, Appendix 1).

Employment:

Planning Practice Guidance Paragraph: 014 Reference ID: 61-014-20190315, revised 15 03 2019, provides the following guidance on the strategic matters on which cooperation is required:

"Paragraphs 20-23 of the National Planning Policy Framework sets out the matters that the strategic policies should make provision for, this is not an exhaustive list and authorities will need to adapt this to meet their specific needs." Paragraph 20(a) of the NPPF requires strategic policies to make sufficient provision for employment.

2011 Census Special Workplace Statistics 12 WU03UK – Location of usual residence and place of work by method of travel to work indicates that:

- 31% of residents commuted out of the District to work, with 9.8% working in Ashford District and 5.4% in Dover District. 3.7% commuted to Greater London.
- 25% of people working in Folkestone and Hythe in-commuted, with 10.3% commuting from Dover District and 5.9% from Ashford District.

In our response to the Regulation 19 Core Strategy and Matter 10 question 2 we expressed our concern that there was no assessment or evidence to show where the jobs for out-commuters would be found or whether they would exist. There is no evidence from the Statements of Common Ground (SoCG) that this matter has been considered in discussions with adjoining local authorities, KCC, Highways England or Affinity Water.