



28 June 2020

CORE STRATEGY REVIEW SUBMISSION DRAFT – PLANNING EXAMINATION

I wish to register the following comments on the Core Strategy Review Submission Draft dated February 2020. They expand on the previous comments I submitted in response to the original consultation process, and reflect changes in the circumstances.

Overview

I do not consider this strategy to be sound on the grounds that it does not meet the needs of locals; much concerning the proposed garden settlement disregards national trends and is speculative; and, the strategy as set out is likely to put a heavy burden on council taxpayers.

I would like to address these sequentially.

Does not meet the needs of locals

The second bullet point of 2.56 states “In the absence of in-migration the population will fall”, making it absolutely plain that the scale of the strategy is designed to attract people in, rather than concentrate on providing for the existing residents.

Proposed Garden Settlement

National trends show considerable reduction in the viability of High Street retail, yet the strategy envisages a complete reversal of this, and that it will have no detrimental effect on the High Streets of Folkestone and Hythe. The strategy also proposes sizeable health and education facilities, again disregarding both local and national trends.

Para 3.29 refers to Sellindge with reference to “a compact, social village”. The truth of the matter is that Sellindge, Stanford, Lympne and Westenhanger will be subsumed into the greater Otterpool Park and will lose their identities.

Para 4.132 sets out the aspirations for Westenhanger Station to become a High Speed link. This makes little sense. High Speed facilities already exist at Folkestone and Ashford, placing another midway between does not seem practical given that the strategy purports to have people employed locally, and to shop and attend entertainment events locally. A High Speed link will only encourage people to work elsewhere, particularly London, and to do their shopping at sites such as Bluewater and Westfield, and to go to entertainments in London. This will actively deter investment in employment, retail, and entertainment not only in the garden settlement but also Folkestone and Hythe. There would also seem to be little incentive for the train companies until the completion of the garden settlement with the potential that they may see little or no financial return during the tenure of their franchise. In the event of the Council now being lead developer, they will undoubtedly be expected by the DfT to contribute financially to the station enhancements, which will place a burden on local council taxpayers and businesses.

With regards the Policy Sections concerning the garden settlement, it is noted that the word “should” appears regularly. This would seem to absolve the Council from meeting any of the objectives. It must be noted that the Council has an extremely poor record with regards the protection of environmental or historical sites, and certain existing developments have seen the alteration or removal of enhancements within the original housing planning. This avoidance of obligations is further emphasised, concerning affordable homes, in the final words of Policy SS6, (1) New homes (b) “subject to viability”. It is understood that failure to achieve the target will result in a financial contribution equivalent to the value of the homes not built would be levied against the developer. As lead developer the Council would therefore be enacting the levy against themselves, again placing a burden on council taxpayers and businesses.

There is also the question of Political will. The Government has made it plain that it sees investment in the North of England as being key. The departure of a generous Party donor from the programme must call into question why they would invest scarce resources for the benefit of a mixed Council in what is a safe seat.

Burden on Council Taxpayers and Businesses

The strategy, particularly with regards to the proposed garden settlement, will require considerable investment. The Council is known to be drawing down

finance from various loans, but these must all be repaid. The land already purchased has cost a significant amount, and when coupled with the likely infrastructure costs and incentives will place a heavy burden on both local council taxpayers and businesses, which will most likely result in sizeable increases to taxes or reduction in key services or both.

Summary

While it is accepted that new housing will need to be built, including some development at the proposed garden settlement site, the current strategy is considered unsound in view of its failure to meet the needs of locals, its overly optimistic disregard of national and local trends, the potential for the garden settlement to be detrimental to facilities and opportunities in Folkestone, Hythe and other local villages, the irreversible change that the garden settlement would bring to all aspects of local life, and the unacceptable financial burden that the strategy will place on council taxpayers and residents.

