



JULY 2020

Folkestone and Hythe Hearing Statements

Matter 4 – District Spatial Strategy, place shaping and sustainable settlements

Iceni Projects Limited on behalf of
Quinn Estates

July 2020

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Statements
MATTER 4 – DISTRICT SPATIAL STRATEGY, PLACE
SHAPING AND SUSTAINABLE SETTLEMENTS

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

1. QUESTION 1

Is the spatial distribution of development across the District justified and what factors influenced the District Spatial Strategy, for example physical and environmental constraints and the capacity to accommodate development?

- 1.1 We consider the general spatial distribution of development is justified, as it focuses development in the least constrained character area and the most suitable area to accommodate strategic growth (Sellindge and Surrounding Area – Character Area 4). Otterpool Park and Sellindge are both considered to be highly suitable areas to accommodate growth in the District given their spatial characteristics and location, the existing and potential infrastructure and the lack of statutory designations. As set out in the AECOM Shepway Growth Options Study Phase One Report (EB 04.20), Page 5-105, Area 4 (Sellindge and surrounding areas) contains “*more extensive land free from direct constraint than any other*” and was considered to be an area that has the potential for “*strategic-scale housing growth*” (Figure 13 of the AECOM Shepway Growth Options Study Phase One Report- EB 04.20).
- 1.2 Although the location of Sellindge has been recognised as a suitable and appropriate location for growth within the Core Strategy Review Local Plan and within the Council’s accompanying evidence base, we do not consider the Council has fully considered the potential of Sellindge to accommodate development. The evidence points to Sellindge being able to accommodate more growth than what is currently being proposed in the Plan, and this is also supported by various Evidence Base documents submitted to support this Plan.
- 1.3 It is considered that the Council should reconsider Sellindge’s capacity to accommodate development and the role it could have in helping the Council achieve their housing need in the Plan period, especially in the early stages of the Plan before Otterpool Park is delivering high quantum of housing annually.

2. QUESTION 4

Is the settlement hierarchy set out in table 4.4 justified? What are the reasons for the distinction between the typologies of settlements and their respective roles?

- 2.1 Quinn Estates does not consider the settlement hierarchy set out in Table 4.4 to be justified, as this has not been updated to reflect committed development that will be delivered at key settlements and has not been updated to reflect the Council's Core Strategy Review evidence base, in particular the Growth Option Studies conducted by AECOM (EB 04.20, 04.21 and 04.30). Considerable change is planned within the Sellindge and Surrounding Area Character Area, which has implications for the settlement hierarchy.

3. QUESTION 5

What evidence is there to justify the identification of each settlement within the respective tiers of the settlement hierarchy?

- 3.1 It is illogical to identify Sellindge and its Surrounding Area as having the greatest potential for accommodating strategic-scale growth, and to identify Sellindge for up to 600 new dwellings, whilst simultaneously maintaining its designation as a “Rural Centre” within the Settlement Hierarchy in the Local Plan.
- 3.2 Paragraph 4.74 of the Plan identifies Rural Centres and Primary Villages as having the following shared characteristics:
- “These are larger or better-served rural settlements within their character area, and as a group of locations there may be potential – subject to further examination of environmental impact – for modest expansion from their current built limits to meet rural development needs. There is a particular contrast in size between the largest and smallest settlements in these categories, so any growth should be proportionately limited in scale and well-related to the existing built environment and infrastructure.”*
- 3.3 A currently small settlement has been identified as being clearly suitable to accommodate 600 new homes, yet it has been classified in a tier of the settlement hierarchy as only being suitable for modest expansion to meet rural development needs.
- 3.4 Quinn Estates considers that a review of the settlement hierarchy is required for this Local Plan to reflect the level of change identified in the Plan. The position of Sellindge as a Rural Centre is not justified or evidenced, and this settlement tier should be reviewed.
- 3.5 Quinn Estates considers that the settlement should be re-designated and recognised either as a “Service Centre”, or it should be given a tier in the hierarchy on its own, given the location’s capability to sustainably accommodate growth through the Plan Period. Sellindge is located in the least constrained area of the District, it already has committed development bringing forward important new infrastructure at the heart of the settlement and it can also benefit from and contribute to the transformational infrastructure that will be delivered at Otterpool Park.
- 3.6 The ability of the settlement to accommodate a significant level of growth is supported by the Council’s Growth Study produced by AECOM comprising a Phase 1 Report (December 2016), a Phase 2 Report (April 2017) and a High-Level Landscape Appraisal (February 2016). This study identified “Sellindge & Surrounding Area” as the most appropriate location in the District to

accommodate strategic-scale growth. Given Sellindge is the only existing well-established settlement within the growth area, this should have been a significant consideration when reviewing the settlement hierarchy.

- 3.7 By maintaining Sellindge within the settlement hierarchy as a Rural Centre suitable for meeting rural development needs and only modest expansion, as outlined at Paragraph 7.3 of the Sustainability Appraisal Report (EB 02.40), Sellindge's position within the settlement hierarchy stifled the assessment of its suitability to accommodate development, and has thus potentially restricted the amount of development identified at the Settlement, which is capped at 600 new homes in the Plan. We also consider that to cap the homes at 600 is simply an arbitrary figure, as it is not supported by any evidence.
- 3.8 Quinn Estates considers that the settlement hierarchy should be amended to elevate Sellindge from a "Rural Centre" to either a "Service Centre" or to a position on the hierarchy on its own to reflect the unique position of the settlement in terms of both its proximity and potential to provide support to/benefit from the Otterpool Park Garden Town. Sellindge was also identified as a "Rural Centre" prior to the existing allocation and that the homes, new shop, village green, expansion of primary school, improvement to bus provision and the expansion of the Doctor's Surgery. It is clear that Sellindge has the appropriate infrastructure to warrant an elevation in the hierarchy or to be a hierarchy on its own. Through amending the hierarchy to reflect these services, this will ensure the Plan is sound and fully justified, with the District focusing development on the most sustainable and appropriate locations, as justified by the evidence base.