

**Supplementary comments on core strategy review policies
SS6, SS7, SS8, and SS9, relating to the proposed new town at Otterpool Park,
and policy CSD9, relating to further expansion proposals at Sellindge.**

1. These policy proposals are discussed independently of each other whereas in fact they are almost contiguous and should be at least considered one alongside the other. There is a degree of ambiguity in policy and approach, and notably some contradiction in evaluation of impact on landscape which would warrant some explanation.
2. The supplementary notes are supplementary to my previous submission which remains “on the table”.
3. The first airing of the core strategy review came in March 2018 with the publication of the “preferred options” consultation document. This was followed by the submission draft (regulation 19 version) which was published for consultation between 25 January 2019 and 11 March 2019, and ultimately the Folkestone and Hythe Core Strategy Review was submitted to the Secretary of State for examination in public on the 10th March 2020. Although the final submission document did contain amendments and alterations from that first published, broadly the main thrust remained virtually identical to the regulation 19 edition.
4. It is pertinent to identify events that have occurred since the publication of the first since the first publication of the review documents, and since the submission of the final document for inspection.
5. These events have bearing in particular on the assessment of issues pertaining to policies SS6, SS7, SS9, SS9, and CSD9.. They do of course have reference to other policies within the core strategy review as they strike to the heart of planning for the future.
6. 24 July 2019, Folkestone and Hythe district Council signed up to the climate emergency and has established a specific committee to respond to this, with an adopted policy of achieving net zero carbon emissions by 2030. The submission documents are notable for the absence of reference to this target, and as such The core strategy would seem to be at odds with the councils own targets. The evaluation of issues surrounding sustainability

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have taken on a different tone and to be meaningful the core strategy should reflect this.

7. Since January 2020 The global pandemic around COVID-19 has manifestly thrown all previous expectations into a melting pot. Through necessity many assumed truths have been put into question, especially in the context of planning for the future, any future. What has been seen is along the lines of a substantial, if ad hoc, experiment into patterns of working, travelling and learning, alongside quite remarkable changes in retail shopping patterns and leisure pursuits. These must question the nature of land use that will be appropriate in the fairly near future
8. Both of these significant events make a strong case for recognising the probability of a forthcoming paradigm shift. One of the key propositions in the promotion of the new garden town/village movement projected by national government was that it should be innovative. A common criticism amongst responses to these various projects is that they have become heavily car dependent commuter housing estates, far removed from the ambition heralded, and certainly far from innovative. The core strategy document that is to come next and replace the existing is undoubtedly the most important of all of them.
9. Focusing on policies SS6 to SS9, when the prospect of Otterpool Park Newtown was first announced to the public by Folkestone and Hythe District Council great play was made that, because the Council was at that time a significant partner landowner, the outcome would be so much better than an 'ordinary' developer would aspire to.
10. The council has recently gained ownership and/or control the whole of the land needed. The council is now unbounded by the usual constraints of a developer and has the opportunity to do what it claims to have wanted originally, a singularly well masterplanned development, follows innovation and provided with infrastructure across the board, sustainable in a meaningful achievable manner, Avoiding the "chaos" of the alternative approach of dispersed development. Currently the proposals seem to fall precisely between the two approaches.
11. One aspect of this imprecise targeting comes to light in the newly re-written policy CSD9, which increases the housing load on Sellindge.


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12. It is worth briefly revisiting the recent history of development in Sellindge and the evolution of policy CSD9. In the run-up to the currently adopted core strategy various proposals were made by the council for development around Sellindge. These were unwelcome in the village, but an alternative proposal was formulated by the residents. With continued involvement the residents succeeded in arriving at a proposal that met the demands of the council's housing needs assessment and provided the village with a facility both physical and characterful that added something to the village other than just a number of additional homes. This was supported by a government funded exercise, carried out by urban initiatives; that exercise also made an assessment of the shape of the village and reported as a master plan, signed off and accepted by the council as well as residents. The implementation of the scheme providing 250 new homes around the Village Green, and providing some other more prosaic facilities, is now well progressed and is well received by the community.
13. The current core strategy review seeks to re-write CSD9 and expand the housing content and extent in ways which the village residents consider unacceptable. Residents also feel strongly that there is a fairly casual dismissal by the council of the reasonable process of consultation. The expanded policy comprises two distinctly separate pieces of land designated site A and site B in the policy.
14. Site B was the subject of a planning application that went to committee on the 3rd of April 2018, mid days after the publication of the core strategy preferred options document that sought the opinion of residents on the prospect of development on that very land. It appears to residents that consent was granted on the strength of the land having been included in the core strategy review, irrespective of the very early stage of that review and that it had yet to go through any form of inspection or examination; irrespective of the fact that that piece of land had been considered within the examination in public for the currently adopted core strategy, and had been dismissed from that. The council and councillors are aware that there is considerable disquiet amongst residents and that the planning process has fallen into more than a little disrepute as a result.
15. Site A is now also subject to a specific outline planning application (Y20/0604/FH), although


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only for part of it. That application was made valid on 4 May 2020 and is not determined at time of writing.

16. The notion that a decision might be made on that land almost synchronously with the concept of the land being utilised in this way through an inspection and examination in public raises further prospect of disillusionment with planning amongst the population.
17. Given the councils subscription recognising the seriousness of the climate emergency, and the consequences albeit as yet unknown of the COVID-19 pandemic and the effect on work, retail, travel and leisure considerations much of the background assumptions made in the preparation of the core strategy must be questioned. Where development is to proceed the standards required should be raised high and frankly inadequate standards should be avoided. These are issues which should be included in a core strategy as a high-level document: a plea for real sustainability And not simply something dressed up as such, concealing a more-of-the-same approach.