

## **Matter 7 – Strategy for the North Downs Area**

**Issue Whether the strategy for the North Downs Area is justified, effective and consistent with national policy.**

**Relevant policies – SS1, SS6-SS9 and CSD9**

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### **Question 7: Is the New Garden Settlement justified in principle?**

If the need for the new settlement is accepted, CPRE Kent supports the aspiration to create it on ‘Garden City Principles’ as defined by the Garden Cities Institute. These are:

- Strong vision, leadership and community engagement
- Land value capture for the benefit of the community
- Community ownership of land and long-term stewardship of assets
- Mixed-tenure homes and housing types that are affordable for ordinary people
- Beautifully and imaginatively designed homes with gardens in healthy communities
- A strong local jobs offer in the Garden City itself and within easy commuting distance
- Opportunities for residents to grow their own food, including allotments
- Generous green space, including: surrounding belt of countryside to prevent unplanned sprawl; well-connected and biodiversity-rich public parks; high quality gardens; tree-lined streets; and open spaces
- Strong cultural, recreational and shopping facilities in walkable neighbourhoods
- Integrated and accessible transport systems

We would like to see a specific commitment to these principles in the Plan. Adoption of these principles would ensure compliance with paragraph 72(c) of the NPPF. They are also referenced in *Garden Communities* (MHCLG August 2018) and reflected in the specific requirements of that prospectus. Use of the term ‘Garden **Town** Principles’ adds ambiguity as it is not defined. If the Council is not prepared to adopt these principles in their entirety then they it should make this clear.

We have highlighted two parts of the above principles where the plan currently falls short: community engagement (paragraph 16(c) of the NPPF also refers) and the ‘surrounding belt of countryside’. As presented in Figure 4.5 of the plan, the garden settlement extends up to the doorsteps of existing residents. It is therefore neither a ‘distinct new settlement’ nor a ‘transformational development of an existing settlement’ (*Garden Communities*) and cannot be said to comply with government policy in its currently proposed form.

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**Question 9: Taking each of the requirements in part (1) of the policy, what is the evidence to support them, including in respect of the need for the requirement and the effect on viability? Are the requirements justified?**

The requirement for 8,000 homes, let alone 10,000 has not been demonstrated. Nor has it been demonstrated that this number of homes can be accommodated within the space available between the existing communities of Lympne, Sellindge and Westenhanger while adhering to good design practice based on Garden City Principles as set out in our response to Question 7.

We have argued that a realistic housing delivery trajectory would target fewer annual completions in the short-term than the average for the whole plan period. In any case, we fear that actual completions will be less than the proposed 738 in these early years whatever targets are set. By adopting a 22% proportion of affordable homes the Council risks undershooting its annual target for affordable homes of 139. The current adopted Core Strategy requires 30% affordable homes for major sites. We could find no evidence that 30% is no longer achievable, especially where the landowner and master developer is the Council itself.

**Question 11: What is the evidence to support the approach to employment development in part (3) of the policy in terms of the scale and type of development? How does the scale of employment development envisaged relate to overall employment land requirements and job growth estimates for the District?**

The Otterpool Park Employment Land Needs Assessment Final Report, December 2018 (EB.07.20) assumes numbers of workplace jobs in Otterpool Park that imply a substantial proportion of the working age population having to out-commute to work. It is unclear where their jobs will be located and whether they will exist. The strategy depends on other districts providing additional employment for Folkestone & Hythe residents.

The Council's aspiration that high-speed trains will eventually be stopping at Westenhanger implies a plan that a significant number of jobs will be in London. There should be greater clarity on the extent to which the Garden Settlement is expected to become a dormitory town - a deeply unpopular prospect for local residents - and how the Council aims to keep out-commuting to a minimum.

We explore these aspects in more detail in our statement on Matter 10.

**Question 12: Is the scale of proposed employment growth and housing growth balanced? What implications would it have for commuting?**

The strategy appears to be to continue the current pattern of substantial out-commuting from the District. This can hardly be called balanced and has repercussions for transport inside and outside the District which we don't think have been adequately addressed. Our submission on Matter 10 gives more detail.

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**Question 14: Taking each of the criteria in part (1) of the policy, are they justified and do they provide a sufficiently clear and effective approach to achieving a suitable form of development?**

In draft Policy SS7 (1)(b)(i) it is unclear why Lymyne is singled out as requiring measures to prevent coalescence of the new settlement while Westenhanger, Newingreen and Barrow Hill are not to be similarly protected.

In draft Policy SS7 (1)(b)(vi) the drainage system must also not increase the risk of flooding upstream of the site. There was flooding in Stanford (north) earlier this year and we have so far seen no evidence that the flood risk there has been evaluated. This clause should refer to 'upstream and downstream' to reflect better paragraph 155 of the NPPF "without increasing flood risk **elsewhere**" (CPRE Kent emphasis).

**Question 16: Is the approach to village neighbourhoods and a high quality townscape in parts (3) and (4) of the policy justified and effective?**

In draft policy SS7 (3)(a) reference to 'garden town principles' should be replaced with 'garden city principles' for reasons outlined in our response to Question 7.

**Question 21: What are the specific requirements for new or improved infrastructure and social and community facilities associated with the New Garden Settlement for example in terms of transport, education, health, open space, sport and recreation, community buildings and waste water? Do any of these have cross boundary implications e.g. secondary education.**

It's not clear from Policy SS9 or the IDP (EB.05.10) what the specific requirements are for new or improved infrastructure for Otterpool – or what the cross-boundary implications are.

SS9 refers generically to a list of items stating that these will be secured and/or funded through legal agreements to ensure delivery at the appropriate phase of development.

It's not clear from this policy what actually is required - or when; who will provide it; how much it will cost; and how it will be funded – nor does the IDP (or Statements of Common Ground) provide clarity on these points.

Paragraph 1.2 of the IDP states that its purpose is to ensure that it is understood "what infrastructure is required to deliver the planned growth and wide objectives of the Council. It also properly accounts for the funding, timing and delivery of projects."

However, it reads as a summary of consultation responses from infrastructure providers and KCC. As stated above, it's not clear what infrastructure will be provided, how it will be funded, when it will be provided or by whom.

Paragraph 1.5 refers to a 'Garden Settlement North Downs IDP'. It's not clear whether this is a separate document, or whether it comprises those sections of EB.05.10 that don't specifically relate to Sellindge (Section 4). If the latter is in fact the case the document should be set out more clearly.

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With regard to health and social wellbeing paragraphs 6.33/4 of the IDP state that development at Otterpool presents an opportunity to attract GPs to the District. However, there is no guarantee this will happen.

The Economic Statement submitted with the current planning application for Otterpool states at paragraph 6.32: “The Kent and Medway Sustainability and Transformation Plan (STP) from 2017 points to shortages of staff and difficulties recruiting and retaining as crucial challenges for the NHS across Kent. In particular it notes that there are very high levels of vacancies at primary care level, with an estimated 136 GP vacancies (12% of the total) across Kent and Medway. There are also problems recruiting practice nurse and mental health service staff.”

It would be interesting to know whether the number of GPs has increased in response to growth as a result of development at Ashford, or whether there remains a shortage (County-wide) as reported in 2017.

Paragraph 6.24 of the IDP concludes that the South Kent Coast Clinical Commissioning Group finds it imperative that solutions are proposed to mitigate the impact of the Otterpool development on health services; but it doesn’t – contrary paragraph 1.6 of the IDP – confirm what is required, how it will be provided, who will provide it, how it will be funded and when it will be delivered.

Statements of Common Ground between the relevant parties should offer more in terms of evidence of assurances; as well as a tabulated list of what is required, when, where and who will deliver it.

The “hope” of the South Kent Coast CCG is not enough (paragraphs 6.25 and 14.6 of the IDP).

With regard to education it is noted that: “Discussions are continuing between the site promoters and Kent County Council (as the Education Authority) about the total area of land to be safeguarded within the redline boundary of the Garden Settlement for education” (paragraph 14.5 of the IDP) – which seems to imply a degree of uncertainty about what is actually required.

**Question 22: How will these be provided and funded?**

The aims of the IDP are repeated at paragraph 1.6. At paragraph 2.3 confirmation is again given that the Council has identified what infrastructure will be provided, “how it will be delivered and an assessment of the potential risk associated with doing so.”

It is not clear where the commentary on delivery is, or the risk assessment.

Paragraph 2.4 explains that Otterpool will be required to fund all associated infrastructure. Continuing at paragraph 2.5, it states: “it needs to be shown that there is not expected to be

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a funding gap associated with the satisfactory implementation of required infrastructure” to serve Otterpool.

It is not clear where the evidence is that there will not be a funding gap and accordingly doesn't comply with national policy as the plan doesn't demonstrate how sufficient provision will be made for infrastructure and community facilities – see IDP paragraph 3.2. [Note: reference here to the 2018 NPPF is incorrect. The Core Strategy Review was submitted on 10 March 2020, therefore the 2019 NPPF should be referenced.]

In respect of wastewater Southern Water state at paragraph 7.7 that it's not possible to provide costs for additional used water infrastructure to serve the proposed growth at Otterpool. How then can the Council be assured that there won't be a funding gap if costs are unknown?

Southern Water then goes on to confirm at paragraph 7.8 that used water treatment infrastructure upgrades to provide for development at Otterpool “is not sufficient to fully accommodate the needs arising from growth.” Funding bids would need to be put forward in the next Asset Management Plan (post 2021) and signed off by OFWAT – unless developers forward fund this work.

The IDP does not comment further on this except to say that Southern Water continues to work with site promoters on this point. No evidence has been provided as to the status of these talks or whether a schedule for infrastructure delivery has been agreed or when it is expected to be. This may affect the rate of development. Or wastewater will need to be tankered out on a regular basis – which will be another cost to be borne by the development and may have environmental implications (paragraph 7.9 of the IPD).

With the Indicative Housing Trajectory for the period 2021/22 and 2022/23 at over 1000 dwellings a year and over 900 for the period 2023/24 to 2024/25 a lot of houses are to be built at the start of the next Asset Management Plan period, with a high degree of uncertainty in terms of wastewater disposal.

Once again, the IDP reads as a shopping list of aspirations and not a document that sets out what is required, how it will be provided, who will provide it, how it will be funded and when it will be delivered.

In terms of potable water supply Affinity Water confirms at paragraph 7.12 of the IDP that (only) 1,500 properties can be supplied with water without the need for strategic infrastructure – which satisfies the build rate to 2025/26. And while Affinity Water has confirmed that planned growth has been accounted for within their Water Resources Management Plan 2019, CPRE Kent is concerned that its 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?

This pattern of un evidenced commitment in terms of funding and delivery also applies to the provision of potable water, gas, electricity, flooding, waste, community and cultural services etc and transport matters.

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Paragraph 8.15 states that precise details of what parts of the highway network need to be upgraded has yet to be agreed between site promoters, Highways England and KCC.

Details are provided on existing bus routes, but not on additional routes within the development to provide wider connectivity. This will be something future residents will be dependent on bearing in mind that the DfT Invitation To Tender documents for the current rail franchise makes clear that bidders are not permitted to make a station stop at Westenhanger for any High Speed services to/from St Pancras (paragraph 8.46).

On this point the Statement of Common Ground between the Council and KCC (EB.13.10) appears to contradict the position of DfT. Both Councils are in agreement that an increase in capacity of High Speed services is needed, to ensure that capacity exists to serve the additional demand created by new development (paragraph 2.20). It's not clear whether this means additional services, more stations or longer trains. In any event, realising these aspirations is not within the control of either authority.

In terms of sustainable travel, EB.13.10 documents that the KCC and Council view is that upgrades will be needed to the frequency of bus services at Otterpool (paragraph 2.24) to mitigate the impact of development. Such provision is to be funded by developer contributions, in agreement with KCC and in consultation with Stagecoach East Kent and other bus service providers. Provision of bus services "up to 6 times an hour" is a huge commitment – but this doesn't explicitly appear to have been costed, or have the agreement of the bus service providers themselves.

Transport for Homes has recently published research into garden villages and in terms of public transport concluded it was "very popular but unfunded. Nearly every garden town wanted excellent public transport. Equally the vast majority of garden villages put sustainable transport at the heart of their vision. Funding was however, very uncertain and pushed a long way into the future - there was little definite. We could find no garden community where the sustainable transport elements were costed and funded with delivery dates." [<https://www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-village-visions.pdf>, June 2020]

**Question 23: How will they be phased/timed in relation to the development proposed and what mechanisms will be in place to ensure they are provided at the right time?**

It's not clear when infrastructure will be provided – whether a specific date has been set, or whether it relies on a number of dwellings to have been commenced/completed. What happens if delivery of development at Otterpool takes place at a slower rate than that assumed in the indicative housing trajectory?

CPRE Kent set out concerns about what we consider to be an unrealistic delivery programme for the new garden settlement at Matter 3 Question 4 and Matter 8 Question 2.

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How would a slower delivery impact on the proposed improvements to Westenhanger railway station? And would delays to improvements reduce the demand for housing and/or result in an increase in traffic movements to Ashford?

Paragraph 14.2 (conclusion/summary) of the IDP states “a large amount of information is available, there have been in-depth discussions with the full range of infrastructure providers and there is a high degree of confidence that the needs of new residents can be met”. If this information exists it hasn’t been sufficiently well documented – accordingly - there can be no high degree of confidence that the needs of new resident can be met.