

## **Matter 10 – Economic and retail growth and the strategy for Priority Centres of Activity**

Issue: Whether the Core Strategy Review has been positively prepared and whether it is justified, effective and consistent with national policy in relation to economic and retail growth and the strategy for Priority Centres of Activity.

Relevant policies – SS2 and SS4

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### **Question 1: What is the evidence in relation to jobs growth and the need for employment land/floorspace in the District over the plan period? What does it show?**

Otterpool Park Employment Land Needs Assessment (EB.07.20) in section B Future Labour Supply sets out scenarios for forecast labour supply at Otterpool Park.

Scenario 2 (5,500 new homes by 2037) sets out at paragraph 2.20 that it assumes a working-age population of 15-64, and that economic activity remains unchanged over the Core Strategy Review period (73.2%). We have reservations about the use of this age band and assumed activity rate:

- Government guidance on school leaving age is a person can leave school on the last Friday in June if they will be 16 by the end of the summer holidays. They must then do one of the following until they are 18: stay in full-time education; start an apprenticeship or traineeship; or spend more than 20 hours or more a week working or volunteering, while in part-time education or training. Is 15 a typographical error?
- State pension age is rising for both men and women. During the period 2026 to 2028 the retirement age for all men and women will be 67.

This will more than likely result in an increase in economically active people and as a consequence a higher economic activity rate. Whilst paragraph 2.21 acknowledges that the supply of labour may be higher it does not assess the effect of different assumptions.

This may well have an impact on District-wide commuting patterns.

Scenario 3 (6,375 new homes by 2037) tests a different housing number with what would appear to be the same assumptions as for scenario 2. Our concerns regarding scenario 2 assumptions apply to scenario 3.

Policy SS2 sets out a target floorspace of 36,760 sqm metres B classes floorspace at the new garden settlement. This is the same figure as set out in EB.07.20 Table 2.5 Net Employment Floorspace Requirements by Scenario for Scenario 3 Otterpool Park Masterplan (6,375 new homes by 2037). The housing figure is higher than the 5,925 housing figure set out in Core Strategy Policy SS6 1(a). We have set out our concerns about what we consider to be an unrealistic delivery programme for the new garden settlement at Matter 3 question 4 and

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Matter 8 question 2. There is no explanation of why the 36,760 sqm figure has been included in Policy SS2.

**Question 2: Is the scale of proposed employment growth and housing growth across the District balanced? What implications would it have for commuting?**

In our response to the Regulation 19 Core Strategy 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.

We have not found any evidence from the Council to alter our view. The Statements of Common Ground with KCC (EB.13.10), Ashford (EB.13.20), Dover (EB.13.30), Canterbury (EB.13.40) and Rother (EB.13.50) whilst clear that the Council will not be seeking any assistance to meet identified housing need from neighbouring districts, do not refer to employment issues. The evidence base indicates that the Council will need to rely on neighbouring districts and those farther afield to provide employment for their new residents.

EB.07.20 Table 3.2 provides Indicative Employment Generation at Otterpool Park by Use Class at 2037:

- For scenario 2 it identifies 1,923 B and A uses jobs and 800 C and D uses jobs, resulting in 2,723 jobs. When taken with the Forecast Labour Supply of 4,115 in Table 2.2 this implies a job density of 66%.
- For scenario 3 it identifies 2,236 B and A uses jobs and 800 C and D uses jobs, resulting in 3,036 jobs. When taken with the Forecast Labour Supply of 4,770 in Table 2.3 this implies a job density of 64%.

This is similar to recent job ratios for the District.

Since 2000 the District's job density has fluctuated between 0.62 and 0.76. Since the high of 0.76 in 2014 the ratio has fallen year-on-year to 0.62 in 2018 as shown in the following table.

Year	Folkestone and Hythe (Jobs)	Folkestone and Hythe
		(density)
2014	50,000	0.76
2015	48,000	0.73
2016	46,000	0.70
2017	44,000	0.68
2018	41,000	0.62

Source: Nomis ONS job density

Note: The density figures represent the ratio of total jobs to population aged 16-64.

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The Core Strategy Review paragraphs 5.180 and 5.181 refer to monitoring. Paragraph 5.181 says: “**Regular monitoring of employment land should continue given its significance to strategy**, dependence on the national economy and potential for losses to other uses. Monitoring should consider the delivery of new industrial/office facilities (including qualitative improvements) at major employment sites as part of the new garden settlement and in the Urban Area and rural locations, illustrating take-up of a range of key opportunities. **Given the need to ensure that the new garden settlement is a truly sustainable community, monitoring will be particularly important to ensure that population and employment floorspace are fully aligned.**” [CPRE Kent emphasis]

Our assessment of EB.07.20 above indicates that the new garden settlement will only provide around two-thirds of the jobs required by residents.

The plan at paragraph 5.180 recognises the importance of employment land to the strategy. It is not clear what action or actions will be taken if population and employment are not fully aligned at the new garden settlement, especially if the employment floor space and employment are not forthcoming.

The MHCLG Garden Communities Prospectus (August 2018) at paragraph 3 states “Equally, this is not about creating dormitory towns.” Job densities of 0.64 suggest that the new garden settlement will be a commuter settlement.

The continued assumption that there will be net out-commuting causes concern. The NPPF at paragraph 149 requires plans to take a proactive approach to mitigation and adapting to climate change.

On 12 June 2019 the Prime Minister announced that the UK will eradicate its net contribution to climate change by 2050. A statutory instrument was laid in Parliament which amended the net UK carbon account target from 80% to 100%<sup>1</sup>.

The UKFIRE report Absolute Zero (Delivering the UK’s climate change commitment with incremental changes to today’s technologies) published in November 2019 sets out that for the UK to achieve zero carbon emissions by 2050 road use will need to be at 60% of 2020 levels - through reducing distance travelled or reducing vehicle weight; and that total energy required to transport food will need to be reduced to 60%. <https://ukfires.org/absolute-zero/>

The recent Transport for New Homes Garden Villages and Garden Towns – Visions and Reality report 2020 concludes that recent new settlements are typically car dependent, and

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<sup>1</sup> The Climate Change Act 2008 (2050 Target Amendment) Order 2019: 2.—(1) Section 1 of the Climate Change Act 2008

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will result in more traffic on roads. [<https://www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-village-visions.pdf>].

The provision of limited employment at the new garden settlement is likely to result in continuing car dependency with increased traffic on roads.

Continued high levels of out-commuting will not help meet government's climate change target.