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**FOLKESTONE & HYTHE DISTRICT  
CORE STRATEGY REVIEW  
SUBMISSION DRAFT (REGULATION 19)  
AND SUPPLEMENTARY REVISED  
HOUSING NEED CONSULTATIONS**

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Summary of Main Issues

MARCH 6, 2020

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## 1. Introduction

- 1.1. The Core Strategy Review Submission Draft (Regulation 19) was published for consultation between 25 January and 11 March 2019.
- 1.2. Following Government changes to the standard method for calculating housing need, a supplementary consultation on a revised minimum housing need figure ran between 2 December 2019 and 20 January 2020.

## 2. Summary of Main Issues

- 2.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 require local planning authorities to prepare ‘a summary of the main issues raised by the representations’. What constitutes a ‘main issue’ is not defined in legislation or guidance but it is generally accepted to mean an issue that goes to the heart of the soundness of the plan.

### Breakdown of comments by chapter

- 2.2. A total of 510 representations were received to the Draft Core Strategy Review from 117 respondents (different individuals and organisations). A further 33 representations from 24 respondents were received to the 2019-20 supplementary consultation on the revised minimum housing need.
- 2.3. The numbers of representations made against each section of the plan are shown in Table 1.

<b>Section</b>		<b>No. of representations (CSR)</b>	<b>No. of representations (CSR-H)</b>
	<b>Core Strategy Review as a whole</b>	<b>21</b>	
	<b>Foreword</b>	<b>0</b>	
<b>1</b>	<b>Introduction</b>	<b>23</b>	
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<b>Section</b>		<b>No. of representations (CSR)</b>	<b>No. of representations (CSR-H)</b>
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<b>4</b>	<b>The Spatial Strategy for Folkestone &amp; Hythe</b>	<b>303</b>	
4.1	District Spatial Strategy	25	1
4.2	Housing and the Economy Growth Strategy	29	26
4.3	Place Shaping and Sustainable Settlements Strategy	15	
4.4	Priority Centres of Activity Strategy	14	
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<b>5</b>	<b>Core Strategy Delivery</b>	<b>128</b>	
5.1	Core Policies for Planning	35	
5.2	Areas of Strategic Change	90	
5.3	Implementation	3	1
Appendices		<b>4</b>	
Appendix 1: Monitoring and Risk		2	
Appendix 2: Glossary of Terms and Technical Studies		1	
Appendix 3: Indicative Housing Trajectory		1	
<b>Total number of comments</b>		<b>510</b>	<b>33</b>

### Comments on accompanying documents

2.4. Numbers of comments to the accompanying documents are shown in Table 2.

<b>Title</b>	<b>No. of representations (CSR)</b>	<b>No. of representations (CSR-H)</b>
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Submission Draft Core Strategy Review Sustainability Appraisal	13	5
Submission Draft Core Strategy Review Habitats Regulations Assessment	3	3
Submission Draft Core Strategy Review Historic Environment Assessment	1	
<b>Total number of comments</b>	<b>17</b>	<b>8</b>

- 2.5. The main issues raised by the representations are outlined section-by-section in this summary.
- 2.6. Where comments have been made against paragraphs of supporting text to a particular policy, they are summarised under the policies they relate to. Where comments do not directly relate to a specific policy, but make general points or relate to a named settlement, they are summarised separately against the most relevant part of the plan.
- 2.7. Comments to the 2019-20 supplementary consultation on the revised housing requirement are summarised with the other representations at the point in the plan against which the comments were made. The text highlights that that these were made to the supplementary consultation.

### 3. Comments on the Core Strategy Review as a Whole

- 3.1. 21 comments were received to the Core Strategy Review as a whole. These raised a number of issues, some general and others relating to specific areas or sites:
- CPRE query whether the set local housing need figure is achievable.
  - Cross-border issues with neighbouring authorities appear to have been addressed; but there is no evidence of any specific agreements.
  - Development proposals will have a huge impact on the residents of Smeeth/Sellindge
  - The district has experienced significant levels of development. Further development will result in over-stretching the local infrastructure (including water, roads, public transport, healthcare); and the loss of quality Grade 1 agricultural land.
  - The proposed garden settlement should be developed in an area that needs extra housing and has the appropriate supporting infrastructure;
  - Development will place huge strain on the roads around Barrow Hill and Sellindge. A by-pass needs to be created to alleviate this before any works commence.
  - The proposed strategy will encourage accommodation for London overspill;
  - There should be a greater focus on developing brownfield rather than greenfield sites.
  - Concerns raised that the Heritage Strategy has not been adopted.

- The impact on tourism through the loss of countryside has not been adequately considered;
- Will the aspirations to protect and enhance the landscape and natural environment reconcile with the desire for economic growth and prosperity;
- There has been a lack of local engagement in regards to the new development at Otterpool Park; in particular Sellindge residents who were told that no further development of their village would occur.

#### **4. Foreword**

- 4.1. No comments were received to the foreword.

### **Part 1 – Introduction**

#### **5. Section 1.1: About the Core Strategy**

- 5.1. 12 representations were received relating to Section 1.1. These raised the following key issues:
- The scale of the development required should have been dealt with through a new Core Strategy, not a review;
  - Building on the scale proposed will have unacceptable impacts on residents, landscape, wildlife, traffic and infrastructure;
  - The Home Builders' Federation states that under-delivery of housing in Rother District should be taken into account in Folkestone & Hythe District;
  - Highways England concurs generally with the CSR's approach and policies with regard to impacts on the strategic road network;
  - Concerns raised about heritage assets within the district; and the current status of the emerging Heritage Strategy; and
  - There has been insufficient publicity and time given to comment on the document. The consultation portal is difficult to navigate and use.

#### **6. Section 1.2: About Folkestone & Hythe**

- 6.1. 11 representations were received relating to Section 1.2. These raised the following issues:
- There is no capacity for a high-speed services at Westenhanger. An additional stop would increase journey times to London from Folkestone, Dover and Thanet;
  - High-speed services are more than adequate at Ashford, Folkestone, Dover and Canterbury;
  - The highways infrastructure is inadequate and high-speed trains cannot stop at Westenhanger because there is no disabled access;
  - Healthcare provision in the area is a weakness, not a strength, and additional facilities are needed before any development takes place.
  - The Heritage Strategy has not been given due consideration in preparing the document; and

- Cozumel Estates Ltd supports proposed amendments to exclude the garden settlement from the application of CIL; and would like confirmation of the boundary of the exemption area.

## **Part 2 – Strategic Issues**

### **7. Section 2.1: District Development Challenges and Potential**

7.1. 7 representations were received relating to Section 2.1. These raised the following issues:

- The CSR is not being prepared to address local housing needs.
- There are no platform facilities for high-speed services at Westernhanger;
- The provision of a high-speed rail service at Westernhanger would not benefit local employment;
- Older residents moving into the district may need greater health and social care, placing more pressure on existing services;
- Kent County Council supports reference to enhancing leisure opportunities encouraging healthy lifestyles and the provision of open spaces, sports pitches and recreational facilities; and
- The water aquifer is not able to support continuing development and water rationing will be needed.

### **8. Section 2.2: Strategic Needs for Sustainable Development**

8.1. 2 representations were received relating to Section 2.2. These comments raised the following issues:

- The housing needs of the district can be met without the need for a garden settlement; and
- There is little evidence that younger people will be attracted and developers will provide the necessary leisure and entertainment facilities required.

## **Part 3 – Aims and Vision for Folkestone & Hythe District**

### **9. Section 3.1: District Planning Aims**

9.1. 6 representations were received relating to Section 3.1. These raised the following issues:

- The creation of a garden settlement would have a detrimental impact on air quality in the area;
- The garden settlement will not meet local needs but will become a dormitory town. There are enough brownfield sites to meet development needs;
- The plan needs to be set within the context of the Paris Climate Change Agreement and United Nations' Sustainable Development Goals;
- Natural England supports revised wording that emphasises the enhancement rather than just protection, of the natural environment;

- Historic England broadly supports the Aims & Vision for Folkestone & Hythe, especially the challenge to enhance management and maintenance of natural and historic assets; and
- Kent County Council states that it is essential that the advice of the Heritage Strategy is accepted, and the priorities it identifies are followed.

## **10. Section 3.2: Vision for Folkestone & Hythe District**

10.1. 15 representations were received relating to Section 3.2. These raised the following issues:

- A new settlement is unnecessary to meet local needs. Furthermore, public-sector investment in the garden settlement, to serve commuters and benefit a limited number of people, is morally indefensible;
- The creation of a garden settlement will draw resources away from Folkestone Town Centre;
- CCPIII Shopping Folkestone SARL states that it is essential that the Core Strategy Review has a commitment to preparing a masterplan for Folkestone Town Centre to ensure support for the Priority Centres of Activity (Policy SS4);
- Lyminge should be protected due to its location in the Kent Downs Area of Outstanding Natural Beauty and any further enlargements of settlements in the parish should be resisted;
- Water capacity, highways and health infrastructure are inadequate.
- An additional stop for high-speed rail at Westenhanger will affect all other stops on the line and there is limited capacity at St Pancras. There is already a link at Westenhanger to high-speed services departing from Ashford. Adding a transport link for commuters will not create local jobs;
- It is not clear how Westenhanger station will be improved, nor how road access to the station and car parking will be provided; and
- Any large-scale development will generate traffic on the A20 to the north of Sellindge and also on minor roads, such as the B2067 which connects to the A2070 south of Ashford, a much quicker route to Ashford International Station than the M20 from J11 to J10/10A.

## **Part 4 – The Spatial Strategy for Folkestone & Hythe District**

### **11. Section 4.1: District Spatial Strategy**

11.1. 14 representations were received relating to the supporting text in Section 4.1. These comments raised the following issues:

- CPRE states that setting ever higher numbers will not increase the rate of delivery of new homes. The rate is determined by the capacity of housebuilders to build houses and their need to provide a return to their shareholders;
- The Home Builders' Federation states that it has reservations about the reliance on the new settlement to meet housing needs and the rates of delivery that have been assumed;

- Taylor Wimpey states that changes to national policy regarding housing provision mean that the district's housing requirements have increased to 14,345 dwellings for the plan period, or 755 homes a year;
- The plan fails to recognise the role that new homes can play in revitalising town centres. As demand for office accommodation is falling and the focus on leisure is at the harbour and seafront, residential uses can be introduced into Folkestone town centre to support shops and services;
- Any new homes should be spread across the region, in small sustainable developments. A new town of this size will obliterate a large part of the countryside and destroy local communities;
- The site is unsuitable and will put massive strain on resources.
- It is unwise to commit to a new town in the context of Brexit, when other regions may become the focus for growth.
- Brexit will make it impossible to live or work in the area. It will be detrimental to air quality, landscape, water supply, policing, traffic, healthcare and other infrastructure;
- This area could be at the forefront of food production after Brexit, preserving its 'garden of England' status;
- The garden town will create houses, not jobs, and will divert investment from deprived parts of Folkestone;
- It has yet to be established whether water companies will be able to meet the demands of the new town;
- There is unprecedented pressure on green spaces between Ashford and Folkestone; the towns need to have a boundary that prevents expansion;
- The plan should have clear reference to marine planning.

11.2. A further representation was received to the 2019-20 supplementary consultation on the revised housing requirement. This raised concerns about decisions being taken in haste, the accuracy of reports compiled on behalf of the council and the potential to meet targets.

### **Policy SS1: District Spatial Strategy**

11.3. 11 representations were received relating to Policy SS1. These raised the following issues:

- Contrary to the Government's criteria for garden towns; there is no local support for the proposal; it is not on brownfield land; it is not away from existing settlements; nor is it a 'transformational' development.
- Taylor Wimpey states that it supports the identification of Sellindge as one of the more sustainable settlements within the district capable of accommodating new development;
- The Kent Downs AONB Unit states that it is unjustified to promote this level of development in the rural North Downs area, as the proposals would have a significant impact on the setting of the AONB and they are not capable of being mitigated satisfactorily;
- The Crown Estate states that Policy SS1 needs to give sufficient weight to rural housing needs; it supports the identification of Brookland as a Primary Village within the District Settlement Hierarchy with the potential to grow;

- The CSR must provide a clearer framework for the distribution of development within the AONB and Romney Marsh. Developers will target other areas and, if delivery is not keeping pace, applications will be approved in sensitive areas around towns and villages. Romney Marsh in particular cannot be regarded as the default pool of housing;
- There is a failure to recognise the role that new homes can play in revitalising town centres. As demand for office accommodation is falling and the focus on leisure is now at the harbour and seafront, residential uses can be introduced into Folkestone town centre to support shops and services;
- Further reference should be made to supporting mixed-use developments at existing employment sites which widen the definition of alternative acceptable commercial uses. This will ensure sites remain viable and avoid prolonged periods of vacancy;
- Natural England states that reference to further expansion at Lydd Airport needs to be strengthened to state that it will only be permitted where direct and indirect impacts can be avoided or fully mitigated; and
- Lydd Airport Action Group states that reference to the airport in Policy SS1 is inappropriate and that the council has succumbed to pressure from the Airport.

## **12. Section 4.2: Housing and the Economy Growth Strategy**

12.1. 16 representations were received relating to the supporting text in Section 4.2. These comments raised the following issues:

- CPRE consider that the housing delivery targets are not justified and unachievable;
- Housing figures have been deliberately skewed to favour the building of a new town. A strategy of mixed use urban extensions should be tested before any consideration of a new town;
- Cozumel Estates Ltd states that more flexibility is needed in employment floorspace requirements. The employment market may be subject to change over the plan period, which could have an implication on the floorspace requirements;
- There is a disproportionate focus on providing houses rather than jobs. A strategy of continuing at the current jobs density, will maintain the existing pattern of net out-commuting, contrary to the aims of new garden settlement;
- It is considered that commercial and industrial floorspace need to be delivered in advance of more houses; and
- CCP III Shopping Folkestone SARL is concerned that the updated retail assessment significantly overstates retail capacity in the Folkestone and Hythe area;

### **Policy SS2: Housing and the Economy Growth Strategy**

12.2. 13 representations were received relating to Policy SS2. These comments raised the following issues:

- Ashford Borough Council and Rother District Council support the overall strategy of meeting the district's housing need within the district;

- Gladman Developments Ltd states that the council is required to use the 2014 projections to calculate its housing need, using the most up-to-date information on affordability;
- Quinn Estates states that the government identifies a local housing requirement of 751 dwellings a year. A 5 per cent uplift should be applied in order to negate the likelihood of sites not coming forward, and the role of Sellindge should be strengthened;
- The Home Builders' Federation states that the minimum number of homes the council needs to plan for is 751 homes a year, a total of 14,269 homes over the plan period;
- Taylor Wimpey states that the council needs to plan for 755 homes a year, and that the current plan would result in a shortfall of 1,185 dwellings;
- Housing numbers should be expressed as 'maximums' rather than 'minimums';
- The council is compromised by being landowner in relation to the garden settlement. The council should explore meeting unmet need with Ashford Borough Council. The development is opposed by the majority of people in the district;
- Cozumel Estates Ltd states that it supports the Otterpool garden settlement as an important part of how the council will meet its housing needs;
- The Crown Estate states raises concerns regarding the ability of the garden town to deliver new homes at pace and scale. To save placing reliance on one large option, the plan should allocate a mix of sites, including sites in settlements such as Brookland;
- The Kent Downs AONB Unit consider that, given the significant harmful impacts on the AONB that would result from the proposed strategic allocations at Otterpool and Sellindge, should other less environmentally-sensitive land not be available, then a legitimate case can be made for not meeting the district's housing need;
- CCP III Shopping Folkestone SARL states that there may not be sufficient capacity at specified times during the plan period to support retail and food and beverage development in all locations. The plan needs to consider the phasing and location of provision, not just the quantum of space; and
- It will not be possible to meet the need for retail floorspace within existing centres or the new settlement. There should be flexibility for the provision of appropriate trade counter retail floorspace within industrial estates across the district.

12.3. A further 26 representations were received to Policy SS2 during the 2019-20 supplementary consultation on the revised housing requirement. These comments raised the following issues:

- The increase to the minimum housing needs requirement should be subject to a statutory consultation of 12 weeks;
- The Home Builders' Federation (HBF) raised concerns regarding the decision to reduce the plan period by a year. The NPPG suggests that under-delivery 'may need to be considered' where a plan is being prepared part way through a plan period. The council is part way through its proposed plan period but has not accounted for under-delivery – therefore a minimum of 14,022 homes is required;

- HBF suggest that the point at which the garden settlement starts delivering new homes is pushed back beyond the first five years and that additional smaller sites are allocated. There is a minimal supply buffer of 230 homes. This does not take account that development is unlikely to be delivered as expected, nor the requirement to prepare flexible plans - a 20 per cent buffer should be added;
- Gladman support the proposed revision to the housing requirement. A robust evidential basis is needed for a windfall allowance of 95; an over-reliance should not be placed on windfall delivery. Developments of five to nine houses should be allocated and not included as windfalls;
- East Kent College (EKC) are supportive of the revised housing need figure as housing is critical to ensuring retain talent and potential within the district;
- Rother District Council considers that there is flexibility in the housing supply as the council has stated its ability to over-deliver against the identified need of 13,284 units assessed through the standard methodology;
- The number houses profiled exceeds by a difference of 231 units. This increases the risk of under-delivery;
- Camland Hythe Ltd also raise concern that the decision to reduce the plan period by a year has resulted in an uplift of 439 houses, rather than 1,116 houses to be delivered up to 2036/37. By choosing not to allocate additional sites for development or increasing densities of existing allocations, jeopardises the CSR's deliverability and flexibility.
- It is also unknown what quantum of housing has been delivered against the Standard Method requirements for the 2018/19 financial year.
- Camland Hythe Ltd requests that the Council demonstrate deliverability through the publication of its housing trajectory.
- London Ashford Airport object to the lack of consideration to the infrastructure requirements associated with the increased housing need over the Plan period. LAA provides much needed employment opportunities and should be given significant weight via a standalone policy in the CSR.
- SGN consider that the revised housing figures raise no areas of significant concern, which would result in the requirement of network reinforcement.
- The Policy has been amended to include both C2 and C3 uses as part of the growth strategy; however, associated policies elsewhere i.e. [Policy CSD2] have not been reviewed or updated to reflect the proposed changes.
- The district already exceeds the amount of housing required and thus these adjustments are not warranted
- The rate of development on Romney Marsh must be slowed down and stronger policies introduced to restrict development.
  - There has been no attempt to argue a lower housing requirement using policies available in the NPPF.
  - The reduction of housing to be delivered by the garden settlement over the plan period will result in an increase in housing (windfalls) in the contested locations.
  - The CSR resets the and increases the base line for housing without taking into account historic, under and over, performance from the respective character areas. Consequently, the Romney Marsh, which delivers housing more rapidly, locks in a higher level of housing development than prescribed relative to other areas.

### **13. Section 4.3: Place Shaping and Sustainable Settlements Strategy**

13.1. 5 representations were received relating to the supporting text of Section 4.3. Comments raised the following issues:

- It is suggested that the council should challenge national policy in regards to its housing requirement;
- The creation of Otterpool Park will increase levels of traffic and air, noise and light pollution. Public transport is minimal and so private cars will be essential;
- Quinn Estates states that the settlement hierarchy is unsound. Sellindge should be re-designated as a Service Centre;
- As demand for office accommodation is falling and the focus on leisure is now at the harbour and seafront, residential uses can be introduced into Folkestone town centre to support the shops and services which remain; and
- The Environment Agency states that, while tidal flood risk is highlighted, the plan should make it clear that the sequential approach should take into account all forms of flooding.

#### **Policy SS3: Place-Shaping and Sustainable Settlements Strategy**

13.2. 10 representations were received relating to Policy SS3. These raised the following issues:

- The Theatres Trust supports the policy for retained valuable facilities where a need for them remains;
- The Diocese of Canterbury is keen to work with the council as it has connections and facilities within the area offering close links to worshippers, schools, landowners and housing communities;
- The Crown Estate has raised concern over flood risk being taken into consideration when looking at sites. A FRA has been raised with regard to land on Romney Marsh with no objection from The Environment Agency with this being included as the site benefits from coastal defences;
- Quinn Estates raised settlement hierarchy not sound as Sellindge has been designated a Rural Centre – should be elevated to a Service Centre;
- Taylor Wimpey requests clarification respecting historic features and sustainable construction measures and cites conflict with the national and local plan policies;
- Kent County Council requests an amendment to wording on flood risks to ‘a site-specific flood risk assessment may be required for other sources of flood risk as identified within EA surface water flood mapping’;
- CCPIII Shopping Folkestone S.A.R.L. welcome the recognition that town centres have critical role to play in establishing the character and economy of settlements but would like the word “potential” removed from paragraph 4.97.

### **14. Section 4.4: Priority Centres of Activity Strategy**

14.1. 10 representations were received relating to Section 4.4 in general and stated that:

- Cozumel Estates Ltd supports the new garden settlement to include a major employment site to provide further industrial premises, town centres to accommodate the needs for retail, office and leisure uses and local centres to protect crucial services and accommodation development that maintains their viability for residents and visitors;
- Concerns have been raised on the infrastructure to support the development including fresh water supply, health and capacity on the M20;
- Concerns expressed over the need for a new garden settlement and the need for regeneration of Folkestone Town;
- CCPIII Shopping Folkestone S.A.R.L. have concerns over the retail offer being pulled away from Folkestone Town Centre to the new settlement and the impact on floorspace;
- Concerns raised over the viability of developing Westenhanger Station in terms of capacity and infrastructure;
- Quinn Estates request clarification on the proposed amendments to the CIL exemption areas at Strategic and Key Development Sites.

#### **Policy SS4: Priority Centres of Activity Strategy**

14.2. 4 representations were received relating to Policy SS4. These raised the following issues:

- Cozumel Estates Ltd considers that the map should be amended to show where the Priority Centre of Activity should be located within the garden town;
- Clarification is needed on the use of mixed-use employment sites within the plan, such as Park Farm Industrial Site;
- CCPIII Shopping Folkestone S.A.R.L considers that Policy SS4 conflates employment and town centre policies – these should be dealt with separately to avoid main town centre uses being treated as employment-generating uses.
- Cozumel Estates Ltd considers that the Policies Map should be amended to show where the Priority Centre of Activity should be located within the garden town.

### **15. Section 4.5: District Infrastructure Planning Strategy**

15.1. 12 representations were received relating to Section 4.5.

15.2. Four representations related to the section in general and raised the following issues:

- Consideration should be given to the Government's Clean Growth Strategy 2018 and Clean Air Strategy 2019 for cleaner energy and fuel sources and on-site generation of low emission energy supplies;
- There are no plans to upgrade the A20 near the new garden town and no improvements to health to support the population, including GPs' surgeries and primary and secondary healthcare; and
- Concern over the ability to support the number of new residents in terms of clean portable water and transport, particularly bus services and the development of Westenhanger, turning the new town into a dormitory town for London overspill community;

15.3. Eight other representations related to specific policies and are summarised below:

- Highways England would like to see more information on encouraging a modal shift from using cars, upgrades to highways and motorways;);
- Certain identified infrastructure upgrades appears to be missing from Figure 4.4 such as schools and flood protection; and
- Kent County Council consider the approach to broadband and fibre to be suitable for the future fibre to the premises (FTTP).

#### **Policy SS5: District Infrastructure Planning**

15.4. 12 representations were received relating to Policy SS5. These raised the following issues:

- Concern at the impact of the new settlement on road infrastructure near Canterbury, especially in line with the development of the new hospital;
- Infrastructure concerns including water, flooding, transport, including comments from CPRE;
- Stanford Parish Council raise concern regarding impact on and understanding of lorry park development;
- –Clarification is sought on what CIL Reg123 infrastructure for services – what will it be paying for including waste disposal?
- Kent County Council are concerned at the need for land for education facilities to ensure delivery at point of impact and support sustainable travel patterns
- Highways England question the infrastructure upgrades, and the need for more emphasis on sustainable travel ;
- The Diocese of Canterbury supports the development and would like to be involved in supporting the ‘social infrastructure’; and
- KCC requests the use of developer contributions/CIL to ensure that any archeologically/heritage assets/findings are archived locally due to the lack of museum space within the region.

### **16. Section 4.6: Strategic Allocations**

16.1. 196 representations were received relating to Section 4.6.

16.2. 11 representations related to the section in general. These raised the following issues:

- Kent County Council recognises that the development will make a significant contribution to the housing requirements
- Object to the proposals for a new garden settlement because of concerns with water supply, health infrastructure, employment, transport, over-population, location and environmental issues
- Camland Hythe Ltd states the garden settlement strategic allocations does not fall within previously developed land and the CSR should include sites at Nickolls Quarry;

- The Environment Agency supports the high standards set for water efficiency in the new developments;
- Historic England seeks assurance that heritage assets are protected, integrated and enhanced where possible;
- Kent County Council states that reference should be made to the need for mineral and waste safeguarding for all sites;
- Natural England states that detailed assessments will be needed to assess the potential effects and options for mitigation which will have implications for location, density and height of built development; and
- Southern & Regional Developments seek to promote land adjacent to the Martello Lakes development and state that the identified flood risk can be mitigated through the raising of ground levels.

16.3. 10 other representations related to specific policies and are summarised below:

### **New Garden Settlement**

- There is concern that Folkestone & Hythe District Council's land interests at Otterpool Park creates a perceived conflict of interests.
- The Kent Downs AONB Unit disagree with the Growth Options Report regarding landscape impacts of the proposed garden town at Otterpool on the setting of the Kent Downs AONB.;
- Objections were raised to the proposed garden settlement because of the potential impacts on transport infrastructure, health and social care, waste management, water supplies; not being able to support the increase in local population;
- The statement that 'the creation of a new town can provide substantial new infrastructure and facilities' ignore current national trends. There is no evidence to show how shortages of doctors, dentists, nurses, carers and teachers will be reversed;
- Concerns raised as to how the rural road network will be affected in neighbouring areas, such as Aldington, and what mitigation will be provided;
- Historic England supports amended text that places greater emphasis on heritage assets making a contribution to creation of a strong sense of place; and
- Unhappy with engagement with adjoining villages; and those in Ashford Borough;

### **Figure 4.5 Garden Settlement North Down – Indicative Strategy**

4 representations were received relating to Figure 4.5, the Indicative Strategy for the Garden Settlement:

- CPRE identify differences between the areas of land deemed 'suitable' for development in the Phase 2 Growth Options Report; and the areas shown in Figure 4.5, especially around Lympne Airfield. The council need to justify this departure from their consultants' recommendations;
- CPRE also have concerns about the depiction of the proposed town centre within the garden settlement, including the height of some of the buildings;
- Historic England is concerned about the entrance to Westenhanger Castle and that other heritage assets are not shown.

## **Policy SS6: New Garden Settlement – Development Requirements**

16.4. 53 representations were received relating to Policy SS6. These raised the following issues:

- Infrastructure concerns raised including roads, traffic, sewage, water, schools, waste disposal, pollution, health services (including GP surgeries and primary care services) and transport services, including buses.
- Concerns raised about perceived lack of time to comment, lack of local consultation and engagement. Lack of co-operation with FHDC, Ashford BC and other local parish councils;
- Concerns raised about the lack of protection of existing villages and the amount of civil works causing disruption for local residents. Concern that development will join three existing parishes and effectively urbanise the entire area;
- The 'requirement' is for 6,375 homes yet the planning application is for 8,500-10,000. There is no justification for the figures contained within the planning application and this illustrates that Otterpool Park is not being driven by local needs;
- Concern raised for the loss of farmland;
- Concerns raised relating to the commitment to achieving 22% percent of affordable homes;
- Ashford Borough Council consider that the policies do not contain enough details to ensure cross border matters can be addressed appropriately i.e. provision of secondary schools and their phasing and locations within the new development;
- Environment Agency requests that the aspiration for “carbon and water neutrality” is amended to “low carbon and high water efficiency”.
- Homes England in general supports Otterpool Park although there maybe inconsistencies between the PPLP and the Core Strategy with the land adjacent to the west of Lympne;
- Concern raised for the protection of archaeological sites, particularly in Newingreen and the site of the Roman Villa at Upper Otterpool;
- Kent County Council supports aspirations to encourage modal shift from the outset of the development and to encourage sustainable development and the intention for the settlement to be a beacon of best practice environmentally;
- Kent Wildlife Trust supports the sentiment that “Otterpool Park will be a beacon for best practice” however to meet the aspirations the proposal should be enhancing and integrating biodiversity into the development in accordance with the NPPF.
- Home Builders Federation do not consider the requirements in each of the allocations policies for each dwelling not to exceed 90 litres per day to be consistent with the national policy. There is sufficient evidence that standards of 110 litres per person per day can be achieved;
- Natural England supports wording referring to the mitigation of impacts on the Kent Downs AONB; although suggest reinstating the aspiration for water and carbon neutrality;
- The Canterbury Diocese supports the CSR and the incorporation of a requirement to make stakeholders central to master planning; and

- The Kent Downs AONB wraps around 3 sides of the proposed Garden Settlement. Otterpool Park will be visible from the AONB.
  - The scale and extent of the development proposed would wholly and fundamentally alter existing views out from AONB to the north from a largely undeveloped rural site to a high density built form;
  - To be determined will be the impact of lighting resulting in a loss of dark night skies, noise movement and increased activity, use of roads and added recreational pressure on the adjacent AONB.
  - Business and Town Centre uses on land between Stone Street and the A20 to the east of Westenhanger are likely to necessitate larger buildings, both in terms of height and footprint which makes their effects harder to mitigate. This would be wholly inappropriate and does not represent a 'Landscape-led development' as is being suggested, nor does it comply with proposed policy wording for the allocation.

A further 5 representations were received relating to Policy SS6 as part of the revised minimum housing needs requirement consultation. These comments raise the following issues.

- F&HDC & Cozumel Estates supports the vision of the CSR that the new garden settlement shall provide for a minimum of 5,925 new homes in a phased manner within this plan period (2019/20 to 2036/37). F&HDC & Cozumel Estates are also confident that, subject to the grant of outline planning consent, the overall the delivery rates envisaged could be achieved.
- Homes England believe there is an opportunity to accelerate delivery of the garden settlement to allow a greater number of neighbourhoods to come forward in parallel.
- EKC are supportive of the revised housing need figure as housing is critical to ensuring retain talent and potential within the district.
- Concerns raised about the potential impacts on an Area of Outstanding Natural Beauty and on local wildlife, infrastructure; and council financial borrowing.

### **Policy SS7: New Garden Settlement – Place Shaping Principles**

16.5. 37 representations were received relating to Policy SS7. These raised the following issues:

#### *General*

- Infrastructure concerns including water supply, healthcare services (especially over stretching GP services in Sellindge), transport links, loss of valuable farmland, environmental impact, air quality, road networks (especially when M20 is closed) and schools;
- Concern over the extent of more building on top of the current developments in Sellindge and the creation of a dormitory town;

- Ashford Borough Council consider that the CSR does not contain enough detail and is not precise enough to ensure that the cross border matters will be addressed appropriately (suggested amendments below).
- Concern that development would obliterate views of the AONB, destroy any natural beauty and have a detrimental impact on surrounding area, especially small villages within the Saxon Shore.

### *(1) Landscape- led approach*

- KCC appreciates that a landscape led approach has been utilised when planning for the development area & welcomes the access strategy that seeks to protect and enhance public rights of way;
- Ashford Borough Council requires amendments to the integrated water management to avoid increased flood risk downstream.
- Kent Wildlife Trust support broad statements for the ecology but are concerned that little thought has been given to how this will be achieved in practice, the impacts to the wider habitat networks or how to engage the local community to support it as an on-going process. Given scale of development greater consideration is required prior to initial masterplanning;
- Natural England - welcomes the amended wording which reflects the need for proposals to mitigate impacts on views from the Kent Downs AONB and suggested minor working amends to strengthen the engagement of the GI strategy within the plan.
- Kent Downs AONB Unit – Request that for provision of structured areas of landscaping integrated into the proposed development with space for the trees to mature and densities which allow for the planting of trees that can establish large crown between buildings. Supporting the high quality palette of materials but is imperative that building materials are chosen to mitigate impact in views from the North Downs scarp. There also concerns that there is no mention of densities for buildings other than town centre or height and scale of the buildings;

### *(2) A vibrant town centre*

- Ashford BC - Concern over cross border consultation in relation to comparison retail in terms of format, scale and location. The policy should be more explicit about the role and function of the town centre and retail provision and impact on other centres;
- Support in principle the development but requires clarity on the quantitative needs for size of units, their location and phasing.

### *(3) Village neighbourhoods*

- KCC LHA – support for the statement “neighbourhoods and town centre shall be connected by a legible network of active streets, footways, cycle ways and open space”;
- Suggested amendments by Cozumel Estates Ltd including the removal of the word “village” when describing neighbourhoods.

- Diocese of Canterbury - Community formation could be given a good more prominence and would like to be involved in working with communities to deliver this;

#### *(4) A high townscape*

- KCC supports the ambition to design a high-quality townscape and encourages early involvement of KCC and other partners of Design Codes to deliver high quality design for long term;
- CPRE support limit on light pollution but concerns raised that development will intensify this;
- Diocese of Canterbury - recognises that high quality place making will be very important and that sustainable development principles must be adopted throughout. Community formation could be given a good more prominence and they would like to be involved in working with communities to deliver this;

#### *(5) Enhancing heritage assets*

- Historic England – support for strategic open space that embraces historic landscape setting of Westenhanger Castle and the commitment to a Heritage Strategy and the changes in paragraph ‘e’ but would like to see more information on the “master plan”.
- KCC – Suggested new text to ensure both masterplan and planning application for the Garden Settlement should respect the existing heritage of the area (including Westenhanger Castle) in line with the NPPF;
- CPRE question why only the coalescence of Lympne is to be avoided.

#### *(6) Sustainable access and movement*

- KCC LHA – Part c should be amended to include Newingreen Junction as this is detailed as a key highway improvement Fig 4.4;
- KCC – Part d & h – suggest addition of improvements to offsite public rights of way to link with the new onsite network and improve the frequency of the service to upgrade to bus services, funded through developer contributions
- Dover District Council - concerns on the impact of Westenhanger Station development, should be phased to come into service at an appropriate time and not before demand is sufficient. The service will not be to the detriment of the journey times of the High Speed Service from Dover.
- Concerns raised over timings, access and viability of the development of a high speed service at Westenhanger and capacity at Ashford;
- Ashford BC - More explanation is required on key junction improvements especially to M20 Junction 9 and the impact on traffic levels;
- More clarification on Junction 11, M20 works and where the funding will come from.
- Regarding bus service needs to be detailed in line with existing services and extra links to what areas.

9 other representations related to specific policies and are summarised below:

- Historic England welcome the additional references in Paragraphs 4.177 and Paragraph 4.176.;
- Music Events at Port Lympne and Lympne Industrial Estate can have an impact on the views (from Fiddling Lane, Monks Horton and other places) from the AONB so a complete new town will not be disguised ;
- Concerns over the development of the station at Westenhanger including;
  - Not objectively addressed and will make Otterpool Park a dormitory town for London commuters;
  - Questionability of financial return and viability of completing this upgrade with questions on involvement of Network Rail;
  - HS1 timetable already running at capacity with added journey time and no capacity at London Terminals;
  - Who are being engaged to deliver the upgraded station and how will the local roads manage the increased traffic flow;
  - Aldington & Bonnington Parish Council suggest wording change from “railway station upgrade and hub will potentially deliver” to “could potentially deliver” and concern relating to the timings for the work to be completed. Have discussions take place with cross border partners on a joint working strategy; and
- Concern raised in relation to equestrian safety with a new town’s worth of traffic using the local lanes, especially when the M20 is closed.;

Other representations related to specific policies and are summarised below:

### **Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles**

16.6. 26 representations were received relating to Policy SS8. The representations raised the following issues:

- General concerns raised in relation to water supply, healthcare provision, air pollution, transport infrastructure, and archaeology to support the level of development along with the development destroying an area of outstanding beauty;
- Concern raised for the need to review the sustainability principles to cover economic, social and environmental as well as water and energy;
- Concerns raised over the ability of Affinity Water to be able to support the fresh water supply to the new development and a possible desalination plant being introduced. Question whether the potable water target can be achieved;
- Concern raised in relation to the Otterpool development encroaching onto Sellindge with no strong justification for the delivery in the chosen area with little consultation;
- Ashford Borough Council would like an amendment to show explicit requirements for waste water including phasing in relation to the proposed development to avoid harm to water quality within the surrounding area.
- Ashford Borough Council considers that amendments are required to the policies which make it clear that the use of SuDS should be designed and

- implemented to reduce flood risk downstream, especially in line with requirements of SS7;
- Southern Water amendment suggested to Policy CSD8 to ensure network reinforcement will be required at the site's "practical point of connection";
  - Dover District Council - would like to discuss in more detail the cross border water supply and quality issues in line with a Water Cycle Strategy;
  - Environment Agency are happy with the inclusion of the high standards set for water efficiency in the New Garden Settlement;
  - Cozumel Estates Ltd would like to remove reference to the 'outstanding' in the BREEAM rating as this is a particularly challenging rating and have suggested new wording;
  - KCC would like a reference to energy efficiency included in the strategy, especially with the Governments possible phased withdrawal of solid state fuels for heating and a move towards electric heating systems such as heat pumps;
  - Natural England - welcome *principle 1 a)* which includes strengthened wording for the energy strategy, which will include potential heat, power and energy networks, to take into account the AONB and its setting;
  - KCC the development of a site waste strategy will need to secure land for waste disposal and this should be at nil cost to the County;
  - KCC welcomes the inclusion of the proposals to be accompanied by a Minerals Assessment but would like the wording strengthened to include an Infrastructure Assessment;
  - Historic England state the definition of sustainable development should also include the historic environment;
  - Kent County Council is pleased to see the inclusion of section 2(iv), in which it is stated that '*sustainable access and transport shall be promoted in accordance with Policy SS7 (6)*'; and
  - Kent Wildlife Trust recommend greater and more detailed attention be given to identifying, mapping and safeguarding priority ecological networks, habitats and species in accordance with paragraph 174 of the NPPF. Need to work with relevant partners from the onset to maximise benefits to wider ecological networks that an explicit commitment to improving connectivity between designated sites and meeting BOA (Biodiversity Opportunity Area) targets for habitat creation.

7 other representation related to supporting text are summarised below:

- Concern raised over the effects of the new development on surrounding villages including road networks and dark skies policy;
- Concern raised as to how new GP's are recruited to support new surgeries and whether there will be NHS provision to support the numbers of potential residents as the development is built;
- Historic England - the definition of sustainable development should include historic environment (NPPF para. 8c); and
- KCC - welcomes considerations (4.188) to assess new development against the County Council mineral safeguarding policies as set out in the KMWLP but suggest an amendment to clarify that Policy DM8 relates to KMWLP regarding waste management policy.

## **Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management**

16.7. 19 representations were received relating to Policy SS9. These raised the following issues:

- General infrastructure concerns raised include roads, traffic, fresh water supplies, transport links, schools, environmental issues, air quality, loss of quality agricultural land, loss of views with outstanding beauty and the lack of time available for local communities to respond to the plan;
- Policy totally ignores National trends concerning the availability of healthcare and education staff and gives no evidence of how these trends are to be reversed. The plan does not offer a solution to how the fresh water supply will be managed to the new development;
- Policy fails to address in enough detail, the infrastructure support that this development is prepared to give areas outside FHDC;
- The Plan does not set out what the housing requirement is, by when, where it should be, and how many homes go to each allocation;
- Otterpool Park was never mentioned in previous plans for Sellindge;
- Ashford Borough Council - more detail should be added to the policy regarding the requirements for wastewater infrastructure and its delivery to ensure that cross boundary matters are addressed;
- Ashford Borough Council – concern raised over secondary school provision. Policy SS9 (1) is very generic, and there are no specific requirements regarding the amount, timing or location of secondary education provision within the development;
- Ashford Borough Council – The current requirements for phasing and delivery of infrastructure set out in the policy is vague, and does not include any specific requirements or parameters around the details of what infrastructure will be required and when.
- Aldington & Bonnington Parish Council – request to be included in the infrastructure developments;
- Historic England - Welcomes the inclusion of a requirement for the Community Trust or elected body responsible for the future management of the new settlement to make specific provision for a heritage facility such as museum/archive storage;
- KCC state the education need is likely to consist of up to 13FE of secondary provision and 2FE of primary provision provided on site. With the scale of developer contributions for KCC-delivered services, KCC fully expects to be included as a S106 signatory (as set out in Section 13.6 of the Otterpool Park Planning Performance Agreement);
- KCC state working collaboratively to ensure an understanding of what waste provision will look like. Pleased to note the inclusion of informal pedestrian and cycle pathways in the plan and that the proposed approach to broadband provision is suitable and adequate to deal with the necessary provision of fibre in the future; and
- Kent Wildlife Trust do not object in principle to the development of a new garden settlement at Otterpool Park but concerned that aspects of the Core

Strategy Review specific to Otterpool Park do not sufficiently take account of biodiversity to meet the requirements of paragraph 174 of the National Planning Policy Framework (NPPF).

5 Other representation relating to the supporting text are summarised below:

- Given the uncertainties that the UK faces currently, and the fact that this Plan depends entirely on private investment, the assumption that it is deliverable is extremely questionable;
- The Council's Community Infrastructure Levy (CIL) Charging Schedule will shortly be updated and the amendments will confirm that the garden settlement will be excluded from the application of the CIL. The parties would welcome further discussion regarding the boundaries of the exemption area;
- Concerns raised about the loss of valuable and beautiful countryside and farmland needed for local food supplies; and
- Aldington should be added to the opportunity for the "Smart Town" infrastructure along with the other villages listed. Other villages local to the area but in Ashford Borough should be able to benefit from the new technology and should be considered in line with cross border districts.

### **Policy SS10: Spatial Strategy for Folkestone Seafront**

16.8. 4 representations were received relating to Policy SS10. These raised the following issues:

- Kent County Council suggest revision of the working to ensure the heritage policy ensures that both the key archaeological features and their settings are preserved ; and
- The Environment Agency supports that the "Special Water Scarcity Status" in paragraph 5.57 has been clarified; and the high standards set for water efficiency in the New Garden Settlement, the Seafront, Shorncliffe and Sellindge developments, and more widely across the district. .

Other representations (2) related to specific policies are summarised below:

- Folkestone Harbour Limited would like Figure 4.6 amended to show the Sea Sports Facility already provided within the red line of the application within the immediate vicinity of The Stade to be retained; and
- A review of the planned green cycle route is required due to the topography.

### **Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone**

16.9. 5 representations were received relating to Policy SS11. These raised the following issues:

- It is suggested that the design and layout of the development should draw upon the military character of the place, and not just the scale and pattern of surrounding development. This would ensure that the new development

- makes a positive contribution to local character and distinctiveness in line with the objectives of the NPPF;
- There is concern locally that the heritage features of the site are not being preserved and that proper archaeological investigation is not being carried out;
  - The Environment Agency supports that the "Special Water Scarcity Status" in paragraph 5.57 has been clarified; and the high standards set for water efficiency in the New Garden Settlement, the Seafront, Shorncliffe and Sellindge developments, and more widely across the district; and
  - Taylor Wimpey would like paragraph i) to be amended to refer to provision of 18% affordable housing in line with outcomes of the agreed viability assessment. Reference to 30% affordable, further fails to accord with CS Policy CSD1 which amended it to 22%. .

Other representations (4) related to specific policies are summarised below:

- Taylor Wimpey seek to amend Figure 4.7 to reflect the consented planning application Reference to the provision of allotments should also be removed and the area of green space at The Stadium should also be adjusted to reflect the consented scheme;
- Taylor Wimpey also question the additional statements covering the possibility of further heritage assets following the work carried out previously by Historic England for the Hybrid planning application (Y/14/0300/SH) where relevant sites were identified; and the need to provide a "significant proportion" of homes to be flexible to the needs of residents as they age. The Council has not produced an appropriate evidence base to justify the imposition of additional requirements; and there is no requirement within the Hybrid planning permission for the delivery of any such units.

## **Part 5 – Core Strategy Delivery**

### **17. Section 5.1: Core Policies for Planning**

17.1. 128 representations were received relating to Section 5.1.

17.2. 3 representations related to the section in general. These raised the following issues:

- CPRE agree that that the assessed requirement for affordable housing translates to about 22% of the housing target over the plan period, in order to achieve 139 homes per year, however they suggest this target should be raised to 30% over the first five years of the plan;
- The stated percentage of affordable housing should be increased to meet the needs of the population from East Folkestone; and

### **Policy CSD1: Balanced Neighbourhoods**

17.3. 9 representations were received relating to Policy CSD1. These raised the following issues:

- Cozumel Estates and Quinn Estates does not object to Policy CSD1 in its current form. The policy seeks a minimum of 22% affordable housing on sites over 0.5Ha or 15 dwellings.
- Alternatively, it is widely considered that the percentage of affordable housing should remain at 30% and not reduced to 22%;
- The Kent Downs AONB Unit supports the proposed lower threshold for affordable housing provision on sites proposing 5 to 10 dwellings within the Kent Downs AONB;
- Home Builders Federation has concerns over the minimum requirements for affordable housing as this would be difficult for developers to cost their schemes easily. .
- Taylor Wimpey note that CSD1 has been updated to reflect the range of affordable housing products. They support reference to the portfolio of affordable products which would aid in the delivery of mixed and balanced communities to meet the needs of a broad range of residents. However they have concerns should the target rise it will create uncertainty for developers; and
- The policy should include 'rent to buy' as part of the range of affordable housing tenures that the Council supports;

### **Policy CSD2: District Residential Needs**

17.4. 6 representations were received relating to Policy CSD2. These raised the following issues:

- Taylor Wimpey would like wording to be amended on the mix of housing to have the ability to deliver lower proportions of 1-bed and 4+ bed houses based on working with Registered Providers should it be found they are in less demand. The Home Builders Federation supports aspirations to provide

a range and choice of homes to meet the needs of the district. However, the findings of the SHMA should not be translated into policy, rather the mix of houses should be left to the developer depending on the needs of the local area. The threshold for consideration should be increased from 15 to 50 dwellings;

- Any requirement for M4(2) compliance should be supported by sufficient evidence to justify each of the standards, with adequate flexibility to take account of site specific circumstances, such as viability. Object to the implication that all dwellings would be required to be built to M4(2) standards as it would constitute an unreasonable and inflexible approach;
- Kent County Council consider that the policy should take into account the Kent Social Care Accommodation Strategy (2014); and
- Cozumel Estates Ltd acknowledges that the policy sets aspirational targets for a range of dwelling sizes but these need to reflect the latest housing requirements for the Otterpool development. It is also requested that the provision of older person accommodation is widened to include specialist units (Class C2 and C3 (b) for the garden settlement.
- Specialist units for older people, particularly in Sellindge, will exacerbate the pressure on a GP practice that is already struggling to meet demand. It seems to be contradictory to the aim at sub-para (a);

### **Policy CSD3: Rural and Tourism Development**

17.5. 2 representations were received relating to Policy CSD3. These raised the following issues:

- CPRE consider that the wording in relation to the conversion of existing buildings that contribute to the character of their location, to be ambiguous and that further clarification is required; and
- The policy fails to comply with NPPF (para 83) in respect of the conversion of existing buildings. Acceptability should not only be dependent on the character of their location but also take account of the diversification of agricultural businesses; and the creation of rural tourism and leisure development.

One representation related to the section in general. This raised the following issue:

- The indication that Westenhanger and Lympne Castles are tourist facilities is not correct as they are for hire businesses and are not open to the public; therefore development will not increase tourism in the area.

### **Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation**

17.6. 4 representations were received relating to Policy CSD4. These raised the following issues:

- The policy needs to be more specific in its wording of features which contribute to 'diverse local landscapes' i.e. coppiced woodland, hedgerows, ponds, walkways and ancient meadows (especially where these support the AONB) and must reflect the need for attractive and high quality open spaces throughout the district;
- Kent County Council requests adding more specific information regarding no net loss of biodiversity and would like to see ecological surveys to be carried out and submitted with any planning application.
- Kent Wildlife Trust feel that more of the biodiversity principles set out in the policy need to be integrated into policies SS6-9. Some of the aspects of the CSR in respect to Otterpool Park do not take into account sufficiently biodiversity to meet requirements of Para. 174 of the NPPF.
- KWT also widely supports that Otterpool Park will be a beacon for best practice for enhancing and integrating biodiversity into the development, however comparable priority should be given to landscape quality of life and sustainability. It is recommended that attention is given to identifying, mapping and safeguarding priority ecological networks, habitats and species in accordance with the NPPF and working with partners and conservation professionals from the outset to address a number of issues; and
- Natural England strongly support the policy's commitment to incorporate and improve GI throughout the district in a long-term and meaningful way. It is suggested further information of GI and biodiversity net gain could be provided through development of a Supplementary Planning Document (SPD) in collaboration with other Kent local authorities

### **Policy CSD5: Water and Coastal Environmental Management**

17.7. 5 representations were received relating to Policy CSD5. These raised the following issues:

- CPRE questions how the policy will address existing drainage problems, especially on the Marsh, such as the foul drains around Brenzett;
- The policy ignores the reality of the actual situation in the South East where the natural aquifer has been identified as being able to only support limited development. Since the publication of the Geological Survey Report this has continued to be drawn on – how will the proposed other technologies be implemented;
- The Environment Agency supports that the "Special Water Scarcity Status" in paragraph 5.57 has been clarified;
- Concerns raised on the potable water supply for the new development;
- The "Water Cycle Study" for Otterpool Park has not been completed.
- Kent County Council are supportive of the policy for the management of surface water, referencing inclusion of Sustainable Drainage Systems ensuring that flood risk must not be increased including reference to integration of water management.

5 other representations related to the section in general. This raised the following issues:

- Concern raised over the amount of water needed to supply all the new homes planned ;
- The Environment Agency welcomes the additional information on the district falling within a “designated Water Scarcity Status Area” which will result in efforts to reduce average domestic consumption;
- What specific measures does FHDC intend to implement to reduce the per person water usage by, an average of, 34% per person from the usage experienced by Southern Water and 18% below that defined in the Building Regulations for a Water Scarcity Status Area?; and
- The Environment Agency request paragraph 5.72 is amended to "Most of the district's water supply comes from groundwater sources". Water resources must be maintained and proposed developments must not have a negative impact to public water supplies or their associated Source Protection Zones. Pollution prevention measures are required in areas of high groundwater levels and/or vulnerability.

## **18. Section 5.2: Areas of Strategic Change**

18.1. 90 representations were received relating to Section 5.2.

18.2. 1 representations related to the section in general. This raised the following issue:

- CPRE raise that they couldn't find the Transport Strategy referred to in para 5.81 and requests that there needs to be an over-arching summary of the various studies and other reports presented as the evidence base in order to resolve any ambiguities between them.

18.3. Other representations related to specific policies and are summarised below.

### **Policy CSD6: Central Folkestone Strategy**

18.4. 3 representations were received relating to Policy CSD6. These raised the following issues:

- Theatres Trust support the promotion of cultural venues articulated throughout the policy;
- The CSR fails to recognise that residential development plays an important role in the vitality of town centres in accordance with NPPF para 85(f). The emphasis is on the harbour and sea front area, and, whilst welcomed does not provided a clear lead for the town centre itself.
- Support the guidance set out in the policy but would like a commitment to prepare a vision and masterplan for Folkestone Town Centre to co-ordinate its long-term development and ensure maximum integration with, and the complementary development of the Seafront area.

### **Policy CSD7: Hythe Strategy**

No representations were received relating to Policy CSD7.

### **Policy CSD8: New Romney Strategy**

18.5. 2 representations were received relating to Policy CSD8. These raised the following issues:

- Pentland Homes consider that the regeneration of Romney Marsh could be enhanced through sustainable development and infrastructure improvements at New Romney, over and above the objectives set out in Policies. Suggest a comprehensive residential led, mixed use development, which would facilitate significant infrastructure improvements, including a new 'By-pass' around the Eastern and Southern edge of the town; and
- Gladman Developments support growth north of the town centre, but question the need for a single masterplan given the recent planning history of the allocation.

3 other representations related to supporting text and figures are summarised below:

- Nuclear Decommissioning Authority support the Core Strategy's position on Dungeness 'A' but suggests that a clearer reference is made to support both the decommissioning and remediation of the Dungeness 'A' site, together with employment (B1/ B2/ B8) uses and development associated with energy generation.
- Natural England suggest additional wording to strengthen text relating to Lydd Airport expansion (5.121) to ensure that there are no detrimental impacts to the Dungeness designated sites; and
- Figure 5.6 Pentland Homes fully support the identification of New Romney as a "Town Centre" and feel that a comprehensive residential led development could facilitate significant infrastructure improvements including a proposed "by-pass" around the Eastern and Southern edge of the town.

### **Policy CSD9: Sellindge Strategy**

18.6. 31 representations were received relating to Policy CSD9. These raised the following issues:

- Infrastructure concerns, including roads, water, healthcare services especially the GP surgery, local school capacity, cycle, pedestrian and bridle ways potential loss of areas of historic interest, green belt and landscaping, traffic, air quality and loss of valuable farmland;
- Quinn Estates believe that 600 dwellings should be the minimum housing figure and that Elm Tree Farm should come forward before other sites in Sellindge ;
- Taylor Wimpey suggest that the policy should split the allocation of Site A and Site B to provide separate requirements for each one. There is no supporting evidence to justify C2 uses on the site. Other considerations are on the lower target on water uses, sewage requirements, energy efficiency standards, landscaping and the AONB, the upgrading of the primary school, upgraded sports facilities within the village;
- Taylor Wimpey believe the percentage of affordable housing should be amended to 20%; that the provision of allotments be removed, and that the criteria for improvements to the doctor's surgery be amended;
- Concerns raised over the impact on the countryside and urbanisation on rural areas;
- There is not adequate information of the phasing and numbers of dwellings that will be built in the development of Otterpool Park.
- The requirement for 22% affordable housing is not enough;
- Some land in Phase 2 is not available for development. There are concerns over the achievement of Phase 2 with the Section 106 agreement showing no provision for a new village hall, cycle/pedestrian access and traffic calming;

- Kent County Council request that consideration is given to requirements needed for school places and expansion to Sellindge Primary School, developer contribution and the planning permission on any land used;
- Kent County Council would like focus to be put on increasing cycle pathways, and improvements to informal traffic calming and a pedestrian and cycle routes to access Westenhanger Station;
- Concerns about the overdevelopment of Sellindge which will jeopardise the habitat it supports;
- Kent Downs AONB Unit suggest that a further criterion be included in Policy CSD9 to address the issues raised in paragraph 5.158, in addition to criterion h in Policy CSD9 which only relates to design;
- Environment Agency endorse the wording used in the policy to highlight Special Water Scarcity Status;

38 other representations related to specific policies and are summarised below:

There were a number of similar representations on Sellindge in paragraphs 5.150 and 5.162:

- Concern over the amount of traffic using the A20 through Sellindge as a result of Otterpool Park being developed in terms of air pollution, noise, mix of vehicles, especially HGV's where the road narrows within the centre of the town. Need to reconsider diverting the traffic away from Sellindge via a through road for the A20 west of Otterpool Park. The road plan for CDS9 is now incorrect;
- Linear villages are widespread within the UK and the absence of a central core is not detrimental;
- Sellindge Parish Council concerned over the delay in seeing plans for the school extension even though the land has been cleared;
- Industrial units need to be placed closer to the M20 Junction 11 and not in the village. Green space required to keep Sellindge/Barrow Hill separate from the Otterpool Park development;
- Aldington & Bonnington Parish Council questions the expanded new facilities and infrastructure to support the increase in the number of new houses in Sellindge, but there has been no consultation with neighbouring parishes and planning authorities on what impact this will have on them;
- Phase 1 of development agreed that the GP surgery would be extended and no further development would commence until this was completed. New residents will have to use other local surgeries and the possibility of new medical centres being developed for Otterpool Park will mean that the local one in Sellindge may close;
- Any 106 development funds coming from housing development must be invested in the village of Sellindge. If Newingreen are having a diversion of the A20 around them, why not Sellindge? The village is the community most impacted negatively through traffic as a result of the plans from the Core Strategy;
- Concern over the need to meet the provision of staff for an expanded surgery and primary school when the National trend is the reverse;

- Aldington & Bonnington District Council has concerns over the Growth Options Study regarding local traffic hot spots and M20 incidents;
- Sellindge is not in the Kent North Downs AONB but it lies on three sides of the village so any development must follow the AONB guidelines;
- The land close to SSSI Gibbins Brook has proposed development plans in CSD9 and is an area of special scientific interest. The expansion of Sellindge will impact the dark skies around the area;
- The listed buildings (Rhodes House, Little Rhodes) mentioned and building of local interest (Grove House, Potten Farm) should be protected and mature trees should be given Tree Preservation Orders;
- Why develop the land for employment within Sellindge when Lympne Industrial Estate is just over a mile away, which will cause an excess of HGV and van movements; and
- There is no evidence to show that technologies will be able to negate the carbon footprint produced from the CSD9 development including traffic movements and water consumption.

12 further representations were received relating to Paragraphs 5.163 – 5.166, & Figure 5.7:

- The connectivity between Phase 1 and site A is only presumed;
- The new developments at Sellindge and Otterpool Park will not benefit the local population; and
- Phase 2 will not be able to meet the criteria of meeting community needs so the development should not be supported

### **19. Section 5.3: Implementation**

19.1. 3 representations were received relating to Section 5.3. These raised the following issues:

- The Authority Monitoring Report (AMR) is not sufficiently robust as it does not show the distribution of housing across the three character areas. This is vital information for all stakeholders to make informed responses to development proposals and policy consultations The North Downs Character Area should be split into the AONB vs the Rest of the Area; and
- CCPIII Shopping Folkestone S.À.R.L would like to suggest an amendment to Para. 5.189 “The retail needs of an area should be updated on a regular basis to reflect changes in local provision and wider changes in the retail sector and economy”. This applies especially to Folkestone Town Centre.
- Historic England consider that the reference to a garden town with “its very own heritage” needs to build on the existing history of the place

A further 1 representation was received as part of the revised minimum housing needs requirement consultation. The comments raise the following issue.

- Windfall sites account for 10.5% of all dwellings. It is questionable whether this represents a cautious estimate or is deliverable?

## **Part 6 – Appendices**

### **20. Appendix 1: Monitoring and Risk**

20.1. 2 representations were received relating to Appendix 1. These raised the following issues:

- Table 6.1 does not show affordable home defined by area. The focus on Otterpool is taking attention away from the needs of Folkestone and Romney Marsh); and
- Table 6.6 – the possibility of the event (Place Competition) should be increased from ‘low’ to ‘high’. Ebbsfleet is at a more advanced stage of delivery and is a more attractive place for London Commuters to live, than Otterpool.

### **21. Appendix 2: Glossary of Terms**

21.1. 1 representations were received relating to Appendix 2. Representations raised the following issues:

- Concern over the change of the title from “Glossary of Terms and Technical Studies” to Glossary of Terms - this should be reinstated and what has happened to the table of Technical Studies?

### **22. Appendix 3: Indicative Housing Trajectory**

22.1. 1 representations were received relating to Appendix 3. Representations raised the following issues:

- It is considered that the targets presented in the bar graph are unrealistic. It is questioned whether the demand for properties will meet the anticipated schedule of delivery over the plan period.

## 23. Submission Draft Core Strategy Review – Sustainability Appraisal

23.1. 13 representations were received relating to the Sustainability Appraisal. Representations raised the following issues:

- Natural England concurs with the wording for the garden settlement policies in particular to mitigate views from the AONB, and the conclusions drawn in the Sustainability Appraisal;
- Concerns raised that the Growth Options Study is flawed in terms of transport infrastructure and capacity i.e. it fails to consider commuting patterns and travel to work areas. There is emphasis on the A20 towards Folkestone and Hythe and the B2068 to Canterbury. There is no evidence that any Growth Study Option was carried out on the A20 towards Ashford or the B2067 which links Lympe to the A2070 south of Ashford;
- The Sustainability Appraisal does not reference the neighbouring parishes adjoining Sellindge and the impact on them by the proposed developments;
- Concerns that the traffic modelling has not taken into account the parishes that border with Ashford and the impact on them with respect to traffic congestion and air quality. Aldington is not mentioned in the document. A full appraisal is required to look at the impact on all adjoining neighbourhoods;
- Paragraph 6.48 suggest that access to existing strategic road infrastructure is expected to have a positive effect on SA2 - creation of high quality and diverse employment opportunities. While it is accepted that SRN access can reduce congestion on lower-order roads which are less able to accommodate heavy traffic, Highways England aims to encourage development in locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives. As such, while limiting congestion is important, this should not be achieved in a way that could encourage an increase in overall car use, even if the road network could accommodate such traffic in that location.
- Highways England is supportive of Paragraphs 6.65 and 6.66 which attribute a positive effect on SA Objective 13 - access to sustainable modes;
- The Kent Downs AONB disagrees with many of the scores assigned in relation to the North Downs Character Area and the impacts of strategic scale development on SA Objective 3.
- The Kent Downs AONB disagrees with the SA score for Table 6.2, sub-area B of Character Area in respect of SA Objective 3 (Landscape), where proximity to and visibility from the AONB means that much of this sub area would be highly visible from the nationally protected landscape of the Kent Downs AONB. As such, it is considered that a significant negative effect would be more appropriate than the minor negative effect that has been assigned to Area B;
- The Kent Downs AONB disagrees with the SA scores for Table 7.1, Otterpool Spatial Options A & B in respect of SA Objective 3. It is considered that both Otterpool Spatial Options A & B would have negative effects in view of the visibility of the site from the highly sensitive Kent Downs landscape;
- The Kent Downs AONB disagrees with the SA scores for Table 8.2 - summary of effects following reappraisal, Policies SS1-SS4, in respect of

SA Objective 3. Allocation large scale development on land in the setting of the Kent AONB is likely to result in detrimental effects to the landscape;

- Kent County Council welcomes reference in Appendix 2, to the Energy White Paper<sup>1</sup> which aims to reduce carbon emissions. However, it is advised the target has changed to 80% by 2050 and may yet drop to 0% by 2050; and
- Sellindge Parish Council comments that Sellindge B (Appendix 4, Sellindge Spatial Options) should not be considered until after 2050. Furthermore, Sellindge Spatial Options C & D are totally unacceptable as it includes the nature reserve provided by Site B in Policy CSD9.

#### **24. Submission Draft Core Strategy Review – Historic Environment Assessment**

24.1. 1 representations were received relating to the Historic Environment Assessment accompanying the Sustainability Appraisal. These raised the following issues:

- Concern that the Roman Villa unearthed at the Otterpool Park development site will not be conserved and separated from the development.

#### **25. Submission Draft Core Strategy Review – Habitats Regulations Assessment**

25.1. 3 representations were received relating to the Habitats Regulations Assessment. These raised the following issues:

- Natural England (NE) would like minor amendments to the reference of Regulations<sup>2</sup>. The CSR and HRA should emphasise that future planning applications for the garden settlement will need a project-level HRA. The CSR HRA should make clear that the PPLP has been assessed in combination for all impact pathways (air quality and recreation pressure on European sites);
- Natural England concurs with the findings of the HRA of no likely significant effect in relation to air quality and recreational impact on the named European sites in Table 2.2. Regarding Dungeness protected sites, as the garden settlement is some distance away and will provide onsite greenspace; it will have little impact on the Dungeness protected sites. NE suggest funding for SARMS should be addressed through a tourism growth plan; and
- Natural England concurs that there are no adverse effects on the Folkestone to Etchinghill Escarpment SAC for the CSR alone and in combination with air quality. NE support the commitment by the Council to undertake monitoring of air quality along the A20 close to the SAC and to review this in conjunction with Natural England.

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<sup>1</sup> Our Energy Future 2003

<sup>2</sup> Conservation of Habitats & Species Regulation 2010 (para 2.6) should be amended to 2017