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BY EMAIL ONLY

11 March 2019

Dear Adrian

Re: Folkestone and Hythe Core Strategy Review 2019 Consultation

Thank you for your email dated 24 January 2019, notifying Kent County Council (KCC) of the Regulation 19 consultation on the Core Strategy Review Submission Draft.

The County Council continues to support the growth ambitions of Folkestone and Hythe District Council to meet local housing needs which have increased significantly to 676 homes a year to 2037, in accordance with the Government's standardised methodology. KCC notes that the proposed new garden settlement at Otterpool Park will make a significant contribution towards the overall housing requirement; and the County Council looks forward to continuing the well-established collaborative working arrangements on the scheme as this moves forward.

The County Council, as a provider of key strategic infrastructure across Kent, has a significant role in providing the infrastructure required to ensure that growth is delivered sustainably. In the current context of the well documented reductions in public sector funding, which has significantly reduced the ability of upper tier authorities to invest in capital infrastructure projects, the role of development contributions in providing this essential infrastructure has heightened in importance. The County Council therefore welcomes the commitment that the Community Infrastructure Levy (CIL) is not to be utilised for Otterpool Park.

Otterpool Park

The County Council has consistently supported the District Council's approach to delivering a new garden settlement at Otterpool Park, including through the submission of an Expression of Interest, in response to the Locally-Led Garden Villages, Towns and Cities Prospectus.

The County Council supports the ambition for the Otterpool Park settlement to be a 'beacon' of best practice environmentally and for it to follow garden town principles to ensure that it creates strong and cohesive communities. The County Council recognises that the location of the proposal will have an impact on the setting of the Area of Outstanding Natural Beauty (AONB) and would draw attention to the matters that are being raised by the Kent Downs AONB Unit. KCC would also encourage early engagement with partners to ensure that Design Codes are developed to enable the long-term delivery and maintenance of high quality design.

As the Otterpool Park proposal develops, the list of social and community requirements for the garden settlement will be subject to further discussion with KCC, given the scale of developer contributions that will be required for KCC delivered services.

Timescales do present a particular challenge in determining and reflecting changes in service provision and funding, and so will necessitate a flexible approach to ensure that infrastructure can be funded and delivered over the long term. Officers will continue to work with the District Council to ensure that as the proposal progresses, all County Council services and infrastructure will be captured in the planning, phasing and delivery of the new settlement.

It is advised that in order for the settlement to be self-sufficient for education provision and deliverable over the plan period, there may be a requirement for the safeguarding of land for the provision of two secondary schools within the site. For the wider masterplan of up to 10,000 homes, the education need is likely to consist of up to 13FE of secondary provision and eight 2FE of primary provision provided on site.

The Kent Social Care Accommodation Strategy, launched in 2014, emphasizes a greater importance on people being able to live longer and more independently in their own homes; and less on more institutional residential care. The Strategy is currently under review and this review will set the future need and strategic direction for the accommodation needs of residents in Kent and those that will require the support of Adult Social Care services. To fit with the objectives of the Strategy, any strategic housing plan should put the emphasis on homes that are built and developed within the Lifetime Homes Standard and promote independent living with or without care and support.

Further, the importance of placing the delivery of social care and public health alongside the wider health agenda will also be critical, and all these services will need to be appropriately provided for within the settlement. This will include the provision of employment and community space for the delivery of social care and public health services.

The County Council requests continued close working with the County Council as it leads the development of a Kent and Medway Energy and Low Emissions Strategy, with the potential that Otterpool Park could be an exemplar of 'clean growth' development. Taking sustainable design approaches (which achieve greater energy efficiency and provide infrastructure that enables more walking, cycling and electric

vehicle use) will in turn will reduce developments' overall impact on local air pollution and will provide a healthier place to live.

In respect of waste management, KCC has been working collaboratively to ensure that there is an understanding of what waste provision will look like moving forward; taking into account the infrastructure review undertaken by KCC Waste Management in 2017. KCC requests to continue working closely with the District as the Waste Collection Authority to carefully plan where the District should take kerbside collected waste to in order to maximise rounds and minimise costs for both parties.

Overall, the County Council welcomes the incorporation of the range of policies that look to ensure that the essential infrastructure will be delivered, phased and prioritised to support the significant growth planned at Otterpool Park. The County Council remains supportive of the focus to secure and/or fund all necessary infrastructure through Section 106 and Section 278 legal agreements, to ensure that infrastructure is delivered at the appropriate phase of the development for the Otterpool Park proposal. The County Council is also supportive of the proposed policy requirement for the consideration of long term stewardship options for the development, to ensure that infrastructure is managed and maintained.

The County Council will continue to support and constructively challenge the District Council through the preparation and master planning of the scheme through our well established, collaborative working arrangements.

Full environmental and technical comments are set out in the schedule accompanying this letter (Appendix 1).

The County Council continues to welcome the positive engagement with the District Council in the progression of its Core Strategy Review and will look to continue the close working arrangements as the Core Strategy Review is submitted for Examination, and beyond, to ensure that development is supported by the necessary infrastructure and service provision.

If you require any further information or clarification on any matter, then please do not hesitate to contact me.

Yours sincerely



Barbara Cooper
Corporate Director – Growth, Environment and Transport

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