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**BY EMAIL ONLY**

**Growth, Environment & Transport**

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Dear Caroline

**Re: Written Statement to the Examination of the Folkestone and Hythe District Council Core Strategy Review**

Thank you for inviting Kent County Council (KCC) to submit a Written Statement to the Examination of the Folkestone and Hythe District Council (FHDC) Core Strategy Review. The County Council provides the following response in respect of the Matters Issues and Questions (MIQ), alongside relevant updates to its Core Strategy Review Pre-Submission Regulation 19 Consultation, submitted 11 March 2019.

**Education**

*(Policy SS9, MIQs 21, 22 and 24)*

The County Council remains mindful of changing demands on the level of primary school spaces required in the district and, with FHDC, will manage required increases in school places through new schools and expansions as appropriate. Where new primary school sites are required, the developer will be responsible for delivery of suitable land. Where the need for new schools are identified against a site, other sites that benefit from those new school places may be required to contribute towards both land and build costs.

KCC will continue to work with FHDC to plan for provision of secondary school places and to ensure additional land is safeguarded. As raised in KCC's previous consultation responses, additional housing identified will increase the pressure for secondary school places which will need to be mitigated. The County Council is not aware of any other opportunities outside the Otterpool Park development to secure land locally for the purposes of a secondary school and the County Council is unable to identify additional land outside of that site that could be secured, at this stage, for education purposes or through future planning

applications. The proposed development at Otterpool Park presents the most appropriate opportunity to secure the required land take to deliver the secondary school places required to mitigate the impact of this development, the wider masterplan framework and potentially additional secondary school places. Therefore, to manage this pressure, there is the need to safeguard two appropriately sized secondary school sites within the proposed Otterpool Park development. Selective provision would also need to be increased proportionately.

This process will be kept under review with FHDC and may be subject to change as the Local Education Authority will need to ensure provision of the additional pupil spaces within the appropriate time and at an appropriate location. This is particularly relevant where developments do not come forward in the first ten years of the plan period and for major strategic sites within the District.

### **Minerals and Waste**

*(Policy SS8, MIQ 19)*

Within KCC's Regulation 19 consultation response, the County Council drew attention to the existence of a materials recycling facility and anaerobic digestion plant at Otterpool Quarry (which was granted planning permission by KCC under reference SH/08/124) that lies within the site of the proposed development. Whilst the facility is not yet active, the planning permission has been implemented and is therefore extant. The County Council previously recommended that Policy SS8 of the Core Strategy Review should make specific reference to the need for a planning application to be submitted with an Infrastructure Assessment (IA). This advice was given to ensure the retention of the safeguarded facility, to assess the acceptability of the proposed development in this part of the strategic allocation, and to provide an assessment against the exemptions to the presumption to safeguard the facility (as set out in adopted Policy DM 8: Safeguarding Minerals Management of the Kent Minerals and Waste Local Plan 2013-30). To the County Council's knowledge this has not been submitted.

The County Council also noted within its response that the Core Strategy Review was silent on minerals and waste safeguarding consideration for all proposed sites. KCC remains of the view that the Core Strategy Review should reference this, where applicable.

The County Council would be happy to help on any of these mineral and waste safeguarding matters, as may be required.

### **Sustainable Urban Drainage Systems**

*(Habitats Regulations Assessment, MIQs 8 and 11; Other matters MIQs 12 and Policy CSD5, MIQ 1)*

KCC welcomes the provision of Policy CSD5 and the commitment made for sustainable water resource management and supports the targets for water usage and sustainable drainage and the ambition for integrated water management. The County Council is concerned that the evidence base for impacts on the water environment may have changed since the assessments for the Local Plan were completed. In particular, the water quality

issues on the River Stour, which parts of the district naturally discharge into, and the consequent impacts on the European designated site of Stodmarsh National Nature Reserve, have only recently come to light. These present a significant challenge to developments in the Stour catchment, notably Otterpool Garden Town. Achieving the requirements set out in policy CSD5 in this area will be challenging, but will be increasingly necessary. KCC expects that any measures employed to mitigate water quality impacts from new development on the River Stour will not have a detrimental effects on water resources in the catchment or on water quality in coastal waters, nor affect the sustainability of the catchment as a whole.

Climate change presents significant challenges for Kent and the water environment in particular, and this policy helps to mitigate these impacts from new development. KCC notes the challenges that may arise in delivering this policy for the developments in the catchment of the River Stour, where the effects on the water environment from cumulative impacts are particularly acute.

In respect of the detailed wording of Policy CSD5, the inclusion of 'wastewater capacity' is restrictive, as it does not recognise other discharge situations. KCC would recommend the following new wording:

*Policy CSD5: New buildings and dwellings must be delivered in line with ~~wastewater~~ sewer capacity and receiving watercourses. **Surface water drainage systems must be designed so as to match greenfield discharge rates and volumes and for development on previously developed land to reduce discharge rates and volumes where feasible, incorporating sustainable drainage systems with full consideration given to integration of water management. The quality of water passed on to watercourses and the sea must be maintained or improved, and flood risk must not be increased by developments within the district.***

Finally, it is also noted that the Habitat Regulation Assessment (HRA) does not include an assessment of the impacts on the Stodmarsh National Nature Reserve, which takes water from the River Stour and is affected by its water quality, which is in turn affected by developments in the district. KCC appreciates that the evidence base may have changed since the Habitats Regulations Assessment (HRA) was prepared and would welcome Natural England's views on whether the HRA is appropriate.

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If you require any further information or clarification on any matter raised in this letter, please do not hesitate to contact me.

Yours sincerely



**Barbara Cooper**  
Corporate Director of Growth, Environment and Transport