

Jones, Gaynor

From: Jones, Gaynor
Sent: 11 July 2019 09:39
To: Jones, Gaynor
Subject: FW: Comments for Planning Application Y19/0257/FH

From: public.access@folkestone-hythe.gov.uk [mailto:public.access@folkestone-hythe.gov.uk]
Sent: 25 May 2019 18:37
To: planning@folkestone-hythe.gov.uk
Subject: Comments for Planning Application Y19/0257/FH

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 6:36 PM on 25 May 2019 from Mrs Sally Edwards.

Application Summary

Address: Otterpool Park Development Ashford Road Sellindge Kent

Proposal: Outline application, with all matters reserved, for a comprehensive residential led mixed use development comprising: Up to 8,500 residential homes including market and affordable homes; age restricted homes, assisted living homes, extra care facilities, care homes, sheltered housing and care villages; demolition of identified existing buildings; a range of community uses including primary and secondary schools, health centres and nursery facilities; retail and related uses; leisure facilities; business and commercial uses; open space and public realm; new planting and landscaping, and ecological enhancement works; sustainable urban drainage systems; utility and energy facilities and infrastructure; waste and waste water infrastructure and management facilities; vehicular bridge links; undercroft, surface and multi-storey car parking; creation of new vehicular and pedestrian accesses into the site, and creation of a new vehicular, pedestrian and cycle network within the site; improvements to the existing highway and local road network; lighting; engineering works, infrastructure and associated facilities; together with interim works or temporary structures required by the development and other associated works including temporary meanwhile uses. |cr|PLEASE USE THIS LINK TO VIEW ALL PLANNING APPLICATION DOCUMENTS <https://www.folkestone-hythe.gov.uk/otterpoolpark/planningapplication> ALL APPLICATION RESPONSES WILL CONTINUE TO BE REGISTERED VIA THIS SITE.|cr|

Case Officer: James Farrar

[Click for further information](#)

Customer Details

Name: Mrs Sally Edwards
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Hythe, Kent CT21 4PE

Comments Details

Commenter Type: Parish or Town Council
Stance: Customer objects to the Planning Application
Reasons for comment: - Residential Amenity
- Traffic or Highways
Comments: Folkestone & Hythe District Council
Planning Application No. Y19/0257
Outline Application for up to 8,500 residential homes and associated works

Comments from Lympne Parish Council

With reference to the above outline planning application we wish to register the following objections.

It must be remembered that the planning proposal for 800 houses in 2012 was turned down as being unsustainable, as was the proposal for a strategic corridor in the same area

1. The scale and area of the application is totally inappropriate and contravenes all normal planning parameters associated with a predominantly Greenfield site located in close proximity to AONB areas to the North, East, and South. This development cannot be viewed in isolation, it must be looked at in context with what else is being built in East Kent.
2. The application seeks to suggest the application has been developed following extensive consultations with local communities, and includes large volumes of statistics and outline details, supposedly based on the consultation process. A fundamental flaw in the consultation process was that the question as to whether the development should proceed at the proposed scale was not part of the process. Lympne Parish Council wishes it to be noted its view reflects the overwhelming view of all its parishioners that have expressed their opinions and that is that they are opposed to this outline application. We completely refute the statement made in the Housing Strategy Executive Summary 'The evidence base for the deliverability of this vision comes from both ongoing consultation and dialogue with existing residents' - the residents of Lympne have continually expressed their concern and antagonism to such a large development, which will swallow up their village.
3. The documents submitted are not a true representation of how the finished, or partly built development will look or consist of. The application, although only an outline application, must be viewed as

whole, and as portrayed is a complete town with all necessary infrastructure and services.

The planning and Delivery Statement, Planning Strategy, sets the tone for the whole document which is full of detail but is actually worded to avoid any legally based commitment, using terms like 'consistent with the general terms and vision' and 'to enable flexibility of delivery' and 'responsive to market needs at the time of delivery'

It should be noted that Policy CSD1 states 'Development proposing 15 or more dwellings should provide 30% affordable dwellings on-site' but then closes with the statement which negates the legal requirement to provide affordable housing 'subject to viability'

4. The documents submitted give Folkestone and Hythe District Council no legal ultimate decision making capacity nor veto. The planning application and project is a joint venture between the two major land owners Cozumel Estates and Folkestone and Hythe District Council. Cozumel Estates motives for promoting the project are quite legitimately to maximise profit on their land holding, Folkestone and Hythe District Councils motives are, or should be, purely to improve and enhance the quality of life of all the existing and future residents of the District, including as part of the core provisions (Not just aspirations) a non negotiable and legally binding promise to ensure proper infrastructure and community facilities are in place at the front end of the construction, together with truly affordable housing to stated policy levels.

Infrastructure, community facilities and affordable housing provision should not be 'subject to viability'

Housing Delivery as described within 3.4 Housing Strategy states 'There is an aspiration to ensure that small and medium developers are not disadvantaged through the procurement processes.....It is therefore envisaged that there will be a range of land parcels provided at Otterpool Park'

ie. In reality plots of land will be sold off to the highest bidder, who can determine what they build to maximise profit without regard to impact on infrastructure, community facilities, nor what the local community requires regarding house type and size mix.

The document continues 'The breadth and depth of delivery will be enabled by adopting the proposed Master Developer Approach..... in simple terms the Master Developer champions and protects the wider vision and takes responsibility for the delivery of critical shared strategic infrastructure, major place making delivery and major planning related section 106 issues.

ie. it is the Master Developer who has the ultimate say regarding all major decisions on land allocation and use, and how 106 monies are spent, and when they are spent on infrastructure and community projects.

5. The total number of housing units proposed when considered alone, and together with other mass housing proposals along the M20 corridor (Maidstone/Ashford/Otterpool) are greatly in excess of the numbers required by the district.

4.12 of the planning and delivery statement details 'The average household size in the district has decreased considerably and will continue to decrease to around 2.02 persons by the end of 2021. The combined impact of increasing population and reducing household size in the district will place pressure on housing resources'

This would suggest the majority of new built accommodation should consist of smaller 1 or 2 bed units but Policy CSD2 states 'at least half of new homes by 2026 to be three bedroom (or larger) dwellings. To inflate the housing unit requirement the 2.02 figure appears to have been used, but to meet the needs of developers to maximise profits by building larger and more expensive homes CSD2 identifies the need for larger homes. Table 9.2 of the Planning and delivery statement shows a range of provision of size of homes, the table provisions would still be met if 92% of all homes on the park were 3-5 bedroomed!!

The number of housing units are greatly in excess of the district's employment potential; these will not be 'houses for local people'. To confirm this statement it should be noted that The Link Park off Otterpool Lane has been vacant for many years and has failed to attract any businesses .

6. There are no confirmed details as to how critical infrastructure will be provided, phased, constructed or financed.

There is no capacity at all locally regarding local health provision (GP surgeries) and Primary School places. The current Potable water, waste water, electricity and gas networks have insufficient capacity to serve the proposal, and no definitive solutions have been included within the application.

Rail, Bus, and road links are currently barely adequate for the existing communities in the surrounding area.

Document 3.9 Community Facilities

The document confirms existing local services are not adequate to serve the proposed new community even prior to the start of stage 2

This document contains a large amount of information regarding Community Facilities without specifically detailing how much this will cost and where these are to be located, and although indicating a phased approach will meet the needs of the new development it is careful not to provide details.

3.9 (1.2) states ' the exact detail of the design and the precise location of community facilities such as school and healthcare facilities will not be determined at this stage'

and that there will be ' Development Principles, which establish the aspirations for what can be achieved.

The document states a section 106 agreement will set out how the facilities will be funded and managed, but this

will only be negotiated after outline planning has been approved, ie outline approval does not guarantee community facilities will be properly funded

Schools

3.9 (3.4) states ' the construction of primary schools may be phased' and ' Building schools in phases does add to construction cost, so the advantage and disadvantages will be considered'

3.9(3.48) Includes the get out statement 'will only deliver enough school places to meet the needs of the children on- site. Where it can be demonstrated through the monitoring procedures that no further school places are needed, delivery of further school sites or floor space will not be triggered'

5.3.17 ' The potential to enhance rail services with additional services to London is also being explored with the aspiration of at least hourly direct services of less than 60 minutes journey time.'

Healthcare

3.9(4.5) states 'there is no surplus capacity for new residents in existing surgeries in the local area' regarding details of actual provision 3.9(4.20) states 'The exact model for delivering these services will depend on the strategic plans, objectives and funding available at the time of the detailed planning permission and delivery'

Document 3.20 Utilities Delivery Strategy

Whilst reviewing possible utility provision options 1.1.6 confirms ' The incumbent providers are the duty holders responsible for provision of a utility within a particular region' ie it is not the applicants' problem.

Potable Water

The current network has capacity for 1500 units (this will be reduced if any other developments connect into the existing local network) in excess of that number will require a new 11km water main to be installed from Paddlesworth Reservoir . The developer will be required to make a contribution of 10% towards the cost of the new main.

Waste Water

The current infrastructure only has capacity for an additional 325 units, any number above that will require a network/treatment process upgrade.

Gas

The gas provider has stated ' they do not have the capability to serve a development of this scale from the existing network without significant and lengthy upstream reinforcement to the intermediate Pressure network'

The applicant admits ' the limited gas supply network has forced a change in our utility strategy approach'

Electricity

The power network has currently enough capacity to serve the first 650 properties.

A network upgrade will be required for additional properties at a total estimated cost of £8,500,000.

Because gas may not be available to the site a connection to the 132kV network may be required. The cost of this is considerable and is currently unspecified or estimated.

Document 3.10 Transport

The proposed development is surrounded by countryside and a high proportion of the residents will have to leave the site on a daily basis. The reality is walking and cycling are not an option for anything but very localised movement.

The 3 transport options, Train, Bus, Vehicle are an essential consideration.

Trains

5.3116 'An upgrade to the passenger facilities is being sort in conjunction with the stakeholders. The station is intended to provide a major hub of activity within the settlement, and enhanced transport interchange. It is envisaged that improvements would include ' Various essential improvements including a platform extension.'

5.3.17 ' The potential to enhance rail services with additional services to London is also being explored with the aspiration of at least hourly direct services of less than 60 minutes journey time.'

Westenhanger station is shown as an integral part of the transport network to serve the site.

The current station site is inadequate for large passenger numbers.

No agreement has been reached with the stakeholders.

The application document avoids making any commitments.

Bus

Bus services are shown as an integral part of the transport network to serve the site.

The current service is inadequate for a large passenger numbers and only operates between the large towns.

No agreement has been reached with the stakeholders, and there is no indication one will ever be signed off!!

Rural bus services will never be adequate to keep people out of their cars.

Vehicle

As the A20 would run through the centre of the development, it is essential the road is upgraded to accommodate the additional traffic flow.

5.3.27 ' The highway access strategy is based on the main access to Otterpool Park being from Junction 11 of the M20 via the A20'

5.3.32 ' Based on the 2016 and 2018 AADT totals, the A20 appears to be already operating above the typical daily flow capacity of 13,000 for a rural road of this current character..... Otterpool Park Development traffic would require the A20 to accommodate a daily flow of 42,895 vehicles for the application scheme.

The application details various road changes, but provides no confirmation of when this work will be completed and how it will be financed.

The current A20 is the relief road for the M20 when the road is closed or congested. If this plan is accepted it will mean lorries backing up throughout the new 'garden' town.

The proposed bypass of the Newingreen junction may be the only solution to the lack of capacity at that junction, but it is complete madness to route the new bypass, and therefore all the lorries, through the centre of the new garden town and past a primary school.

Although the proposal is for 40% green space with linking footpaths, it must still be recognised that hundreds of acres of agricultural land used for growing our food , are being lost.

Overall the more one looks at the infrastructure for Otterpool, the less viable the project becomes.

It may be appropriate to build a few houses for local people on the racecourse- a green brownfield site- but 8500 houses is totally unsustainable. As the above review indicates there are multiple problems ranging from the provision of water to the management of the roads and traffic.