



Planning Policy Team
Folkestone and Hythe District Council
Civic Centre
Castle Hill Avenue
Folkestone
Kent
CT20 2QY

Dear Sir/Madam

Core Strategy Local Plan Review, Otterpool Park section

General comments:

Aldington parish is a rural community that has been under extreme and constant pressure from the cumulative effects of ongoing development within the village for the last 10 years. The village infrastructure has failed to keep pace with the scale of development: the surrounding lanes are too narrow for the increased traffic flows, including constant construction traffic; the bus service is inadequate; there is no mains gas; water supplies are under stress; mobile signals and broadband quality are generally poor; the local doctor's surgeries are over 4 miles away, at Hamstreet and Sellindge, and are not reachable by such public transport as there is; and the William Harvey Hospital is not directly reachable by public transport. In view of all this, Aldington and Bonnington Parish Council (A&BPC) cannot welcome a new town of up to 10,000 new dwellings being sited within a few hundred yards of its eastern boundary. Furthermore, the proposed site for Otterpool Park is immediately adjacent to a stunning AONB along the Aldington ridge, from which it can only detract by its presence. However, despite these extreme reservations, the Parish Council acknowledges that the new town has government approval and, in the expectation that it will go ahead, would wish to be fully involved in whatever way it can in influencing the final outcome of Otterpool Park, so as to minimise and mitigate the undoubted disruption to the lives and amenity of the residents of Aldington and Bonnington that will be caused by the Otterpool development.

A&BPC is concerned to note that no account appears to have been taken in Policies SS6 to SS9 on Otterpool Park of the neighbouring proximity of Aldington parish to the Otterpool Park site, nor that of any other neighbouring parish that lies within Ashford Borough. The former Shepway Council held no public engagement session in Aldington or any other of the neighbouring parishes that lie outside its own administrative boundary in Ashford Borough. This is counter to the draft, revised NPPF, which requires under 3.16 that 'Plans should: ... c) be shaped by early, proportionate and meaningful engagement between planmakers and communities, local organisations, businesses, infrastructure providers and statutory consultees.'

The draft, revised NPPF further requires that:

'26. Local planning authorities and county councils (in two-tier areas) have a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. 27. Strategic plan-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers). 28. Effective and on-going joint working between strategic plan making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere. 29. In order to demonstrate effective and on-going joint working, strategic plan-making authorities should prepare and maintain one or more statements of common ground, documenting the cross boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.'

A&BPC finds from the evidence of this draft Local Plan that such collaboration cannot have taken place and calls on Folkestone & Hythe District to pay due attention to the needs of all the parishes neighbouring Otterpool, and not just those that lie within its own administrative boundary.

The residents of Aldington & Bonnington will suffer the negative consequences of the construction of Otterpool and reduced amenity after it has been built: the increased traffic flows through the village, and even more so when the M20 or the A20 are closed, or blocked, or when J10A is under construction; the increased light and air pollution from the proximity of a new town; the exacerbation of a water supply that is already acknowledged to be under severe stress.

A&BPC calls on Folkestone & Hythe District to mitigate this loss of amenity through ensuring that Aldington and Bonnington residents will enjoy the same level of upgrading of infrastructure – bus services, internet, mobile signals – as will those neighbouring parishes that lie within Folkestone & Hythe District.

A&BPC recognises that Otterpool Park will form the setting for the neighbouring AONB and urges Folkestone & Hythe District to take every measure to minimise the impact of placing a new town of up to 10,000 new dwellings in such a sensitive location.

A&BPC is extremely concerned at the lack of proposals for enhanced hospital provision in the area, given that the new town could imply some 30,000 additional residents. The William Harvey Hospital, and particularly its A&E department, is at capacity and therefore unable to provide an adequate service. The Otterpool proposals (Policy SS6) include a health centre, but this does not compensate for existing inadequate hospital provision.

A&BPC urges Folkestone & Hythe District to enter discussions with the local hospital trusts as to how adequate provision can be made. The PC would recommend that planners drop into the William Harvey Hospital A&E, both the walk-in side and the ambulance-delivery side, at different times of day to see just how congested it already gets and what the waiting times are.

Specific Comments

Charter for Otterpool Park:

Para 4.156 states that 'Although the charter does not form planning policy, it does set out the council's aspirations for the new settlement and was the subject of stakeholder consultation before being finalised.'

A&BPC wish to point out that, while the PC is grateful that planners have attended and given presentations at parish meetings, and that PC representatives have been invited to a meeting at Shepway Council and to a workshop on Otterpool, no public engagement exhibition was held in Aldington parish or in any other neighbouring parish that lies within Ashford Borough.

A&BPC regret to conclude that Aldington and Bonnington residents have not been properly consulted on the Otterpool Park proposals.

Figure 4.5 map:

A&BPC welcomes the proposed 'strategic open space' on the western edge of the Otterpool site, as it believes that a green buffer is desirable to separate the garden town from Aldington parish.

Nevertheless, the parish council would be pleased to see footpaths and cycleways extending into Aldington from Otterpool, in line with Policy SS7, 6, d: 'Footpaths, cycleways and bridleways should link to existing public rights of way, nearby villages and the wider countryside.'

Policy SS6:

Policy SS6 states that 'The masterplan shall be prepared in partnership and in consultation with the local planning authority, stakeholders, partner organisations, local people and interest groups.'

A&BPC request that residents of Aldington and Bonnington parishes henceforth be properly considered as 'stakeholders' and as 'local people' for all future such consultation and that they be properly consulted, in exactly the same way as the residents of villages that lie with in Folkestone & Hythe District.

Policy SS7:

Policy SS7, 4, e. states 'External lighting should be designed to support the aims of the [Kent Downs Management Plan](#) on Dark Skies and the Institution of Lighting Professionals (ILP) Guidance Notes for the Reduction of Light Pollution, to ensure the impact of lighting is minimised.'

A&BPC believes that lighting itself should be minimised, so as to ensure the continuation of the dark skies that the Aldington ridge in the AONB enjoys, rather than just attempting to minimise the *impact* of Otterpool's lighting.

Policy SS7, 6, h. states that 'The existing bus network that serves the surrounding towns and villages will be upgraded and new services provided as an integral element of the transport hub and settlement.'

Aldington is an immediately neighbouring village with an abysmal bus service to Ashford that does not support commuters, does not run in the evenings and does not run at weekends. Buses run from Aldington to Hythe and Folkestone on only one day a week, with just one service each way. A survey of all residents undertaken by A&BPC in August 2017 revealed that an improved bus service was the overwhelming top wish of residents responding to the survey. A&BPC calls on Folkestone & Hythe District properly to consider Aldington as a 'surrounding village' when it seeks the upgrading of the existing bus network and the provision of new services.

Policy SS9:

Policy SS9 states that 'The nearby communities of Lympne, Barrow Hill, Sellindge, Westenhanger, Saltwood, Stanford and Postling should have appropriate access to and benefit from the infrastructure provided. If it is appropriate for infrastructure to be shared with existing communities then this shall be decided through local consultation as part of the masterplanning process', while para. 4.175 states that 'Where feasible, the latest high speed internet technology should be made available to the neighbouring

communities of Lympne, Postling, Stanford, Westenhanger and Barrow Hill, with 5G connectivity also explored as an early opportunity for innovation.'

A&BPC points out that Aldington parish lies closer to the proposed boundary of Otterpool than do some of those listed communities; the only difference is the administrative line that divides them: they are in Folkestone & Hythe District and Aldington is in Ashford Borough. Aldington and Bonnington residents should equally have the benefit of the latest high speed technology (broadband speeds at present in both parishes are generally dire). A&BPC believes that Folkestone & Hythe District is failing in its duty to consult properly with and consider the needs of those neighbouring parishes that lie outside its own district boundary.

Para. 4.169 states that 'the district is an area of 'severe water stress'. Aldington already experiences this water stress. The development of Otterpool can only exacerbate the situation. A&BPC considers that Aldington's needs should be taken into account when infrastructural upgrades and new systems are being implemented.

Para. 4.174 'New garden settlement and the Community Infrastructure Levy': clearly the District Council are excluding the scheme from CIL as they own a large proportion of the land to be developed as well as being able to maximise the level of S106 payments from the developers. However, there is no provision within the policies to improve the infrastructure or community facilities in the neighbouring parishes, in particular those in the neighbouring planning authority, who will be clearly affected by a development of this magnitude.

Para. 4.176 alludes to the establishment of a Town Council for the stewardship and maintenance of the community's assets, initially funded by way of captured increase in land values. However, in the case of a Town Council, funding will be by way of precept on the householders.

Para. 4.177 places emphasis on developing a network of local volunteers. However successful this may be in the early day, A&BPC queries whether this is sustainable for the medium or long term.

Core Strategy Review Sustainability Appraisal

A&BPC finds that this sustainability appraisal considers the position of and the impact of Otterpool Park on villages and character areas lying to the north, east and south of the proposed site, but not those lying immediately to its west, including Aldington. In addition, no account has been taken of the location of Aldington's heritage assets or its conservation areas, or of its ancient woodlands, some of which lie close to the edge of the Otterpool Park site. The PC can only conclude that the appraisal has excluded consideration of any affected parishes outside the Folkestone & Hythe administrative boundary. As a result, A&BPC considers this appraisal, and its conclusions, to be **unsound**.

p. 237, SA14: 'Policy SS9 requires that the new infrastructure provides access to the existing neighbouring communities at Lympne, Barrow Hill, Sellindge, Westenhanger, Saltwood, Stanford and Postling. It is expected that these Shepway Draft Core Strategy Review – SA Report 238 March 2018 SA Objectives SA Score Policies SS6, SS7, SS8 and SS9 policies would thereby help not only to ensure that the new settlement will have an appropriate degree of self-sufficiency but is still appropriately integrated with the surrounding communities.'

No mention is made of Aldington or of other neighbouring Ashford Borough parishes. Given the likely negative impacts on the parishes from the development of Otterpool Park, A&BPC believes that Aldington and Bonnington should also benefit from new infrastructure.

p.78, 7.22: 'Finally, both options contain a significant amount of development directly adjacent to the busy transport corridor of the M20 and the highspeed railway line both of which

generate a significant amount of noise. The volume and constant nature of the noise is likely to generate adverse effects on the health and well being of new residents. Although, measures would likely be put in place to mitigate such effects.'

No proposals are put forward as to how the significant noise is going to be mitigated. A&BPC is not convinced by anything in the appraisal that the health and well-being of new residents will be protected.

Core Strategy Review Habitats Regulations Assessment

A&BPC acknowledges and welcomes the fact that the HRA does take account of Aldington as a neighbouring parish: 2.2 'All European sites lying partially or wholly within 10km from the District boundary were included in order to address the fact that Local Plan policies may affect European sites which are located outside the administrative boundary of the plan.'

A&BPC considers that a similar approach should have been applied to the Core Strategy Review SA and to Policies SS6 to SS9 within the draft Local Plan, which is being consulted upon.

A&BPC calls upon Folkestone & Hythe henceforth to take account of all neighbouring parishes, including those outside its own administrative boundary.

Yours faithfully

Peter Setterfield PSLCC
Parish Clerk