
Planning Statement - Addendum

Prepared by Savills (UK) Limited



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Appendices

Appendix 1 - Application Reference 24/0505/FH Updated Document List 2024

Appendix 2 - Response to Public Consultation Comment

1. Introduction

1.1. This addendum to the Planning Statement has been prepared on behalf of Folkestone Harbour & Seafront Development Company to support updated documents in respect of the Reserved Matters Application (“RMA”) (ref. 24/0505/FH) of Phases 5 and 6 comprising of Plots F1, F2, G1, G2 and H. The RMA was submitted on 4th April 2024. Following the statutory consultation period to the application and following further discussions with Folkestone and Hythe District Council (“FHDC”), the proposals have been amended, taking into account the comments that have been made to date. These revised proposals have sought to address these comments, and it is considered that these offer an improved scheme, with a better design that remains compliant with the outline consent. The supporting documents to the application have therefore been updated in line with the amendments made.

Supporting Information

1.2. The following documents have been updated or provided with an addendum chapter to support the RMA application:

- Revised proposed plans, sections and elevations, prepared by A is FOR;
- Revised accommodation schedule, prepared by A is FOR;
- Revised Biodiversity Net Gain Report, prepared by Fellgrove;
- Design Addendum, prepared by A is FOR;
- Planning Statement Addendum, prepared by Savills (this document);
- Energy and Sustainability Statement Addendum, prepared by Atelier Ten;
- Ecology Letter Confirming No Material Change, prepared by Fellgrove;
- Revised Fire Strategy, prepared by Atelier Ten;
- Flood Risk Assessment Letter Confirming No Material Change, prepared by Buro Happold;
- Flood Evacuation Warning Plans Letter Confirming No Material Change, prepared by Buro Happold;
- Drainage Letter Confirming No Material Change, prepared by Eckersley O’Callaghan;
- Revised Heritage Townscape and Visual Impact Assessment, prepared by Stephen Levrant Heritage Architecture;
- Internal Daylight and Sunlight Report Letter Confirming No Material Change, prepared by Delva Patman Redler;
- Landscape Statement Addendum, prepared by Spacehub;
- Revised Landscape Drawings, prepared by Spacehub;
- Revised Noise Impact Assessment, prepared by Cahill Design Consultants;
- Revised Socio Economic Impact Assessment, prepared by Amion Consulting;
- Revised Environmental Impact Assessment Statement of Conformity; prepared by Savills Planning (EIA Consultants);
- Health Impact Assessment, prepared by Savills Health and Social Impact Assessment team;
- Transport Statement Addendum, prepared by Pell Frischmann and

- Technical Memorandum on Wind Tunnel Assessment (WTA), prepared by RWDI.

1.3. Please refer to Appendix 1 for the full details of the documents that supersede those that were submitted in the original submission.

1.4. This Addendum document sets out the updates and amendments made since the April 2024 submission and the respective document updates should be read in conjunction with the original Planning Statement (Savills, March 2024).

Structure of this Planning Statement Addendum

1.5. This Statement is set out under the following headings:

- **Section 2 (Proposed Development)** provides an overview of the proposed development which forms part of this RMA;
- **Section 3 (Scheme Amendments)** Details the consultation process and Applicant response;
- **Section 4 (Compliance with Outline Consent)** demonstrates the amended proposals compliance with the outline conditions and Planning Policy Framework; and
- **Section 5 (Conclusions)** draws our conclusions in respect of these revised proposals.

Background

1.6. Following the submission of the RMA to FHDC, consultation took place which provided the opportunity for the public and statutory consultees to comment on the proposals. The first public comments were made on 22nd April 2024 and the most recent comment uploaded was on the 22nd of August 2024. These have been a mixture of general comments, objections, and support for the scheme.

1.7. FHDC submitted a letter to the Applicant on the 15th of July 2024 providing comments on the proposals.

This set out the merits of the scheme, alongside recommending revisions to certain elements of the proposals. The Applicant has sought to address these recommendations, alongside the public comments to provide an improved, revised scheme, whilst ensuring that the proposals remain compliant with the approved outline consent and the parameter plans.

1.8. There are a number of elements of the proposals that remain consistent with the original submission. Officers agreed that the following parts of the proposals were suitable and could be retained:

1.9. The Officers considered that the overall layout of the buildings and blocks is acceptable, creating an improved ground floor arrangement which enables permeability to the sea front. Alongside this, the variety of commercial unit sizes at ground floor, including the provision of double height spaces has been supported.

1.10. The following buildings were also viewed as being acceptable:

- The Rotunda (Plot G1, building 6 'B6');
- The Lookout (Plot G1, B9);
- The Crescent (Plot F1), (excluding northern elevation) and
- Plot H1 and H2 (given the positive stepped scale response to the retention of the Harbour Master's House (which also includes the form of F1 B2)).

1.11. As these elements of the proposals have been considered acceptable, they have remained consistent in principle in the amended proposals and are not dealt with further in this Addendum Planning Statement.

1.12. Comments were raised in regard to the overall hierarchy of massing and design, the Goods Yard, fenestration, materiality and roof level plant. These comments have been addressed in the revised proposals and a full response has been provided in Section 3 of this Addendum Planning Statement.

2. Proposed Development (amended)

Revised Proposed Development

2.1. Comprehensive detail and discussion of the revised designs is set out in the updated architectural drawings and Design Statement Addendum prepared by A is For.

2.2. The description of development remains unchanged from the original submission. Due to the design changes resulting in a reduction in height of some buildings and the reduction of mass, there are some minor changes to the number of apartments and provision of commercial floorspace.

2.3. Each of the units (apartments and duplex) will meet the requirements of the Nationally Described Space Standards (NDSS).

Bedrooms	Number of Units	Approximate Unit Mix (The Harbour Plots) (%)
1 bed-apartment	135	33%
2 bed-apartment	194	47%
3 bed-apartment	25	6%
4 bed-apartment	0	0.0%
1 bed duplex	6	1.5%
2 bed duplex	23	6%
3 bed duplex	14	3%
4 bed duplex	3	1%
1 bed townhouse	0	0.0%
2 bed townhouse	2	0.5%
3 bed townhouse	2	0.5%
4 bed townhouse	6	1.5%
Total	410	100%

Figure 1 – Proposed revised housing mix across Plots F1, G1 and H delivering a variety of unit types

2.4. Condition 43 of the S73 consent sets out the commercial floorspace limits and this is outlined for each type of commercial use. It was agreed during pre-application discussions that the old use classes would be complied with as these were set out in Condition 43.

Land Use	Proposed Commercial GIA (sqm) Harbour Plots	Commercial GIA (sqm) in Plot C1	Total Commercial GIA (sqm) for the masterplan	Condition 43 GIA Limit (sqm)
A1 Convenience	349.9	146.7	496.6	500
A1 Comparison	1,798.8	0	1,798.8	2,500
A3 – Food and Drink A4 – Drinking A5 – Hot Food and Takeaway	1,969.2 598.7 = 2,567.9	179.5	2,747.4	3,000
D2 – Leisure	2,049.9	0	2,049.9	3,000
D1 – Non-Residential Institutions	231.1	0	231.1	500
B1 – Business	491.1	0	491.1	500
Total	7,488.7	326.2	7,814.9	10,000

Table 1 – Proposed commercial mix in the masterplan

3. Scheme Amendments

3.1. As referred to above, design comments were received from FHDC officers on the 15th of July 2024. The applicant provided a response letter to these officer comments on the 24th of July. Two meetings were then held with officers; one on the 16th of August to discuss areas of clarification in relation to suggested amendments, and another meeting on the 5th of September to present the proposed amendments to officers. Officers were very supportive of the changes to the scheme.

3.2. The officer comments and the applicant's most recent responses and relevant design amendments are set out below for clarity.

Officer Comments (letter dated 15/07/2024)	Amended Design Response
<i>Design</i>	
<p>The hierarchy of massing and volume of the Plot G1 buildings as currently proposed is not supported. It feels that all the buildings are competing for attention – this requires simplification.</p> <p>It is considered that there is the potential to increase the massing of the North Quay buildings G1 B4 and G1 B7 at the expense of reducing the height/volume of G1 B5 and G1 B8 to create a consistent base height. This would align with the Masterplan Design Guidelines which envisaged a more uniform datum in this area to emphasise the increased heights of the Rotunda (G1 B6) and Lookout (G1 B9).</p>	<p>Reductions made to the “middle buildings” (buildings G5, and G8) in Plot G and increases to the North Quay Buildings (buildings H2, G1, G4 and G7). It can be considered that the buildings no longer ‘compete,’ they appear ‘simplified,’ and the massing creates a ‘consistent base height’ allowing for increased emphasis of the Rotunda and Lookout buildings.</p>
<p>Exploring changes in colour and materiality may also help with the above.</p>	<p>The colour and materiality of some of the buildings have been amended to respond to the officer comments. This includes a ‘off white’ façade, which has been introduced to buildings G2, G5 and G8 (the ‘middle buildings’).</p>
<p>Officers do not support the composite designs of the northern elevations of buildings G2, G5, G7 and F2 – particularly their chaotic appearance in views from the Harbour. The view is jumbled and over dominated by number of independent designs that uncomfortably compete. A calmer architectural language is required to better manage the transition from the ‘red’ buildings to the ‘white’ buildings behind and to support a more distinctive townscape role of the Rotunda.</p>	<p>The architectural language has been ‘calmed’ through a number of interventions including façade, balcony, and window simplification, alongside the building unification discussed above. This results in improved, ‘less chaotic’ views from the harbour, with a better transition between the ‘red’ and ‘white’ buildings with emphasis of the Rotunda, as set out by officers.</p>

The Goods Yard does not sit comfortably with the upper floors of the host building above - especially with the transition to balconies. It does not relate well to its context.	The design has been amended so that there is more separation between the Goods Yard and the upper residential floors creating a clear transition between that and the balconies above.
Provision for outdoor dining at the Goods Yard, when weather permits, should be incorporated.	Outdoor dining provision has now been incorporated into the Goods Yard proposals.
The choice of materiality and colour are also questioned. The Green metal finish would be at odds with its surroundings.	The materiality of the external parts of the Goods Yard were designed to reflect the Southern Railway livery in the heyday of the Harbour Station. The amendments retain this sentiment, but introduce a broken up approach with more fenestration.
The elevations lining Harbour Station railway line are more resolved, and the continuous curve adds structure and coherence. Elsewhere, the elevations need more work to find a grain that helps to break down the blocks, adding verticality.	The window design, balcony shapes and balconies depths have been simplified. The details on the facades have been made more simple to provide consistency across each elevation and building which adds to a more regular verticality across the facades.
The roof plant is visible and disruptive in a number of views of the scheme especially of G1 B2, B5 and B8. Further detail on the roof layouts is requested given the amount of visible photovoltaic panels, plant equipment and biodiverse roofs, there is a concern that the buildings will look bulkier than as indicated.	The revised proposals have introduced screening to the roof plant areas, this is in the form of Anodised Aluminium Architectural Screening. The screening along with the reduction in massing of the buildings reduces the visibility of the roof plant areas, resulting in no disruption to the views of the buildings from the harbour.

Officer Comments (letter dated 15/07/2024)	Amended Design Response
<i>Landscaping</i>	
A stronger connection to water shaping the landscape design is requested. There should be more generous playspace in size, and could more LAP (Local Area of Play, for young children) be included.	A strong connection to the water formed part of the initial submission providing a new route down to the intertidal zone with the intention that this will be used for water sports, fishing, and providing general access to the public. Additional play elements have been integrated into seating to make the playspace more generous.
Concern for the level of hard standing.	Further planting has been included to soft areas of hard standing, as well as further understorey planting to the play space.

<p>Concern about whether it would be comfortable to sit in the area in relation to the wind analysis undertaken.</p> <p>The landscape lacks interest. Could more undulation be incorporated (as in the shingle gardens) to provide better shelter and play opportunities.</p>	<p>The scheme has been designed to ensure compliance in wind analysis terms, allowing for comfortable walking and periods of sitting, whilst significantly improving the existing wind conditions for the site. Notwithstanding this, additional tree planting has been introduced to further shelter pedestrians towards the Harbourside edge. Additional understorey planting has now been included, above the existing proposed mitigation measures to mitigate winds and retain a comfortable microclimate.</p>
<p>Playspace as per that on the northern harbour should be provided in the space to the south of Building 6 (Rotunda) as part of the spill out space from the Market Hall.</p>	<p>Further play elements have been included.</p>
<p>The resident gardens are too small for genuine amenity use and do not provide privacy. Resident gardens' need to be larger and have more defensibility than the box hedge planting currently depicted. The railings proposed to create defined spaces on Plot D1 provide an example approach. A raised ground floor would be an alternative solution that creates an elegant street scene.</p>	<p>The residential gardens are all a minimum of 2m deep, and are as generous as the balconies which provide external amenity space at the upper levels.</p> <p>Hedge planting is replaced with brick upstand planters and railings. This will provide further privacy as requested by officers.</p>
<p>Concern about the proposed LEAP to the south of the Boardwalk. Could it be brought north of the Boardwalk to improve accessibility, cover from the elements and lack of lighting?</p>	<p>Playspace south of the boardwalk has been relocated to further improve accessibility and closer to well light areas.</p>
<p>The provision of play for older children is also not clear and the only fixed play is to the north. In addition, how will neurodivergent needs be catered for?</p>	<p>Accessibility to the shingle garden has been created to ensure play for older children whilst considering neurodivergent needs.</p>

3.3 Officers were supportive of the design amendments. Their comments of support are set out below:

Comments in Design Meeting 12/09/2024
<p>Massing - There is a better hierarchy to the buildings – it is positive that the middle buildings have reduced in height, alongside the increases to the front buildings. This allows the Rotunda to be more prominent. The proposed massing to block (F2 / F3) along the railway is welcomed and this presents a better design.</p>
<p>Colour - The subtle colour changes which have taken place are positive.</p>
<p>Design – Proportionality and connectivity have now improved. The simplification of the designs has been beneficial to the proposals.</p>

The Goods Yard – The separation between the residential balconies and the Goods Yard is more simple and improved. It feels more a part of the space in these revised proposals. This Goods Yards is an upgrade to the existing space and is not being lost. Also, the provision of outdoor seating retains the feel of the current Goods Yard.

The materiality of the external parts of the Goods Yard were designed to reflect the Southern Railway livery in the heyday of the Harbour Station. The amendments retain this sentiment, but introduce a broken up approach with more fenestration/ glazing. These are positive amendments, and this now feels more part of the surroundings.

Fenestrations – The window geometry on the middle buildings is better.

Plant level enclosure – Do clarify the plant enclosure materiality in the amended design documents, ensuring that the material chosen does not cause glare when submitted as part of the application. Think about colour when selecting the enclosure material. For example, industrial buildings / sheds if appropriate.

Landscaping – Seafront Park – Could the smaller planting at the seafront park be made as a more deliberate play space? Explore harder side railings due to the play spaces near the edges. These details look to be considered in relation to the play space located within the Seafront Park Play Area.

3.4 It is clear from the text set out above that the comments made by officers in relation to design and landscaping have been taken on board and the design of the scheme has been amended accordingly, resulting in further improvements to the scheme that officers are supportive of. In summary, the key amendments that have been incorporated into the design include:

- Reduction in massing to the ‘middle buildings’ (buildings G5, and G8) in Plot G
- Increase in massing in the North Quay Buildings ‘red buildings’ (buildings H2, G1, G4 and G7)
- Alteration of building colours
- Simplification of fenestration details (balconies and windows)
- Alteration to plant enclosure details
- Resultant increase in the prominence of the Rotunda (G1 B6) and Lookout building (G1 B9)
- Increased glazing to the Goods Yard building, including outdoor seating provision
- Increased landscaping and play space for the harbour

4. Compliance with Outline Consent

Outline consent compliance / compliance with conditions

- 4.1 Condition 1 of the outline permission requires the submission of details of the access, appearance, layout and scale (reserved matters) of each phase of development to be submitted before development is commenced within that phase. This application seeks to provide revised detail of reserved matters associated with the Harbour Plots.
- 4.2 Condition 2 of the outline permission requires details of all of the reserved matters for the first phase, or subphase to be submitted no later than five years from the date of the outline consent, and all other reserved matters applications to be submitted before the expiration of 10 years from 30th January 2015. A reserved matters application for Plot B1 (application reference Y18/1252/FH), formed the first subphase of phase 1 within the illustrative phasing plan has already been consented by the council, and is now under construction. Plot A, Plot C1 and Plot D1 have also been submitted and approved (22/0956/FH, 22/0625/FH & 22/1207/FH), with Plot E1 currently under consideration (22/2168/FH). Therefore, this reserved matters application for the Harbour Plots makes up the sixth submission, and the fifth and sixth phase of the outline consent and sits well within the date of expiry of the 10 years since 2015. This is providing amendments to the scheme, which was submitted in April 2024, prior to the expiry of January 2025 for the submission of details of all reserved matters.
- 4.3 Condition 4 requires that each reserved matters submission demonstrates compliance with the approved parameter plans and the associated development principles established at outline. Alongside the associated Design and Access Statements, Transport Plan, technical documents and addendums submitted in support of this application.
- 4.4 Condition 6 notes that unless otherwise agreed, the development shall be carried out in accordance with the approved phasing plan. As set out above, this application seeks approval for the fifth and sixth phase of development following applications for phases 1-4.

- 4.5 Condition 7 of the consent relates to the details required to be demonstrated by each reserved matters applications. Following the revised proposals, section 3 of the Planning Statement Addendum outlines the details under the headings of condition 7 which supersedes section 7 of the Planning Statement.
- 4.6 Condition 8 of the outline consent requires that the areas of public open space are to be laid out, equipped and maintained in accordance with the approved phasing plan, and retained in accordance with the management plan as required by condition 7. The layout plan, landscaping plans and Landscaping Design and Access Statement and subsequent addendums highlight the layout of the public realm and compliance with condition 8 related to the Harbour Plots. Section 3 of the Planning Statement Addendum also highlights accordance with condition 7, including the provision of detail regarding the management and maintenance strategy.
- 4.7 Condition 12 requires the facilities associated with loading, unloading and turning of vehicles clear of the highway. The revised Transport Statement (report ref. F1) highlights compliance with this condition, as do the proposed public realm plans which include detail regarding the highway.
- 4.8 Condition 17 highlights the need to identify the provision of private outside space, inclusive of balconies. As mentioned in section 2 above all units have access to private outdoor space via the provision of balconies, terraces and winter gardens. These provide private open space with excellent sunlight and daylight as demonstrated in the revised Internal Daylight and Sunlight Report, prepared by Delva Patman Redler LLP (report ref. Internal Daylight and Sunlight Addendum Report Letter). This confirms that the revised scheme will not result in a material change. Overall, this could lead to minor improvements to the daylight and sunlight levels.

4.9 Condition 20 requires detail of the biodiversity enhancements to be submitted for approval alongside the reserved matters application. This detail is provided in the Landscaping Design and Access Statement and the addendum. A revised Biodiversity Net Gain (BNG) Assessment has also been undertaken for the whole masterplan, which identifies an increase generally due to the beach works undertaken thus far, and a Plot specific assessment for the Harbour Plots which identifies that habitat creation will create a positive increase in biodiversity. The integration of newly created habitat and hedgerow shows that the site far exceeds the national requirement for a 10% BNG rating, although not mandatory for this RMA as the Outline consent was granted prior to the recent BNG regulations. The integration of newly created habitat and hedgerow results in a BNG score of 154.06% habitat unit net gain and 100.00% hedgerow unit net gain. It is understood that both these reports fully discharge this condition in relation to biodiversity enhancement for the Harbour Plots. The changes are not considered material, so the PEA and Habitat Assessment previously submitted remain valid. This continues to comply with Condition 20 of the outline consent.

4.10 Condition 21 requires that Phase 6/ Plot G1 includes mitigation measures to reduce the impact of wind flow down-rush. These measures were discussed within the initial architects DAS and thoroughly within the revised Wind Tunnel Assessment (WTA). Detailed WTA has been undertaken to inform the design of the proposal. The WTA has been re-run with the revised proposals to demonstrate that there will be comfortable and good quality outdoor spaces within the plots. The revised design has been reviewed by technical consultants, and confirmed that the change would not fundamentally change the wind-building interactions, as the overall massing of the scheme remain similar to that previously assessed. It is understood that the WTA and associated features within the design discharge condition 21 in relation to Plot G1, as required by the outline permission.

4.11 Condition 27 requires the detail associated with surface water drainage on site to be submitted to the LPA. The revised Flood Risk Assessment has been issued to FHDC. The methodology and date used has been agreed prior to submission with the Environment Agency (EA). The Drainage Design Strategy plans and Flood Warnings and Evacuation Action Plan have been reviewed against the proposed amendments and it have been confirmed that these two documents remain valid and do not require updating as part of the amended scheme. This therefore continues to comply with Condition 27 of the outline.

Policy Compliance

4.12 Notwithstanding the above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that any planning application must be determined in accordance with the development plan for the area unless any material considerations indicate otherwise. This is reiterated within the NPPF (2023).

Adopted Development Plan

4.13 The Site is situated within the authority area of Folkestone and Hythe District Council, the relevant Development Plan for the site therefore comprises:

- Folkestone and Hythe Places and Policies Local Plan (2020)
- Core Strategy Review (2022)

Core Strategy Review (2022)

4.14 The Core Strategy Review was adopted in March 2022. This replaced the Shepway Core Strategy (2013), which was the relevant development plan document when the outline consent was granted. For ease of reference however, the Core Strategy (2022) relevant policies, and compliance with the outline consent and relevant policies, are noted in the tables below where considered helpful.

Core Strategy Review (2022)		
Policy	Description	Comments
Policy SS10 'Spatial Strategy for Folkestone Seafront'	Folkestone Seafront is allocated for mixed-use development, providing up to 1,000 homes, as well as c.10,000 sq. m of floorspace comprising small shops and retail services (Use Class A), offices (Use Class B) and other community and leisure facilities (Use Classes C1, D1, D2 and Sui Generis), together with beach sports and sea sport facilities and with associated and improved on- and off-site community and physical infrastructure.	Planning permission was granted in 2015, and subsequently amended in 2018, for the comprehensive development of the site in line with the requirements of Policy SS6 of the now superseded Core Strategy Policy (2013). This current application brings forward development in line with the site specific policy as updated under Policy SS10 'Spatial strategy for Folkestone Seafront' within the new Places and Policies Local Plan (2020) which reflects the required development of the site as consented at outline stage. Phases 5 and 6 of the masterplan includes the provision of commercial floor space. This schedule is set out in full in Section 2 of the Planning Addendum.

Core Strategy Review (2022)		
Policy	Description	Comments
Policy CSD1 Balanced Neighbourhoods	Development resulting in new housing (Use Class C3) is supported where it contributes to creating balanced neighbourhoods which address affordable housing needs.	<p>As part of the outline planning consent there is a requirement to provide 8% (of total units provided) Intermediate shared ownership properties across the masterplan.</p> <p>This requirement is not allocated to individual phases and the S106 only stipulates that any <i>“shortfall below 8% provision in the amount of affordable housing provided in the first five phases of the development shall be added to the affordable housing to be provided in the last Phase.”</i></p> <p>The legal agreement therefore requires that any shortfall in provision of affordable housing in the first 5 phases should be made up in the latter phase. However, Table 7 of the July 2013 committee report indicated the phasing of the affordable housing units.</p> <p>As per agreement with FHDC, the Affordable Housing provision is therefore to be provided in line with the phasing approach outlined in Table 7.</p> <p>Plots F1, G1 and H will therefore deliver 53 shared ownership homes in Phase 5 & 6. This is as per discussion with the Local Authority in relation to the provision of affordable housing across the masterplan, and the strategy that has been developed in regard to AH delivery. This will mean that overall, the masterplan will have delivered 8% affordable housing as per the S106 legal agreement.</p>
Policy CSD2, District Residential Needs	Sets out development requirements for residential accommodation, in line with the spatial strategy’s approach to managing demographic and labour market changes. The policy particularly notes that developments of 15 or more dwellings should include a range of tenures and sizes with the starting points reflecting the mix identified in the SHMA.	<p>Plots F1, G1 and H offers a range of tenures within the property, and results in the overall affordable housing mix being 8% for the masterplan.</p> <p>The amended proposal also offers 410 new homes in a range of sizes as outlined in section 2 above (between 1-4 bedrooms). The percentages offered of owner-occupied units largely meet the mix identified in the SHMA. There is a skew towards one bedroom apartments, however, this is considered to meet the intentions of the policy whereby the SHMA is the ‘starting place’ for unit mix provided’ and is considered appropriate when considered in the context of the masterplan overall. This balances the housing mix based for the whole masterplan. This discussion is detailed further in the lower section of this statement titled ‘Housing Mix’.</p>

Core Strategy Review (2022)		
Policy	Description	Comments
Policy CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation	<p>Compliance with national Net gains in Biodiversity.</p> <p>Demonstration of protection and enhancement valued landscapes, sites of value ecology/geology.</p> <p>Improve Green infrastructure asset (inc. areas of high coastal/recreational potential)</p>	<p>As established by the Biodiversity Net Gain assessments prepared by Fellgrove, the proposals for the Harbour Plots result in a Biodiversity Net Gain result well in excess of national requirements. The biodiversity offering of the plot is a testament to the interesting planting and shingle garden design offered by the scheme, and by the master plan as a whole. Habitat enhancement is significant in relation to coastal vegetated shingle, hedgerow creation, gardens, urban trees, green roofs, and the seafront park. The assessment also notes that no loss to habitat is identified as a result of the development. The amended design remains compliant with the policy requirements.</p>

Folkestone and Hythe Place and Policies Local Plan (2020)

4.15 As set out in the Planning Statement submitted with this submission, the Council adopted the ‘Places and Policies Local Plan’ in 2020, which identifies specific sites for new homes and workspaces that the District needs.

4.16 Part Two of the Places and Policies Local Plan introduces a range of Development Management Policies. The outline consent conditions, and compliance of the schemes with these as outline above, address the policies relevant. The policies are also further considered in Section 7 of this statement in reference to Conditions 4 and 7 specifically.

Other Material Considerations

4.17 In addition to the adopted Development Plan, the following documents remain important material considerations in relation to this Reserved Matters application:

- National Planning Policy Framework (NPPF) (2023)
- Kent Design Guide (2007)

Details of Revised Reserved Matters

4.18 Condition 7 of the outline consent (ref. Y17/1099/SH) states that the following details are required in a Reserved Matters Application:

- Layout;
- Access;
- Scale and Appearance;
- Public Open Spaces Public Realm Design;
- Landscaping and
- Playspace.

4.19 Section 7 of the Planning Statement provided these details, alongside an assessment of the Reserved Matters. However, as the proposals have been amended some of these details have changed and are re-assessed below.

Layout

4.20 Condition 7 requires the layout of routes, buildings and spaces. These remain consistent with the original submission. It also requires parking details which remain the same (provided across the three levels of the car park, and visitor parking provided at basement level of the proposed car park).

4.21 Details on the distribution of market and affordable dwellings within the phase has remained consistent in principle. However, due to the redistribution of massing and slight reduction in proposed units the overall numbers have changed. These elements are therefore revisited below:

Housing Mix

4.22 The amended unit mix is as set out in section 3 above, with the provision of 410 units offering a clear variety of unit types in line with the requirements of planning policy. Paragraph 60 of the NPPF (2023) states that the overall aim of residential development should be to meet as much of an area's housing need as possible, providing an appropriate mix of housing types for the local community.

4.23 Policy HB2 of the Places and Policies Local Plan outlines that an appropriate housing mix is required, meeting the needs of existing residents whilst also attracting new households; it is particularly important to appeal to families and key employees. Policy CSD2 of the Core Strategy Review outlines that a range of sizes of new dwellings should be provided. The supporting text of this policy states that *"planning decisions considerations should be given to the particular circumstances of the development including design, practicality (for example regarding the management of properties) and viability."*

4.24 According to previous delegated reports relating to decisions on Reserved Matters submissions for the Folkestone Masterplan, the range should consider the SHMA mix below as a starting point. The SHMA is guidance and is solely prepared to inform policy making. It is not a material consideration in determining planning applications. The SHMA guidance is set out below for reference only:

Tenure	1-bed	2-bed and 3-bed	4+ bed
Owner-occupied/private rent	5-20%	65-70%	15-30%
Affordable tenures	20-25%	50-60%	20-25%

Table 2 – SHMA Guidelines for Owner-Occupied/Private & Affordable Tenures

4.25 The SHMA is used as a starting point for assessing housing mix and while some phases/ plots may deviate from this starting point, the mix has been formulated in accordance with the particular circumstances of this development and the proposed design and masterplan guidelines for each plot as directed by the parameter plans which were amended in the Section 73 application (ref. Y17/1099/SH).

Bedroom Type	SHMA Guidance	Plot A	Plot B	Plot C	Plot D	Plot E	Total mix for Plots A, B, C, D & E	Plots F1, G1 & H	Total mix of all plots inc. F1, G1 & H
1 bed	5-20%	0%	21%	19%	1%	38%	16%	34%	19%
2 & 3 bed	65-70%	85%	64%	81%	93%	33%	71%	62%	70%
4+ bed	15-30%	15%	14%	0%	5%	29%	13%	1%	11%

Table 3 – Owner-Occupied/ Private Housing Mix % against SHMA

Bedroom Type	SHMA Guidance	Plot A	Plot B	Plot C	Plot D	Plot E	Total mix for Plots A, B, C, D & E	Plots F1, G1 & H (approx.)	Total mix of all plots inc. F1, G1 & H (approx.)
1 bed	5-20%	0	18	24	1	40	83	141	224
2 & 3 bed	65-70%	11	54	86	86	35	269	260	529
4+ bed	15-30%	2	12	0	5	31	50	9	59

Table 4 – Owner-Occupied/ Private Housing Unit Number Mix - Folkestone Masterplan to date

4.26 The current consented housing mix (Plots A to E1) is broadly in line with the SHMA, with a slight under provision of 4+ bed units (13%, required 15%). However, following the amended design for Plots F1, G1 and H the provision of 4+ bed units across the masterplan increases from 8% to an increase of 11% 4-bed units, as well as a decrease in the provision of 1 bed units from 25% to 19%, compliant with the SHMA, across the masterplan.

4.27 Consequently, as noted in Section 7 of the Planning Statement, the Section 73 permission revised the design guidelines and envisioned a more dense development in the Harbour Plots. However, the masterplan can deliver a suitable proportion of “family housing” as demonstrated in the table below:

Bedroom Type	Masterplan Units	Masterplan %
1 bed	230	19%
2 bed	536	70%
3 & 4 bed	59	11%
Total	825	

Table 5 - Owner-Occupied/ Private Housing Unit Number Mix Across Folkestone Masterplan

4.28 Section 7 of the Planning Statement details the rationale behind the unit mix in the Harbour Plots and across the masterplan. Although there has been some very minor changes to the distribution of units due to the redistribution of massing, the overall picture remains the same and the justification set out in the Planning Statement stands.

Affordable Housing Provision

4.29 As required by the S106, the details of affordable housing have been submitted in the RMA, including the location, property and size of Affordable Housing units on site.

Plot	Phase	1-bed	2-bed	3-bed	4+ bed	Total	% units
A (22/0956/FH)	1	0	-	-	-	0	0%
B1 (18/1252)	1	0	-	-	-	0	0%
C1 (22/0625/FH)	2	4	-	-	-	4	3.5%
D1 (22/1207/FH)	3	4	-	-	-	4	4%
E1 (under consideration)	4	2	4	-	-	6	5%
Total (units)	-	10	4	0	0	14	3.5%

F1, G1 & H (to be submitted)	5 & 6	31	21	1	0	53	12.8%
Total (units)	-	41	29	1	0	67	8.1%*

[* Calculation: **67** (total no. of affordable housing units across the masterplan) ÷ **825** (total no. of units across the masterplan) x 100 = **8.12%**.]

Table 6 – Provision of affordable units per RMA application & across the masterplan %

4.30 Table 9 identifies that there is a under provision of larger, 4+ bed family units and an oversupply of 1 bed units within the affordable housing tenure.

Bedroom Type	SHMA Guidance	Plot A	Plot B	Plot C	Plot D	Plot E	Total mix for Plots A, B, C, D & E	Plots F1, G1 & H	Total masterplan mix (inc. F1, G1 & H)
1 bed	20-25%	0%	0%	100%	100%	33%	71%	59%	62%
2 & 3 bed	50-60%	0%	0%	0%	0%	67%	29%	41%	38%
4+ bed	20-25%	0%	0%	0%	0%	0%	0%	0%	0

Table 7 – Affordable housing % mix against SHMA

Bedroom Type	Plot A	Plot B	Plot C	Plot D	Plot E	Plots F1, G1 & H	Total Number
1 bed	0	0	4	4	2	31	41
2 & 3 bed	0	0	0	0	4	22	26
4+ bed	0	0	0	0	0	0	0

Table 8 – Affordable housing figures across the Masterplan

4.31 There have been slight changes to the number of affordable homes (from 52 to 53 units), and overall unit numbers, and mix. Justification for the affordable provision is set out in Section 7 of the Planning Statement and this remains consistent with these revised proposals.

4.32 All 410 residential dwellings meet the Nationally Described Space Standards (NDSS) and achieve Class 1 of the Approved Document M4. 20% of the units distributed across the first and second floors meet Approved document M4(2) requirement. This supersedes the Lifetime Homes Standards.

4.33 All units have been thoroughly assessed and designed to ensure satisfactory levels of sunlight and daylight. The revised Internal Daylight and Sunlight Report assessment prepared by Chartered Surveyors, Delva Patan Redler (DPR) discusses the assessment in detail. The letter provided confirms that there is no material change in the daylight and sunlight levels in relation to the amended scheme. Overall, the reduction in mass could lead to minor improvement to the daylight and sunlight levels of the habitable rooms tested at the three lower floors. The assessment method continues to be appropriate with assessment of the first three levels of each building, as any sunlight daylight levels will improve above this level. Furthermore, the assessment in relation to use of a 150-lux target for kitchens is appropriate in any case and the approach taken has been affirmed by appeal decisions, as detailed in the letter provided. This letter should be read alongside the assessment initially submitted. The full technical daylight sunlight assessment is being undertaken for completeness, and will be issued to officers in due course to supplement this letter.

Access;

4.34 In relation to access, condition 7 states that the following should be provided:

'The access and circulation of modes of travel within the relevant phase or sub-phase, the design of roads paths and junction layout including the provision of footpaths and cycleways.'

4.35 Pedestrian, cycle and vehicle access remains consistent with what was proposed in the original submission. Refer to Section 7 of the Planning Statement and the Transport Statement for full details.

Scale and Appearance;

4.36 In relation to scale and appearance, condition 7 states that the following should be provided:

‘Scale, form and appearance of the architecture within each phase in accordance with the mandatory parameter and design guidelines, including frontage design and public/private realm definition and boundary treatments.’

4.37 Plot F1, F2, G1, G2, and H ‘the Harbour Plots’, sit on the former Harbour Arm Car Park, south of Harbour Approach Road and the Swing Bridge and Viaduct, east of the adjacent masterplan Plot E1 and Marine Parade.

4.38 Each of the three plots that contain residential or commercial blocks above ground, F1, G1 and H, contain a differing number of buildings. There continues to be a total of 15 buildings across the three harbour plots. This are of differing heights also, with alterations to these as part of the amended scheme. These are detailed below:

- Plot F1 - four buildings from 3 - 5 storeys
(October Amended Drawings – Building F2 & F3 – increased by one-storey)
- Plot G1 - nine buildings at 4 – 11 storeys
(October Amended Drawings – Building G5 & G8 – reduced by one-storey)
- Plot H - two buildings at 4 storeys
(October Amended Drawings – buildings altered to be more symmetrical)

4.39 The proposals to Plots F2 and G2 remain consistent with the original submission. Please refer to Section 7 of the Planning Statement for full details.

Public Open Spaces Public Realm Design;

4.40 In relation to Public Open Spaces and the Public Realm Design Strategy, condition 7 outlines the following details which should be provided:

'The extent, layout and specification of public open spaces, in accordance with the mandatory Folkestone Seafront Landscape Guidelines Rev: 3 - 21.05.2018 and Supplementary information and including details of street furniture (including lighting, seating, signage, bus stops, bins surface treatments, threshold levels) and play space and delivery of Marine Parade, accompanied by a management plan showing how the relevant areas of public open space are to be laid out, paved, planted, equipped and maintained together with a timetable for their implementation.'

4.41 The Updated Landscape Design and Access Statement, dated October 2024, prepared by Spacehub details the revised Public Realm Strategy.

Landscaping and Playspace

4.42 The Landscaping design and specification of Play space, as well as a play strategy, is provided within the associated public realm are provided in the revised Landscaping report (dated October 2024) by Spacehub. The play areas provided as part of the harbour scheme measures 1,412 sqm (LAP + LEAP) with inclusion of the harbourside area, seafront park, residential garden (located in Plot F1 and accessible to all harbour plot residents from Plots F1, G1, and H), and publicly accessible shingle garden.

4.43 LEAP (Local Equipped Areas for Play) provision is required at 0.077 hectares per 1,000 population. A total of 1,115sqm LEAP play is provided in excess of this requirement in the shingle garden. This meets Policy C4 within the Places and Policies Local Plan (2020). This over provides the requirement required as part of the masterplan play strategy as previously agreed at outline stage.

5. Conclusions

- 4.44 This Planning Statement Addendum has been prepared in support of a Reserved Matters Application which is currently being determined by Folkestone and Hythe District Council, on behalf of the Applicant (Folkestone Harbour GP Ltd) for the site at of Plots F1, F2, G1, G2 and H of Folkestone Seafront.
- 4.45 Following consultation on the initial proposals and discussions with Officers at the Local Planning Authority, amendments have been made to the proposals. This has included the redistributing of the massing which has resulted in a reduction in the building heights of buildings G5 and G8 on Plot G, and alteration of massing of all buildings on Plot H and buildings F2 and F3 on Plot F. This has resulted in the Rotunda being the principle building in the development and means that buildings no longer compete with one another. There have also been revisions to the Goods Yard building.
- 4.46 The list of amended documents to be issued, are set out below for clarity.

Appendix 1 - Application Reference 24/0505/FH Updated Document List 2024

Document Submitted April 2024	April 2024 Document Superseded? (Y/N)	Updated Document Submitted October 2024
Accommodation Schedule , dated March 2024, prepared by A IS FOR	Yes	Accommodation Schedule , dated October 2024 prepared by A IS FOR
Covering Letter , dated March 2024, prepared by Savills	No	Addendum Cover Letter , dated October 2024, prepared by Savills
Design and Access Statement , dated March 2024, prepared by A IS FOR	No	Addendum Design Statement , dated October 2024, prepared by A IS FOR;
Ecology Appraisal and Biodiversity Net Gain Assessment , dated February 2024 prepared by Fellgrove	Yes	Updated Biodiversity Net Gain Assessment , dated October 2024 prepared by Fellgrove
Habitat Assessment Report & Folkstone Plots PEA , dated March 2024, prepared by Fellgrove	No	Ecology Letter – Confirming No Material Change , dated October 2024 prepared by Fellgrove
Energy and Sustainability Statement & Statement on Sustainable Construction , dated March 2024, prepared by Atelier Ten	No	Addendum Energy and Sustainability Statement , dated October 2024, prepared by Atelier Ten
Fire Strategy , dated March 2024, prepared by Atelier Ten	Yes	Revised Fire Strategy , dated October 2024, prepared by Atelier Ten
Flood Risk Assessment dated March 2024, prepared by Buro Happold	No	Flood Risk Assessment Letter – Confirming No Material Change , dated October 2024 prepared by Buro Happold [Note: new FRA issued early October, prior to amended drawing submission].
Flood Warning and Evacuation Plan , dated March 2024, prepared by Buro Happold	No	Flood Warning and Evacuation Plan Letter - Confirming No Material Change , dated October 2024, prepared by Buro Happold
Proposed Site Drainage Layout , dated January 2024, prepared by Buro Happold	No	Drainage Letter – Confirming No Material Change , dated October 2024, prepared by Buro Happold
Heritage and Townscape Assessment including Visual Impact Assessment of key views , dated March 2024, prepared by Stephen Levrant Heritage Architecture	Yes	Updated Heritage and Townscape Assessment Visual Impact Assessment dated October 2024, prepared by Stephen Levrant Heritage Architecture
N/A	N/A	Internal Daylight and Sunlight Letter – Confirming No Material Change , dated October 2024, prepared by Delva Patman Redler
Internal Daylight and Sunlight Report , dated March 2024, prepared by Delva Patman Redler	Yes [To be issued November 2024].	Updated Internal Daylight and Sunlight Report , dated November 2024, prepared by Delva Patman Redler
Landscape Design and Access Statement , dated March 2024, prepared by Space Hub	No	Addendum Landscape Statement , dated October 2024, prepared by Space Hub
Noise Impact Assessment , dated March 2024, prepared by Cahill Design Consultants	Yes	Revised Noise Impact Assessment , dated October 2024, prepared by Cahill Design Consultants
Socio Economic Impact Assessment , dated February 2024, prepared by Amion Consulting	Yes	Revised Socio Economic Impact Assessment , dated October 2024, prepared by Amion Consulting

Statement of Community Engagement , prepared by Maxim PR	No	Consultation during the planning application determination covered in Planning Statement Addendum, dated October 2024, prepared by Savills
EIA Statement of Conformity , dated March 2024, prepared by Savills Planning (EIA Consultants)	Yes	Updated EIA Statement of Conformity , dated October 2024, prepared by Savills Planning (EIA Consultants)
Transport Statement , dated January 2024, prepared by Pell Frischmann	No	Transport Statement Addendum , dated October 2024, prepared by Pell Frischmann
Wind Tunnel Assessment (WTA) , dated March 2024, prepared by RWDI	No	Wind Tunnel Assessment (WTA) Microclimate Technical Memorandum , dated October 2024, prepared by RWDI
N/A [Document not prepared in the initial submission].	N/A	Health Impact Assessment , dated October 2024, prepared by Savills
Harbour Plots Planning Statement - Guidelines Review Appended	No	Planning Statement Addendum , dated October 2024, prepared by Savills

Appendix 2 - Response to Public Consultation Comments

Application Reference: 24/0505/FH

Former Rotunda Amusement Park, Plots F1, F2, G1, G2 and H, Marine Parade, Folkestone, CT20 1SU

Overview

The application was submitted March 2024 (reference. 24/0505/FH), for Plots F1, F2, G1, G2 and H of the Folkestone outline consent (ref. Y17/1099/SH). Following discussion with the Council and having regard to public comments, we are pleased to submit an amended proposal which has the retains the same description of development, but has sought to address the comments. We believe that this has resulted in an improved scheme that remains in line with the outline consent, the associated parameter plans and design guidelines.

On behalf of the Applicant, Folkestone Harbour (GP) Ltd, we write in response to the comments received on the application (ref. 24/0505/FH) throughout the public consultation period. The Applicant addresses the themes running throughout the comments that have been submitted to the Council by members of the public.

Where relevant to the RMA, the following themes have been addressed below:

- Design;
- Transport;
- Socio-Economic Impact;
- Heritage;
- Affordable Housing and
- Health Impacts.

Design

In response to comments on the scale and height of the proposals, all buildings in the RMA submission have been designed to sit within the approved parameter plans as granted at outline planning application stage (Y17/1099/SH dated 26th September 2018). The buildings sit below the maximum heights and horizontal parameters in several locations, and do not exceed the already approved limits set by the outline permission. This scale was considered and approved at outline stage where it was determined that the scale was appropriate and that the proposals could integrate with the character of the surrounding area. However, following additional conversations with the Council and after further consideration, further reductions and redistribution of massing has been implemented (still in compliance with the maximum heights and horizontal parameters).

Transport

Some respondents commented on transport issues, particularly in relation to the provision of visitor parking and the impact on the local traffic network.

As outlined in the Transport Statement Addendum, there are 582 car parking bays for residents within the site which equates to 1.42 spaces per unit. This is in line with the parking provision agreed for the wider masterplan at Outline stage.

It is pertinent to note that the existing land has a temporary car park which was always intended to be a “meanwhile use” as the outline consent approved mixed use development on this part of the site. Therefore, this should not be used as an existing baseline for the site’s car parking numbers. Around 350 public / visitor parking spaces will be provided on site within the proposed car park with a further five public / visitor parking spaces for blue badge holders provided within the public realm within the site, as set out in the initial Transport Statement. The proposals for car parking are in compliance with the requirements of KCC guidance and PPLP Policy T2.

Extensive Pre-Application discussions took place with KCC Highways prior to the submission of this application. It was agreed that the proposals would fall within the parameters that were agreed at the outline stage, and that no additional traffic modelling above that already carried out would be necessary.

A capacity assessment was carried out for Harbour Approach Road in order to inform the level of queuing on site and ensure that the proposed barrier locations are appropriate. The existing traffic flows on Harbour Approach Road accounted for in the capacity assessment remain the same as those used for the assessment undertaken as part of the March 2024 Transport Assessment, with the proposed design amendments to the scheme. Furthermore, the priority junction would operate well within capacity with the amended development in place, with limited queuing and delay for vehicles exiting the site. This accounts for a seasonal weekend peak period, and therefore the junction is likely to operate with even more capacity on typical days.

Heritage

There were respondents who highlight concern for how the proposals would impact the heritage and townscape of the surrounding area.

Chapter 7 of the Original Environmental Statement assessed the potential effects on Townscape, Landscape and Visual Amenity. The conclusions of the assessment have been reviewed and compared against the scheme as proposed through the RMA submission. The Original Environmental Statement identified a number of significant beneficial effects relating to townscape and landscape which related to improved views of the Site and beneficial integration with the townscape in the surrounding area.

A Heritage and Visual Impact Assessment was undertaken which found that the majority of impacts were of minor scale. It is also confirmed where appropriate that no cumulative developments are not seen in certain views.

Chapter 8 of the ES, was later superseded by Chapter 5 of the 2017 Addendum ES (for the S73) and remains relevant to this RMA. The detailed plans were reviewed against the parameter plans for the Outline Proposals. This has determined that the Proposed Development remains broadly the same as the original outline proposal and any changes would be so minor as to not materially alter the assessed effects upon the heritage resource presented in the ES and addendums.

Archaeology and heritage was also assessed as part of the 2017 Addendum Chapter 5. The assessment concluded that the effect on Grade II* listed Leas Lift had changed from “moderate beneficial” to “minor to moderate beneficial.” The impact on the Grade II listed Marine Crescent and unlisted Harbour House had changed from “moderate beneficial” to “minor adverse.” Lastly, the impact on the Folkestone Conservation Area had changed from “moderate beneficial” to “minor adverse.” Since the 2017 Addendum, the design of the Proposed Development has not increased outside of the assessed parameters and therefore the conclusions have not changed.

Socio-Economic Impact

Respondents commented that the socio economic assessment was “too high level.” This was originally assessed in the EIA, and it has been confirmed in the Statement of Conformity that the conclusions of this remain consistent. Regardless of this, an Economic Assessment was submitted with the application which found that this RMA will account for a significant proportion of the additional economic impact.

The updated Socio Economic Impact Report confirms that the changes to the scheme in the revised proposals will have no material impact on the outcomes of the Economic Assessment.

Affordable Housing

The outline consent requires 8% of units to be provided as shared ownership (affordable housing). This requirement is not allocated to individual phases and the S106 only stipulates that any “*shortfall below 8% provision in the amount of affordable housing provided in the first five phases of the development shall be added to the affordable housing to be provided in the last Phase*”.

These proposals meet the affordable housing provision requirements, and this is detailed fully in Section 4 of the Planning Statement Addendum, ensuring compliance with the affordable provision approved under the outline consent.

Health Impact Assessment (HIA)

A few respondents requested a Health Impact Assessment should be undertaken for the RMA. In the Places and Policies Local Plan (adopted September 2020), Policy HW2 sets out the requirements of a Health Impact Assessment. It states that:

“For residential development of 100 or more units and non-residential development in excess of 1,000sqm a Health Impact Assessment will be required, which will measure the wider impact of the development on healthy living and the demands that may be placed on health services and facilities arising from the development.

Where significant impacts are identified, measures to address the health requirements of the development should be provided and/or secured by planning obligations or planning conditions as appropriate.

A Health Impact Assessment for smaller forms of development may also be required where the proposal is likely to give rise to a significant impact on health, for example, the cumulative impacts of a number of developments might necessitate the need for new health or social infrastructure.”

The question turned to whether this was a relevant input for the RMA, or whether the potential health impacts of development have been resolved at outline stage.

Subject to discussions with Officers, it was considered prudent to produce a Health Impact Assessment, although it is considered to have been addressed at outline stage. The assessment identifies the impact of the development on healthy living and the impact of additional residents on local health services. This included no further mitigation or measures for local care services based on the financial contribution provided in the region of £1,008,000 to fund off-site primary care improvements within the town centre area. The assessment indicated that the proposals will be supportive of good health and wellbeing, with no material adverse health impacts anticipated. The harbour plot proposals will therefore facilitate a healthy, vibrant, and cohesive community.