

# CORE STRATEGY REVIEW LOCAL PLAN

Submission Draft  
Consultation Statement  
February 2020



EB 01.90

# Contents Page

1. Introduction .....	2
2. Regulation 18 Core Strategy Review Local Plan – Preferred Options document...	3
3. Regulation 19 Core Strategy Review Local Plan - Submission Draft document.....	6
4. Regulation 19 Core Strategy Review Local Plan - Submission Draft Revised Housing Requirement	
5. Duty to Cooperate .....	9

## Appendices

Appendix 1 - Local Plan consultees

Appendix 2 - Local libraries and their opening times

Appendix 3 - (a) Summary of representations received to the Regulation 18 Core Strategy Review Local Plan – Preferred Options document, plus (b) Officer’s responses and suggested amendments

Appendix 4 - Summary of representations received to the Core Strategy Review Local Plan - Submission draft document and Revised Housing Requirement document

# 1. Introduction

1.1 The National Planning Policy Framework 2019 (NPPF) requires each local planning authority to produce a local plan for its area that contributes to sustainable development while reflecting the vision and aspirations of local communities. Furthermore, the Localism Act 2011 aims to make the planning system clearer, more democratic and more effective.

1.2 The District Council is undertaking a review of the adopted Core Strategy Local Plan (2013) following the completion of an updated Strategic Housing Market Assessment (SHMA) for the district in 2016/17, which showed an increased need for housing. The Core Strategy Review Local Plan (CSR) is a planning document which sets out the development strategy for the district, for the period from 2019/20 to 2036/37. It is an update of the adopted Core Strategy Local Plan (2013) and continues to include policies for strategic development sites but also introduces proposed policies for a new Garden Settlement and additional sites in Sellindge within the North Downs Area.

1.3 The consultation statement sets out how Folkestone & Hythe District Council (F&HDC)<sup>1</sup> undertook consultation between 2018 and 2020 to inform the CSR Submission Draft document.

1.4 F&HDC carried out one Town and Country Planning (Local Development) (England) Regulations 2012 (hereafter referred to as the Regulations) consultation under Regulation 18 and two under Regulation 19, as detailed below:

- The first consultation was undertaken on the CSR Preferred Options document between **29 March** and **18 May 2018**.
- The second consultation was undertaken on the CSR Submission draft document between **25 January** and **11 March 2019**.
- The third consultation was undertaken on the CSR Submission draft Revised Housing Requirement between **2 December 2019** and **20 January 2020**.

1.5 The document has been produced in accordance with Regulation 22 (1 (C)) of the Regulations which sets out that a Consultation Statement has to be produced to show:

- Which bodies and persons were invited to make representations under Regulation 18
- How those bodies and persons were invited to make such representations,
- A summary of the main issues raised by those representations
- How those main issues have been addressed in the local plan
- The number of representations submitted at Regulation 19 stage and a summary of the main issues raised.

---

<sup>1</sup> As of 1<sup>st</sup> April 2018 Shepway District Council became Folkestone & Hythe District Council

1.6 The Consultation Statement will assist the Inspector at the Examination in determining whether the District's CSR complies with the requirements for public participation and government guidance.

1.7 The report shows that the consultation carried out by F&HDC has complied with the statutory requirements set out in the Regulations. The report also shows that public involvement was carried out following the approach set out in the council's Statement of Community Involvement (2015).

## **2. Regulation 18 Core Strategy Review Local Plan – Preferred Options document**

2.1 On 30 June 2016 Cabinet agreed a Local Development Scheme (LDS) which included a commitment to the partial review of the Core Strategy (2013) in order to identify how additional housing and employment needs will be met over an extended plan period (Report No. C/16/13).

2.2 A progress report was taken to Cabinet, on 19 April 2017 (Report No. C/16/107) including updates on the various technical work streams being undertaken. The report included the finalised Strategic Housing Market Assessment (SHMA), the Sustainability Appraisal (SA) Scoping Report, an initial assessment of Core Strategy (2013) policies with recommendations for their review and a progress report on the AECOM High Level Options Report and Phase 2 Options Report.

2.3 On 17 January 2018 Cabinet were updated again on the progress of the Local Plan and subsequently approved the CSR for consultation (Report No. C/17/73).

## **Key Consultation Methods and Analysis**

### **Pre-consultation meetings**

2.4 Prior to the start of the consultation period a number of strategic planning Duty to Cooperate meetings were held in 2017/18 with key consultees, these meetings including:

- Environment Agency, Natural England and the Kent Downs AONB Unit - The meeting was held to discuss strategic planning in connection with the district's growth ambitions, the review of the Core Strategy Local Plan, technical work-streams and issues, and related nature conservation, ecology, flood risk, and landscape issues.
- Southern Water, South East Water and Affinity Water - The meeting was held to discuss strategic planning issues in connection with Otterpool Park and the council's growth ambitions and related matters.
- NHS and Emergency Services - The meeting was held to discuss detailed issues around health and well-being, the provisioning of a potential community

health hub, the emerging proposals for Otterpool Park, progress relating to the on-going review of the Core Strategy Local Plan and other related matters.

2.5 In addition to the above meetings, further Duty to Cooperate meetings were held with all neighbouring authorities, as well as Kent County Council. More detail on these meetings can be found in the Duty to Cooperate Statement Core Strategy Review (2019).

2.6 The CSR, Regulation 18 document was published for consultation for seven weeks between **29 March** and **18 May 2018** (the standard six week period was extended to allow for the Easter bank holidays).

### **Promotion of the consultation period**

2.7 The consultation was advertised through a wide variety of means. A Public Notice was placed in the KM Group newspapers and two press releases were issued, whilst it was also promoted through the council's website, social media channels on twitter and Facebook.

2.8 All interested parties were invited by email or letter to make comments (Appendix 1), these included:

- Specific statutory consultation bodies that the council consider may have an interest in the Local Plan;
- General consultation bodies (charity, community and voluntary groups) that the council consider appropriate; and
- Residents, business owners and other stakeholders who have requested to be included on the council's consultation database.

### **Consultation Events**

2.9 The consultation documents were made available to view in the council Offices at Folkestone and all public libraries (Appendix 2) within the district, during opening hours. Representation Forms were available at all the venues, from the council website or on request from the Planning Policy Team.

2.10 During the seven week consultation period a series of public consultation events were held across the district, with over 115 people signing in.

Date	Venue	Time
16.04.18	Folkestone Civic Centre	3-7pm
17.04.18	Hawkinge Community Centre	3-7pm
19.04.18	Sellindge Village Hall	3-7pm
24.04.18	Hythe South Road Pavilion	3-7pm

25.04.18	New Romney Scouts Hall	3-7pm
----------	------------------------	-------

Table 1: Venues, dates and timings of public consultation events for the Core Strategy Review Local Plan – Preferred Options document

2.11 The public events consisted of a number of information boards to facilitate discussions with council officers. Copies of the draft consultation documents were available to view as well as handouts to take home, explaining how to make a comment on the plan.

## Feedback

2.12 Comments could be made online via the council's Consultation Portal, which makes submitting comments easy and accessible, allowing people the time to consider what they wanted to say and in their own time. Alternatively comments could be sent:

- In writing to: Planning Policy, Folkestone and Hythe District Council, Civic Centre, Castle Hill Avenue, Folkestone Kent CT20 2QY; or
- E-mailed to: [planning.policy@folkestone-hythe.gov.uk](mailto:planning.policy@folkestone-hythe.gov.uk); or

## Results

2.13 The seven week consultation resulted in the submission of **746 comments** from **109 individuals and organisations**. All sections and policies attracted comments, including those left unchanged from the 2013 plan.

2.14 Officers reported back to Cabinet on 14<sup>th</sup> November 2018 (C/18/49). The report contained tables setting out summaries of all comments, prepared responses and suggested amendments to the plan as a result (Appendix 3). A brief summary of the key issues to emerge from the consultation are set out below.

2.15 Most comments raised objections with the plan's proposals. Frequently raised concerns were that:

- The district's infrastructure cannot cope with growth (water supply, highways, health and education were frequently raised);
- The level of development would not address local needs and new homes would not be affordable for local people;
- The level of affordable housing sought from new developments should remain at 30 per cent, as developers too often reduce the affordable housing they provide on the grounds of viability;
- The focus should be on regenerating Folkestone rather than providing a new town and the new town proposals would draw investment away from struggling areas; and
- The district's heritage is under threat.

2.16 Frequently raised concerns relating to the new garden settlement (policies SS6-SS9) were that:

- Proposals would harm the Kent Downs Area of Outstanding Natural Beauty and would urbanise the area between Ashford and the coast;
- Local infrastructure cannot cope with the level of development; and
- Insufficient attention has been provided to retail and employment provision and the social dimension.

2.17 Frequently raised concerns relating to proposals for Sellindge (policy CSD9) were that:

- Local infrastructure cannot cope with the level of development;
- Local people feel that the development is being imposed on them and proposals do not follow the previously agreed masterplan for Sellindge; and
- Sellindge needs a bypass; this should be provided as part of the garden town proposals.

2.18 As part of the consultation a “call for sites” was carried out, directed at strategic sites (250 or more homes) to identify reasonable alternatives to those allocated in the plan. In total nine sites were put forward and it is considered that none of the sites present suitable alternative or additional allocations to those currently proposed in the Core Strategy Review.

2.19 Since the conclusion of the Preferred Options consultation, council officers have continued to meet with statutory consultees and interested parties to discuss key issues. Further information on these meetings can be found in the council’s Duty to Cooperate Statement (2019). In addition officers presented to the Folkestone & Hythe Business Advisory Board on 22<sup>nd</sup> November 2018 to provide information on the CSR, including next steps.

### **3. Regulation 19 Core Strategy Review Local Plan- Submission Draft document**

3.1 On 14<sup>th</sup> November 2018 Cabinet approved the CSR (Regulation 19) Local Plan (C/18/49) prior to its second consultation.

#### **Key Consultation Methods and Analysis**

3.2 The CSR Submission Draft, Sustainability Appraisal, Habitats Regulations Assessment and an up to date evidence base were published for consultation between 25 January and 11 March 2019, over a six week period.

#### **Promotion of the consultation period**

3.3 The consultation was advertised through a Public Notice placed in the KM Group newspapers on 23 January 2019, a press release, and the council’s social media sites Twitter and Facebook with regular reminders and on the council’s website. The

consultation featured on the council’s home page, under the Latest News section throughout the consultation period.

3.4 Letters or emails were sent directly to specific and general consultees, Councillors and residents and interested parties who had submitted representations on the Preferred Options document.

3.5 Hard copies of the Plan and representation forms were made available to view at local libraries and council offices during the normal opening hours (Appendix 2). All documents were available to view on the council’s website.

3.6 Hard copies of the consultation documents were sent to each of the Parish and Town Councils within the district as well as all neighbouring Parish and Town councils. In addition, all Parish and Town Councils were offered an informal meeting with council officers to assist them with any questions they may have regarding the consultation.

## Feedback

3.7 Comments could be made online via the council’s Consultation Portal, which makes submitting comments easy and accessible, allowing people the time to consider what they wanted to say and in their own time. Alternatively comments could be sent:

- In writing to: Planning Policy, Folkestone and Hythe District Council, Civic Centre, Castle Hill Avenue, Folkestone Kent CT20 2QY; or
- E-mailed to: [planning.policy@folkestone-hythe.gov.uk](mailto:planning.policy@folkestone-hythe.gov.uk);

## Results

3.8 A total of 510 comments were received to the CSR Submission Draft from 117 individuals and organisations.

3.9 The comments have been broken down by chapter as shown in Table 2 below:

Section		Number of comments
	<b>Core Strategy Review as a whole</b>	
	<b>General</b>	<b>21</b>
<b>1</b>	<b>Introduction</b>	<b>23</b>
1.1	About the Core Strategy	15
1.2	About Folkestone and Hythe	8
<b>2</b>	<b>Strategic Issues</b>	<b>9</b>



Section		Number of comments
2.1	District Development Challenges and Potential	7
2.2	Strategic Needs for Sustainable Development	2
<b>3</b>	<b>Aims and Vision for Folkestone &amp; Hythe</b>	<b>22</b>
3.1	District Planning Aims	7
3.2	Vision for Folkestone & Hythe	15
<b>4</b>	<b>The Spatial Strategy for Folkestone &amp; Hythe</b>	<b>303</b>
4.1	District Spatial Strategy	25
4.2	Housing and the Economy Growth Strategy	29
4.3	Place Shaping and Sustainable Settlements Strategy	15
4.4	Priority Centres of Activity Strategy	14
4.5	District Infrastructure Planning Strategy	24
4.6	Strategic Allocations	196
<b>5</b>	<b>Core Strategy Delivery</b>	<b>128</b>
5.1	Core Policies for Planning	35
5.2	Areas of Strategic Change	90
5.3	Implementation	3
Appendices		<b>4</b>
Appendix 1: Monitoring and Risk		2
Appendix 2: Glossary of Terms and Technical Studies		2
<b>Total number of comments</b>		<b>510</b>

Table 2: The numbers of comments made against each section

3.10 The main issues arising from the comments have been summarised and are outlined on a chapter-by-chapter basis in Appendix 4.

## 4. Regulation 19 Core Strategy Review Local Plan-Submission Draft Revised Housing Requirement

4.1 As the review of the Core Strategy has progressed national planning policy has changed several times and a new method of calculating housing requirements has been introduced that has resulted in an increase in the number of houses the authority needs to plan for in the district to 2036/37. However it is considered that there is no

need to identify additional housing sites to allocate in the Core Strategy Review to meet the new national housing need figure.

## **Key Consultation Methods and Analysis**

4.2 A consultation on the proposed amendments to the minimum housing requirement in the Core Strategy Review, accompanying Sustainability Appraisal and Habitats Regulations Assessment ran for seven weeks from 2 December 2019 to 20 January 2020.

4.3 The council has published on its website a number of Statements of Common Ground with neighbouring local authorities and other organisations to support the Core Strategy Review, and these were also available for comment.

### **Promotion of the consultation period**

4.4 The consultation was advertised through a Public Notice placed in the KM Group newspapers on 27<sup>th</sup> November, a press release, the council's social media sites Twitter and Facebook with regular reminders and on the council's website. The consultation also featured on the council's home page.

4.5 Letters or emails were sent directly to specific and general consultees, Councillors and residents and interested parties who had submitted representations on the Preferred Options document.

4.6 Hard copies of the Plan and representation forms were made available to view at local libraries and the council's offices in Folkestone during normal opening hours (Appendix 2). All documents were available to view on the council's website. In addition hard copies of the consultation documents were sent to each of the Parish and Town Councils within the district.

### **Feedback**

4.7 Comments could be made online via the council's Consultation Portal, which makes submitting comments easy and accessible, allowing people the time to consider what they wanted to say and in their own time. Alternatively comments could be sent:

- In writing to: Planning Policy, Folkestone and Hythe District Council, Civic Centre, Castle Hill Avenue, Folkestone Kent CT20 2QY; or
- E-mailed to: [planning.policy@folkestone-hythe.gov.uk](mailto:planning.policy@folkestone-hythe.gov.uk);

### **Results**

4.8 A total of 33 comments were received to the CSR Submission Draft Revised Housing Requirement document from 24 individuals and organisations. The main issues arising from the comments have been summarised and incorporated into Appendix 4.

## **5. Duty to Cooperate**

5.1 Section 110 of the Localism Act sets out the duty to cooperate, this applies to all local planning authorities and a number of other bodies. Paragraphs 178 to 181 of the National Planning Policy Framework provide guidance on planning strategically across local boundaries and highlight the importance of joint working to meet requirements that cannot be wholly met within a single local planning area through joint working, policies and plans. The Duty to Cooperate covers a number of public bodies in addition to neighbouring authorities. These bodies are required to cooperate with councils on issues of common concern to develop sound plans.

5.2 The council has proactively sought to have discussions with relevant organisations at appropriate stages of the development of the Plan. A list of the meetings held and the matters discussed at those meetings is included in the council's Duty to Cooperate Statement.

PPCSRLP10220/V1



**Appendix 1: Local Plan Consultees**

## Appendix 1- Local Plan Consultees

The Town and Country Planning (Local Development) (England) Regulations 2012 (Reg 18) require us to consult:

1. Such of the specific bodies as we consider may have an interest in the subject of the proposed document;
2. Such of the general consultation bodies as we consider appropriate and
3. Such residents or other persons carrying on business in the area from which we consider it appropriate to invite representations.

### Specific Consultation Bodies

A relevant authority any part of whose area is in or adjoins Shepway, namely:

Kent County Council  
Kent District or Borough Councils  
Parish and Town Councils  
Neighbouring County Councils  
Neighbouring Unitary Authorities  
Neighbouring London Boroughs  
Neighbouring Districts or Boroughs  
Neighbouring Parish/Town Councils  
Police Authorities  
The Coal Authority  
The Environment Agency  
English Heritage  
Natural England  
Network Rail Infrastructure Limited (company number 2904587)  
The Highways Agency  
Any person to whom the electronic communication code applies (under section 106(3)(a) of the Communications Act 2003)  
Any person who owns or controls electronic communications apparatus in Shepway  
Any of the following exercising functions in Shepway:  
A Primary Care Trust established under section 18 of the NHS Act 2006 or continued in existence by virtue of that section;  
A person to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989;  
A person to whom a licence has been granted under section 7(2) of the Gas Act 1986;  
Sewerage undertakers and  
Water undertakers  
The Homes and Communities agency

### **General Consultees**

Voluntary bodies some or all of whose activities benefit any part of Shepway  
Bodies which represent the interests of different racial, ethnic or national groups in Shepway

Bodies which represent the interests of different religious groups in Shepway

Bodies which represent the interests of disabled persons in Shepway

Bodies which represent the interests of persons carrying on business in Shepway

All other residents, business owners and other stakeholders who have either previously responded to a Local Plan consultation or asked to be notified of future Local Plan consultations.

## **Appendix 2: Local Libraries and Opening Hours**



## **Appendix 2 - Document Viewing Locations**

Planning Policy documents that are out for public consultation will be available to view throughout the consultation period at the locations listed below:

### **Folkestone and Hythe District Council**

**Civic Centre Offices, Castle Hill Avenue, Folkestone, CT20 2QY**

9.00am – 5.00pm (Monday, Tuesday, Thursday, Friday)

9.30am – 5.00pm (Wednesday)

(Saturday and Sunday – Closed)

### **Cheriton Library Opening Hours**

**64 Cheriton High Street, Folkestone, CT20 1HD**

9.00am – 1.00pm, 2.00pm – 5.00pm (Monday, Thursday)

9.00am – 1.00pm (Wednesday)

10.00am – 1.00pm, 2.00pm – 5.00pm (Friday)

10.00am – 2.00pm (Saturday)

(Tuesday and Sunday – Closed)

### **Folkestone Library Opening Hours**

**2 Grace Hill, Folkestone, CT20 1HD**

9.30am – 5.00pm (Monday, Tuesday, Thursday, Friday)

09.30am – 4.30pm (Saturday)

10.00am – 4.00pm (Sunday)

(Tuesday – Closed)

### **Hythe Library Opening Hours**

**1 Stade Street, Hythe, CT21 6BQ**

9.30am – 5.00pm (Tuesday, Wednesday, Thursday, Friday)

9.30am – 4.30pm (Saturday)

(Monday and Sunday – Closed)

### **Lydd Library Opening Hours**

**Skinner Road, Lydd, TN29 9HN**

11.00am - 4.00pm (Monday, Tuesday, Thursday)

Midday – 4.00pm (Friday)

9.00am – 1.00pm (Saturday)  
(Wednesday and Sunday – Closed)

## **Lyminge Library Opening Hours**

**Station Road, Lyminge, CT18 8HS**

10.00am – 2.00pm (Monday, Wednesday, Friday)

Midday – 5.00pm (Tuesday)

10.00am – 5.00pm (Thursday)

9.00am – 1.00pm (Saturday)

(Sunday – Closed)

## **New Romney Library Opening Hours**

**82 High Street, New Romney, TN28 8AU**

9.00am – 2.00pm (Monday, Friday)

1.00pm – 5.00pm (Tuesday)

9.00am – 1.00pm (Wednesday, Saturday)

10.00am – 4.00pm (Thursday)

(Sunday – Closed)

## **Sandgate Library Opening Hours**

**Sandgate High Street, Sandgate, CT20 3RR**

9.30am – 1.00pm (Monday, Friday, Saturday)

9.30am – 5.00pm (Tuesday, Thursday)

(Wednesday and Sunday – Closed)

## **Wood Avenue Library Opening Hours**

**Wood Avenue, Folkestone, CT19 6HS**

10.00am – 1.00pm, 2.00pm – 4.30pm (Monday, Thursday, Friday)

9.30am – 1.00pm (Wednesday)

10.00am – 1.00pm (Saturday)

(Tuesday and Sunday – Closed)

**Appendix 3 (a):  
Summary of Representations Received to Regulation 18 Core  
Strategy Review Preferred Options Consultation Document**



---

# FOLKESTONE & HYTHE DISTRICT CORE STRATEGY REVIEW REGULATION 18 DRAFT

---

## Summary of Consultation Comments

JULY 17, 2018

## Contents

<b>1. Introduction.....</b>	<b>3</b>
Breakdown of comments by section .....	3
Breakdown of comments by policy.....	4
Comments on accompanying documents.....	5
<b>2. Comments on the Plan as a Whole .....</b>	<b>6</b>
<b>3. Section 1.1: About the Core Strategy.....</b>	<b>6</b>
<b>4. Section 1.2: About Folkestone &amp; Hythe .....</b>	<b>7</b>
<b>5. Section 2.1: District Development Challenges and Potential .....</b>	<b>8</b>
<b>6. Section 2.2: Strategic Needs for Sustainable Development .....</b>	<b>9</b>
Policy DSD: Delivering Sustainable Development.....	9
<b>7. Section 3.1: District Planning Aims.....</b>	<b>10</b>
<b>8. Section 3.2: Vision for Folkestone &amp; Hythe District .....</b>	<b>10</b>
<b>9. Section 4.1: District Spatial Strategy .....</b>	<b>12</b>
Policy SS1: District Spatial Strategy.....	13
<b>10. Section 4.2: Housing and the Economy Growth Strategy .....</b>	<b>14</b>
Policy SS2: Housing and the Economy Growth Strategy .....	14
<b>11. Section 4.3: Place Shaping and Sustainable Settlements Strategy.....</b>	<b>15</b>
Policy SS3: Place-Shaping and Sustainable Settlements Strategy.....	16
<b>12. Section 4.4: Priority Centres of Activity Strategy .....</b>	<b>16</b>
Policy SS4: Priority Centres of Activity Strategy.....	17
<b>13. Section 4.5: District Infrastructure Planning Strategy .....</b>	<b>17</b>
Policy SS5: District Infrastructure Planning .....	18
<b>14. Section 4.6: Strategic Allocations .....</b>	<b>18</b>
Policy SS6: New Garden Settlement – Development Requirements.....	20
Policy SS7: New Garden Settlement – Place Shaping Principles .....	22
Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles.....	24
Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management.....	25
Policy SS10: Spatial Strategy for Folkestone Seafront.....	27
Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone.....	28
<b>15. Section 5.1: Core Policies for Planning .....</b>	<b>30</b>
Policy CSD1: Balanced Neighbourhoods.....	30
Policy CSD2: District Residential Needs .....	31
Policy CSD3: Rural and Tourism Development .....	31
Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation.....	32
Policy CSD5: Water and Coastal Environmental Management .....	32
<b>16. Section 5.2: Areas of Strategic Change .....</b>	<b>32</b>
Policy CSD6: Central Folkestone Strategy.....	33
Policy CSD7: Hythe Strategy .....	34
Policy CSD8: New Romney Strategy.....	34
Policy CSD9: Sellindge Strategy .....	34

<b>17. Section 5.3: Implementation.....</b>	<b>37</b>
<b>18. Appendix 1: Monitoring and Risk .....</b>	<b>38</b>
<b>19. Appendix 2: Glossary of Terms and Technical Studies .....</b>	<b>38</b>
<b>20. Core Strategy Review – Sustainability Appraisal .....</b>	<b>39</b>
<b>21. Core Strategy Review – Habitats Regulations Assessment .....</b>	<b>39</b>

## 1. Introduction

- 1.1. The Folkestone & Hythe District Core Strategy Review Regulation 18 Version was published for consultation between **29 March** and **18 May 2018**.<sup>1</sup>

### Breakdown of comments by section

- 1.2. A total of **746 comments** were made to the Core Strategy Review (including Appendices) from 109 individuals and organisations. The representations were broken down by section as shown in Table 1.

<b>Section</b>		<b>Number of comments</b>
	<b>Comments on the plan as a whole</b>	1
<b>1</b>	<b>Introduction</b>	
1.1	About the Core Strategy	39
1.2	About Folkestone and Hythe	46
<b>2</b>	<b>Strategic Issues</b>	
2.1	District Development Challenges and Potential	69
2.2	Strategic Needs for Sustainable Development	29
<b>3</b>	<b>Aims and Vision for Folkestone &amp; Hythe</b>	
3.1	District Planning Aims	26
3.2	Vision for Folkestone & Hythe	31
<b>4</b>	<b>The Spatial Strategy for Folkestone &amp; Hythe</b>	
4.1	District Spatial Strategy	54
4.2	Housing and the Economy Growth Strategy	23
4.3	Place Shaping and Sustainable Settlements Strategy	20
4.4	Priority Centres of Activity Strategy	17
4.5	District Infrastructure Planning Strategy	23
4.6	Strategic Allocations	196
<b>5</b>	<b>Core Strategy Delivery</b>	
5.1	Core Policies for Planning	62
5.2	Areas of Strategic Change	103
5.3	Implementation	2
<b>Appendices</b>		
Appendix 1: Monitoring and Risk		3

<sup>1</sup> After the consultation opened, on 1 April 2018, the local planning authority changed its name from Shepway District Council to Folkestone & Hythe District Council.

<b>Section</b>	<b>Number of comments</b>
Appendix 2: Glossary of Terms and Technical Studies	2
<b>Total number of comments</b>	<b>746</b>

### **Breakdown of comments by policy**

- 1.3. Policies for the new garden settlement (SS6-SS9) received the most responses (105 in total) along with Policy CSD9: Sellindge Strategy (27 comments).
- 1.4. Numbers of comments received against each policy are set out in Table 2. (This table does not include numbers of comments made against the supporting text of the policies; these are detailed in the sections that follow.)

<b>Title</b>	<b>Number of comments</b>
Policy DSD: Delivering Sustainable Development	7
Policy SS1: District Spatial Strategy	13
Policy SS2: Housing and the Economy Growth Strategy	11
Policy SS3: Place-Shaping and Sustainable Settlements Strategy	8
Policy SS4: Priority Centres of Activity Strategy	6
Policy SS5: District Infrastructure Planning	8
Policy SS6: New Garden Settlement – Development Requirements	48
Policy SS7: New Garden Settlement – Place-Shaping Principles	19
Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles	18
Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management	20
Policy SS10: Spatial Strategy for Folkestone Seafront	8
Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone	7
Policy CSD1: Balanced Neighbourhoods	10
Policy CSD2: District Residential Needs	5
Policy CSD3: Rural and Tourism Development	1
Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation	6
Policy CSD5: Water and Coastal Environmental Management	3
Policy CSD6: Central Folkestone Strategy	4
Policy CSD7: Hythe Strategy	4



Policy CSD8: New Romney Strategy	8
Policy CSD9: Sellindge Strategy	27

### Comments on accompanying documents

- 1.5. In addition to the comments on the Core Strategy Review itself, **eight comments** were received on the accompanying documents, as shown in Table 3.

<b>Title</b>	<b>Number of comments</b>
Core Strategy Review Sustainability Appraisal	6
Core Strategy Review Habitats Regulations Assessment	2
<b>Total number of comments</b>	<b>8</b>

## 2. Comments on the Plan as a Whole

- 2.1. One comment was received against the plan as a whole. This states that the National Grid has reviewed the plan and has no comments to make.

### Part 1 – Introduction

## 3. Section 1.1: About the Core Strategy

- 3.1. 39 representations were received relating to Section 1.1. These raise the following issues:
- Keen to ensure that the historic environment is taken into account (Historic England);
  - Kent County Council supports the council's growth ambitions and supported its expression of interest for the locally-led garden villages, towns and cities prospectus for Otterpool Park;
  - Concerned that the Core Strategy Review does not contain a policy for London Ashford Airport (London Ashford Airport);
  - Canterbury Diocese has a key role to play in the formation of communities and is keen to work with the council;
  - A single local plan document would be clearer and more consistent for the development industry;
  - The relationship between the Places and Policies Local Plan and Core Strategy Review is unclear and the production of the plans is out of sequence;
  - The council should undertake a complete review of the Core Strategy rather than a partial review;
  - The vision for the district is not ambitious enough;
  - The evidence base is incomplete and needs to be updated;
  - The housing market area should include Ashford;
  - Lack of justification for the increase in housing – the council should challenge government requirements;
  - Empty buildings should be taken into account;
  - More truly affordable homes are needed;
  - Community Infrastructure Levy (CIL) should be payable over the whole district;
  - Support amendment to exclude the garden settlement from the application of CIL (Quod on behalf of landowners);
  - Object to the despoliation of the Area of Outstanding Natural Beauty (AONB), destruction of wildlife, increased light pollution, disruption due to building works, impacts on property values, impacts on mental health, increased crime and loss of community cohesion;
  - Publicity for the plan has been poor and the consultation portal is inadequate; residents cannot respond to the revised National Planning Policy Framework and Core Strategy Review at the same time;
  - Proposals in the Core Strategy Review are unsustainable, undeliverable, unpopular and divisive;
  - Houses will only be for out-of-town buyers and second-home owners; and
  - Infrastructure cannot cope (water, roads and health infrastructure).

#### 4. Section 1.2: About Folkestone & Hythe

4.1. 46 representations were received relating to Section 1.2.

4.2. 41 representations were received relating to the text. These raise the following issues:

- There is no mention of the district's historic defensive role over centuries, including at Seabrook and Shorncliffe;
- The Royal Military Canal is under threat of development;
- Cultural heritage is a strength and should be recognised in Table 1.1: Folkestone;
- The plan does nothing to address deprivation in inner and north Folkestone;
- The creative industries and Folkestone Triennial benefit incomers rather than residents;
- The constraints in Table 1.3: Romney Marsh are 'strengths' not 'weaknesses', as they inhibit development;
- Romney Marsh needs its own tourism strategy;
- Strengths of Romney Marsh include agricultural industry, tourism and balanced towns and villages; weaknesses include housing inappropriate for local needs and isolated developments;
- Flood risk is not limited to coastal flooding – fluvial flooding is also a risk;
- Local roads are inadequate, particularly the A259, and access to London Ashford Airport is poor;
- There should be a specific policy to support the expansion of London Ashford Airport as an opportunity location to build on the district's economic strengths;
- The 'weaknesses' of the North Downs (Table 1.4: North Downs Area) help to preserve its 'strengths';
- The potential despoliation of the AONB is the reason planning inspectors have refused development at Lympne;
- A good, integrated public transport system needs to link to Ashford railway station to give access to the high speed railway service;
- Water, sewerage, broadband and power infrastructure is poor; and
- The high speed route is nearing capacity and any additional stops would add to the journey time for Folkestone and Dover residents.

4.3. An additional five representations put forward site submissions:

- Booker Wholesale, Park Farm Industrial Estate, Folkestone;
- Three Acre Estate and Five Acre Estate, Park Farm Road, Folkestone (two sites);
- Land North of Cockreed Lane, New Romney – states that this represents a sustainable location and should be included as part of Policy CSD8;
- The Piggery, Ashford Road, Sellindge<sup>2</sup>; and
- Land adjoining Etchinghill Nursery, Etchinghill.

---

<sup>2</sup> Part of area allocated in Regulation 19 Places and Policies Local Plan

## Part 2 – Strategic Issues

### 5. Section 2.1: District Development Challenges and Potential

5.1. 69 representations were received relating to Section 2.1. These raise the following issues:

- There is implacable resistance to house building on anything other than a very modest local scale;
- The council should be spending its limited funds on deprived communities and not engaging in property development;
- The growth strategy is inconsistent with the district's constraints;
- The figures for housing growth need timescales to be meaningful;
- The assumption that the district's spatial strategy should be underpinned by a garden town requires further testing;
- The M20 is already at capacity and the road network cannot cope with the extra traffic generated by 10,000 new households at Otterpool Park;
- B2068 Stone Street to Canterbury will assume greater importance with Otterpool Park;
- Another station at Westenhanger will add to the journey times for Folkestone and Dover residents;
- The benefits of high speed rail are unquantified and a stop at Westenhanger is not guaranteed;
- The area is one of the most water-stressed in the UK;
- From the point of view of water efficiency, the whole of the south east of England is classified as being of "serious" water stress (Environment Agency);
- The water consumption target of 90 litres per person per day is unrealistic when average consumption is currently around 155 litres;
- The Environment Agency's revised flood zones need to be reflected in the plan;
- Development is to serve people migrating from London;
- Infrastructure is inadequate (roads, public transport, healthcare, retail, education and social facilities);
- The solution to 'Operation Stack' may involve additional infrastructure in the district;
- Transport connections need to identify Folkestone West railway station;
- The Folkestone Seafront development should incorporate council-owned car parks to create sufficient car parking;
- Development should be locally-led, with Section 106 requirements for local employment and skills training, with a focus on young people;
- The claim that new house-building brings employment is a fiction;
- The district needs a vibrant popular youth culture, music scene and night-time economy if younger people and cultural creators are to be attracted. The council must provide reasons for generations to stay and build lives in the district;
- The council should encourage higher education institutions;
- More community events, sports, leisure and social activities are needed to bring different generations and people of different backgrounds together; and

- Figures for growth in Canterbury need amending (Canterbury City Council).

## 6. Section 2.2: Strategic Needs for Sustainable Development

6.1. 29 representations were received relating to Section 2.2 (22 comments to the text and seven comments to Policy DSD).

6.2. Comments on the text raise the following issues:

- Welcome reference to improving educational attainment (Education and Skills Funding Agency);
- Further education is under-supported;
- Economic and social development have to run together to be sustainable;
- The arts must coexist alongside social and leisure facilities, music and late night culture. There need to be reasons for the current and next generation to stay in the area;
- Sustainable development needs the involvement of the community. Investment should be in people as well as buildings;
- More should be made of tourism, working with local trusts, amenity and history societies;
- Heritage assets are undervalued;
- The provision of healthcare is a major concern and the population increase would place overwhelming demands on services;
- Otterpool Park is not needed to meet local housing needs; and
- Affordable housing contributions should be raised to 30 to 50 per cent and not be subject to viability considerations.

### Policy DSD: Delivering Sustainable Development

6.3. Seven representations were received relating to Policy DSD. These raise the following issues:

- The Education and Skills Funding Agency recommends the approach of the London Borough of Ealing in planning for school expansions and new sites, and providing development management policies for schools;
- Support the commitment to collaborate through the Duty to Cooperate (Dover District Council);
- The policy should be rewritten to include the transparent and full involvement of local communities;
- The policy should prevent occupation of developments until the required infrastructure is in place;
- The term “sustainable” needs to be defined and reference to “out-of-date” policies should be replaced by “superseded by national policy” (CPRE Shepway);
- It is not clear how proposals will be assessed to ensure that they improve “the economic, social and environmental conditions in the area”; and
- The plan’s policies will destroy social infrastructure and the natural environment.

## **Part 3 – Aims and Vision for Folkestone & Hythe District**

### **7. Section 3.1: District Planning Aims**

7.1. 26 representations were received relating to Section 3.1. These raise the following issues:

- There is no evidence to support the sustainability of the aspirations or to demonstrate that the challenges will be met;
- Documents do not cover transport, roads and parking;
- Concerns regarding the aim to provide capacity for housing beyond the plan period (Kent Downs AONB Unit);
- The aim to provide innovative and distinctive architecture has not been met at Shorncliffe, Princes Parade and Folkestone Seafront;
- Support for the cultural and creative aims - recommend engagement with the trust should proposals for performing arts facilities come forward (Theatres Trust);
- Add the aim to increase prosperity by capitalising on the district's heritage assets;
- Existing popular music culture must be respected alongside other cultural offerings as it attracts all ages and classes, with support for a vibrant social scene and night-time economy;
- Historic venues (Leas Pavilion and Dance Easy) and sites (Royal Military Canal and Shorncliffe Garrison) are not being protected;
- The term "viable" needs to be explained or removed from paragraph 3.5(1) as financial viability can be manipulated (Theatres Trust);
- The aim should be to "conserve and enhance" not "manage" the AONB (Kent Downs AONB Unit);
- Otterpool Park and Folkestone town centre should be used together to improve tertiary education facilities (Go Folkestone Action Group);
- The Otterpool Park proposals are far too extensive to be sustainable – smaller scale, truly affordable housing is needed to suit the rural character of the North Downs;
- Healthcare facilities are insufficient to serve Otterpool Park;
- The Royal Victoria Hospital site should be used for elderly people (Go Folkestone Action Group); and
- A policy is needed for London Ashford Airport (London Ashford Airport).

### **8. Section 3.2: Vision for Folkestone & Hythe District**

8.1. 31 representations were received relating to Section 3.2. These raise the following issues:

- The section lacks substance on delivery and is based on aspirations (e.g. high speed railway serving Westenhanger);
- Healthcare facilities are inadequate;
- Support the vision for Folkestone & Hythe, including a new garden settlement (Quod on behalf of landowners);
- Otterpool Park will not address the lack of affordable homes locally;

- The garden town would not just be visible from the North Downs ridge but from the entire escarpment, much of which has public access (Kent Downs AONB Unit);
- The garden town would pull the population centre away from Folkestone leaving the central area deprived;
- There is no environmental capacity for the garden town;
- Lympne will not be able to maintain its distinct character - proposed mitigation is wholly inadequate;
- Jobs growth will not match population growth in the garden town;
- The garden town will be developer-led rather than community-led;
- Welcome the aspiration for water neutrality, but this needs to be applied at a large scale rather than for individual homes. New water consumption needs to be balanced by reductions elsewhere (Environment Agency);
- It will be difficult to achieve water neutrality; development should aim to be highly water efficient with an aspiration for water neutrality (Quod on behalf of landowners);
- Strongly object to proposals for housing and sports facilities adjacent to the Royal Military Canal, Hythe<sup>3</sup> (Historic England);
- Too much development in Hythe will detract from the vision; and
- Hawkinge is a town not a village and it doesn't blend into the landscape as is claimed.

---

<sup>3</sup> An allocation in the Places and Policies Local Plan, Policy UA18.

## Part 4 – The Spatial Strategy for Folkestone & Hythe District

### 9. Section 4.1: District Spatial Strategy

9.1. 54 representations were received relating to Section 4.1 (41 comments to the supporting text and 13 comments to policy SS1).

9.2. Comments on the supporting text raise the following issues:

- The appeal of the district will be lost when villages around the new town merge with Otterpool, losing their identity;
- The development of Otterpool Park has nothing to do with meeting local need and everything to do with creating a commuter town. Building housing promotes immigration which creates problems;
- It is not clear how building a garden settlement will promote social mobility;
- Proper evidence is needed of what housing is required, and where, to avoid creating misplaced communities;
- The remaining coastline should be preserved;
- Could further education provision be used to address the balance between the older and younger population?;
- Figures for housing completions and housing targets are confusing;
- The housing targets are nearly double those of the previous Core Strategy and more than the government requires;
- A legitimate case could be made for the district not to meet its housing need (Kent Downs AONB Unit);
- Object to unrealistic and unsustainable housing targets (CPRE Shepway);
- It is extraordinary that the Strategic Housing Market Assessment does not include Ashford;
- Research is self-serving, unconvincing and incomplete;
- Targets are based on assumptions about in-migration from London which may or may not continue;
- Concern that the plan proposes housing delivery beyond the plan period – there is no justification for this (Kent Downs AONB Unit);
- The council will need to fully consider its housing need when the standard methodology and revised NPPF are formally published. This will likely be supported by new household projections scheduled for release in September 2018 (Gladman Developments Ltd.);
- The increase in housing growth will place significant additional pressure on education facilities – the plan will need to meet infrastructure requirements (Education and Skills Funding Agency);
- Categorising employment as “supporting infrastructure” betrays a “housing first” attitude;
- There is not enough detail about measures to increase employment;
- The town centre needs to be developed to provide opportunities for the daytime and night-time economies;
- An ambitious strategy is needed to improve deprived areas and develop brownfield sites;
- The council proposes to pursue a nuclear waste facility on Romney Marsh against local people’s wishes – this is a major strategic issue and should be subject to consultation;
- The council needs to be open about how the water supply will be dealt with;



- Support the intention that development elsewhere in the AONB will be limited, but this should be explicitly set out (Kent Downs AONB Unit);
- The area between Folkestone and Ashford should not be allowed to join up;
- The plan should be clear and consistent about what is proposed for the rest of the North Downs and AONB;
- If a new railway station is built, Folkestone will be more than one hour from central London;
- Sustainable construction techniques should not only be applied in the Urban Area; and
- The plan should recognise the scope of London Ashford Airport to expand beyond the current capacity, within the plan period.

### **Policy SS1: District Spatial Strategy**

9.3. 13 representations were received relating to Policy SS1. These raise the following issues:

- Evidence suggests that there are significant upwards pressures on housing need which the plan will need to address (The Crown Estate);
- The principle of the creation of a garden settlement is supported (The Aspinall Foundation);
- Support the spatial strategy and the focus on Folkestone Seafront (The Trustees of Viscount Folkestone);
- The spatial strategy based on a new town and the expansion of Sellindge is not supported (Kent Downs AONB Unit);
- There was no meaningful consultation with local residents before the garden town bid was submitted;
- There is no genuine local consent for a garden town; design parameters and infrastructure will be watered down; targets for housing delivery will not be met due to lack of capacity in the housebuilding industry (CPRE Shepway);
- The Kent Downs and Romney Marsh areas are unique and can easily be overdeveloped and spoiled with traffic and pollution;
- The development of a garden town will starve Folkestone of retail and business trade;
- Object to failure to include provision for housing in North Downs rural settlements outside Sellindge and Otterpool (E. Charlier and Sons Ltd.);
- The plan should focus on the harder areas to resolve within Folkestone east and north where the greatest benefits will be found;
- London Ashford Airport should be identified within the policy (London Ashford Airport); and
- References in the policy to “new development” and “commercial development” are too general (CPIII Shopping Folkestone S.A.R.L.).

9.4. Of these 13 comments, five comments promote the development of sites and areas:

- Booker Wholesale, Park Farm Industrial Estate, Folkestone - Park Farm Industrial Estate is changing in nature and appropriate development should be directed there;
- Land north of Aldington Road (zoo car park);

- Land adjoining Etchinghill Nursery, Etchinghill;
- Land at Brookland can assist in meeting development needs; and
- London Ashford Airport.

## 10. Section 4.2: Housing and the Economy Growth Strategy

10.1. 23 representations were received relating to Section 4.2 (12 comments to the supporting text and 11 comments to policy SS2).

10.2. Comments on the supporting text raise the following issues:

- Support the housing provision set out in Table 4.2 (Quod on behalf of landowners);
- There are so many houses being built in and around Folkestone and Hythe – we do not need any more;
- There is a lack of credibility over the housing figures – Otterpool was first planned for 12,000 homes, then 10,000, now 5,500 up to 2036/37;
- The figure of 5,500 new homes for the garden settlement provides the minimum that could be expected to be delivered from the development (Quod on behalf of landowners);
- The priority should be to create jobs for existing residents rather than built houses for migrants;
- Housing does not contribute to employment, other than through relatively few construction jobs;
- Without a policy to support London Ashford Airport the plan will not be effective in delivering economic growth in an area;
- There is no strong evidence on the drawbacks of existing employment allocations – this risks losing existing employment land to speculative mixed-use developments;
- The masterplan should be informed by the Employment Opportunities Study rather than be required to reflect it (Quod on behalf of landowners);
- The plan focuses on long-term delivery only, through a garden town. This is an excessive spatial focus given uncertainty over the timescale for completions – the plan should look at short-term delivery; and
- A further 900 homes should be delivered in the North Downs area to ensure that housing needs are met while the difficult task of delivering the garden settlement is achieved.

## Policy SS2: Housing and the Economy Growth Strategy

10.3. 11 representations were received relating to Policy SS2. These raise the following issues:

- The intention to meet the locally identified housing need of 633 dwellings a year on average is supported (The Aspinall Foundation);
- Support the recognition of the garden settlement as an important element of housing provision (Quod on behalf of landowners);
- The plan will need to demonstrate that it is providing a wide range of sites in a wide range of locations to encourage the widest possible range of housebuilders (Gladman Developments Ltd.);

- The plan needs to include figures for the provision of floorspace for retail and other main town centre uses (CCPIII Shopping Folkestone S.A.R.L.);
- Figures for housing need are not substantiated by evidence of employment opportunities; provision for community facilities is omitted;
- Park Farm Industrial Estate is changing in nature, and this should be reflected in the strategic policy to ensure that previously developed land is utilised;
- The credibility of the plan has been undermined by the decision to promote Otterpool Park before the Core Strategy Review has been completed;
- Concerns over the proposed housing need in view of changes to the government's methodology and spatial implications for the North Downs area (Kent Downs AONB Unit);
- The varying figures for housing need are inconsistent and lack credibility; and
- It is essential that proper consideration is given to water, drainage, schools, medical facilities and roads. Affordable housing should be provided – agreements are often made but not kept. The Kent Downs and Romney Marsh areas are unique and can easily be overdeveloped.

## **11. Section 4.3: Place Shaping and Sustainable Settlements Strategy**

11.1. 20 representations were received relating to Section 4.3 (12 comments to the supporting text and eight comments to policy SS3).

11.2. Comments on the supporting text raise the following issues:

- It is not the case that there is spare capacity in existing infrastructure;
- Text about rural and primary villages is too open-ended and lacks clarity; it seems to indicate that “piecemeal” development will continue regardless of “strategic” development at Otterpool;
- Object to the assertion that the area of the proposed Otterpool development is lower quality than other parts of the region;
- The text needs to make it clear that a sequential approach will be undertaken to ensure that sites at lowest risk are considered first (Environment Agency);
- Paragraphs relating to the sequential approach (paragraph 4.73) and strategic needs and flood risk (paragraph 4.75) should be deleted as they provide get-outs for inappropriate development;
- Tidal flooding is not the only flood risk;
- Reference to the Water Resources Management Plan needs to be updated (Kent County Council);
- The plan should refer to the need to follow the Kent Downs AONB Management Plan and associated Design Guidance (Kent Downs AONB Unit);
- Safeguards are needed over and above planning controls (such as community ownership) to ensure that the highest quality is achieved (CPRE Shepway);
- Welcome the aim to achieve water-neutral development, but this needs to be applied at the large-scale and is not something that can be achieved at

the scale of an individual self-build or custom-build home (Environment Agency); and

- Achieving carbon and water neutrality is challenging. The text should be amended to refer to the aim for the garden settlement to achieve the highest possible standards of energy and water efficiency with an overall aspiration towards carbon and water neutrality (Quod on behalf of landowners).

### **Policy SS3: Place-Shaping and Sustainable Settlements Strategy**

11.3. Eight representations were received relating to Policy SS3. These raise the following issues:

- The principle of creating a garden settlement is fully supported (The Aspinall Foundation);
- Support reference to the garden settlement within the policy (Quod on behalf of landowners);
- The policy to create a garden settlement is noted (Diocese of Canterbury);
- It is not clear whether the policy applies to cultural uses – it should be amended to read “community, cultural, voluntary of social facilities” (Theatres Trust);
- All flood risk criteria should apply (bullet points (c) (i), (ii) and (iii)) (CPRE Shepway);
- Historic features of conservation interest have not been respected at Shorncliffe Garrison and the Royal Military Canal;
- There should be some form of continuous assessment between the local planning authority and developer to see when remedial action is needed to address the impacts of development; and
- The development of previously developed land is likely to be acceptable wherever it lies, not just within “defined settlements”.

## **12. Section 4.4: Priority Centres of Activity Strategy**

12.1. 17 representations were received relating to Section 4.4 (11 to the supporting text and six comments to policy SS4).

12.2. Comments on the supporting text raise the following issues:

- Support identification of a major employment site and town centre within the garden settlement in Table 4.4 and support identification of a proposed strategic town in Figure 4.3 (Quod on behalf of landowners);
- Reference in the text to an “over-arching approach” to town centres should be reinstated;
- A full and robust town centre assessment is needed before a policy promoting these uses in the garden settlement can be found sound. References relating to the garden town not competing with other centres are insufficient to stop significant amounts of retail floorspace coming forward in this location (CCPIII Shopping Folkestone S.A.R.L.);
- The Policies Map needs to be updated to include Primary Shopping Areas for the district’s main town centres, including Folkestone;

- Residents from the garden settlement will not shop at Folkestone, they will go to Ashford;
- The economic survival of Hythe is dependent on their being sufficient car parking space for the town centre;
- The plan does not reflect the surplus, uncertainties and lack of demand for industrial space;
- Providing more employment land will not necessarily lead to more investment or jobs;
- Concern over proposals to provide major employment sites within the new garden settlement and at Hawkinge (Kent Downs AONB Unit); and
- The provision of another railway station will diminish the advantages of High Speed 1 to Folkestone businesses.

#### **Policy SS4: Priority Centres of Activity Strategy**

12.3. Six representations were received relating to Policy SS4. These raise the following issues:

- Request that the Policies Map is updated to show the garden settlement as a Priority Centre of Activity (Quod on behalf of landowners);
- Concerns at proposals to provide major employment sites within the garden settlement and at Hawkinge (Kent Downs AONB Unit);
- The policy should state that mixed-use developments will be acceptable where they provide a net gain of suitable local job opportunities (Ravensbourne Investments Ltd.);
- The policy should state that a preference will be given to out-of-centre sites that are accessible by a range of modes of transport other than the car and include consideration of the impact on town centres (CCPIII Shopping Folkestone S.A.R.L.);
- The policy does not provide sufficient flexibility in requiring no net loss of B Class and sui generis employment uses; and
- Work is required to existing towns before a new town is constructed.

### **13. Section 4.5: District Infrastructure Planning Strategy**

13.1. 23 representations were received relating to Section 4.5 (15 to the supporting text and eight to policy SS5).

13.2. Comments on the supporting text raise the following issues:

- National policies relating to the provision of school places should be referenced (Education and Skills Funding Agency);
- The Education and Skills Funding Agency (ESFA) welcomes references to improving educational attainment and the need for development to facilitate improvements. Emerging ESFA proposals for funding schools as part of large residential developments may be relevant;
- A strategy for higher education is missing (CPRE Shepway); and
- Local demands for tertiary education should be examined – the Kent College site could be combined with provision at Otterpool (Go Folkestone Action Group).

- Following work currently being undertaken, look forward to working with the district council to secure essential highway improvements (Kent County Council);
- The omission of a policy dealing with London Ashford Airport is not justified - a policy is needed which supports the airport's continued enhancement and expansion, subject to impacts being acceptable;
- Reference to there being "no adverse environmental consequences" is too onerous – environmental impacts need to be balanced against economic growth in planning decisions;
- Infrastructure in east Folkestone is the priority, rather than Westenhanger station;
- Grave reservations about the ability of roads around the garden settlement to cope with increased traffic, particularly: heavy goods traffic; through-traffic in Sellindge; the increased draw of Westenhanger station; and routes to Hythe and the Marsh;
- Current A20 improvements in Sellindge have not included cycle paths, contrary to the encouragement in the plan for sustainable living; and
- Improvements to Folkestone's one-way system are needed that provide for more two-way traffic; railway lands near Tram Road need to be used for road-widening and car parking; support should be given to the Leas Lift (Go Folkestone Action Group).

### **Policy SS5: District Infrastructure Planning**

13.3. Eight representations were received relating to Policy SS5. These raise the following issues:

- Broadly support the policy (Education and Skills Funding Agency);
- The policy should be amended to ensure that Section 106 negotiations not only take account of viability, but also contributions through the Community Infrastructure Levy (Taylor Wimpey);
- Developments may have the capacity to bring forward new infrastructure that could work alongside existing infrastructure to improve capacity (The Trustees of Viscount Folkestone);
- The creation of new communities may involve reshaping organisations and redrawing boundaries, as well as new resources – the Diocese needs to be fully involved in these plans (Diocese of Canterbury);
- It is not clear what the needs for water, roads, highways, schools and community facilities are;
- The policy needs to be more robust and a more suitable funding model is needed as Section 106 and Community Infrastructure Levy are ineffective;
- There are significant problems with the provision of healthcare; and
- The Infrastructure Delivery Plan should be published.

## **14. Section 4.6: Strategic Allocations**

14.1. 196 representations were received relating to Section 4.6 (76 comments to the supporting text and 120 comments to policies SS6-SS11).

14.2. 19 comments on the general supporting text raise the following issues:

### New Garden Settlement

- The site at Otterpool will destroy local communities and continue to develop the area between Folkestone and Ashford;
- The scale of development is unsustainable given constraints and the impacts of growth in Ashford;
- Proposals do not show the context of the settlement regarding the district or wider region;
- Focussing on the garden town is a long-term strategy only; the plan needs to be redrafted to focus on short-term delivery;
- The proposals leave no buffer between the homes in Barrow Hill and the proposed housing development – a clear boundary is needed;
- Development west of Otterpool Lane is too far away from the proposed new town high street and transport/community hub;
- The development will have negative impacts on residents in Barrow Hill through increase traffic;
- The footpath under the Grove Bridge should not be removed just to allow better flow of traffic; and
- Land north of Westenhanger and north west and east of junction 11 should be included – the high street and transport hub would then be in the middle of the new town.

### Growth Options Study

- The Growth Options Study is a reiteration of the strategic corridor approach that was soundly rejected by the Inspector at the last Core Strategy process;
- The Growth Options Study includes assumptions that cannot be challenged until detailed plans are available – it needs to be revised;
- Strongly question the study's findings that development in the area to the east of Westenhanger is acceptable and that high density development between Stone Street and the A20 to the east of Westenhanger is justified (Kent Downs AONB Unit);
- The area identified in the Phase Two report is open farmland and cannot be described as “suitable for residential development”;
- The Phase Two report does not detail the necessary improvements to road infrastructure; and
- The Phase Two report does not define what is meant by a “critical mass” – this lends itself to high-density housing on light assumptions.

### A Charter for Otterpool Park

- It is disingenuous to state that community involvement has been encouraged from the outset;
- Stakeholder consultation did not include local residents;
- The garden town is supposed to be locally-led but less than two per cent of local residents support it (Monks Horton Parish Meeting and Sellindge and District Residents' Association); and
- The town needs to build on the existing history of the place (Historic England).

### **Policy SS6: New Garden Settlement – Development Requirements**

14.3. 13 comments were made to the supporting text to Policy SS6 and Figure 4.5: Garden Settlement North Downs – Indicative Strategy. These raise the following issues:

- A bypass is needed for Sellindge to accommodate traffic from the new town, improve movements when the M20 is closed and access land west of Harringe Lane;
- A higher percentage of self-build needs to be included; a number of self-build dwellings should be specified;
- The employment study for Otterpool Park has only recently been published;
- Paragraph 4.163 contains aspirations rather than policies;
- A new paragraph is needed to state that the delivery of school places will be managed over the course of construction to be delivered at appropriate points in line with housing (Quod on behalf of landowners);
- The following comments were made relating to Figure 4.5:
  - The notation should be amended to allow for greater flexibility in the location of the town centre (Quod on behalf of landowners);
  - The figure contains errors and needs to be aligned with the draft masterplan;
  - Concern about the use of zoo land, particularly the car park;
  - The use of grey triangles to identify heritage assets is misleading – it only identifies listed buildings, not other types of asset. The grade II listed Royal Oak public house, grade II registered Sandling Park and archaeological remains are not shown (Historic England);
  - Should show the southern entrance to the castle being reinstated and a sufficiently large undeveloped area retained between the A20 and the castle (Historic England); and
  - Currently the plan is just a number of separate housing developments around the villages of Sellindge, Lympne and Westenhanger.

14.4. 48 representations were received relating to Policy SS6. These raise the following issues:

- There has been a lack of consultation with local residents;
- The scale of development is unacceptable and would destroy the character of the area. It would not be in keeping with the Area of Outstanding Natural Beauty and would lead to the loss of agricultural land;
- The council is preparing for a new conurbation, absorbing the local villages and encroaching on Hythe, Folkestone and Saltwood;
- The development is in the wrong place – homes should be built on brownfield sites within Ashford and Folkestone;
- Large communities living close to deprived areas are more prone to antisocial behaviour and a reduced quality of life – small clusters of development would have less impact (Stowting Parish Meeting);
- The garden town is a real opportunity to create a great place to live, rather than extending the urban sprawl of Ashford or Folkestone;
- We must not build another centre of growth so close to Ashford – it will result in a built-up area from Ashford to the coast, mainly consisting of dormitory settlements for people working in London;



- To maintain Lympne as a separate, vibrant village it needs some new houses and space between Lympne and Otterpool;
- The William Harvey hospital and doctor's surgeries are already over-stretched;
- There is insufficient water, sewerage, road or primary health care infrastructure;
- There is the possibility of flooding;
- A bypass is needed for Sellindge – this would help Sellindge residents, the Otterpool development and through-traffic;
- The development will lead to increased congestion in and around Hythe – Hythe will be swamped;
- The amount of development has nearly doubled from the existing Core Strategy and is more than the government requires;
- Plans need to be rethought – no one in Sellindge, Stanford and Lympne wants the development;
- The development will put a huge strain on the water supply in what is already a water-scarce area;
- Not convinced that the aspiration of one job per dwelling will be achieved. The employment opportunities are overstated;
- Homes would not be affordable. It is a common ploy of developers to lower the number of units when permission is granted;
- The affordable housing proportion should be 30 per cent (CPRE Shepway);
- Support the policy, but amendments should be made to:
  - Identify water and carbon neutrality as an aspiration;
  - Provide greater flexibility regarding the mix of housing;
  - Provide greater flexibility in the phasing of development;
  - Provide clarity on the requirement to “meet the needs of the elderly”;
  - Provide greater flexibility regarding the provision of self-build plots;
  - Remove a fixed target for school provision with a requirement to monitor and manage provision over the course of construction and occupation of homes (Quod on behalf of landowners);
- Support the specification of anticipated requirements for new schools – it needs clear explanation how this has been calculated (Education and Skills Funding Agency);
- Insufficient attention has been given to the retail and town centre offer – it could cause significant harm to town centres in the district and beyond (CCPIII Folkestone Shopping S.A.R.L.);
- Object to the proposed allocation; however if it comes forward, it is essential that potential harm to the Area of Outstanding Natural Beauty is addressed in this policy (Kent Downs AONB Unit);
- Welcome the ambition to create a water-neutral development, but this would need to be applied at a large scale, not in the context of individual homes or even a larger new development (Environment Agency);
- Kent County Council has commented as follows:
  - The Rights of Way Improvement Plan should be referenced. This will enable joint working to deliver improvements;
  - The public right of way network can provide opportunities for leisure and recreation within the site and provide access to the wider network;
  - Support criteria related to connectivity (1(d)) and 1(e)) – good connectivity will reduce car reliance from the outset;

- Reference to “community facilities” (criterion 4(a)) is left undefined – this should include provision for the elderly, young people, faith groups, libraries, social care, etc;
- Detailed amendments are suggested to wording relating to education provision; and
- An assessment is needed to determine whether the strategic allocation would be compatible with the permitted waste recovery facility at Otterpool Quarry;
- Canterbury City Council has commented as follows:
  - Further emphasis is needed on the delivery of employment development as part of each phase;
  - Query whether any work has been done to assess the impacts on key routes to Canterbury (Stone Street and Nackington Road) which are already subject to congestion; and
  - Would support the provision of a frequent, high quality bus service between Otterpool and Canterbury connecting to the fast bus route from South Canterbury/Nackington Road to the bus station;
- The settlement will be clearly visible from the escarpment to the north and North Downs Way National Trail. There are potential impacts but also opportunities for enhancement for the Otterpool Quarry and Lympne Escarpment Sites of Special Scientific Interest. There is the opportunity for an ambitious green and blue infrastructure strategy to mitigate impacts and provide net gain. Policy wording should be strengthened to achieve biodiversity gains (Natural England);
- The second paragraph does not reference the historic environment – it should state that the town’s townscape and landscape will be informed by the historic character of the area (Historic England);
- Support the principle of a new garden settlement. A degree of flexibility is needed to enable some peripheral sites to be brought forward earlier in the plan period. The affordable housing contribution should be expressed as a target, rather than a minimum (The Aspinall Foundation);
- The requirement to make stakeholders central to the masterplanning is welcomed (Diocese of Canterbury);
- The delivery of garden settlements is incredibly challenging and will take significant time – a cautious approach is needed to delivery, given the experience of proposals in North Essex (Gladman Developments Ltd.); and
- Strategic scale development must be balanced against the delivery of a range of sites so that smaller housebuilders, as well as national operators, can work together.

### **Policy SS7: New Garden Settlement – Place Shaping Principles**

14.5. 13 comments were made to the supporting text to Policy SS7. These raise the following issues:

- Bridlepaths, footpaths and cycle paths must feature heavily in the new development and be part of phase one;
- Paragraph 4.164 fails to reference the historic environment. It would be better to also reference how other heritage assets (designated or not) can inform the character of the new settlement (Historic England);

- More landscaping is required between the current homes in Barrow Hill and the proposed new estates to ensure existing communities do not lose their identity;
- Doubt whether the new high street will be commercially viable due to lack of footfall;
- Alternatives to a high street should be considered with different layouts such as squares;
- A large town is going to have a town centre that competes with neighbouring towns – look to Marlborough and Poundbury for inspiration;
- A high speed train stopping at Westenhanger would be at the expense of commuters travelling from Folkestone;
- Kent County Council suggests amendments in relation to train operating companies; and
- There should be 40 per cent green space in the development.

14.6. 19 representations were received relating to Policy SS7. The raise the following issues:

- Lympne should not be destroyed as a separate, historic village in order to create a “vibrant new town”;
- There is a lack of clarity regarding revisions and amendments to delivery;
- To overcome traffic congestion in Sellindge, a through-road from the A20, next to Otterpool Lane should be built to access the new development west of Otterpool Lane and west of Barrow Hill. This could then come out onto Harringe Lane and then back onto the A20;
- New rights of way should be in place during the first stage of development;
- Harringe Lane would be more suited to becoming an access-only road to the residents and form part of the new bridlepath and cycle path network;
- Broadly support the policy, but suggest that the term “village” should be removed when describing neighbourhoods (Quod on behalf of landowners);
- A full assessment of the retail requirements of the garden settlement is required before any sound retail and town centre policy can be put forward (CPIII Shopping Folkestone S.A.R.L.);
- It is important that policies relating to retail provision in the new settlement are clear as to the scale and form of facilities required and that they will not be greater than required to meet the day-to-day needs of the new community;
- Criterion 1(a) should require a landscape-led approach that respects historical character;
- Westenhanger Castle should be made part of the project to complete its conservation and be an integral part of the new settlement and should be included within the allocation boundary;
- Historic England suggest amendments to paragraph (d) of SS7 in relation to archaeological and heritage assets;
- The newly discovered Roman Villa should play a major part in shaping the new town, along with the Castle at Westenhanger;
- Kent County Council suggests:
  - Additional text in relation to public rights of way within Policy SS7(1)(v). The Rights of Way Improvement Plan should be referenced;

- High quality, traffic-free walking and cycling routes should be provided within new developments that integrate with the wider transport network (Policy SS7 (6)(e));
- Amendments to Policy SS7(6)(g) in relation to train operating companies;
- Provisions on sustainable access and movement are supported;
- An assessment is needed to demonstrate whether or not the development would be compatible with waste recovery facility at Otterpool Quarry;
- Any upgrades to Westenhanger Station should not impact or degrade the existing high speed provision in Dover (Dover District Council);
- Community formation should be given more prominence to ensure the social dimension of sustainable development has as much priority as economic and environmental aims and objectives (Diocese of Canterbury);
- 40 per cent green infrastructure is missing from this document (CPRE Shepway);
- Natural England advises that the policy should include more reference to the AONB, Green Infrastructure (GI), and long-term stewardship of the GI estate; and
- Kent Downs AONB Unit advises that:
  - The policy fails to incorporate sufficient safeguards to ensure development would mitigate the impacts of the proposal on the Kent Downs AONB;
  - A requirement to improve important gateways into the new town should be included; and
  - The orientation of streets and building heights should be included within the policy to minimise any impact on the AONB.

### **Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles**

14.7. Six comments were received to the supporting text of Policy SS8. These raise the following issues:

- Correction to wording to state “serious water stress” rather than “severe” (Environment Agency);
- The environmental dimension of sustainability includes the historic environment and this should be reflected here (Historic England);
- Affinity Water South East region has neither the infrastructure nor water resources to support a new town, which would be twice the size of Hythe (Monks Horton Parish Meeting and Sellindge & District Residents’ Association);
- There is insufficient detail on water use; and
- Safeguarded minerals are not correctly identified (Kent County Council).

14.8. 18 representations were received relating to Policy SS8. These raise the following issues:

- A site-wide heat and power network has the potential to be particularly harmful to the landscape of the AONB (Kent Downs AONB Unit);

- Would like early discussion with the council and other stakeholders to address cross-boundary water supply and quality issues (Dover District Council);
- Insufficient attention has been given to the provision of retail and town centre space – this could cause significant harm to town centres within the district and beyond (CCPIII Shopping Folkestone S.A.R.L.);
- Support ambition for water efficiency and BREEAM standard for non-residential development. Welcome ambition to create a water-neutral development; however this concept should be applied at a large scale, not that of individual homes or even larger developments (Environment Agency);
- The water efficiency target is not achievable;
- The following amendments should be made:
  - The requirement to achieve BREEAM ‘Outstanding’ standard should be replaced by the requirement to achieve ‘Very good’ standard with the aim to meet ‘Excellent’ standard;
  - Water neutrality should be expressed as an “aspiration” rather than an “aim”;
  - Zero carbon standards for community buildings should be an aspiration (Quod on behalf of landowners);
- Kent County Council has commented as follows:
  - The policy refers to achieving water neutrality as an “aim” but elsewhere it is referred to as an “aspiration” – to achieve water neutrality a large proportion of the existing housing stock in the district would need to be retrofitted;
  - The importance of maintaining the “integrity of water quality” should be referred to in the policy, as well as the text;
  - The requirement for non-residential buildings to achieve BREEAM “outstanding” standard will lead to large increase in the build costs of schools, which must be met by the development;
  - In relation to a minerals assessment, particular reference should be made to Policy DM7 of the Kent Minerals and Waste Local Plan 2013-30; and
  - Consideration should be given to the impact of the development on non-motorised users along rural lanes, as these routes provide connections for horse riders and cyclists travelling between public rights of way;
- The formation of communities could be given more prominence – this should be given as much priority as economic and environmental aims and objectives (Diocese of Canterbury); and
- Support the aim for construction to be soil neutral, but some movement of soils may make sense (CPRE Shepway).

### **Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management**

14.9. 13 representations were received to the supporting text of Policy SS9. These raise the following issues:

- Ashford borough residents affected by the development have not been consulted;

- Education contributions by developers need to be sufficient to deliver school places if the plan is to be deliverable;
- Kent County Council has commented as follows:
  - The text will need updating following the announcement on the Housing Infrastructure Fund;
  - The text should refer to informal pedestrian and cycle pathways;
  - The achievement of water neutrality should be an aspiration rather than an aim;
  - Letter received from Kent County Council setting out its General Site Transfer Requirements;
- Large developments should not be 'zero-rated' for the Community Infrastructure Levy (CIL) – CIL should be captured alongside Section 278/Section 106 contributions;
- Support the amendment to exclude the garden settlement from CIL (Quod on behalf of landowners);
- Question why a "tariff-based approach" depends on securing Housing Infrastructure Fund monies;
- Question whether all archaeological studies have been carried out, and if new features are found (e.g. a Roman settlement) how will this affect the design of the town;
- The provision of good broadband services should be delivered, but may be costly over such a wide area; the words "where feasible" should be removed; and
- Some members of the group regard the area as Green Belt, and most believe that water supply will be a problem (Go Folkestone Action Group).

14.10.20 representations were received relating to Policy SS9. These raise the following issues:

- Strongly disagree with the strategy for housing development in rural areas, particularly in respect of Otterpool Park;
- Object that there is no mention of how infrastructure will be funded. Concern that infrastructure costs will exceed funds;
- There needs to be more joined-up thinking between organisations covering emergency services, hospitals and education;
- Nearby villages that fall within Ashford borough should also benefit from Section 106 funding, as they will be directly impacted;
- Insufficient attention has been given to retail and town-centre policies – inappropriate development could cause significant harm to town centres in the district and beyond (CCPIII Shopping Folkestone S.A.R.L.);
- Contributions and improvements should be secured towards the costs of managing increased visitor impacts on the Area of Outstanding Natural Beauty (Kent Downs AONB Unit);
- Support the emphasis on early delivery of critical infrastructure, particularly primary education, and the approach of prioritising Section 106/Section 278 agreements to secure delivery. This will need to be planned carefully to work within pooling constraints (Education and Skills Funding Agency);
- Southern Water has commented as follows:
  - The site is within Southern Water's wastewater service area network – reinforcement will be required at the "practical point of connection";

- There is no provision to support the delivery of wastewater infrastructure which is funded through mechanisms other than CIL or Section 106 agreements;
- Any upgrades to wastewater treatment works would be funded and delivered through the water industry's five yearly price review process;
- Network improvements will be provided through the new infrastructure charge but Southern Water will need to work with the site promoters to understand the development programme;
- Southern Water has limited powers to prevent connections to the sewerage network even when capacity is limited – planning policies and conditions play an important role in coordinating development and infrastructure;
- Southern Water's infrastructure crosses the site and easements will be required as well as buffers around wastewater pumping stations;
- In relation to a Community Trust, there is a need to make provision for a heritage facility, such as a museum/archive storage (Historic England);
- Kent County Council has commented as follows:
  - An assessment is needed to demonstrate whether or not the development would be compatible with the waste recovery facility at Otterpool Quarry;
  - Reference should be made to the county council's Rights of Way Improvement Plan;
  - Criterion 1(a) should include community and waste facilities;
  - Support for criterion 2(a) – this will prevent the need for retrospective installation of fibre to the cabinet;
  - Support for provision for ducting in criterion 2(d) – this will ensure that impacts on the highway are kept to a minimum as a result of maintenance and repairs;
  - In relation to Criterion 3(a) any route that is not a Public Right of Way or cycle route which is adopted highway will not be maintained by the County Council;
  - Criterion 3(b) – the strategy for stewardship could include street furniture and public art;
  - Criterion 3(b)(vi) – in some cases there may be an opportunity for surface water drainage systems to be adopted by the sewerage undertaker; and
- Social infrastructure provisions should be strengthened. The social dimension should have at least as much priority as economic and environmental objectives. The Diocese has the skills to work with the local planning authority to improve the policy and ensure delivery (Diocese of Canterbury).

### **Policy SS10: Spatial Strategy for Folkestone Seafrost**

14.11. Nine representations were received relating to the supporting text of Policy SS10. These raise the following issues:

- Renumbering policies is confusing. Policies should be reviewed where circumstances have changed;
- The policy should remain until the project is complete;

- Any development must recognise that this area has a long history as a place with a nightlife;
- Support the retention of the Harbourmaster's House and the Princess Royal. Would like to see the Fishermen's Museum continue (Go Folkestone Action Group);
- The Seafront scheme will need to complement the town centre shops; the Leas Lift is vital to connect the seafront;
- Support the statement that local partners should work together to improve connectivity between the seafront and town centre;
- Transport links in the harbour area need to be rethought; and
- The proposal to redirect the England Coastal Path along the road was rejected.

14.12. Eight representations were received relating to Policy SS10. These raise the following issues:

- Questions whether the policy is still valid;
- Support the 90 litres/person/day target for water efficiency, but reference to the Code for Sustainable Homes should be deleted (Environment Agency);
- Folkestone and Dover is the most water-stressed area of the UK;
- The policy will need to be updated given the current scheme for the seafront;
- The focus on Folkestone seafront is supported;
- Support the policy and the statement that local partners should work together to improve connectivity; and
- Renumbering the policy is ridiculous. 'Sui generis' and 'A' use classes should be removed. The policy was ignored when granting permissions.

### **Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone**

14.13. Three representations were received relating to the supporting text of Policy SS11. These raise the following issues:

- Adjustments should be made to reflect the consented scheme (removal of the provision of allotments and adjustment of green space at the stadium) (Taylor Wimpey);
- Reference to listed buildings is out-of-date, as four buildings/structures are now grade II listed (The Racquets Court, Concrete Barrack Block, Sir John Moore Library and Risborough Gates) (Taylor Wimpey); and
- Tourism could be greatly improved if the developer was encouraged to retain the last remaining stable block; unfortunately this is destined for demolition.

14.14. Seven representations were received relating to Policy SS11. These raise the following issues:

- The focus on Shorncliffe Garrison is supported;
- The policy should be updated to reflect consented development and national guidance, in particular affordable housing provision and reference to the Code for Sustainable Homes (Taylor Wimpey);



- Support the 90 litres/person/day target for water efficiency, but reference to the Code for Sustainable Homes should be deleted (Environment Agency);
- There is no mention of heritage – the site contains heritage artefacts. Reference should also be made to the Seabrook Valley;
- The National Planning Policy Framework has not been adhered to when it comes to delivering historic interpretation; and
- Renumbering the policy is ridiculous. Heritage features of the site are not being preserved or investigated properly – the policy has not safeguarded these features.

## Part 5 – Core Strategy Delivery

### 15. Section 5.1: Core Policies for Planning

15.1. 62 representations were received relating to Section 5.1. These comprise 37 comments on the supporting text and 25 comments on the policies (CSD1-5).

15.2. Comments on the supporting text raise the following issues:

- More homes should be developed in Folkestone town centre alongside new parking for residents and shoppers – the decline in shopping space needs to be managed (Go Folkestone Action Group);
- Affordable housing targets should remain at 30 per cent;
- The Royal Victoria Hospital site should be used for the elderly;
- Creating travellers' sites is concerning;
- There is a serious lack of public toilets;
- The Heritage Strategy is still in draft and the Destination Management Plan has not been adopted;
- A local list of heritage assets is needed;
- Heritage assets are not being considered positively (Royal Military Canal, Shorncliffe Garrison);
- The windmill at Stanford (Grade II\*) needs to be included on Figure 5.2;
- Assessing the suitability of future development must consider the impact on the Kent Downs (e.g. Port Lympne) (Kent Downs AONB Unit);
- Adequate parking needs to be provided for the coastal park;
- Reference to “special water scarcity status” need to be updated (Environment Agency);
- The strategy for water supply and management needs to be comprehensively reviewed and supported by detailed independent studies;
- The draft Water Resources Management Plan currently out for consultation does not cater for the housing growth proposed;
- The district falls within one of the most water-stressed areas of the UK with less fresh water per person than Morocco;
- The use of grey water can play a significant role in new developments;
- The updated Water Cycle Study is needed now;
- Welcome the aspiration for water neutrality, but this needs to be applied at a large scale rather than for individual homes. New water consumption needs to be balanced by reductions elsewhere (Environment Agency; Kent County Council); and
- Occupation of developments needs to be aligned with the delivery of the requisite sewerage infrastructure (Southern Water).

### Policy CSD1: Balanced Neighbourhoods

15.3. 10 representations were received relating to Policy CSD1. The representations raise the following issues:

- Smaller scale housing development around Lympne, Westenhanger and Sellindge is needed which suits the rural character and is truly affordable;
- The housing market area should include Ashford (CPRE Shepway);

- House-building should only be allowed where sufficient affordable housing is included;
- The proportion of affordable housing should be maintained at 30 per cent;
- On the Romney Marsh and the AONB the affordable target should be set at 30 per cent with a further 20 per cent for retirement homes;
- The requirement for a 30/70 shared equity/affordable rent-social rent split will be inappropriate for a number of allocations;
- Support the provision of 22 per cent affordable housing, subject to viability and welcome the acknowledgement that the split of tenures is a starting point (Quod on behalf of landowners);
- Support the lower threshold for affordable housing provision in the AONB (Kent Downs AONB Unit);
- There should be more one- and two-bedroom terraced, semi-detached, flats and maisonettes for first-time buyers;
- The policy does not reflect the broader range of affordable housing (starter homes, discounted market sales, shared ownership and rent-to-buy) in the consultation National Planning Policy Framework (NPPF) (Taylor Wimpey); and
- Reference to rent-to-buy should be made within the policy as well as the text (Rentplus Ltd).

### **Policy CSD2: District Residential Needs**

15.4. Five representations were received relating to Policy CSD2. The representations raised the following issues:

- The policy should be updated to reflect the broader definition of affordable housing in the draft NPPF. Requirements for housing mix and tenure should be amended to avoid unnecessary prescription. It is not clear how the policy will be monitored (Taylor Wimpey);
- The housing mix is difficult to forecast too far ahead;
- Units for older people should not be limited to the garden town and Sellindge (CPRE Shepway);
- The policy should indicate what will be done to house the older population;
- The mix at Otterpool Park will look to meet the target mix, dependent on viability and deliverability and ensuring flexibility between phases. Amendments should be made as follows:
  - The requirement for sizes of houses to be split by tenure is too prescriptive; it should be expressed as a maximum percentage of one bed dwellings and a minimum percentage of three bed dwellings;
  - The requirement for specialist units for older people should be widened to include Use Class C2, in addition to Class C3(b) (Quod on behalf of landowners);
- Rents should be capped to help people in low paid jobs; and
- An excess of new property risks creating a stagnant property market.

### **Policy CSD3: Rural and Tourism Development**

15.5. One representation was received relating to Policy CSD3. This states that the policy needs to incorporate the findings of the Heritage Strategy and Destination Management Plan.

### **Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation**

15.6. Six representations were received relating to Policy CSD4. These raise the following issues:

- Development that would involve the loss, or prejudice the use, of playing fields is strongly resisted (Sport England);
- References to encouraging healthy living and active lifestyles are welcomed and could be strengthened by referencing Sport England's Active Design Guidance;
- The focus on the natural environment and policies to protect and enhance biodiversity are welcomed (Environment Agency);
- Support the development of a robust strategy for mitigating recreational disturbance to European-designated sites (RSPB);
- The wording and principles should be strengthened to ensure that net gains in biodiversity can be achieved (Natural England); and
- The location, scale and complexity of the garden settlement means that there are significant environmental implications, but the development offers the opportunity for an ambitious blue and green infrastructure strategy for people and wildlife (Natural England).

### **Policy CSD5: Water and Coastal Environmental Management**

15.7. Three representations were received relating to Policy CSD5. These raise the following issues:

- The policy could refer to the Water Framework Directive, as is referenced in the text (Environment Agency);
- Adequate foul sewer capacity must be provided in line with development. Brownfield development must address contamination, however, this can lead to conflicts with sustainable drainage, as infiltration drainage is not always appropriate (Environment Agency); and
- The target for water consumption should be reduced to 90 litres/person/day.

## **16. Section 5.2: Areas of Strategic Change**

16.1. 103 representations were received relating to Section 5.2. These comprise 60 comments on the supporting text and 43 comments on the policies (CSD6-9).

16.2. Six comments were received on the general supporting text. These raise the following issues:

- Support for priority areas of regeneration (Table 5.1);
- Welcome references to improving educational attainment and the need for development to facilitate improvements to education (Education and Skills Funding Agency);
- The text should state that the council will support development proposals associated with the decommissioning of Dungeness 'A' (Nuclear Decommissioning Authority);

- Consents for London Ashford Airport should not be seen as a limit of future expansion, but as an opportunity for further investment in the district and to improve links between the UK and mainland Europe. Planning policy will not be effective without a policy to support this (London Ashford Airport); and
- The Sellindge Strategy must also incorporate the A20 Barrow Hill, which is over one third of the village of Sellindge.

### **Policy CSD6: Central Folkestone Strategy**

16.3. 13 comments were submitted to the supporting text to Policy CSD6. These raise the following issues:

- A university or tertiary education facility should be created, using a combination of development arc, Kent College and Otterpool Park, joined by rail links (Go Folkestone Action Group);
- The University Centre Folkestone is now the Sixth Form Centre;
- The harbour development has failed to make use of the town's coastal location to attract tourists and will harm the setting of The Leas;
- Investment in the restoration of the Leas Lift should be a priority within the first phase of the plan period rather than "over the plan period";
- While Figure 5.5 recognises the cliff as a barrier to movement in Folkestone, the road and rail system also restricts access;
- Folkestone town centre needs new buildings (including large shops and car parks) with appropriate tourist and boutique shops on the seafront and 'click and collect' and retail warehouses at Park Farm (Go Folkestone Action Group);
- Fail to see any contribution by the harbour owner to reintegrating maritime activities;
- Support improved connections to the sea and visitor attractions from the town, but these cannot be delivered by the land at Folkestone seafront alone; and
- While cycling in Folkestone is supported, there are considerable differences in level between the town and the seafront.

16.4. Four representations were received relating to Policy CSD6. These raise the following issues:

- References to meeting needs for education infrastructure are supported; the next version of the plan should include more detail. The Education and Skills Funding Agency would like to be included in discussions on potential site allocations;
- More needs to be done to provide a supportive framework for creative and digital industries (The Creative Foundation);
- Support requirement for new development to improve connectivity to and within the town centre; and
- Heritage policies are too late to avoid destruction of heritage assets.

**Policy CSD7: Hythe Strategy**

16.5. One representation was received relating to the supporting text to Policy CSD7. This raised the following:

- Problems at the A259/A261 junction will be exacerbated by additional traffic from the Martello lakes development and Otterpool Park.

16.6. Four representations were received relating to Policy CSD7. These raise the following issues:

- Welcome references to the need for development to improve education facilities. The next version of the plan should clarify requirements, sites and timescales, while retaining a degree of flexibility (Education and Skills Funding Agency);
- Welcome plans to improve bus links to railway stations, but question the deliverability of this, given that the bus company is privately owned; and
- Priorities for investment should be identified.

**Policy CSD8: New Romney Strategy**

16.7. Eight representations were received relating to Policy CSD8. These raise the following issues:

- Romney High Street is congested, schools are overcrowded and health facilities are in crisis – developers should be improving infrastructure rather than creating problems and walking away;
- Impacts on the High Street and public safety need to be seriously considered – provision of a southern by-pass road is fundamental;
- There is only one road that all residents must use to vacate the whole of Littlestone, Greatstone and Lydd-on-Sea;
- Romney Marsh should not be seen as suitable for large-scale development;
- Proposed development in Cockreed Lane, New Romney should be cancelled;
- Occupation of the development should be aligned with the delivery of sewerage infrastructure, ensure future access to infrastructure and include a buffer between housing and pumping stations (Southern Water);
- Support policy but question the need for a masterplan, given that parcels already have planning permission (Gladman Developments Ltd.); and
- Land north of Cockreed Lane should be included within the policy (Christ Church College).

**Policy CSD9: Sellindge Strategy**

16.8. 40 representations were received relating to the supporting text to Policy CSD9. These raise the following issues:

- Ashford and Canterbury hospitals will not cope with all development. Sellindge surgery cannot recruit doctors and serves ten other villages. Concern that a new health centre at Otterpool will also be for the residents of Sellindge but it is not clear when it will be built;

- Barrow Hill is a very valued part of Sellindge village, despite being severed by the motorway and railway bridges (Sellindge Parish Council);
- The description of Barrow Hill as being “severed” with a “poor sense of place” is inaccurate. Barrow Hill must have the same traffic-calming as the rest of the village;
- Existing planned development should be built before considering even more;
- Object to Rhodes House/Homelands Close development;
- The development of high grade agricultural land should be a last resort;
- Development will ruin the rural character of the village;
- Any new homes should be no more than two storeys in height;
- Future development must have the same amount of community engagement as the previous proposals did (they were supported). Community feel that the additional development is being imposed on them. The facilities and infrastructure should be provided for the additional 600 dwellings – residents should not have to travel elsewhere (Sellindge Parish Council);
- Excellent opportunity to have an all-weather footpath/cycleway to Westenhanger station;
- Improved connection to Swan Lane must be a pedestrian/cycleway, not a vehicular link (Sellindge Parish Council);
- Key time to plan a Sellindge bypass as part of the access road into Otterpool, West of Otterpool Lane and the A20, coming out west of Sellindge Church;
- With Brexit the A20 and M20 could be gridlocked with port traffic;
- Having large delivery lorries accessing the site would not be safe;
- A contraflow capability is needed during motorway incidents, maintenance and Operation Stack, to ensure that the M20 can remain operational without having to divert motorway traffic along the A20;
- Woodland planting should be used to the north boundary of Bucknell Trust land and development should only be on land between the A20 and M20 to mitigate any impacts (Sellindge Parish Council);
- The boundary should be heavily landscaped in all locations;
- Land between the M20 and fast rail link, East of Grove Bridge, Barrow Hill, also has significant fauna, flora and habitat. This must be protected (Sellindge Parish Council);
- Support for the use of new technologies to achieve low carbon and low waste with aspiration for carbon neutrality (Sellindge Parish Council);
- Picture 5.8: Sellindge Strategy should identify Places and Policies Local Plan allocations;
- The Taylor Wimpey site (The Lees) is a welcome addition to Sellindge; and
- Proposals that fail to deliver community infrastructure should be resisted (Sellindge Parish Council).

16.9. 27 representations were received relating to Policy CSD9. The representations raised the following issues:

- 600 dwellings represents a major expansion of strategic scale in the rural North Downs area within the Kent Downs AONB and would have potential

- cumulative impacts with the garden town of Otterpool (Kent Downs AONB Unit);
- The building of 1,300-1,600 homes is not sustainable;
  - The big increase in population can only lead to massively increased congestion, noise, pollution and increased consumption of natural resources;
  - The existing masterplan for Sellindge, arrived at through a democratic process, should not be overridden;
  - The northern part of this proposal has already been granted consent, without the grace to wait for this consultation to conclude;
  - Plans should not be expanded from what was originally planned (250 homes) - it will swamp the village out of all recognition;
  - Object to the allocation around Grove House or any site that will turn the village into an ugly suburban settlement;
  - Barrow Hill should be incorporated into the policy, along with the allocated site in the Local Plan<sup>4</sup>. Taking the footpaths away from under Grove Bridge will cause extreme danger to life - Kent County Council state that there is not enough room for two-way traffic and a path. A Sellindge bypass must be considered which would reduce congestion and benefit Otterpool Park (Sellindge Parish Council);
  - Much of the traffic will use the A20 which will be inadequate, particularly at peak times. Those wishing to travel to Canterbury will use the B2068 which has been an accident blackspot for many years;
  - Concern about road safety with more traffic on single track lanes;
  - Key time to plan a Sellindge bypass as part of the access road into Otterpool, West of Otterpool Lane and the A20, coming out west of Sellindge Church;
  - Water supply struggles to meet existing demand - there is a risk of water shortages if there is a substantial increase in housing stock;
  - Strategic-scale sites must be balanced against housing delivery and providing choice so that smaller housebuilders, as well as national operators, can work together;
  - Reference to education infrastructure is welcome but the plan should provide site-specific policies (Education and Skills Funding Agency);
  - Criteria need to be amended to ensure occupation is phased to align with delivery of sewerage infrastructure and ensure future access for maintenance and improvement (Southern Water);
  - Support from landowners of allocated sites;
  - The requirement for a masterplan is unrealistic. The policy should be amended to: refer to 20 per affordable housing; remove reference to the provision of allotments; and refer to payment towards improvement of the doctor's surgery, rather than "expansion" (Taylor Wimpey);
  - Object to the allocation of the land to the west of Sellindge over the more sustainable site of land at Elm Tree Farm to the rear of Sellindge Primary School for the delivery of 188 dwellings (Quinn Estates);
  - Object to the 'double pooling' of the financial contributions and that the development should be CIL exempt (Quinn Estates);
  - Kent County Council:

---

<sup>4</sup> Places and Policies Local Plan, Policy ND5: General Sellindge Policy



- Supports criteria for bridleways and cycle routes but would expect the improvements to be fully funded by development contributions;
- Expects improvements to traffic-calming features at key locations and suggests that an off-site shared-use pedestrian and cycle route is considered to provide a realistic alternative to the car, encouraging active travel;
- Suggests amendments with regard to water usage and fibre-to-premise broadband;
- Supports the inclusion of a village green/common and pedestrian and cycle enhancements, but there should be a focus on improving cycle infrastructure within large developments and creating attractive routes between larger settlements; and
- Natural England concurs with the findings drawn in the Sustainability Appraisal regarding Sellindge.

## **17. Section 5.3: Implementation**

17.1. Two representations were received relating to Section 5.3. These raise the following issues:

- Budget constraints are a major risk to the plan; and
- The monitoring of retail provision and the health of centres is essential; however, it is equally important to monitor regularly how changes in the retail sector and the economy may be affecting the demand side (CCPIII Shopping Folkestone S.A.R.L.).

## **Part 6 – Appendices**

### **18. Appendix 1: Monitoring and Risk**

18.1. Three representations were received relating to Appendix 1. These raise the following issues:

- Reference to achieving national Creative Enterprise Zone status should be included (The Creative Foundation);
- The use of vacancy rates to monitor the health of town centres is inadequate – monitoring should be expanded to include changes in retail occupancy, mix of uses and the proportion of national multiple stores, at the very least (CCPIII Shopping Folkestone S.A.R.L.); and
- Risk factors relating to the health of the national economy and the local housing market should be identified as “high” rather than “low”; development should be scaled-back and Otterpool Park abandoned.

### **19. Appendix 2: Glossary of Terms and Technical Studies**

19.1. Two representations were received relating to Appendix 2. These raise the following issues:

- Lack of evidence invalidates the consultation – the period for responses should be extended or consultation repeated; and
- The local list is not mentioned and references to “Shepway” are outdated.

## 20. Core Strategy Review – Sustainability Appraisal

20.1. Six representations were received relating to the Sustainability Appraisal. These raise the following issues:

- Without knowing what mitigation is proposed, it is impossible to say if the Core Strategy Review is sustainable;
- The impacts of strategic-scale development on Objective 3b: Landscape are significantly underestimated (Kent Downs AONB Unit);
- Several of the objectives are contradictory and not achievable:
  - SA1 – the area needs more truly affordable housing;
  - SA3 – development would cause significant harm to the district’s landscape;
  - SA4 – nothing in the plan takes Folkestone’s heritage into account;
  - SA6 – a large area of greenfield land is to be developed, but this is not mentioned under SA6. Positive effects under SA6 do not match the negative effects for all options for Sellindge;
  - SA7 – does not identify the severity of impacts on agricultural land quality, contaminated sites or the decommissioning of the nuclear power station;
- Reference to the Water Resources Management Plan needs to be updated (Kent County Council);
- With regard to the garden settlement, net biodiversity gains could be achieved if net gain can be secured over and above any residual losses – the policy wording should be strengthened in this respect. Beneficial effects will depend on long-term stewardship (Natural England); and
- The garden settlement will have significant impacts on views from the escarpment – substantial and innovative avoidance and mitigation will be required; not just structural landscaping, but also the design of walls and roofs and the use of ‘green’ roofs and walls. Possible major negative impacts should be recorded for SA3 (Natural England).

## 21. Core Strategy Review – Habitats Regulations Assessment

21.1. Two representations were received relating to the Habitats Regulations Assessment (HRA). These raise the following issues:

- In relation to in-combination assessment, whilst the Places and Policies Local Plan has been included in terms of air quality, it is less clear whether other impacts, principally recreation pressure, have been included. Also, it is not clear what level of housing has been assessed. Policy SS6 states a minimum of 5,500 homes within the plan period with potential future growth up to 10,000 homes beyond, within the proposed allocation area. We advise the upper limit of 10,000 homes for the garden settlement, in addition to the Sellindge extension, forms the basis of the HRA. Notwithstanding this, Natural England concurs with the findings of the HRA, subject to caveat (Natural England); and
- The HRA is difficult to understand, digest and comment on.

**Appendix 3 (b):  
Representations Received to Regulation 18 Core Strategy Review  
Preferred Options Consultation Document - Officers' Responses  
and Suggested Amendments**

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
<b>GENERAL</b>					
	171	1162998	Dear Sir / Madam Shepway District Council: Core Strategy Local Plan Review Consultation SUBMISSION ON BEHALF OF NATIONAL GRID National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation. Further Advice National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:	Comments noted.	No change proposed.
<b>1.1 ABOUT THE CORE STRATEGY</b>					
1.1	91	1162635	I object to this development. This would have not been on the cards unless the council had brought the race course. Now the billionaire brothers are working with the council for personal gain its all go. Depsite you needing to build thousands of house you are on the other hand prepared to knock down perfectly good houses for this development running peoples lives but thats fine as long as you make money. We dont want another town. what a joke. Why would you do this? we have ashford, canterbury, folkestone. The only buyers will be from out of town especially with weesterhanger becoming high speed. Probably will end up being 2nd homes from those living in london. So dont benefit those locally in need of homes. In addition you are running the countryside building on a place likely to flood. It is be an eyesore just as bad as your decisions for folkestone seafront and the hotel at park farm.	The concerns are noted but the District Council has to plan for future homes to meet the local need of the district, ensuring that there is a sufficient amount and variety of land that can come forward until 2037 and beyond. The District Council has followed Government guidance by objectively assessing the local need until 2037 and this has resulted in the number of new homes that need to be accommodated. The district Council seeks to provide for this through the smaller sites allocated in the emerging Places and Policies Local Plan as well as the larger strategic sites, including the Garden Settlement. The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link).	No action in terms of amending paragraph 1.1 but note concerns in relation to existing residents and potential development.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.1	122	1162774	I totally object to this hideous development proposed at Otterpool , none of the residents want this and we haven't been consulted about any part before the greedy council used our money to buy our farmland to concrete over.....the airfield has a high court injunction to stop development here, so should not even be considered as part of the concrete jungle that the council will be making millions out of.....we don't want a garden town here we want our green space left as it is, we bough our house here to live in a rural and historic village, not to be surrounded by thousand of houses to take away our open space and our historic airfield.....the water company has already said that they could not supply the water for this monstrosity, but David Monk decided he knew better , again all in the name of greed.....I bet he wouldn't want to live amongst what he is proposing to subject us villagers to.....and then there is the wildlife he will be murdering, as they will have their homes destroyed.....also with that amount of houses in a small village like this means the amount of cars on the road would triple, our roads cant cope now, so it would be total chaos trying to travel anywhere.....not to mention the pollution from the exhaust fumes.....Totally object to this monstrosity !!! The racecourse has had planning rejected for houses so what has changed since the council has invented this hideous garden town	The concerns are noted but the District Council has to plan for future homes to meet the local need of the district, ensuring that there is a sufficient amount and variety of land that can come forward until 2037 and beyond. The government has introduced a new national methodology to set out how many new homes local authorities should plan for. For Folkestone & Hythe district this indicates that the council should provide for an average of 676 new homes a year. The District Council seeks to provide for this through the smaller sites allocated in the emerging Places and Policies Local Plan as well as the larger strategic sites, including the Garden Settlement. The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link). The Garden Settlement also provides the mass and scale to fund the necessary infrastructure, working with the relevant authorities and organisations, rather than adding to existing settlements, which, individually, they would not be able to do. With regard to water the District Council, working with water providers, are confident that this can be met.	No action in terms of amending paragraph 1.1 but note concerns in relation to existing residents and potential development.
1.1	174	1163006	Inappropriate regarding infrastructure	The concerns are noted but the District Council has to plan for future homes to meet the local need of the district, ensuring that there is a sufficient amount and variety of land that can come forward until 2037 and beyond. The District Council has followed Government guidance by objectively assessing the local need until 2037 and this has resulted in the number of new homes that need to be accommodated. The District Council seeks to provide for this through the smaller sites allocated in the emerging Places and Policies Local Plan as well as the larger strategic sites, including the Garden Settlement. The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link). The Garden Settlement also provides the mass and scale to fund the necessary infrastructure, working with the relevant authorities and organisations, rather than adding to existing settlements, which, individually, they would not be able to do. With regard to water the District Council, working with water providers, are confident that this can be met.	No action in terms of amending paragraph 1.1 but note concerns in relation to existing residents and potential development.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.1	356	1163108	<p>Otterpool Park Policies SS6 TO SS9: With reference to the proposed Otterpool Park Garden Town I wish to register my objections for the following reasons. Although this development has the words Park and Garden in its title these are simply words which I believe are there to disguise the true facts. If this development goes ahead an area up to two miles in length which is at present an area of outstanding natural beauty and historic importance will be covered in concrete and inappropriate buildings, some of which possibly being up to six stories in height. There is no way that this could be called a park or a garden, Otterpool Town will not add to the landscape but instead will be visible for miles around destroying not only the beauty of the landscape but also the natural habitat of many species of wildlife and plant life. It will also cause unacceptable levels of light pollution. Another reason for concern which is rarely talked about is that Defra have classified the South of England an Area of Serious Water Stress '. Below is an extract from the Southern Water web site.</p> <p>The truth is that the South of England is one of the driest areas in the UK. It has been classed as an @Area of Serious Water Stress@ by Defra, the Government Department for Environment, Food and Rural Affairs. Climate change</p> <p>Climate change is likely to see temperatures rise between 2 o C and 3.5 o C by 2080 with rainfall in the South East of England dropping by up to half. Droughts like we saw in 2004 6 are likely to be more common. And as the population of the South East continues to rise, the amount of water we need to supply will increase even further, placing more pressure on local rivers and the already stressed natural environment. These facts should not be ignored however it seems that that the council are determined to do just that. Building on this scale in this area is simply creating a crisis waiting to</p>	<p>The concerns are noted but the District Council has to plan for future homes to meet the local need of the district, ensuring that there is a sufficient amount and variety of land that can come forward until 2037 and beyond. The government has introduced a new national methodology for setting out how many new homes local authorities should plan for. For Folkestone &amp; Hythe district, the national methodology indicates that the council should plan for an average of 676 new homes a year. The District Council seeks to provide for this through the smaller sites allocated in the emerging Places and Policies Local Plan as well as the larger strategic sites, including the Garden Settlement. The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link). The Garden Settlement also provides the mass and scale to fund the necessary infrastructure, working with the relevant authorities and organisations, rather than adding to existing settlements, which, individually, they would not be able to do. With regard to water the District Council, working with water providers, are confident that this can be met. Working with other bodies, such as Historic England, Natural England and the Environment Agency, the concerns relating to wildlife and the historic environment can be mitigated or enhancements provided.</p>	<p>No action in terms of amending paragraph 1.1 but note concerns in relation to existing residents and potential development.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.1	432	75105	<p>Response to Core Strategy Review Consultation Draft Regulation 18 Version March 2018 on behalf of: The Shepway Environment and Community Network (SECN) The Friends of Lympne Airfield Association The NO Otterpool Newtown Coalition The Save Princes Parade Group The Fisherman 's Beach Association</p> <p>Publicity to raise awareness of the existence of the Review and the need and opportunity for residents to respond to it has been extremely poor with the result that the task of engaging members of the community in the process has fallen, late in the day, to those of us regularly taking issue with the Council on a range of contentious development plans such as the so called Otterpool Park proposal. That is simply not good enough. For the very small proportion of residents able to access and comprehend it, extreme difficulty has been experienced using the Council website portal which by common consent is complex and confusing. That criticism also applies to the Council 's portal setting out the elements of the Local Plan (PPLP). That being the case here we register our very strong objection to the lack of publicity and the unrealistic amount of time allowed for considered responses ' to this long-term plan.. ' (1.3). Properly addressing the issues raised in this document comprising 167 pages of important detailed information by residents and electors most of whom have jobs and are unfamiliar with the subjects raised requires time to research and understand the issues and the implications. There is also the matter of the revised draft of the NPPF (1.1 Changes to National Planning Policy ') recently published for consultation and closed on May 10 th with which this response to Regulation 18 is required to ensure justification, effectiveness, positivity and consistency along with procedural requirements to form tests of soundness '. Given the rationale of the constraints on residents</p>	<p>Noted that there are concerns that the District Council did not do enough to advertise the consultation, but the District Council directly contacted all interested organisations, groups and individuals as well as all the parish councils and other statutory organisations, informing them of the consultation. In addition adverts were placed in local papers and exhibitions were held in local halls. Local papers also carried local articles and social media was also used to ensure that the consultation reached a wider audience.</p>	<p>No amendments to paragraph 1.1.</p>



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.1	433	75105	Green panel 1.1 on page 7 especially items involving Policies SS6/SS9 - a New Garden Settlement ' Objection to despoliation of the AONB, destruction of local communities (villages) and absence of public support for the Otterpool development as required under the Locally "Led Garden Villages , Towns and Cities ' DCLG publication March 2016. Two rounds of public consultation and major public meetings resulted in less than 5% support. Required as a prerequisite for expressions of interest ' DCLG Criteria for support ' page 25 paras 55/56. DCLG page 13 para 53 Size '. The number of houses now envisaged would be below 5500 and likely to fall further as land included in the Otterpool plan is excluded. Policy CSD9 (Sellindge) Undertaking re specially funded agreed plan for 250 house development dishonoured as at least twice as many are now under consideration and construction.	The site for the Garden Settlement and the additional allocation in Sellindge were identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these constraints into consideration. The location of the site was landscape-based taking into account the setting of the AONB (it is outside of the AONB). It is noted that this will have an impact on local residents in the area and the Council is working with Parish Councils to ensure that their concerns are considered and any positive benefits are realised. For example, there is an open space buffer around Lympne to ensure that the village does not merge with other developments. Paragraph 55 and 56 of the DCLG publication 'Locally-Led Garden Villages, Towns and Cities' states that: '55. We expect expressions of interest to demonstrate a strong local commitment to delivery. New garden towns and cities should have the backing of local authorities in which they are situated, including the county council in two-tier areas. To ensure that the potential local economic impacts and benefits have been considered they should also have the explicit support of the Local Enterprise Partnership(s). 56. Expressions of interest should set how the local community is being, or will be, engaged at an early stage, and strategies for community involvement to help win local support'. The District Council has met the requirements of this paragraph. ( <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733047/Locally-led_garden_villages__towns_and_cities_archived.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733047/Locally-led_garden_villages__towns_and_cities_archived.pdf</a> )	No action in terms of amending paragraph 1.1 but note concerns in relation to existing residents and potential development.
1.1	478	75105	Summary In conclusion we believe that many of the plans laid out in this Core Strategy Review are in fact both unsustainable and undeliverable as circumstances on the ground and the public perception of the threat to its current quality of life implicit in those plans grows.	Disagree with the conclusion. The strategic allocations carried over from the 2013 Core Strategy either have started or have planning permission. The evidence suggests that the Garden Settlement allocation is in a good position to be deliverable. The District Council has an agreement with other landowners, including the Government body Homes England, which provides the commitment to the development. Working with other bodies, such as Natural England, the Environment Agency and infrastructure providers has indicated that there are no unresolvable issues.	No changes required to Paragraph 1.1.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.1	564	588509	<p>CONSULTATION ON THE CORE STRATEGY LOCAL PLAN REVIEW AND ASSOCIATED DOCUMENTS 1. Further to our meeting on 3 May 2018, and on behalf of London Ashford Airport (LAA), we set out below our representations to the consultation on the Core Strategy Local Plan Review (CSLPR), and the accompanying Sustainability Appraisal (SA) and Habitat Regulations Assessment. 2. These representations follow on from our representations to the Places and Policies Local Plan Submission Draft (February 2018), Preferred Options Consultation (October 2016) and the Issues and Options Consultation (January 2015). 3. LAA's key concern is that the Council has chosen not to include a policy addressing LAA in the CSLPR (or the Places and Policies Local Plan). The omission of such a policy is a fundamental failing of the CSLPR which should recognise the importance of LAA and its potential to improve and support Folkestone and Hythe's economy. For this reason, the CSLPR is not sound in its current form and does not comply with paragraph 182 of the National Planning Policy Framework (NPPF). 4. Furthermore, the Places and Policies Local Plan (P&amp;PLP) was published before the CSLPR. This seems to be out-of-sequence as the CSLPR sets out the aims and objectives to be delivered by the P&amp;PLP. In our view, either the P&amp;PLP should follow on from the CSLPR or the consultation period for both documents should have run alongside each other to provide a more cohesive approach. Soundness of the Local Plan 5. Paragraph 182 of the NPPF sets out four considerations to be taken into account when determining whether the local plan is sound. The local plan must be: - Positively prepared; - Justified; - Effective; and - Consistent with national policy. 6. As currently drafted, the CSLPR, and the accompanying Sustainability Appraisal and Habitat Regulations Assessment, are not sound for the reasons</p>	<p>With regard to the policy addressing London Ashford Airport please see the District Council's response to Policy SS2: District Spatial Strategy, which proposes an amendment to enable an Area Action Plan (AAP). With regard to the timing of plans, the Places and Policies Local Plan (PPLP) meets the requirements set out in the adopted Core Strategy (2013), which runs until 2031, and this has progressed to the final stages in the plan-making process. To delay this because the Core Strategy is being reviewed would be detrimental to the Council's ability to meet housing or other targets and result in further reliance on old saved development management policies from the 2006 Local Plan. The Core Strategy Review, which runs until 2037, updates the housing requirement, this being met primarily by the new Garden Settlement. There is still a need to identify smaller sites alongside the new garden settlement and have development management policies to guide new development, so the PPLP does not need to be delayed to wait for the Core Strategy Review.</p>	<p>Amend Policy SS1: District Spatial Strategy and supporting text to state that the council will work with the airport, local community and other stakeholders to prepare an Action Area Plan for the London Ashford Airport site, should proposals come forward for further expansion.</p>
1.1	373	1157838	<p>Firstly, I would like to say that it is bizarre that the button to comment on the introduction is on the preceding page. The layout of this Consultation Portal is not good. Further engagement with the public is needed in the form of workshops to inform them of the proposals within the Core Strategy review. Missing and incomplete documents should be available to the public prior to this review. It would seem the Council have jumped the gun on the reviews of both the Core Strategy and PPLP. Furthermore, this Consultation Portal is not fit for purpose, as it does not allow commenting on the HRA. I am unable to contact the team on the final day of commenting, who were available until Midnight during the PPLP review. The timeouts are also quite annoying when commenting.</p>	<p>The concerns are noted and the District Council will ensure that these issues will be picked up in future consultations. The late deadline was given to provide people with extra time to submit their representations, rather than limiting it to the working day. The District Council also provided an extended consultation period, beyond the minimum six week period, for people to submit representations. Whilst the issue of seeking help outside normal working hours has not been an issue before, it may be helpful that future consultations should have a statement stating staff will only be available during normal working days (Monday to Friday) and hours (9am until 5pm). The comment is also incorrect in stating that the HRA was not available to comment on. The HRA (and SA) had been given a separate consultation point in the portal so that comments could be made against a pdf version of the assessment. The National Planning Policy Framework advises that Local Plans should be underpinned by relevant and up-to-date evidence, which should be adequate and proportionate supporting and justifying the policies concerned. The District Council has done this. There will be times during the production of a Plan that it will have to continue progress when longer pieces of work are being produced. To wait would mean that other work may become out-of-date and would have to be recommissioned.</p>	<p>Update Section 1.1 to reflect the next stage of consultation on the Submission Draft (Regulation 19) Core Strategy Review.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.1	578	1162196	I HAVE STRUGGLED WITH THIS PORTAL - LOST DATA AND NOW IT REFUSES TO TAKE THE SUBMISSIONS. IT SHOULD NOT BE USED FOR CONSULTATIONS UNTIL IT HAS BEEN REFINED. LOOK AT THE HMRC PORTAL FOR TAX. THIS IS HIGHLY USER FRIENDLY AND DOES NOT WASTE PEOPLES TIME. PLEASE ADD THESE COMMENTS TO MY EXISTING COMMENTS WHICH I HAVE BEEN UNABLE TO INPUT ON THE PORTAL	It is unfortunate that a few people had problems with the portal and their issues have been fed back to the company providing the software. The District Council provided support (during normal office hours) to ensure that all representations were submitted on time. The consultation portal is used by many local authorities and this Council has used it successfully for this and other consultations with only a few people having problems with it.	No change proposed.
1.1	550	1164105	Re: Folkestone and the proposed approach of a two-tiered local plan is not favoured. Hythe District Council Core Strategy Review (March 2018) These representations, by Hume Planning Consultancy, relate to strategic issues which affect the potential 'soundness' of the emerging plan. It is requested that the concerns are addressed at this early stage. Firstly, Because of the Government 's focus on frequent reviews (at least every 5 years) for local plans, a single local plan document would provide clearer direction and consistency for the development industry. We would request that this alternative is carefully considered at this early stage.	The Places and Policies Local Plan was produced to meet the requirements of the Core Strategy Local Plan adopted in 2013. Whilst it is noted that single plans are now preferred, this plan is now at an advanced stage. Amalgamating this Plan with the Core Strategy Review would result in further unnecessary delay which would be detrimental to the Council's ability in meeting housing or other targets. The documents that make up the Development Plan for the district should also be read as a whole. The new National Planning Policy Framework (2018) also indicates that Plans should be clear which policies are strategic and which are not. The two plans clearly show this.	No change proposed.
1.1	615	1057385	Thank you for your email dated 29 March 2018 notifying Kent County Council (KCC) of the first consultation on the early review of the Core Strategy Local Plan 2013. The County Council supports the growth ambitions of Folkestone and Hythe District Council and recognises that the update to the adopted Local Plan 2013 is underpinned by a reassessment of housing and employment requirements, now to 2036/37. This will see a substantial increase in the housing requirement, from a current minimum of 350 dwellings per year to at least 633 dwellings per year - notwithstanding the impact of the proposed national introduction of a standardised approach to assessing housing need. In meeting the development requirements, the early review sets out the policy framework for the delivery of a new garden settlement at Otterpool Park, and further growth at Sellindge. In June 2016, KCC supported the District Council in its submission of an Expression of Interest to the Locally-led garden villages, towns and cities prospectus, welcoming the November 2016 announcement of funding and support from Government. There are well established, collaborative working arrangements in place between both Authorities, respecting the roles of the District Council as local planning authority and major landowner, under the terms of a Planning Performance Agreement. The County Council continues to welcome the positive approach to engagement taken by the District Council in the preparation of its updated Local Plan. KCC has a number of environmental and technical comments to make on the new and significantly amended policies. For ease of reference, these are set out in a schedule accompanying this letter but will also be submitted via the District Council 's consultation portal.	Support and comments noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.1	513	1155269	Comments from Rolfe Lane and Area Residents Association re Folkestone and Hythe District Council Core Strategy Review Please see below comments on behalf of over 140 household members of the Rolfe Lane and Area Residents Association. We were advised at a recent Strategy Consultation meeting in New Romney that comments could be made via email rather than the online facility which is laborious and constraining not user friendly at all. It is noted that the Places and Policies Plan should flow from the Core Strategy, yet this has already been reviewed. Does this mean that it will be updated again after this review?	Government guidance indicates that Local Plans should be reviewed at least every five years. Reviews may be partial (focusing on a few policies) or complete (looking at the entirety of the plan); the extent of the review will depend on the issues facing the district at the time.	No change proposed.
1.1	650	1042306	Folkestone and Hythe Core Strategy Local Plan Review Regulation 18 Consultation Thank you for your email of 29 March 2018 inviting comments on the above document. As the Government 's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process, and welcomes the opportunity to comment upon this key planning document. Historic England has the following detailed comments to make on the draft Local Plan Review. The order of comments follows that of the draft Plan and is confined to matters relating to the historic environment and heritage assets within our purview. As far as it is relevant, this letter should be read alongside our letter of 16 March 2018 regarding the draft Places and Policies Local Plan Regulation 19 consultation, particularly with regard to the views expressed in that letter in relation Princes Parade at Hythe. At this stage it is the new proposals for development of the Otterpool Park Garden Town which, which has in part necessitated this review, which is the focus for our comments. You will note also that there has been a good deal of discussion and exchanges of correspondence on this matter between the Council and Historic England since the proposals first emerged and the comments below are cast in the context of those ongoing conversations.	Comments noted and the District Council will continue to work with Historic England throughout the plan-making process.	No amendments to paragraph 1.1 required. Continue to work with Historic England through the plan-making process.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.1	529	1163318	<p>Canterbury Diocese has a key role to play in the formation and sustainability of communities. It already has significant social infrastructure in place in the areas covered by the proposed Garden Settlement and has much more to offer if fully involved in the development process. 1. The Diocese was established in the C6th Century and its parish system predates the formation of the County of Kent. With a long-established presence in every community, including all of the parishes encompassed by the proposed Otterpool Park Garden Town, the Diocese has an important role to play in building and sustaining the emerging new communities. This exciting new venture demands close attention to those strands of community development that will make up the social infrastructure of the new town. The Diocese brings to the enterprise centuries of experience in:</p> <ul style="list-style-type: none"> <li>i. Delivering, sustaining and housing 'worshipping' communities which in turn serve the wider community.</li> <li>ii. Developing, supporting and housing community leaders and their families. Establishing teams where appropriate.</li> <li>iii. Establishing and sustaining schools, colleges and universities which provide excellent education for children and adults, and which in themselves become community hubs.</li> </ul> <p>2. The Diocese is therefore keen to work in partnership with Folkestone and Hythe District Council in the shaping of the new town from the outset and to this end has already been in dialogue with Julia Wallace, the Otterpool Park Project Manager, for some time.</p>	Comments noted.	No action in relation to paragraph 1.1 but the District Council will continue to work with the Canterbury Diocese.
1.1	676	1165835	<p>Until you get a Council leader and dept directors who actually care about our District your policies will always remain unpopular and divisive. The public 100% see your leaders as pandering to the government and its 'crazy' housing policies. Maybe when you have leaders who will take a stance and say "we will build where its wanted by the voters not where we can make most money"! This gives the sniff of policies influenced by builders and developers. Shepway has been very famous for that in the past? So with a new name and hopefully a few new faces Folkestone and Hythe District Council can get some respect back and hopefully will keep me voting Conservative as this govt and PM May are making me consider never voting again!</p>	The concerns are noted but the District Council has to plan for future homes to meet the local need of the district, ensuring that there is a sufficient amount and variety of land that can come forward until 2037 and beyond. If the District Council did not do this then there would be even more pressure from developers building where they want to. The government has introduced a new national method of calculating how many homes local authorities should plan for that the council is required to follow. This indicates that the council should plan for an average of 676 new homes a year. The District Council seeks to provide for this through the smaller sites allocated in the emerging Places and Policies Local Plan as well as the larger strategic sites, including the Garden Settlement.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.2	3	1157870	I don't understand why the P&PLP identified sites are not considered in this consultation - should the Core Strategy reflect the Local Plan, and vice-versa?	The Places and Policies Local Plan (PPLP) meets the requirements set out in the adopted Core Strategy (2013) up to 2031, and this has progressed to the final stages in the plan-making process. To delay this because the Core Strategy is being reviewed would be detrimental to the Council's ability to meet housing or other targets and result in further reliance on old saved development management policies from the 2006 Local Plan. The Core Strategy Review (to 2037) carries over the same requirements of the adopted Core Strategy but introduces the new housing requirement, this being met primarily by the new Garden Settlement. There is still a need to identify smaller sites alongside the new garden settlement and have development management policies to guide new developments, so the PPLP does not need to be delayed to wait for the Core Strategy Review.	No change proposed.
1.2	83	1029376	The core strategy is based upon housing in Otterpool whereas the Local Plan does not include Otterpool. This plan looks forward and does not consider housing in progress This leads to a lack of transparency over the total housing to be provided	Paragraphs 4.10 to 4.15 sets out the housing requirements and the relationship of the two plans. The Places and Policies Local Plan sets out the non-strategic allocations (smaller sites) for the district until 2031. The Core Strategy sets out the strategic allocations (sites over 250 dwellings, including the Garden Settlement). The next draft of the Plan will, however, include an indicative housing trajectory for the Core Strategy Review plan period (see Appendix 3 of the Submission Draft Core Strategy Review). This should provide clarity on this issue.	Include an indicative housing trajectory for the Core Strategy Review plan period as an appendix to the Submission Draft (Regulation 19) plan.
1.2	181	1163014	I moved to Sellindge from Ashford to avoid the mass expansion of housing to enjoy a more peaceful countryside life that I'm used to from my childhood. However there appears to be nowhere that is safe from the continuous onslaught of housing development. The proposal will have a number of devastating effects on the local community. 1 - 30 years of continuous disruption from building works. 2- demolition of green countryside that supports an array of wildlife. 3 - negative effects on the mental health of the local population due to increased stress from continuous construction and lack of access to the countryside. 4 - negative impact on property values due to the development. 5 - loss of community cohesion. There are so many negative aspects to this development that it's impossible to list them. Britishness is built on the values that stem from strong village communities and we are rapidly destroying these villages. Do we want the entire country to be made up of soulless towns? Please do not destroy what makes this country special by discounting the views of villagers and those who enjoy living in the countryside.	The concerns are noted but the District Council has to plan for future homes to meet the local need of the district, ensuring that there is a sufficient amount and variety of land that can come forward until 2037 and beyond. The government has introduced a new national methodology for calculating how many new homes local authorities should plan for. This indicates that the council should provide for an additional 676 new homes a year. The District Council seeks to provide for this through the smaller sites allocated in the emerging Places and Policies Local Plan as well as the larger strategic sites, including the Garden Settlement. The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link). The Garden Settlement also provides the mass and scale to fund the necessary infrastructure, working with the relevant authorities and organisations, rather than adding to existing settlements, which, individually, they would not be able to do. With regard to water the District Council, working with water providers, are confident that this can be met.	No action in terms of amending paragraph 1.2 but note concerns in relation to existing residents and potential development.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.2	321	1157838	<p>The Core Strategy and PPLP when combined represent over-development above and beyond any Government targets. Empty housing is not being properly considered, despite the No Use Empty scheme. The website for this scheme is very slow in providing up-to-date data - the most recent figures are from 2016 - so a true reflection of the situation is not available. The Council quote a figure around 400 empty properties. The current data on the website, however, shows 1,773 empty dwellings with 547 of those being long-term vacant as of 2016 and shows an increase of around 500 dwellings in Kent empty that year. It seems quite unbelievable that 147 properties have been occupied since then, and the Council appear to be using the lower of the two figures, which doesn't give an accurate indication of how many buildings are unoccupied.</p> <p>Rightmove shows over 900 properties for sale within a 5 mile radius of Hythe, which doesn't take into consideration the whole District, and 100 for rent. Adding a 3 mile radius of Lydd gives a further 180 homes for sale and only 6 to rent. Are these additional to those in the No Use Empty scheme? This pressure to continue developing new housing needs to be seriously reconsidered at Government level as well as by the Council and other Councils. Why was the PPLP reviewed before the Core Strategy when some of the developments within it lie in areas defined in the Core Strategy? It is impossible to prepare either document efficiently when there is no Heritage Strategy or Local List in place. The Council need to look at providing more truly affordable housing (e.g. social housing) rather than playing property developer and building more housing that won't be affordable to first-time buyers, and looking at Council Tax and business rates in the District, to try and encourage empty housing to be filled before building more.</p>	<p>The District Council has undertaken a SHMA which includes objectively assessed need for housing in the district and the requirements for affordable housing. With regard to the affordable housing, social landlords were consulted to identify the need in the area. The District Council seeks a mixture of tenancies for affordable housing (such as social rented). The numbers of empty homes quoted will depend on the measure being used. At the time of the consultation there were 400 long-term empty homes (homes empty for six months or more) in the district. The council has introduced an award-winning scheme for bringing long-term empty properties back into use and has been securing the re-use of about 70 long-term empty homes a year. The number of long-term empty properties is around 0.7 per cent of the district's housing stock. There will always be a number of homes empty at any one time as part of the ordinary operation of the housing market: homes will be vacant for sale when families have moved away or elderly homeowners have moved into care, owners will have moved out while homes are undergoing substantial refurbishment, homes will be empty pending demolition and redevelopment of the land. The Places and Policies Local Plan (PPLP) meets the requirements set out in the adopted Core Strategy (2013) up to 2031, and this has progressed to the final stages in the plan making process. To delay this because the Core Strategy is being reviewed would be detrimental to the Council's ability to meet housing or other targets and result in further reliance on old saved development management policies from the 2006 Local Plan. The Core Strategy Review (to 2037) carries over the same requirements of the adopted Core Strategy but introduces the new housing requirement, this being met primarily by the new Garden Settlement. There is still a need to identify smaller sites along side the new garden settlement and have development management policies to guide new developments, so the PPLP does not need to be delayed to wait</p>	No change proposed.
1.3	30	1162344	<p>This plan does not in any way support the aims of local residents. It has been shown that there is overwhelming objection to the plans and that it is being forced on local residents in a completely underhanded manner.</p>	<p>The concerns are noted but the District Council has to plan for future homes to meet the local need of the whole district, ensuring that there is a sufficient amount and variety of land that can come forward until 2037 and beyond. This is the first consultation for the Core Strategy Review. The government has introduced a new national methodology for calculating how many new homes local authorities should plan for. This indicates that the council should be providing an additional 676 new homes a year. The District Council seeks to provide for this through the smaller sites allocated in the emerging Places and Policies Local Plan as well as the larger strategic sites, including the Garden Settlement. The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link).</p>	No action in terms of amending paragraph 1.4 but note concerns in relation to existing residents and potential development.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.4	85	1029376	The Core Strategy cannot ignore the developments within the local plan because this would make the core strategy incomplete. Similarly the Local Plan cannot ignore the core strategy, both have to be compatible to have the complete picture. The housing agreed in the Local Plan could render the forecasts and increases in the core strategy incorrect giving false information. The review is only partial and no date has been given for a full review, it is not possible to consider housing separate from other issues such as infrastructure, housing/retail mix, parking, heritage, tourism, employment and similar issues. There is as yet no Heritage strategy which is important when considering wide ranging developments	The concerns are noted. The District Council is planning for future homes to meet the local need of the whole district, ensuring that there is a sufficient amount and variety of land that can come forward until 2037 and beyond. Table 4.2 in the Core Strategy Review shows how the different plans and allocations contribute towards the overall housing supply. The government has introduced a requirement for all local planning authorities to review their plans at least every five years. Reviews may be partial (concentrating on a few policies) or complete (looking at the whole plan). The extent of the review will be dependent on the issues facing the area at the time it is undertaken. With regard to the new Garden Settlement, the government has introduced a new national methodology for calculating how many homes local authorities should plan for. This indicates that the council should provide an average of 676 new homes a year. The District Council seeks to provide for this through the smaller sites allocated in the emerging Places and Policies Local Plan as well as the larger strategic sites, including the Garden Settlement. The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link).	No change proposed.
1.4	323	1157838	If the PPLP is meant to be implementing Core Strategy principles, the Core Strategy as implemented in 2013 should have been final prior to the review of the PPLP. This cannot be found to be sound without a Core Strategy in place, or a final Heritage Strategy. The Local List is also entirely missing. The Council's implementation of these key documents is all over the place. Better structure should have been devised for the roll-out of these documents and the review should have been in a more appropriate order. Both the Core Strategy and PPLP are crucial documents and must sit alongside each other.	The Places and Policies Local Plan allocates a range of small- and medium-sized sites throughout the district to 2030/31. The Core Strategy Review extends this plan period to 2036/37 and puts forward proposals for strategic growth. Both plans will contribute to the growth needs of the district in the coming years, as set out in Table 4.2 in the Core Strategy Review. The government is introducing new requirements for local planning authorities to review their plans at least every five years, so there will be opportunities to review proposals in the plans regularly over the coming years.	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.4	206	1163018	The entire process for lodging detailed comments specific to individual paragraphs of this document does not allow for overview so I am posting my comments here under one heading so that they are not fragmented and diluted. The needs of Folkestone and Hythe District are for increased affordable housing and social housing, such need in large being aggravated by failure to ensure such provision in preceding years. That has been contributed to by failure of developers to adhere to assurances given to make such provision as a condition of grant of permission to develop at all. Failure to enforce such commitments has enabled the use of development land intended to provide affordable housing to provide instead more expensive homes earning greater profit for developers. The area has limited available land for new development and it is vital that what is left is used wisely. The plans for development currently in progress in the main are for housing which will not be affordable to local residents but which are specifically aimed at attracting London residents to move to the area benefitting from improved rail links. The Otterpool Garden Town is a prime example of this approach and will develop a huge area of land with housing unattainable by today's local children when they grow up. The new Town will be a dormitory for London workers and this will attract issues of crime - empty properties are easy targets for burglary, while "latch-key" teenagers of absent parents migrate towards anti-social behaviour in the community around their homes. The area has one of the best schools in the country within its region and yet children graduating from University education will be unable to afford homes in the area where they grew up and were educated. To fail them in the Housing market drives out bright talent from the area and offers nothing to sustain a community that grew up in and loves the area. I am told that even	Housing of all kinds, market and affordable, is needed to address the housing shortage. The new National Planning Policy Framework sets out a definition of affordable housing in Annex 2 that the council must have regard to in preparing its plans. The government has introduced a new methodology for calculating housing need in the new National Planning Policy Framework. The government's objective is to significantly boost the supply of homes and the council must have regard to this in preparing its plans.	No change proposed.
1.5	317	1157838	"Some amendments" required for the garden town appear to be the Council excusing themselves (as developer) from paying CIL. This is unacceptable and surely a conflict of interest? Why are the key developments in the Core Strategy (Folkestone seafront development, Shorncliffe camp, New Romney, Sellindge and Otterpool Park) zero rated for CIL? Surely the large developers are the very people you want to be contributing such payments? I note that Folkestone Town Centre is similarly zero rated, although construction of supermarkets etc. outside the area does have a CIL charge. I sincerely hope this doesn't mean we will see supermarkets attempting to bulldoze the town centre and build there in order to avoid CIL.	The council cannot require Community Infrastructure Levy (CIL) and Section 106 payments from developers for the same pieces of infrastructure. Zero-rating large schemes for CIL allows the council to secure much greater contributions to infrastructure through Section 106 agreements than if the flat-rate CIL payment was applied; there is also greater certainty over the timing of infrastructure provision through Section 106 agreements than through CIL. Applying CIL to the new garden settlement would reduce the infrastructure that could be secured and would not benefit future residents or the wider district.	No change proposed.
1.5	725	1164722	It is confirmed that the Council's Community Infrastructure Levy (CIL) Charging Schedule will shortly be updated. The amendments will confirm that the Otterpool Park garden settlement will be excluded from the application of the CIL. The Parties support this proposed amendment.	Noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.7	290	1162196	<p>Many of the documents that are necessary to inform the revised Core Strategy have yet to be prepared. This includes important documents such as: Duty to Co-operate Statement Shepway Green Infrastructure Report Shepway Water Cycle Report Infrastructure Delivery Plan / Infrastructure Table Shepway Playing Pitch Strategy and Sports Facilities Report Whole Plan Viability Assessment This throws considerable doubt over the soundness of the plan. How can a major new town be proposed when the Council is unaware of important issues such as the District 's capacity to secure water and what the true cumulative impact of development will be? The Duty to Co-Operate Statement is evidently to be based on Dover. This is a pointless exercise as the only relevant Council is Ashford. The supporting evidence for Dover is wholly unconvincing and in the end Ashford 's exclusion appears to boil down to politics. Paragraph 3.46 of the SHMA, Part 1 Objectively Assessed Need states To their west the HMA is soundly defined, to the north Ashford does not consider Shepway as part of their HMA although as with any HMA there are cross boundary links This paragraph is repeated in the Duty to Co-operate statement accompanying the Place and Policies (para 4.8). The evidence in the SHMA skirts around Ashford by excluding Ashford from some of the assessment criteria. There is no rational basis for its exclusion - only that Ashford does not consider it part of their HMA. The districts border each other, the scale of development is affecting all social and physical infrastructure, and many people work in Ashford while others live in Ashford and work in Shepway. It is also possible that land in Ashford could meet some of the housing needs of Shepway given its constraints. This has not been explored by Shepway.</p>	<p>The National Planning Policy Framework (2018) states that plans should be supported by evidence that is "adequate and proportionate" (paragraph 31). New evidence has been produced through the development of the Core Strategy Review so far and will be produced for the next consultation on the Submission plan and provided on the council's website. The government's new National Planning Policy Framework is introducing statements of common ground as a way to record agreements between authorities - a statement of common ground will be developed for the Core Strategy Review. This paragraph will be updated to refer to the next stage in the Core Strategy Review process.</p>	<p>Update paragraph 1.7 to refer to the next stage in the Core Strategy Review process.</p>
1.7	212	1162685	<p>The 'extensive evidence base' is incomplete in both scope and temporal extent. The Appendix lists 11 documents which have yet to be completed or to be brought up to date. This consultation should not be closed before the complete evidence base has been published.</p>	<p>The National Planning Policy Framework (2018) states that plans should be supported by evidence that is "adequate and proportionate" (paragraph 31). New evidence has been produced through the development of the Core Strategy Review so far and will be produced for the next consultation and provided on the council's website. This paragraph will be updated to refer to the next stage in the Core Strategy Review process.</p>	<p>Update paragraph 1.7 to refer to the next stage in the Core Strategy Review process.</p>
1.7	327	1157838	<p>I agree with Mr. Horner's comment. Table 6.9 lists Core Strategy Technical Studies, many of which are still being prepared or entirely unavailable to the public. This review is, quite frankly, a farce without many key documents available that are referenced. The advertising of the review has been poor, as is illustrated by the low number of comments. Public consultation events were only held on one day in each location, which may have been inconvenient for some, meaning they would then have to travel. These events were entirely focused on Otterpool Park and didn't cover other key areas in the Core Strategy whatsoever. How are we supposed to consult on something when we aren't given all the information, and consultations are poorly advertised?</p>	<p>The National Planning Policy Framework (2018) states that plans should be supported by evidence that is "adequate and proportionate" (paragraph 31). New evidence has been produced through the development of the Core Strategy Review so far and will be produced for the next consultation and provided on the council's website. This paragraph will be updated to refer to the next stage in the Core Strategy Review process.</p>	<p>Update paragraph 1.7 to refer to the next stage in the Core Strategy Review process.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.8	133	1029376	There are other documents needed in order to complete a full review of the core strategy such as a Heritage Strategy and the Destination Management Plan. Plans are needed to develop tourism particularly to enable the industry to function by providing decent routing and parking to tourist/visitors locations. A date should be set to deliver all documents needed to support this strategy and a date set to deliver the completed core strategy	The National Planning Policy Framework states that local plans should be supported by evidence that is "adequate and proportionate". New evidence has been produced through the development of the Core Strategy Review so far and will be produced for the next consultation and made available on the council's website.	No change proposed.
1.8	116	1029376	The Heritage Strategy and Destination Management Plan should be used in conjunction with the Local Plan to develop a complete Core Strategy. In addition a review of the roads system is needed to make it fit for the next 20 years We also need a review of the costs of updating the infrastructure to cope with the housing increases	The National Planning Policy Framework (2018) states that plans should be supported by evidence that is "adequate and proportionate" (paragraph 31). New evidence has been produced through the development of the Core Strategy Review so far and will be produced for the next consultation and made available on the council's website.	No change proposed.
1.8	329	1157838	Please see my response to Paragraph 1.7 with regard to missing and incomplete documents and the effectiveness of public consultation events. Furthermore, I would like to point out that two planning officers were invited to a Shepway HEART Forum meeting to talk about the Core Strategy Review. As per the aforementioned consultation events, they concentrated solely on the "garden town", completely ignoring developments such as Shorncliffe camp and the Folkestone seafront. They effectively showed us a map of the development, some facts and figures, including the timeline for the review of the Core Strategy and PPLP. This is not an effective presentation to explain the review process, including all of the sites. Most questions asked were given rather vague answers. It was noted by several attendees that one of the officers appeared as though he didn't really want to be there. Perhaps he was more worried about the train he informed us he had to catch at 19:10. It is strange he would agree to come to a meeting at 18:00 to give a presentation at the end, if he had to catch a train from a station that is a good 10 minutes away. How long does he think our meetings take? As it transpired, we agreed to move their presentation forward, with the result that some members missed it. I do not feel that this is an example of positive community engagement.	The National Planning Policy Framework (2018) states that plans should be supported by evidence that is "adequate and proportionate" (paragraph 31). New evidence has been produced through the development of the Core Strategy Review so far and will be produced for the next consultation and made available on the council's website. The council held a series of consultation events to explain the proposals and give people the opportunity to ask questions and engaged on social media to answer questions. Officers attended the HEART Forum at the specific request of the Forum and answered questions for an hour-and-a-half until the agenda moved onto other matters.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.8	434	75105	<p>The task of responding to both this Review and the revised NPPF is made the more difficult due to the large number of papers and pieces of legislation quoted most of which are unknown to us eg. 1.8 page 8 and 1.11 on page 9. This Core Strategy Review is peppered with references using terminology and Council Planning Speak, only comprehensible to council planners and certain specialist council officers. We find it inconceivable that the residents and electors should be expected to study and respond to two important pieces of draft legislation at the same time, namely this Core Strategy Review and the revised NPPF and we reject the timetable. It is an absurd situation that ill serves the interests of the community which is largely excluded from the consultation process by reason of its inability to comprehend and connect.</p> <p>We here list some of the key issues on which we expect to make detailed representations to the PINS Inspectors conducting the forthcoming Public Inquiries, our common and overriding rejection of proposals and conclusions set out in the document follows from the lack of awareness of and engagement in the process by the community. The democratic process is not being enacted.</p>	<p>Noted. The text of the Core Strategy Review has been amended to simplify that of the adopted 2013 Core Strategy. Opportunities will be sought to improve the text further for the Regulation 19 version of the plan. The council cannot schedule its consultation to avoid any national or neighbouring consultations that may be in preparation and it has no advance notice of when the government is about to consult on any proposal - the website <a href="http://www.gov.uk/government/publications?publication_filter_option=consultations">www.gov.uk/government/publications?publication_filter_option=consultations</a> lists the large number of consultations being undertaken at any one time. The council held a series of consultation events to explain the proposals and give people the opportunity to ask questions. The consultation was held for eight weeks, longer than the six week standard consultation period.</p>	<p>Amend the text of the Core Strategy Review as far as possible to simplify the plan.</p>
1.9	435	75105	<p>The task of responding to both this Review and the revised NPPF is made the more difficult due to the large number of papers and pieces of legislation quoted most of which are unknown to us eg. 1.8 page 8 and 1.11 on page 9. This Core Strategy Review is peppered with references using terminology and Council Planning Speak, only comprehensible to council planners and certain specialist council officers. We find it inconceivable that the residents and electors should be expected to study and respond to two important pieces of draft legislation at the same time, namely this Core Strategy Review and the revised NPPF and we reject the timetable. It is an absurd situation that ill serves the interests of the community which is largely excluded from the consultation process by reason of its inability to comprehend and connect.</p> <p>We here list some of the key issues on which we expect to make detailed representations to the PINS Inspectors conducting the forthcoming Public Inquiries, our common and overriding rejection of proposals and conclusions set out in the document follows from the lack of awareness of and engagement in the process by the community. The democratic process is not being enacted.</p>	<p>Noted. The text of the Core Strategy Review has been amended to simplify that of the adopted 2013 Core Strategy. Opportunities will be sought to improve the text further for the Regulation 19 version of the plan. The council cannot schedule its consultation to avoid any national or neighbouring consultations that may be in preparation; the council has no advance notice of when the government is going to consult on new policy documents. The council held a series of consultation events to explain the proposals and give people the opportunity to ask questions. The consultation lasted for eight weeks, longer than the usual six week consultation period.</p>	<p>Amend the text of the Core Strategy Review for clarity as far as possible.</p>
1.11	436	75105	<p>1.11 page 9 Line 5 Queen 's speech June 2017 - ...land for new homes in the right places.. '.</p>	<p>Noted. This section will be updated to refer to the new National Planning Policy Framework (July 2018).</p>	<p>Update section to refer to the new National Planning Policy Framework.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.12	4	1157870	It is felt by many that the 'vision' for the District is not ambitious enough. We have no USP at present, apart from the Triennial, but no celebration of our cultural Heritage, or major visitor attraction	Noted. The council is working with local people on heritage issues, such as through proposals to introduce locally listed buildings. It is also currently developing a Neighbourhood Plan and a Design Statement with parish councils in the district. There will be further opportunities for joint work as the Heritage Strategy is finalised.	No change proposed.
1.12	117	1029376	as below	The government has introduced a requirement that all local planning authorities review their plans at least every five years. The review may be a partial review of a few policies or a full review of the document; this will depend on the issues facing the area at the time of the review.	No change proposed.
1.12	213	1162685	For this Core Strategy to be sound, the evidence base should surely cover the entire plan period to 2036/7.	The National Planning Policy Framework (2018) states that plans should be supported by evidence that is "adequate and proportionate" (paragraph 31). New evidence has been produced through the development of the Core Strategy Review so far and will be produced for the next consultation and made available on the council's website.	No change proposed.
1.15	100	1029376	The diagram merely indicates a review of Places and Policies Local Plan following the Core Strategy but does not indicate that the Local Plan should be compliant with the Core Strategy, hence the hierarchy is somewhat misleading. The Core strategy is also misleading in that, since this is a partial review Sections 1.2,2.1,2.2,3.1,3.2 and 4 are incomplete prior to developing 5. This means that we are being asked to agree to 5 prior to completing previous sections	The government has introduced a requirement that all local planning authorities review their plans at least every five years. The review may be a partial review of a few policies or a full review of the document; this will depend on the issues facing the area at the time of the review.	No change proposed.
<b>1.2 ABOUT FOLKESTONE &amp; HYTHE</b>					
1.25	5	1157870	There is no mention of the District's unique position in terms of the defensive role it has had over the centuries, or of the role of Shorncliffe in the creation of the modern British army. As a consequence, we have castles, defensive structures and built heritage, some of it scheduled as Ancient Monuments	Noted. Amend this section to refer to the defensive role that the district has played.	Amend paragraphs to refer to the defensive role that the district has played in the past.
1.25	115	1029376	Whilst the infrastructure is, in some cases, very good there are significant improvements needed to the overall infrastructure particularly roads. The airport at Lydd contributes little to the economy of the area. The High Speed railway is nearing capacity and any additional stops planned at Otterpool would add to the journey time for Dover and Folkestone residents. Local Roads are poorly laid out and in poor condition, a thorough review of the roads system is required in order to regenerate deprived areas in East Folkestone	The council has worked closely with infrastructure providers as part of the Core Strategy Review and is continuing to work with providers in drawing up the next version of the plan. Where infrastructure requirements for a specific site are confirmed, they are identified in relevant policies. Policy SS5: District Infrastructure Planning also sets out a general framework for infrastructure provision.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.25	214	1162685	The district's 'excellent infrastructure' is limited to the M20 and High speed rail. Other road connections, for example to Canterbury via Stone Street are poor and roads within the district leave a lot to be desired. The A259 lacks capacity at peak periods, especially west of New Romney and connections to 'London Ashford Airport' are so bad it seems unlikely to ever attract the business it is being expanded to accommodate. Access to the strategic site at Shorncliffe continues to be severely compromised by the Horn St railway bridge. The A261 into Hythe is under severe stress and will only get worse with planned developments in west Hythe.	Noted. The paragraph will be amended to clarify this statement.	Amend paragraph 1.25 to clarify statement.
1.25	84	1029376	Whilst the infrastructure is ,in some cases, very good there are significant improvements needed to the overall infrastructure particularly roads. The airport at Lydd contributes little to the economy of the area. The High Speed railway is nearing capacity and any additional stops planned at Otterpool would add to the journey time for Dover and Folkestone residents. Local Roads are poorly laid out and is poor condition, a thorough review of the roads system is required in order to regenerate deprived areas in East Folkestone	The council has worked closely with infrastructure providers as part of the Core Strategy Review and is continuing to work with providers in drawing up the next version of the plan. Where infrastructure requirements for a specific site are confirmed, they are identified in relevant policies. Policy SS5: District Infrastructure Planning also sets out a general framework for infrastructure provision.	No change proposed.
1.25	437	75105	Issues arising from 1.25 pages 11 and 12 Lydd (London Ashford Airport) can only be accessed by a lengthy two lane country road, is not a significant airport and there is no rail connection.	Noted.	No change proposed.
1.25	376	1157838	The infrastructure is most certainly not excellent. Roads are in extremely poor state all over the District, most certainly in Folkestone itself. Water supply is at its limit in some rural areas. Sewerage can be an issue. Broadband provision is often poor in remote areas. Mobile phone reception is extremely spotty in rural areas and even places such as Sandgate. We have had several major power cuts in Winter months over the past few years, one of which left some people without power for days, including vulnerable people with medical equipment. When there is snow, we are hopelessly ill-prepared and gritters do not visit many roads. Incidentally, whilst it is outside Kent, you forgot to mention that Rother also borders the District.	Noted. The statement in paragraph 1.25 will be clarified.	Clarify statement in paragraph 1.25 relating to infrastructure links.
1.28	438	75105	The Kent Downs AONB encompasses most of the existing settlements referred to on page 12 - eg. Lympne. The potential for despoliation of the of the AONB setting I s the reason five Planning Inspectors and a High Court Judge have refused development of Lympne Airfield which is immediately adjacent to the village.	Noted. The Core Strategy Review outlines the process the council has undertaken to identify areas with capacity for future development in Section 4.6: Strategic Allocations.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.31	118	1029376	The document indicates that inner and Northern Folkestone are deprived areas but does nothing to address this. A strategy should seek to resolve major problems	Disagree that the Plan does not try and resolve the issue of deprived areas in Folkestone. Whilst local plans focus on land use issues, the Core Strategy does set out the issues for the district, the aims and future vision (section 3) and then sets out the overall strategy in section 4. This not only considers the district as a whole but also the urban character area. The policies identify areas for new homes and businesses to ensure that the area can be regenerated. This, in conjunction with strategies and work by the District Council as a whole, such as strategies by Economic Development and Housing, ensure that deprived areas have the jobs and homes for the people who live there.	No change proposed.
1.31	544	1163824	<p>REPRESENTATIONS TO FOLKESTONE &amp; HYTHE DISTRICT COUNCIL CORE STRATEGY REVIEW 2018, REGULATION 18 CONSULTATION BOOKER WHOLESALE, PARK FARM INDUSTRIAL ESTATE, FOLKESTONE, CT19 5EY CBRE Ltd (CBRE) acts as planning consultants for CBRE Global Investors (CBRE GI) in respect of Booker Wholesale, Park Farm Industrial Estate, Folkestone, CT19 5EY ( the site ' hereafter). CBRE GI manage the site on behalf of its owners Azko Nobel CIF Nominees Ltd. CBRE are instructed to submit representations to Folkestone and Hythe District Council (FHDC) in respect of the consultation on their 2018 Core Strategy Review. The Site The site is located on the south east boundary of the Park Farm Industrial Estate and is approximately 0.7ha. The site comprises a single warehouse unit with ancillary parking located in front of the main building, and is accessible from Park Farm Road. The site is bound by allotments to the south, Park Farm Road to the west and other warehouse units to the north currently occupied by Hire Station. Private residential gardens back onto the site to the east, with the surrounding area to the south and west predominantly in residential use. The Beacon Folkestone school is located opposite the site, with the wider Park Farm Industrial Estate located north west and is bound by the A259 (Churchill Avenue). The site is located approximately 1km to Folkestone Central train station and had good public transport links with a bus stop located immediately outside the site on Park Farm Road. The Development Plan for FHDC comprises Saved Policies from the Local Plan (2006) and the Core Strategy Local Plan (2013). The site is located in the established major employment site of Park Farm Industrial Estate and is within a designated Priority Centre of Activity Network. A site location plan is appended to this letter.</p>	The Core Strategy Review sets out policies for strategic development and identifies land suitable for strategic level development across the district. For residential development, this equates to sites that could provide at least 250 or more homes with the necessary infrastructure. The site is only 0.7ha which would only cater for approximately 20 to 30 dwellings. It is, therefore, considered that this site would not provide the strategic scale benefits for the district and should not be allocated in the Core Strategy Review. Smaller scale sites and the allocation of employment sites are considered in the Places and Policies Local Plan, but as this is proceeding to examination, it is too late to consider this site or the argument for changing the employment policy. The site will, however, be considered in any future SHLAA/SHELA assessment, which will be reviewed regularly.	No change proposed.
1.31	561	1043780	See attached site submission	The representation discusses two sites within the Park Farm Industrial Estate, which is retained for employment in the Shepway District Local Plan (Policy E4) and in the emerging Places and Policies Local Plan Submission Draft (Policy E2). The representation seeks a more intensive use of the sites to increase employment levels and meet strategic targets for providing employment, commercial and retail floor space. The emerging Policy E2 does enable other uses to be permitted, subject to five criteria. Subject to other planning policies (both national and local) in regard to the sequential approach to town centre developments, there may be scope to consider other uses on the land.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.35	158	1162805	Folkestone is a collection of what has been described above. Yet its focus about on redeveloping the creative quarter (old high Street and Tontine Street) and triennial though positive in itself is used misleadingly in that those that appreciate such improvements are usually incommers and the creative improvements are in my opinion and from the many I people I speak to (as a business owner in the creative quarter) do not take into account the existing population who have reported a sense of bewilderment and concerns over the cost of such projects. On the whole such feedback concerns it self with the limitation of the areas publicised as Creative which in effect focuses tourism to a small proportion of the town	Noted. Clustering creative industries within a small creative quarter creates visibility and lends recognition of Folkestone being a creative hub by residents and visitors alike. It has also helped to create an international festival to attract more visitors and spend for the wider benefit of businesses across the town. Finding ways in which a growing creative sector can expand into other areas of the town will be important for the future economic health of the district. The government's 'Industrial Strategy Building a Britain Fit for the Future' recognises ideas and innovation as one of the five foundations for the future prosperity of the UK, and it is important that the Core Strategy Review does what it can to encourage this cluster of activity in Folkestone.	No change proposed.
Table 1.1	6	1157870	An added strength is the cultural Heritage, but this not mentioned in 1.25 above	Noted. Specific reference to cultural heritage will be added to Table 1.1.	Add reference to cultural heritage to Table 1.1.
Table 1.1	1	1159646	With regard to the assumed Strengths and Weaknesses the glaring omission from Weakness is the sad fact that we are lumbered with a highly manipulative group of individuals (councillors) determined to ignore reasoned argument and ride roughshod over local opinion.	The government has introduced a new methodology for calculating the need for housing development which the council must have regard to in the plans it is preparing. New development is needed to meet future household growth and the council cannot ignore this. Plans are subject to several stages of consultation and a public examination before an independent planning inspector before they can be brought into force and people have the opportunity to put their views across through this process.	No change proposed.
Table 1.1	137	1029376	Whilst the infrastructure, in some cases is outstanding, there are significant improvements needed to the overall roads system within Folkestone which is not helping the deprived areas who are within this poorly laid out system designed for ferry traffic some years ago. This should be added to the weaknesses. The rail system does provide a good service but the addition of more commuters will mean a lack of seating. Adding another station to the line will increase journey time	Noted. Reference will be added to Table 1.1 that Folkestone has some infrastructure constraints.	Add reference in Table 1.1 to Folkestone having some infrastructure constraints.
Table 1.1	439	75105	Table 1.1 Folkestone under 'Strengths'. The town does not have Excellent road and rail links to London.. ' The M20 is under capacity and frequently blocked whenever there is industrial action in Calais or bad weather interrupts cross channel ferries out of Dover. A possible Parkway station at Westenhanger would be dependent upon the advent of the Otterpool New Town development now in doubt due to both significant planning and financial set backs.	Noted. Some infrastructure links are not excellent. Table 1.1 will be amended to reflect this.	Amend Table 1.1 to reflect comments.
1.37	440	75105	Paras 1.37 & 1.38 and Table 1.2 page 15. The iconic and historically important Royal Military Canal listed as a National Monument which runs from Winchelsea in East Sussex to Seabrook at the eastern end of Prince's Parade in Hythe is under threat of development strongly opposed by English Heritage and local residents. Should development proceed it would seriously detract from the setting and restrict public access to the beach.	Noted. There are no proposals affecting the Royal Military Canal in the Core Strategy Review.	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.38	441	75105	Paras 1.37 & 1.38 and Table 1.2 page 15. The iconic and historically important Royal Military Canal listed as a National Monument which runs from Winchelsea in East Sussex to Seabrook at the eastern end of Prince 's Parade in Hythe is under threat of development strongly opposed by English Heritage and local residents. Should development proceed it would seriously detract from the setting and restrict public access to the beach.	Noted. There are no proposals for the Royal Military Canal in the Core Strategy Review.	No change proposed.
Table 1.2	7	1157870	Hythe was a part of the Shorncliffe Garrison, as it hosted the school of musketry, that was the original training establishment, now represented by the ranges. The RMC a SAM, should be valued and protected at all costs, and the 'hub' of defensive structures at Seabrook, may be missed as it might not be identified with either of the main towns, or with the garrison at Shorncliffe	Noted. Table 1.2 will be amended to refer to Hythe's heritage.	Amend Table 1.2 to refer to Hythe's heritage.
Table 1.2	442	75105	Paras 1.37 & 1.38 and Table 1.2 page 15. The iconic and historically important Royal Military Canal listed as a National Monument which runs from Winchelsea in East Sussex to Seabrook at the eastern end of Prince 's Parade in Hythe is under threat of development strongly opposed by English Heritage and local residents. Should development proceed it would seriously detract from the setting and restrict public access to the beach.	Noted. There are no proposals affecting the Royal Military Canal in the Core Strategy Review.	Amend Table 1.2 to refer to Hythe's heritage.
1.41	443	75105	1.41 1.48 and Table 1.3 - Romney Marsh. To those of us that live in the area and know the Marsh well the 'weaknesses' listed in Table 1.3 are in effect its 'strengths' as they seriously inhibit development. The importance of Romney Marsh as a unique and essentially undeveloped area of land cannot be overstated. The coastal strip running from Fishermans Beach and the MOD Ranges at Hythe to Dungeness and the larger MOD establishment was formed over several thousand years by storms which threw up the vast expanse of shingle that comprises that part of the Marsh. It is home to a very significant number of rare plants, birds and insects and hosts the original RSPB Reserve.	The council does not consider that lack of suitable housing, deprivation, lack of facilities, limited rail services, lack of employment opportunities, severe flood risk or impacts on sensitive ecology could be counted as "strengths".	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.41	585	333951	<p>Land North of Cockreed Lane, New Romney Folkestone and Hythe District Council Core Strategy Review Consultation Representation on Behalf of Christ Church, Oxford Savills has been instructed by Christ Church, Oxford to submit representations to the first draft of the Core Strategy Review (Regulation 18). This follows a representation submitted to the Preferred Options ' stage of the Shepway Places and Policies Local Plan in November 2016. This representation seeks the amendment of Policy CSD8 New Romney Strategy ' to support the extension of the allocation to include Land North of Cockreed Lane. Land North of Cockreed Lane represents a sustainable location on the edge of New Romney, adjacent to existing residential development. It would therefore be in the interests of proper and comprehensive planning to include this as part of Policy CSD8. Not only would this deliver much needed housing within the District, but also reinforce the supply of housing which at present only marginally exceeds the District 's 19-year requirement (2018/19 2036/37). A location plan has been enclosed with this letter. The site is outlined in red, and comprises an area of 4.7 hectares. Site Description The site is approximately 4.7 hectares and currently comprises an agricultural field. The topography of the site is generally flat. The site is located north of Cockreed Lane from which it can be accessed. The site is bounded by Hope Lane to the north, Cockreed Lane to the south/east, and the Wallingham Drain and tree planting to the west. Adjacent land to the north and west is in agricultural use. Residential development lies to the south and playing fields and an open field to the east. The site is within close proximity to New Romney which contains a number of services and facilities including a range of shops on the High Street (Dymchurch Road), primary and secondary schools and doctors surgeries. A number of bus services</p>	<p>The 4.7ha site is located to the north of New Romney, beyond the current broad location identified in the adopted Core Strategy (2013). The site has been previously assessed in the District Council's Strategic Housing Land Availability Assessment (SHLAA) (Ref 373), which concluded: '...it is considered unsuitable for development at this stage given ... its separation from the main settlement it is not in the same administrative ward, and there is a significant amount of undeveloped open space between.... Therefore... development would currently constitute encroachment into the countryside and should not be allocated at this time'. Since that assessment the broad location has been granted outline and full planning permission. The areas with full planning permission (to the north and east) have either been completed (north) or is under construction (east). The space between the site and the built form is, therefore, starting to be filled in. However, the site is located in an open rural location with no direct development to the north, west and southwest. This would lead to development encroaching into the countryside, which would be detrimental to the rural, open, character of the area. If the site is considered on its own, it would also be too small to be identified as a strategic site. The Core Strategy sets out policies for strategic development and identifies land suitable for strategic level development across the district. For residential development, this equates to sites that could provide at least 250 or more homes with the necessary infrastructure (this site could provide approximately 140 dwellings at 30 dwellings per hectare). It is also premature at this time to consider the site as an extension to the broad location. The current broad location has not yet been built out and important elements of the development, such as a link through the site, have not yet been created. There is, therefore, concern that if this land was to be developed, the existing wider road network would not be suitable for the additional traffic and there would be no opportunities through any</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.41	569	588509	<p>Consistent with National Policy 18. The Council 's failure to take forward a policy acknowledging and supporting LAA in the Places and Policies Local Plan and/or the CSLPR is a failure to meet the Council 's ambitions as set out in the Shepway Economic Development Strategy (2015-2020). 19. The Shepway Economic Development Strategy states: Lydd Airport is set to bring major economic development opportunities in the future, following Shepway District Council 's granting of planning permission for a new terminal building and for the extension of the runway. This could act as the catalyst for attracting new support and other service based businesses to this area. 20. The CSLPR has failed to acknowledge or pursue the ambition of LAA, in terms of its undoubted ability to act as the catalyst for attracting business and economic development to the area. 21. Paragraph 9 of the NPPF states that pursuing sustainable development means making it easier for jobs to be created and improving conditions where people live, work, travel and take leisure. Paragraph 18 and 19 of the NPPF further state that the Government is committed to securing economic growth in order to create jobs and prosperity and is doing everything to support sustainable economic growth. 22. Omitting a policy addressing the future of LAA, which will include the delivery of jobs and travel opportunities, means the CSLPR is contrary to national policy and is unsound. As noted in paragraph 14 above, stating that the Council will monitor the economic situation before considering addressing the socio-economic challenges faced by Romney Marsh in a future Core Strategy review is not encouraging economic development. Conversely, it is potentially acting as an impediment to sustainable growth. 23. We consider that there should be a specific policy addressing LAA, highlighting its importance for the District and supporting its continued</p>	<p>Noted. In the absence of clear development intentions for the future of the site, the council does not consider that a specific policy for LAA would be justified. However the council will work with LAA, the local community and other stakeholders to prepare an Action Area Plan for the site, should specific development proposals come forward at some point in the future.</p>	<p>Amend Policy SS1: District Spatial Strategy and supporting text to state that the council will work with the airport, local community and other stakeholders to prepare an Action Area Plan for the London Ashford Airport site, should proposals come forward for further expansion.</p>
1.42	444	75105	<p>1.41 1.48 and Table 1.3 - Romney Marsh. To those of us that live in the area and know the Marsh well the 'weaknesses' listed in Table 1.3 are in effect its 'strengths' as they seriously inhibit development. The importance of Romney Marsh as a unique and essentially undeveloped area of land cannot be overstated. The coastal strip running from Fishermans Beach and the MOD Ranges at Hythe to Dungeness and the larger MOD establishment was formed over several thousand years by storms which threw up the vast expanse of shingle that comprises that part of the Marsh. It is home to a very significant number of rare plants, birds and insects and hosts the original RSPB Reserve.</p>	<p>Noted. The council does not consider that the issues listed in Table 1.3 - lack of access to suitable housing, deprivation, lack of facilities, limited accessibility, lack of employment opportunities, high flood risk and impacts on ecology - could be said to be "strengths".</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.43	445	75105	1.41 1.48 and Table 1.3 - Romney Marsh. To those of us that live in the area and know the Marsh well the weaknesses ' listed in Table 1.3 are in effect its ' strengths ' as they seriously inhibit development. The importance of Romney Marsh as a unique and essentially undeveloped area of land cannot be overstated. The coastal strip running from Fishermans Beach and the MOD Ranges at Hythe to Dungeness and the larger MOD establishment was formed over several thousand years by storms which threw up the vast expanse of shingle that comprises that part of the Marsh. It is home to a very significant number of rare plants, birds and insects and hosts the original RSPB Reserve.	Noted. The council does not consider that the issues listed in Table 1.3 - lack of access to suitable housing, deprivation, lack of facilities, limited accessibility, lack of employment opportunities, high flood risk and impacts on ecology - could be said to be "strengths".	No change proposed.
1.44	446	75105	1.41 1.48 and Table 1.3 - Romney Marsh. To those of us that live in the area and know the Marsh well the weaknesses ' listed in Table 1.3 are in effect its ' strengths ' as they seriously inhibit development. The importance of Romney Marsh as a unique and essentially undeveloped area of land cannot be overstated. The coastal strip running from Fishermans Beach and the MOD Ranges at Hythe to Dungeness and the larger MOD establishment was formed over several thousand years by storms which threw up the vast expanse of shingle that comprises that part of the Marsh. It is home to a very significant number of rare plants, birds and insects and hosts the original RSPB Reserve.	Noted. The council does not consider that the issues listed in Table 1.3 - lack of access to suitable housing, deprivation, lack of facilities, limited accessibility, lack of employment opportunities, high flood risk and impacts on ecology - could be said to be "strengths".	No change proposed.
1.45	447	75105	1.41 1.48 and Table 1.3 - Romney Marsh. To those of us that live in the area and know the Marsh well the weaknesses ' listed in Table 1.3 are in effect its ' strengths ' as they seriously inhibit development. The importance of Romney Marsh as a unique and essentially undeveloped area of land cannot be overstated. The coastal strip running from Fishermans Beach and the MOD Ranges at Hythe to Dungeness and the larger MOD establishment was formed over several thousand years by storms which threw up the vast expanse of shingle that comprises that part of the Marsh. It is home to a very significant number of rare plants, birds and insects and hosts the original RSPB Reserve.	Noted. The council does not consider that the issues listed in Table 1.3 - lack of access to suitable housing, deprivation, lack of facilities, limited accessibility, lack of employment opportunities, high flood risk and impacts on ecology - could be said to be "strengths".	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.45	570	588509	<p>25. The following section sets out our proposed amendments to the CSLPR to ensure the plan is sound. This includes justification on why a policy on the LAA and/or Romney Marsh (including support for LAA) is necessary to make the Plan sound and provided a draft working for the policy. Core Strategy Local Plan Review New Policy for LAA 26. The CSLPR 's Strategic Need A states that the Council will build on economic strengths by supporting key sectors and businesses by promoting further investment and maximising opportunities for growth (our emphasis). 27. The CSLPR states that the District has excellent infrastructure and connections, including by air, with specific reference to LAA. It states that the District is, therefore, well placed to capitalise on this outstanding infrastructure by providing opportunities for business growth and inward investment to the area. 28. Paragraph 1.45 of the CSLPR states that LAA is well established and has attracted significant investment proposals. Table 1.3 sets out the strengths and weaknesses of the Romney Marsh area. One of the weaknesses identified is the limited large-scale employment opportunities. LAA provides stable employment in the area. In order to maximise LAA 's opportunities for growth, the CSLPR must acknowledge LAA 's potential to expand beyond its current planning consents, if the environmental impacts are acceptable. 29. To ensure that the weakness outlined in Table 1.3 are mitigated, LAA should be acknowledged as an opportunity location. LAA 's current positive role as a significant employer in Romney Marsh should be identified as a strength. A specific policy for LAA to recognise its importance and support the principle of further improvements, expansion and investment, subject to environmental considerations, should be included. 30. The CSLPR fails to acknowledge and reasonably balance the long-term economic aspirations of LAA, which will benefit</p>	Noted.	Amend paragraph 1.45 to refer specifically to London Ashford Airport.
1.46	448	75105	<p>1.41 1.48 and Table 1.3 - Romney Marsh. To those of us that live in the area and know the Marsh well the 'weaknesses ' listed in Table 1.3 are in effect its ' strengths ' as they seriously inhibit development. The importance of Romney Marsh as a unique and essentially undeveloped area of land cannot be overstated. The coastal strip running from Fishermans Beach and the MOD Ranges at Hythe to Dungeness and the larger MOD establishment was formed over several thousand years by storms which threw up the vast expanse of shingle that comprises that part of the Marsh. It is home to a very significant number of rare plants, birds and insects and hosts the original RSPB Reserve.</p>	Noted. The council does not consider that the issues listed in Table 1.3 - lack of access to suitable housing, deprivation, lack of facilities, limited accessibility, lack of employment opportunities, high flood risk and impacts on ecology - could be said to be "strengths".	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.47	449	75105	1.41 1.48 and Table 1.3 - Romney Marsh. To those of us that live in the area and know the Marsh well the weaknesses ' listed in Table 1.3 are in effect its ' strengths ' as they seriously inhibit development. The importance of Romney Marsh as a unique and essentially undeveloped area of land cannot be overstated. The coastal strip running from Fishermans Beach and the MOD Ranges at Hythe to Dungeness and the larger MOD establishment was formed over several thousand years by storms which threw up the vast expanse of shingle that comprises that part of the Marsh. It is home to a very significant number of rare plants, birds and insects and hosts the original RSPB Reserve.	Noted. The council does not consider that the issues listed in Table 1.3 - lack of access to suitable housing, deprivation, lack of facilities, limited accessibility, lack of employment opportunities, high flood risk and impacts on ecology - could be said to be "strengths".	No change proposed.
1.48	450	75105	1.41 1.48 and Table 1.3 - Romney Marsh. To those of us that live in the area and know the Marsh well the weaknesses ' listed in Table 1.3 are in effect its ' strengths ' as they seriously inhibit development. The importance of Romney Marsh as a unique and essentially undeveloped area of land cannot be overstated. The coastal strip running from Fishermans Beach and the MOD Ranges at Hythe to Dungeness and the larger MOD establishment was formed over several thousand years by storms which threw up the vast expanse of shingle that comprises that part of the Marsh. It is home to a very significant number of rare plants, birds and insects and hosts the original RSPB Reserve.	Noted. The council does not consider that the issues listed in Table 1.3 - lack of access to suitable housing, deprivation, lack of facilities, limited accessibility, lack of employment opportunities, high flood risk and impacts on ecology - could be said to be "strengths".	No change proposed.
Table 1.3	8	1157870	Needs a Tourism Strategy for the Marsh	Noted. Although the Destination Management Plan has not been formally adopted by the council, it has brought together a wide range of tourism groups and businesses to create the Folkestone & Hythe Tourism Board, with representatives from major tourist attractions, accommodation providers, Visit Kent, Folkestone Town Council and F&HDC, . The Board has focussed, in the first instance, on marketing the district, working together to produce a tourism website ( <a href="http://www.visitfolkestoneandhythe.co.uk">www.visitfolkestoneandhythe.co.uk</a> ) which was launched in May 2018. This has provided an important platform to market the district, sitting within the family of the Visit Kent website. The Board is now looking at future projects to take forward for the year ahead. Folkestone & Hythe District Council contributes to a wide variety of other tourist initiatives, helping managing important attractions such as the Coastal Park, Royal Military Canal, Folkestone Warren, the district 's beaches, and supporting other attractions and initiatives such as the Romney Marsh Visitor Centre and the White Cliffs and Romney Marsh Countryside Partnerships, which focus strongly on helping local people and visitors to enjoy the district 's built and natural heritage.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Table 1.3	291	1162196	<p>This section needs rewriting as it does not reflect the strengths and weaknesses of Romney Marsh only SDC 's desire to develop and failure to appreciate the importance of protecting land and landscape for its own sake. Most of the weaknesses stated reflect consequences of over development. There now needs to be more focus on quality and appropriateness, not volume and consequential problems. For example, the inability of local people to access housing is not due to the lack of housing but to the failure to provide appropriate housing, in particular affordable housing. Romney Marsh has natural constraints such as being a major flood plain. The manoeuvring to overcome these constraints should stop. The fact that there is no mention of agriculture, a vital land use of Romney Marsh, or the importance of tourism based on nature and the seaside, speaks to the preference given to inappropriate development</p> <p>Strengths should include: Flourishing agricultural industry secured on the area 's high proportion of grade 1 and grade 2 agricultural land Important tourist destination centred on the seaside and natural environment Coastal resorts which remain popular in season, especially for beaches and watersports New Romney as hub town for the Romney Marsh Area has employment and housing growth opportunities . This point should be eliminated. It is not a strength - only an aspiration. This point should be replaced by : Balanced mix of towns and villages with New Romney as the principle hub Weaknesses should include: Inadequate supply of appropriate housing. Constraints on local ability to access suitable housing Most of the weaknesses mentioned in this table are consequences of Shepway 's desire to develop insensitively in rural areas particularly those which have natural and legal constraints. For example, Take the two points: Rural deprivation in some towns</p>	<p>Noted. The council does not consider that the issues listed in Table 1.3 as "weaknesses" - lack of access to suitable housing, deprivation, lack of facilities, limited accessibility, lack of employment opportunities, high flood risk and impacts on ecology - could be said to be "strengths". The area's unique natural environments, coastal resorts, watersports, traditional settlements and distinctive landscapes are all recognised in the table as "strengths". The table will be amended to refer to the agricultural importance of the area.</p>	<p>Amend Table 1.3 to refer to the agricultural importance of the area as a "strength".</p>
Table 1.3	215	1162685	<p>What does 'Constraints on local ability to access suitable housing' mean? If it means there is a lack of affordable housing for locals, why not say so? What does 'isolated from available jobs' mean? There aren't enough jobs on the Marsh, or people have difficulty travelling to available jobs on the Marsh? Flood risk is not limited to the risk of (presumably coastal) defences being overwhelmed. The winter of 2013/4 highlighted the risks from fluvial flooding. If recreational impact on sensitive ecological areas is highlighted here then so should the impact of increased air traffic.</p>	<p>Noted. Table 1.3 will be amended to clarify these points.</p>	<p>Amend Table 1.3 to clarify the statements.</p>
Table 1.3	451	75105	<p>1.41 1.48 and Table 1.3 - Romney Marsh. To those of us that live in the area and know the Marsh well the 'weaknesses' listed in Table 1.3 are in effect its 'strengths' as they seriously inhibit development. The importance of Romney Marsh as a unique and essentially undeveloped area of land cannot be overstated. The coastal strip running from Fishermans Beach and the MOD Ranges at Hythe to Dungeness and the larger MOD establishment was formed over several thousand years by storms which threw up the vast expanse of shingle that comprises that part of the Marsh. It is home to a very significant number of rare plants, birds and insects and hosts the original RSPB Reserve.</p>	<p>Noted. The council does not consider that the issues listed in Table 1.3 - lack of access to suitable housing, deprivation, lack of facilities, limited accessibility, lack of employment opportunities, high flood risk and impacts on ecology - could be said to be "strengths".</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Table 1.3	571	588509	<p>25. The following section sets out our proposed amendments to the CSLPR to ensure the plan is sound. This includes justification on why a policy on the LAA and/or Romney Marsh (including support for LAA) is necessary to make the Plan sound and provided a draft working for the policy. Core Strategy Local Plan Review New Policy for LAA 26. The CSLPR 's Strategic Need A states that the Council will build on economic strengths by supporting key sectors and businesses by promoting further investment and maximising opportunities for growth (our emphasis). 27. The CSLPR states that the District has excellent infrastructure and connections, including by air, with specific reference to LAA. It states that the District is, therefore, well placed to capitalise on this outstanding infrastructure by providing opportunities for business growth and inward investment to the area. 28. Paragraph 1.45 of the CSLPR states that LAA is well established and has attracted significant investment proposals. Table 1.3 sets out the strengths and weaknesses of the Romney Marsh area. One of the weaknesses identified is the limited large-scale employment opportunities. LAA provides stable employment in the area. In order to maximise LAA 's opportunities for growth, the CSLPR must acknowledge LAA 's potential to expand beyond its current planning consents, if the environmental impacts are acceptable. 29. To ensure that the weakness outlined in Table 1.3 are mitigated, LAA should be acknowledged as an opportunity location. LAA 's current positive role as a significant employer in Romney Marsh should be identified as a strength. A specific policy for LAA to recognise its importance and support the principle of further improvements, expansion and investment, subject to environmental considerations, should be included. 30. The CSLPR fails to acknowledge and reasonably balance the long-term economic aspirations of LAA, which will benefit</p>	<p>Noted. In the absence of clear development intentions for the future of the site, the council does not consider that a specific policy for LAA would be justified. However the council will work with LAA, the local community and other stakeholders to prepare an Action Area Plan for the site, should specific development proposals come forward at some point in the future. Policy SS1: District Spatial Strategy will be amended to reflect this.</p>	<p>Amend Policy SS1: District Spatial Strategy and supporting text to state that the council will work with the airport, local community and other stakeholders to prepare an Action Area Plan for the London Ashford Airport site, should proposals come forward for further expansion.</p>
1.49	60	1032113	<p>The AONB should be given its correct title (in the last sentence it is referred to as the North Downs AONB).</p>	<p>Noted. Amend paragraph 1.49 to refer to the Kent Downs Area of Outstanding Natural Beauty.</p>	<p>Amend paragraph 1.49 to refer to the Kent Downs Area of Outstanding Natural Beauty.</p>
1.49	452	75105	<p>Paras 1.49 1.54 and Table 1.4. Kent North Downs AONB is the County 's second important area which owes much to its tabled weaknesses ' for the preservation of its strengths '. The population at large owes its existence to the clear chalk-filtered potable water supplied and conserved by this most extensive aquifer which is the North Downs.</p>	<p>Noted. These paragraphs will be amended to refer to the role of the North Downs in supplying water to the area.</p>	<p>Amend paragraphs in this section to refer to the role of the North Downs in supplying water.</p>



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.49	528	1037842	Site Submitted	The 1.6ha site lies on the edge of the village adjacent to the similar sized Etchinghill Nursery site, which has been allocated for residential development in the emerging Places and Policies Local Plan (Submission Draft Published 2018). The Core Strategy Review sets out policies for strategic development and identifies land suitable for strategic level development across the district. For residential development, this equates to sites that could provide at least 250 or more homes with the necessary infrastructure. The representation suggests that this site would provide 20 dwellings or 10,000sqm of floorspace. It is, therefore, considered that this site would not provide the strategic scale benefits for the district and could not be allocated in the Core Strategy Review. The District Council will, however, add the site to the list of sites in the current Strategic Housing Land Availability Assessment (SHLAA) for consideration in the future.	No action other than to test the site in the SHLAA for possible future smaller site developments.
1.49	562	1164182	See attached site submission	The 13.8ha site is located to the west of Moorstock Lane and to the north of Ashford Road (A20) on the western side of Sellindge. The Shepway Growth Options Study Phase Two Report (April 2017) considered the suitability areas around Sellindge for strategic sized development. This assessment considered the impact of such development on a number of issues, such as agricultural land, landscape (particularly in relation to the AONB), heritage, or the wider highway network. It was concluded that land to the west of Moorstock Lane was considered unsuitable due to the detrimental impact on landscape and heritage. For landscape the Phase Two Report concluded that: 'The landscape characteristics of land north and west of Moorstock Lane is considered to make it unsuitable on the landscape criterion, specifically its strongly rural and remote character and its small-scale fields, mature and veteran trees'. For heritage the Phase Two Report concluded that: '... the setting of Guinea Hall is part of the land west of Moorstock Lane considered unsuitable on the landscape criterion. Land north of Ashford Road to the north-east of St Mary's Church, Sellindge, is part of the church setting and the historic landscape around Hoddiford Mill, and as such, is considered unsuitable for development, but was less suitable in landscape terms in any case'.	The site is unsuitable for development. No change proposed.
1.5	453	75105	Paras 1.49 1.54 and Table 1.4. Kent North Downs AONB is the County's second important area which owes much to its tabled weaknesses ' for the preservation of its strengths '. The population at large owes its existence to the clear chalk-filtered potable water supplied and conserved by this most extensive aquifer which is the North Downs.	Noted. These paragraphs will be amended to refer to the role of the North Downs in supplying water.	Amend paragraphs in this section to refer to the role of the North Downs in supplying water to the area.
1.51	454	75105	Paras 1.49 1.54 and Table 1.4. Kent North Downs AONB is the County's second important area which owes much to its tabled weaknesses ' for the preservation of its strengths '. The population at large owes its existence to the clear chalk-filtered potable water supplied and conserved by this most extensive aquifer which is the North Downs.	Noted. These paragraphs will be amended to refer to the role of the North Downs in supplying water.	Amend paragraphs to refer to the role of the North Downs in supplying water to the area.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
1.52	455	75105	Paras 1.49 1.54 and Table 1.4. Kent North Downs AONB is the County 's second important area which owes much to its tabled weaknesses ' for the preservation of its strengths '. The population at large owes its existence to the clear chalk-filtered potable water supplied and conserved by this most extensive aquifer which is the North Downs.	Noted. These paragraphs will be amended to refer to the role of the North Downs in supplying water.	Amend paragraphs to refer to the role of the North Downs in supplying water to the area.
1.53	456	75105	Paras 1.49 1.54 and Table 1.4. Kent North Downs AONB is the County 's second important area which owes much to its tabled weaknesses ' for the preservation of its strengths '. The population at large owes its existence to the clear chalk-filtered potable water supplied and conserved by this most extensive aquifer which is the North Downs.	Noted. These paragraphs will be amended to refer to the role of the North Downs in supplying water.	Amend paragraphs in this section to refer to the role of the North Downs in supplying water to the area.
Table 1.4	458	75105	Paras 1.49 1.54 and Table 1.4. Kent North Downs AONB is the County 's second important area which owes much to its tabled weaknesses ' for the preservation of its strengths '. The population at large owes its existence to the clear chalk-filtered potable water supplied and conserved by this most extensive aquifer which is the North Downs.	Noted. These paragraphs will be amended to refer to the role of the North Downs in supplying water.	Amend paragraphs in this section to refer to the role of the North Downs in supplying water to the area.
Table 1.4	374	894636	The table identifies a range of weaknesses implying that these apply across the full area, although the text has already noted that these vary greatly across the geographical extent, small hamlets to larger villages. The intricacies and interactions are not fully recognised. Rural transport links are poor. Communities rely entirely in remoter areas on private transport. Even within the larger villages the provision of public transport is still poor, and in itself the greatest obstacle to their truest sustainability, as well as that of their immediate satellites. The absence of a good integrated public transport system impacts negatively on all aspects. A decent public transport system connecting to Ashford Railway station would give perfectly sensible access to high speed rail for commuters and longer distance travellers, whilst also facilitating access to local facilities for those who stay within the area. Access to work, access to schools, access to towns.	Noted. Table 1.4 records the attractive environment of the Area of Outstanding Natural Beauty as a "strength" and the impacts of the urban environment and infrastructure routes as a "weakness".	No change proposed.
1.54	457	75105	Paras 1.49 1.54 and Table 1.4. Kent North Downs AONB is the County 's second important area which owes much to its tabled weaknesses ' for the preservation of its strengths '. The population at large owes its existence to the clear chalk-filtered potable water supplied and conserved by this most extensive aquifer which is the North Downs.	Noted. These paragraphs will be amended to refer to the role of the North Downs in supplying water.	Amend paragraphs in this section to refer to the role of the North Downs in supplying water to the area.
<b>2.1 DEVELOPMENT CHALLENGES AND POTENTIAL</b>					
2.2	553	1164105	The economic and social objectives of the plan to address deprivation within the district are acknowledged. However, there is an assumption, for instance at paragraph 2.2 of the Plan, that the garden settlement has to be the means by which this will be addressed. The assumption that the districts spatial strategy should be underpinned by a garden town requires further testing if it is to represent a fundamental ' building block ' of the plan as it is at present.	Section 4.6 of the plan (Strategic Allocations) sets out more detail on the evidence supporting the garden settlement as a strategic allocation. Section 2.1 sets out the general context of development in Kent and East Kent.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.3	31	1162344	That's exactly right - the concreting over of vast swathes of countryside would be to service population migration from London, NOT for local people.	The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or the natural change in households. The government's objective is to significantly boost the supply of homes (National Planning Policy Framework, paragraph 59) and the council is required to plan for the growth in households.	No change proposed.
2.3	202	1163015	people are migrating from london (2.3) and the vast majority of them are building their future plans here. they are attracted here because the property is 'affordable' (relative to london) many of them are in some way, directly or indirectly associated with the creative industries', folkestone is and always has been a magnet for creatives, artists, musicians, inventors. now we 've finally got them, let 's try and keep them AND their children (not literally you understand). the town has fought for long enough to regenerate now we 're at the beginning of a major shift in fortunes, let 's not kill off all of the vibrancy and turn in to eastbourne! if there is a vibrant social scene/infrastructure / choice of establishments in which to socialise, they will integrate with like minded individuals, locals and other migrants. this will keep them here and attract more like minded people. they will build communities, spend their time and money here, isn't that the real objective?	The council notes these comments and agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government 's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council 's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.3	459	75105	<p>Strategic Issues Page 22 paras. 2.3 2.6 The 178,600 new homes planned for the County is a totally unrealistic objective. Whether for delivery by 2031 or any other forecast year. There will simply not be sufficient water. The County is already designated as an area of water scarcity ' indicating that drought conditions would apply following two winters of less than average rainfall. Affinity Water (AW) the supplier to east Kent stated at a meeting on 23 rd February that capacity exists for the first ( Otterpool )1000 properties, but then infrastructure upgrades will be needed after that '. SDC 's (and probably KCC 's) water consumption figure of 90 litres per person per day (lpd) must have been dreamt up in cloud cuckoo land. AW states that its average consumption is between 160-141 lpd. so bases its forecast ability to supply on 155 lpd. Implacable resistance to house building on any other than a very modest local scale allowing for strictly local needs is meeting with growing resistance as we note the inward migration in Kent accounts for 72% of the County 's population increase. Thus the overwhelming rejection of the Otterpool Newtown development by the community means that under the terms of the DCLG 's Locally-Led ... document the proposal cannot proceed. Notwithstanding the wording of para. 55 on page 25 which implies that ' strong local commitment.. ' equates to that of our LA Shepway District Council, our LA is completely out of step with the community resorting to the malpractice of consistently misrepresenting the figures and publicising untrue statements by its senior elected members and some officers in an attempt to show public support. The Folkestone and Dover area is known as the Dour region (WRZ 7) and is the most water stressed area in the UK reliant for 90% on groundwater supply. Unlike other water companies, Affinity/we have no sizable reservoirs being dependant on rainfall to recharge our</p>	<p>The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or the natural change in households. The government's objective is to significantly boost the supply of homes (National Planning Policy Framework, paragraph 59) and the council is required to plan for the growth in households. Issues of water supply and water quality are considered in the Council's Water Cycle Study.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.3	479	1037610	<p>2.1 District Development Challenges and Potential 2.3-5 These sections talk of migration, numbers of houses to be built and employment providing evidence that house building is developer led, highly priced and being constructed using out of area contractors. i.e. Shorncliffe Heights demolition contractors are out of county, suggesting that National Housebuilders have their own teams not local to the areas of work. Therefore, we must question what do these schemes do for the local job market and the local economy? Perhaps part of the S106 agreements should be that a set % provide for local employment and/or skills training opportunities Housing development where possible, should be community led, built by local companies bidding for the work by tender and managed by local professionals. I would urge the district investigate a scheme they partnered in the 1990 's for 'The Meade ' in Hawkinge using a Cost Plan housing method; council owned land, where the project delivered homes at cost to those who met the criteria of residents wishing to buy their first home '.it worked! It would appear that Migration is driving the strategy not the needs of local people. Commercial interest, commercial viability and income to the District Council based on community infrastructure levies (or land values in the case of Otterpool) are driving quantities of housebuilding in this strategy. This takes the possibility of future home ownership by local people on local salaries out of reach. Shared ownership is not the answer. Help to buy has had a minimal impact. Locally led development could be the answer. No shortcuts, no loss of CIL, everything paid for except developer profits. Otterpool could be the catalyst for regeneration. More needs to be done to address this developer dictated glut of poorly built / cheap to build/expensive to buy housing Refer <a href="https://www.theguardian.com/commentisfree/2017/feb/23/building-as below">https://www.theguardian.com/commentisfree/2017/feb/23/building-</a></p>	<p>The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt natural household growth. With the Core Strategy Review and Places and Policies Local Plan the council is providing a range of sites from small sites of around 10 homes to a new garden settlement, as well as requiring the provision of self-build plots as part of larger developments. This is intended to provide a range of different types of homes to cater for different needs.</p>	No change proposed.
2.4	119	1029376	<p>as below</p>	<p>The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt the natural change in households. The National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (paragraph 59), and the council is required to plan for the future growth of households.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.4	460	75105	<p>Strategic Issues Page 22 paras. 2.3 2.6 The 178,600 new homes planned for the County is a totally unrealistic objective. Whether for delivery by 2031 or any other forecast year. There will simply not be sufficient water. The County is already designated as an area of water scarcity ' indicating that drought conditions would apply following two winters of less than average rainfall. Affinity Water (AW) the supplier to east Kent stated at a meeting on 23 rd February that capacity exists for the first ( Otterpool )1000 properties, but then infrastructure upgrades will be needed after that '. SDC 's (and probably KCC 's) water consumption figure of 90 litres per person per day (lpd) must have been dreamt up in cloud cuckoo land. AW states that its average consumption is between 160-141 lpd. so bases its forecast ability to supply on 155 lpd. Implacable resistance to house building on any other than a very modest local scale allowing for strictly local needs is meeting with growing resistance as we note the inward migration in Kent accounts for 72% of the County 's population increase. Thus the overwhelming rejection of the Otterpool Newtown development by the community means that under the terms of the DCLG 's Locally-Led ... document the proposal cannot proceed. Notwithstanding the wording of para. 55 on page 25 which implies that ' strong local commitment.. ' equates to that of our LA Shepway District Council, our LA is completely out of step with the community resorting to the malpractice of consistently misrepresenting the figures and publicising untrue statements by its senior elected members and some officers in an attempt to show public support. The Folkestone and Dover area is known as the Dour region (WRZ 7) and is the most water stressed area in the UK reliant for 90% on groundwater supply. Unlike other water companies, Affinity/we have no sizable reservoirs being dependant on rainfall to recharge our</p>	<p>The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt natural household growth. Issues of water supply and water quality are considered in the Council's Water Cycle Study.</p>	<p>No change proposed.</p>
2.5	120	1029376	<p>The statement that we need more jobs because we have more housing means that if we dont build we wont need more jobs, so why build!!</p>	<p>The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt the natural change in households.</p>	<p>No change proposed.</p>
2.5	138	1029376	<p>The previous clause 2.4 indicates that Kent has made a significant contribution already. This clause indicates that because we are building houses we need to create jobs. It appears far easier to build houses than create jobs so we are in a vicious circle</p>	<p>The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt the natural change in households.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.5	461	75105	<p>Strategic Issues Page 22 paras. 2.3 2.6 The 178,600 new homes planned for the County is a totally unrealistic objective. Whether for delivery by 2031 or any other forecast year. There will simply not be sufficient water. The County is already designated as an area of water scarcity ' indicating that drought conditions would apply following two winters of less than average rainfall. Affinity Water (AW) the supplier to east Kent stated at a meeting on 23 rd February that capacity exists for the first ( Otterpool )1000 properties, but then infrastructure upgrades will be needed after that '. SDC 's (and probably KCC 's) water consumption figure of 90 litres per person per day (lpd) must have been dreamt up in cloud cuckoo land. AW states that its average consumption is between 160-141 lpd. so bases its forecast ability to supply on 155 lpd. Implacable resistance to house building on any other than a very modest local scale allowing for strictly local needs is meeting with growing resistance as we note the inward migration in Kent accounts for 72% of the County 's population increase. Thus the overwhelming rejection of the Otterpool Newtown development by the community means that under the terms of the DCLG 's Locally-Led ... document the proposal cannot proceed. Notwithstanding the wording of para. 55 on page 25 which implies that ' strong local commitment.. ' equates to that of our LA Shepway District Council, our LA is completely out of step with the community resorting to the malpractice of consistently misrepresenting the figures and publicising untrue statements by its senior elected members and some officers in an attempt to show public support. The Folkestone and Dover area is known as the Dour region (WRZ 7) and is the most water stressed area in the UK reliant for 90% on groundwater supply. Unlike other water companies, Affinity/we have no sizable reservoirs being dependant on rainfall to recharge our</p>	<p>The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt the natural change in households. Issues of water supply and water quality are considered in the Council's Water Cycle Study.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.6	462	75105	<p>Strategic Issues Page 22 paras. 2.3 2.6 The 178,600 new homes planned for the County is a totally unrealistic objective. Whether for delivery by 2031 or any other forecast year. There will simply not be sufficient water. The County is already designated as an area of water scarcity ' indicating that drought conditions would apply following two winters of less than average rainfall. Affinity Water (AW) the supplier to east Kent stated at a meeting on 23 rd February that capacity exists for the first ( Otterpool )1000 properties, but then infrastructure upgrades will be needed after that '. SDC 's (and probably KCC 's) water consumption figure of 90 litres per person per day (lpd) must have been dreamt up in cloud cuckoo land. AW states that its average consumption is between 160-141 lpd. so bases its forecast ability to supply on 155 lpd. Implacable resistance to house building on any other than a very modest local scale allowing for strictly local needs is meeting with growing resistance as we note the inward migration in Kent accounts for 72% of the County 's population increase. Thus the overwhelming rejection of the Otterpool Newtown development by the community means that under the terms of the DCLG 's Locally-Led ... document the proposal cannot proceed. Notwithstanding the wording of para. 55 on page 25 which implies that ' strong local commitment.. ' equates to that of our LA Shepway District Council, our LA is completely out of step with the community resorting to the malpractice of consistently misrepresenting the figures and publicising untrue statements by its senior elected members and some officers in an attempt to show public support. The Folkestone and Dover area is known as the Dour region (WRZ 7) and is the most water stressed area in the UK reliant for 90% on groundwater supply. Unlike other water companies, Affinity/we have no sizable reservoirs being dependant on rainfall to recharge our</p>	<p>The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt the natural change in households. Issues of water supply and water quality are considered in the Council's Water Cycle Study.</p>	<p>No change proposed.</p>



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.7	182	1162568	<p>This Core Strategy needs to include specific references outlining the proposed actions to retain and attract the 18-44 year old demographic. There is a significant body of undisputed evidence that a thriving night-time economy and late night provision is absolutely key to achieving that. FHDC in recent years has ignored this population and allowed the night-time economy to be devoured by development and increasing economic pressures. If FHDC continues to prioritise and show favouritism towards its ageing population at the detriment of the 18-44 year old population it is creating an extremely damaging future environment. Therefore, this Core Strategy needs revisions that specifically identify and communicate how it is going to address this skewed ageing population by protecting the town's late night economy (the little of it that remains) and how it intends supporting popular culture and the related local businesses so that this demographic can be rebuilt. This is particularly critical in the Seafront and Tontine Street area which have served many generations of the town as the late night music district for decades and have a rich heritage that has in recent years been ignored and shown increasing disrespect. The late-night businesses and music entrepreneurs of this town have now created a formal Music Board in order to ensure that we follow the lead of the United Nations and LEAVE NO-ONE BEHIND, especially the younger generation and the lower income residents in more deprived wards. Our work with the Mayor of London has resulted in Sadiq Khan writing the music industry ecosystem and night-time economy (including the Late Night Economy) into the revised London Plan for the first time in history. London's music venues and busking pitches are now listed in the London Plan as important ASSETS. It is a reflection of the work that most cities around the world are now doing to protect their cultural</p>	<p>The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.</p>	<p>Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.</p>
2.8	108	1162696	<p>It is vital then with this born in mind that our council endeavours to place as URGENT the need to provide facility for these numbers migrating in predominantly from London. To assume that those choosing to make their homes in East Kent will be happy with an inferior infrastructure, be it in healthcare - retail - schooling pre and secondary - social &amp; lifestyle - is just stupid. Provide those who're migrating into the area with good reason to spend on homes &amp; social living for all ages.</p>	<p>The council has worked closely with a wide range of organisations in producing the plan (including Kent County Council, Highways England, Network Rail, the Environment Agency, the NHS and water companies, among others). They have taken account of the growing population and the new homes being planned, and have let the council know what needs to be provided, such as new primary schools, doctors surgeries or water treatment works. In addition, discussions with these organisations is continuing as the council prepares the next version of the plan. When requirements are firmed up, as planning applications come forward for the sites in the plan, then the provision of new facilities, such as primary schools, will be linked to phases of the development so that they will be there in time for the new residents to use.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.8	159	1162805	<p>I am concerned regarding the lack of scope in the strategy to identify the needs of younger members of the Folkestone community . There is little provided outside beachfront recreation to engage youth culture and or job provision beyond increasing cafe small business work. Youth culture throughout the Uk is one of the drivers for future change My experience as a cultural ambassador and licensed music venue in Folkestone is that it is rare to get people under 25 in any creative environment. (They go off to London to seek solace and freely mix with own kind) When We do meet with them they are not violent , borish or unintelligent , but bright thoughtful and creatively abundant. They are crying out to have youth culture recognised and supported . Looking for places to meet during the day and among the late night evening entertainment. Recognising this or at least consulting about this with younger residence in our area is a must and may go along way to stem the exodus of young people 18 - 30 year olds from leaving the area.</p>	<p>The council notes these comments and agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government 's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council 's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.</p>	<p>Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.8	141	1162805	<p>this listed challenge may not be correct in that we witness daily with in our business new people coming to folkestone to seek a place to live . They do not say that it is Canterbury or Ashford that drives them here but that it is "cultural' attached to folkestone and its location to the Seaside. as a primary reason . This indicates the growth of creative and recreational business in the town I feel you have missed the opportunity to consider the impact that such cultural development has had on the county. Attracting young Creators seems to be omitted in your review. These young people should not be restricted to traditional arts but also those that encourage youth culture by way of music , dance and socialising. It may also be of interest to you to look at supporting young people who are not creative! many leave not because they go to 'University' basically because they are not jobs! there is a high proportion of young people in Folkestone that cannot afford university.</p>	<p>The council notes these comments and agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government 's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council 's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.</p>	<p>Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.</p>
2.11	293	1162196	<p>Shepway acknowledges the constraints to growth, yet, continues to pursue a volume, rather than quality led growth strategy. This policy is inconsistent with the constraints it faces. For example, Shepway acknowledges serious water stress issues, yet produces a Core Strategy which includes a new town without the evidence to substantiate its overall viability. Much of the evidence produced is self serving with parameters set which can be achieved for example, water recycling rather than water supply.</p>	<p>The amount of growth is a reflection of the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt the natural growth in households. Issues of water supply and water quality are considered in the Council's Water Cycle Study.</p>	<p>No change proposed.</p>
2.11	217	1162685	<p>Operation Stack is not just a problem for this district, nor will a solution be found within this district alone.</p>	<p>Noted.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.11	592	329173	Core Strategy Local Plan Review Consultation- Planning and Compulsory Purchase Act 2004 and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 Thank you for consulting us on the above. We have the following comments to make. Water Resources Section 2.11 - "The Environment Agency (EA) classifies east Kent as an area of 'moderate' and 'serious' water stress, and new development needs to meet high standards of water efficiency". From the point of view of water efficiency in this context, the EA classifies the whole of South East England as of "serious" water stress. The classifications referred to here reflect the sensitivities of individual waterbodies in east Kent, on a smaller scale than is relevant to the supply of water.	Noted. Paragraph 2.11 will be amended to reflect this comment.	Amend paragraph 2.11 to reflect this comment.
2.11	702	1157734	Comments on Core Strategy on behalf of Save Princes Parade. Context The draft core strategy sets out the growth targets for housing and employment for the period 2014 to 2037 and the strategy for delivering that level of development with some growth in the existing urban areas but the main vehicle for delivery being a new urban area at Otterpool. The NPPF states that Plans need to be to be positive and aspirational, and the Council describes it as such. But the NPPF also requires that Plans are realistic and deliverable. Areas where development can take place in Folkestone and Hythe District are heavily constrained by land use designations such as AONB, the Countryside which the NPPF recognises has an intrinsic value, and Flood Zones, as well as water shortages and inadequate infrastructure. This limits the amount of land available where development can take place to meet the housing and employment targets. These constraints are recognised in para 2.11 of the Core Strategy which states: 2.11 There are however significant constraints to growth. East Kent benefits from varied and important landscapes, such as the Kent Downs Area of Outstanding Natural Beauty, and has internationally significant wildlife sites, such as those located along the coastline from Dungeness to Whitstable. The Environment Agency classifies east Kent as an area of 'moderate' and 'serious' water stress, and new development needs to meet high standards of water efficiency. Infrastructure upgrades are also needed; a major issue is 'Operation Stack' on the M20 which requires a long-term solution. East Kent also has pockets of high deprivation, particularly in Dover, Folkestone and Thanet.	Noted.	No change proposed.
2.12	219	1162685	Figures for the plans of other local authorities in this paragraph are meaningless without any timescales. How can anyone form a view as to whether F&HDC is 'pulling its weight' in terms of housing numbers?	Noted. Given the changing context, with the recent introduction of a national methodology for calculating how many homes local authorities should plan for, it is proposed that the detailed figures in paragraph 2.12 are deleted to avoid confusion.	Delete detailed housing requirements within paragraph 2.12.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.12	586	1164860	<p>Thank you for the opportunity to comment on the Regulation 18 draft CSLP Review. Please note the below represents informal officer comments only, and does not prejudice any future comments or decisions of the City Council. We note the proposals to meet local housing needs within the District and that this is supported by a strategy to improve the quality of, and access to, employment opportunities within Shepway. In this respect, we welcome the approach to maximising the sustainability of proposed growth through high levels of self-containment. Although policies such as SS6 (3) provide some support to the phasing of employment development alongside housing growth, we would support further policy emphasis on the physical delivery of employment development as part of each phase, to ensure that these sustainability objectives are achieved. As regards transport issues, we would query whether any work has been undertaken to assess the potential impacts on key routes into Canterbury as a result of the New Garden Settlement policies. In particular, traffic routing from Otterpool Park to Canterbury is likely to use Stone Street and then Nackington Road to access key routes into the City. This area is already subject to congestion and any assessment should be considered in combination with committed growth in the Canterbury District Local Plan (CDLP) (2017), including the 4,000 home, mixed use allocation at South Canterbury. Unlike with Dover, Folkestone and Ashford, there are no rail connections between Otterpool and Canterbury, and currently no bus service. We would strongly support the inclusion of a frequent, high quality service bus service between Otterpool and Canterbury within policies in the CSLP to ensure that this is delivered through the development. We would point out that such a service could connect to the fast bus route proposed from South Canterbury/Nackington Road to the bus station,</p>	<p>The point in relation to paragraph 2.12 is noted. Given the changing context, with the recent introduction of a national methodology for calculating how many homes local authorities should plan for, it is proposed that the detailed figures in paragraph 2.12 are deleted to avoid confusion.</p>	<p>Delete detailed housing requirements in paragraph 2.12.</p>
2.15	220	1162685	<p>Folkestone West is missing from the figure.</p>	<p>Noted. Figure 2.1 will be amended to include Folkestone West railway station.</p>	<p>Amend Figure 2.1 to include Folkestone West railway station.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.15	480	1037610	2.15 Transport Links Objection / Comment The core strategy is based on hypothetical scenarios, concerning HS1. Ashford suffered badly with removal of Eurostar Services from its station. What guarantees are there to support the aspiration of HS1 to serve Otterpool new town, which creates the transport links for future growth? The infrastructure within Folkestone is not of sufficient capacity to service 1000 new homes on Folkestone Seafront. This site should incorporate existing council owned car park sites to develop the whole area creating sufficient car parking. The Hotel Burstin and Pavilion Court should be looked at to be replaced (either through a replacement hotel on the Seafront development which would enable redevelopment of the Burstin/Pavilion site to create further parking and hotel or residential accommodation opportunities, uplifting the entire area	The council has worked closely with a wide range of organisations in producing the plan (including Kent County Council, Highways England, Network Rail, the Environment Agency, the NHS and water companies, among others). They have taken account of the growing population and the new homes being planned, and have let the council know what needs to be provided, such as new primary schools, doctors surgeries or water treatment works. In addition, the council is continuing to consult with these organisations in producing the next version of the plan. When requirements are firmed up, as planning applications come forward for the sites in the plan, then the provision of new facilities, such as primary schools, will be linked to phases of the development so that they will be there in time for the new residents to use. Infrastructure needs related to the seafront are set out as part of the application and provision will be triggered when the development reaches the appropriate phase. Details of the car parking will come forward as part of the reserved matters application. The council does not own the Burstin hotel site and cannot require that it be redeveloped, but if it does come forward for redevelopment, then it will be considered within the wider context, including Core Strategy Review Policy CSD6: Central Folkestone Strategy.	No change proposed.
2.16	32	1162344	The M20 is already at capacity through Maidstone and cannot take any more traffic without serious delays to existing road users. It's also so heavily used by freight traffic that lane 1 needs resurfacing all the way from junction 11 to Ashford and it's been in that condition for several years.	The council has worked closely with a wide range of organisations in producing the Core Strategy Review (including Kent County Council, Highways England, Network Rail, the Environment Agency, the NHS and water companies, among others). They have taken account of the growing population and the new homes being planned, and have let the council know what needs to be provided, such as new primary schools, doctors surgeries or water treatment works. In addition, the council is continuing to talk to these organisations in preparing the next version of the Core Strategy Review. When requirements are firmed up, as planning applications come forward for the sites in the plan, then the provision of new facilities, such as primary schools, will be linked to phases of the development so that they will be there in time for the new residents to use.	No change proposed.
2.16	121	1029376	If we build another station at Westenhanger we will add journey time of around 8 minutes/day for all residents of Folkestone and Dover, there is insufficient capacity at St Pancras for more trains which are close to full now	There are options that could be implemented regarding high speed services, such as services stopping alternately at Westenhanger and Folkestone West, to ensure that overall journey time to Folkestone and Dover is not lengthened.	No change proposed.
2.16	221	1162685	It would be useful to set out the evidence (if any) for the 'benefits that High Speed rail has brought to Folkestone'. That would give some measure of how important it would be to have high speed trains stop at Westenhanger. There may well have to be some trade-off between the services available from Westenhanger and Folkestone West.	There are options that could be implemented regarding high speed services, such as services stopping alternately at Westenhanger and Folkestone West, to ensure that overall journey time to Folkestone and Dover is not lengthened.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.16	286	339712	Folkestone and Hythe District Council (FHDC) has made a great feature of Otterpool Park Garden Town having access to the high-speed rail link to London and the Continent from Westenhanger station, but this is by no means assured. Any new service would be at the expense of a worse service for Folkestone. A good high-speed service to London would be a great attraction and Otterpool Park would very likely become a dormitory town for high-speed London commuters, much against the spirit of a Garden Town. Westenhanger station would also attract other London commuters from surrounding villages causing heavy traffic congestion around junction 11 on the M20 at certain times.	There are options that could be implemented regarding high speed services, such as services stopping alternately at Westenhanger and Folkestone West, to ensure that overall journey time to Folkestone and Dover is not lengthened. The introduction of high speed rail would provide additional opportunities for residents of the new town accessing London but would also be a benefit for businesses locating to employment space in the new town, providing quick access for workers, clients and suppliers.	No change proposed.
2.16	139	1029376	The benefits of services from Westenhanger have to be balanced against the disbenefits for others travelling from Folkestone and Dover	There are options that could be implemented regarding high speed services, such as services stopping alternately at Westenhanger and Folkestone West, to ensure that overall journey time to Folkestone and Dover is not lengthened.	No change proposed.
2.17	222	1162685	Where is the evidence for the district being 'relatively self-contained' and a 'clear axis of movement' being along the coast rather than along the so-called 'strategic corridor'?	Noted. This will be amended to take account of the comments. The Strategic Housing Market Assessment provides details of the district's level of self-containment.	Amend the paragraph to take account of the comments.
2.17	285	339712	Otterpool Park Garden Town is situated between the villages of Sellindge and Lympne. Much of the proposed new development would be sited away from these existing villages, creating a green 'buffer zone'. This is supposed to minimise the impact on the existing communities but the introduction of 10,000 new households with possibly 20,000 to 30,000 people would have a devastating effect on the lives of those people living in this rural area. It is not reasonable to expect that these new residents at Otterpool Park would walk, cycle or rely on public transport for their journeys, most households would need one or two cars to be able to function, plus there would be delivery lorries and service vehicles moving to and from the new town. The surrounding road network could not possibly cope with such a large increase in traffic. Tinkering with a few road junctions around the A20 would have little effect as the whole area is mainly served by narrow country lanes. The M20 would only provide a small part of the majority of local journeys. The road network could not cope with the extra traffic generated by 10,000 new households at Otterpool Park.	The need for growth is driven by changing patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or the natural changes in households. The National Planning Policy Framework sets out the government's objective to significantly boost the supply of housing (paragraph 59) and the council is required to plan for the future growth in households.	No change proposed.
2.17	333	339712	Do not build more houses than are needed to meet local need.	The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or the natural change in households. The National Planning Policy Framework sets out the government's objective to significantly boost the supply of homes (paragraph 59) and the council is required to plan for the growth in households over the plan period.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.18	223	1162685	The B2068 Stone St to Canterbury deserves a mention here. It is the preferred route north from the centre of the district and will assume greater importance if the garden settlement is progressed.	Noted. The paragraph will be amended to refer to the B2068 Stone Street to Canterbury.	Amend the paragraph to refer to the B2068 Stone Street to Canterbury.
2.19	33	1162344	No they don't. There are precious few jobs in East Kent, that's why everyone drives up the M20 to work in West Kent.	Data produced by the Office for National Statistics show a high level of self-containment in employment journeys for the district of Folkestone & Hythe, stretching into neighbouring parts of Dover district. This results in the area being defined as a discrete Travel to Work Area by ONS.	No change proposed.
2.2	140	1029376	The statement that the growth outstrips the national average means that there should be no government pressure to keep building	The growth that the plan seeks to meet results from the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt the natural change in households. Previous levels of growth are taken into account in arriving at future needs.	No change proposed.
2.2	203	1163015	trends aren't real - they've not happened, they are what will happen if you don't get proactive and do something to the steer them in the direction you want them to go . . . Our results indicate that living a socially active life and prioritizing social goals are associated with higher late- life satisfaction and less severe declines toward the end of life , said study lead author Denis Gerstorf, PhD, of Humboldt University. The research was published in the journal Psychology and Aging.	The growth that the plan seeks to meet results from the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). In providing new homes the council is planning for these future generations.	No change proposed.
2.2	463	75105	Population and Health Page 27 paras. 2.20 2.22 state that fastest growing section of the population is the 45-65s. Those of us that live here are only too well aware of the recent cut backs in health facilities wherein many patients have not been found alternative health centres after losing their own. One is bound to ask, other than the myopic pressure from government to build houses wherever a space presents itself, why Kent County Council purchased the major part of the Royal Victoria Hospital in Folkestone for housing development exacerbating the loss of local medical facilities so sorely needed. It is to be hoped that question is answered when Strategy Review Regulation 19 is published.	Noted. We have worked closely with a wide range of organisations in producing the Core Strategy Review including the Clinical Commissioning Groups. They have taken account of the growing population and the new homes we're planning, and have let us know what we need to provide. In addition, we are continuing to talk with infrastructure providers in preparing the next version of the Core Strategy Review. When requirements are firmed up, as planning applications come forward for the sites in the plan, then the provision of new facilities, will be linked to phases of the development so that they will be there in time for the new residents to use.	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.21	183	1162568	<p>This statement in paragraph 2.21 "the proportion of residents aged 20-44 has shrunk over the last 20 years; this could be attributed to the 'university effect' (young people moving away from the district to take up opportunities in further education)" demonstrates that this issue has not been analysed in sufficient depth. FHDC has allowed the night time economy and late night economy to be put under increasing pressure due to planning and licensing policies. This demographic relocates to areas that have a vibrant night life and social scene. FHDC in recent years has been prioritising older residents and this in effect will create a 'retirement town'. That has very serious consequences for the future of the town. This Core Strategy needs to be revised so that it includes specific statements outlining how the policies will support the night life that remains in the town and how it will help stem the net outflow of 19-44 year olds. This is especially important in regard to general health and wellbeing where music and popular music in particular is widely recognised as essential in combating loneliness and social isolation across all ages. We need to keep the entire population social, especially the more deprived sections of the community. Cultural content MUST match the taste preferences of the target demographic. We must not force feed cultural content that they are not interested in. It doesn't succeed in engaging the target audiences. This has been proven in Folkestone over previous years.</p>	<p>The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.</p>	<p>Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.</p>
2.21	464	75105	<p>Population and Health Page 27 paras. 2.20 2.22 state that fastest growing section of the population is the 45-65s. Those of us that live here are only too well aware of the recent cut backs in health facilities wherein many patients have not been found alternative health centres after losing their own. One is bound to ask, other than the myopic pressure from government to build houses wherever a space presents itself, why Kent County Council purchased the major part of the Royal Victoria Hospital in Folkestone for housing development exacerbating the loss of local medical facilities so sorely needed. It is to be hoped that question is answered when Strategy Review Regulation 19 is published.</p>	<p>Noted. We have worked closely with a wide range of organisations in producing the Core Strategy Review including the Clinical Commissioning Groups. They have taken account of the growing population and the new homes we're planning, and have let us know what we need to provide. In addition, we are continuing to talk with infrastructure providers in preparing the next version of the Core Strategy Review. When requirements are firmed up, as planning applications come forward for the sites in the plan, then the provision of new facilities, will be linked to phases of the development so that they will be there in time for the new residents to use.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.22	109	1162696	If the general trend is heading towards an older population then SURELY it is a matter of priority or redress this! It is a nonsense to be extolling the huge potentials of this region that offers facilities both natural and manmade and then place a statistic that suggest that all that's going to happen to the vision you're creating on paper here is to watch it descend into pipes & carpet slippers! If our council is suggesting on one hand that this county of ours has potential to shine because of all of it's benefits & their schemes & then be happy to allow it to last for no more than one generation because the population would be disproportionately aged....then what are they thinking! This in an IMPERATIVE POINT! Vibrant, youthful, homebuilding, young professionals is what East Kent is attracting so far on it's almost mother nature given merits almost alone. Offer them the promise of more to come with enterprise and socially driven infrastructure to keep them and their families here, NOT the potential of an elephants graveyard by the coast!!	Noted. Amendments will be made to these and other comments to stress the need to create vibrant places to attract and keep young people in the district.	Amend wording of policies and supporting text to reflect these points.
2.22	132	1162805	This data suggests Folkestone is content with an increasing ageing population . What we see as a business is a depletion of younger people as customers . this complies with your findings but I do not agree with the suggestion of younger pole leaving to take up educational opportunities as a whole . many younger pole we have met have not opportunities for good employment, they also have little or no socialising spaces , clubs or venues catering for 20 + age groups	The council notes these comments and agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government 's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council 's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.22	142	1162805	Kent has had a decrease in younger population because there has been a decline in opportunities for young people to work effectively and most of all find places to socialise in Folkestone for example has limited night time opportunities to socialise. Let's not accept that population average age is just increasing.. the strategy should consider active resolutions to this . Create social opportunities with Kent for younger people	The council notes these comments and agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.
2.22	465	75105	Population and Health Page 27 paras. 2.20 2.22 state that fastest growing section of the population is the 45-65s. Those of us that live here are only too well aware of the recent cut backs in health facilities wherein many patients have not been found alternative health centres after losing their own. One is bound to ask, other than the myopic pressure from government to build houses wherever a space presents itself, why Kent County Council purchased the major part of the Royal Victoria Hospital in Folkestone for housing development exacerbating the loss of local medical facilities so sorely needed. It is to be hoped that question is answered when Strategy Review Regulation 19 is published.	Noted. We have worked closely with a wide range of organisations in producing the Core Strategy Review including the Clinical Commissioning Groups. They have taken account of the growing population and the new homes we're planning, and have let us know what we need to provide. In addition, we are continuing to talk with infrastructure providers in preparing the next version of the Core Strategy Review. When requirements are firmed up, as planning applications come forward for the sites in the plan, then the provision of new facilities, will be linked to phases of the development so that they will be there in time for the new residents to use.	No change proposed.
2.24	110	1162696	Surely the way forward is community engagement. Provide reasons for as many areas of cross community to integrate as possible. More sports facilities making use of the fact we are a seaside town. Let's make some new olympians from our corner of the country. Appoint a sports liaison figure for the town for instance.....attempt to engage otherwise differing groups.	It is agreed that the promotion of facilities that engage different groups and generations should be encouraged. Policy SS8 for the new garden settlement, promotes facilities for healthy living and community engagement. Regarding sports facilities, the council is producing a Playing Pitch Strategy to assess what sports facilities are necessary as part of the Core Strategy Review; this has been developed with the help of local sports groups and other organisations, such as Sport England.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.25	111	1162696	With the manner of the migration into East Kent and the yet not fully settled nature of this unbalanced (against migration from town into London say) influx of new faces and attitudes in the town & areas, it is not unreasonable to expect some resistance to change. It was the same when the fishing community found the ever larger art community being the driving force behind movement & things happening in town. It only took the right events & action of trusted folk to make the transition work smoothly. It's all about community involvement.	It is agreed that the promotion of facilities that engage different groups and generations should be encouraged, particularly for the creation of the new garden town. Policy SS8 for the new garden settlement, promotes facilities for healthy living and community engagement.	No change proposed.
2.25	184	1162568	Yes. But cultural preferences must be respected and appropriate content made available for social opportunities. Force feeding cultural content that doesn't match people's taste preferences does not succeed in engaging them. Popular music culture needs more support. See my full comments at <a href="http://www.foundinmusic.com/core-strategy-folkestone">www.foundinmusic.com/core-strategy-folkestone</a>	The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.
2.27	112	1162696	It's not surprising to see the growth in hospitality & recreation has a steady growth against many slower & indeed regressing areas here. If the professional sector is leading the way it is, then it seems only logical that if these are local people making the most of the employment here OR migrating to the area to settle & work, that leisure support for all ages is going to follow. The need for fully diverse leisure & social involvement & interaction is essential & should be encouraged by this & any other council.	It is agreed that the promotion of facilities that engage different groups and generations should be encouraged. Policy SS8 for the new garden settlement, promotes facilities for healthy living and community engagement. Regarding sports facilities, the council is producing a Playing Pitch Strategy to assess what sports facilities are necessary as part of the Core Strategy Review; this has been developed with the help of local sports groups and other organisations, such as Sport England.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.3	288	339712	Folkestone and Hythe District Council is one of the main development partners of Otterpool Park. FHDC has failed to receive the £281 million Housing Infrastructure Grant from Central Government which it was hoping would finance the much needed improvements to the local infrastructure. Before there is any major increase in local population, there is a need for spending on the road network, public transport, water supply and waste, hospitals, schools and services and the shortfall in finances must not be at the expense of the more rundown areas of Folkestone nor cutting back on providing services to the existing population. Now there is this huge hole in infrastructure finances, Otterpool Park new town should not proceed as a cut price, second rate housing development just to allow the developers and landowners to achieve the profits they were expecting.	Government policy encourages local authorities to plan to meet the need for new homes through planning for larger scale developments, such as new settlements or significant extensions to existing villages and towns. The government states that local authorities should identify opportunities for rapid implementation, such as through joint ventures or locally-led development corporations (National Planning Policy Framework, paragraph 72). Major developments elsewhere in the district, such as at Folkestone Seafront, will also help to deliver prosperity and promote regeneration.	No change proposed.
2.3	185	1162568	Previous strategies have not worked. The town needs more cultural activity that successfully matches the taste preferences of the deprived population so that they can be fully engaged. Popular music culture is key to this.	The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.3	466	75105	<p>Economy and Education The claim is often made by developers that building houses brings employment. Other than that temporarily and very locally engaged in building the houses it is a fiction. 2.30 The District has severe areas of deprivation compared with much of the South East and is now ranked as the third most deprived of the 13 council areas in Kent ' so little prospect of local employment for the projected population growth driven by inward migration from London et al to live in the Otterpool Newtown. Of the 20,000 + people to be housed in Otterpool Newtown requiring a job, at least 5,000 would need to commute to Maidstone and London resulting in 5,000 cars having to park at the notional Westenhanger Parkway Station. That would deny a very large area of the Racecourse to house building further reducing the size of the projected Otterpool Newtown and the funds needed to pay for the extensive infrastructure to support the remaining houses.</p>	<p>Noted. However, the creation of new communities will generate employment through the services and facilities that are needed to meet the needs of the new population and provide new workers to enable existing businesses to expand.</p>	<p>No change proposed.</p>
2.31	186	1162568	<p>Again this is a result of the ineffectiveness of previous strategies. In order to engage this population properly we need to ensure content and social opportunities match their taste preferences. Not force feed arts led content and opportunities that do not and will not successfully match their tastes and interests.</p>	<p>The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government 's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council 's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.</p>	<p>Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.34	187	1162568	See above comment to 2.31. We need to match people's taste preferences in order to successfully engage them.	The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.
2.35	113	1162696	Is university status for the town worthy of consideration?	Noted. The council recognises the importance of the tertiary sector which appears to be less expansionist than it was pre-2008. However, regarding the new garden town, informal approaches have been made to a few universities to assess whether this situation might be changing but it does not appear to be so which makes a satellite campus in the new town difficult to deliver. More locally, universities seem to be centralising around existing premises rather than seeking new satellite campuses; Canterbury Christ Church University, for example, has acquired the former Canterbury prison to develop as future premises, rather than looking further afield. We will continue to monitor the sector to detect any early signs that the consolidation trend is changing and if so how the District might benefit. The new garden settlement will be a long-term project, built over a number of years, and there may be opportunities in the future.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.35	188	1162568	The evening and night-time economy sector is actually a major employer of low skilled workers so let's give more support to our local evening and night-time economy businesses and help boost growth.	The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.36	224	1162685	With 'no higher education institutions within the district' one might expect it to be an aim of the Council to encourage higher level courses to be hosted here, in line with the aspiration to lift the level of educational achievement, but we couldn't find any reference to such.	Noted. The council agrees that further education should be supported and works with organisations to achieve this. Folkestone College (East Kent College) has invested heavily in its site with help from Folkestone & Hythe District Council. The council meets regularly with Folkestone College and other training providers to help with further education provision, which could include the need for new premises if this was to be identified as a priority by the providers. Funding for project could come from a number of sources, including the Local Growth Fund from the Local Enterprise Partnership, EU funding and other sources. Regarding higher education, the sector appears to be less expansionist than it was pre-2008. However, following proposals for the new garden town, informal approaches have been made to a few universities to assess whether this situation might be changing but it does not appear to be so which makes a satellite campus in the new town difficult to deliver. More locally, universities seem to be centralising around existing premises rather than seeking new satellite campuses; Canterbury Christ Church University, for example, has acquired the former Canterbury prison to develop as future premises, rather than looking further afield. We will continue to monitor the sector to detect any early signs that the consolidation trend is changing and if so how the District might benefit. The new garden settlement will be a long-term project, built over a number of years, and there may be opportunities in the future.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.36	189	1162568	Again I stress that it is essential to provide a thriving nightlife if we are to successfully address the net outflow of young adults. That's what they want. This core strategy fails to address this and provide recognition and support for the popular music culture infrastructure within Folkestone town centre.	The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.
2.37	467	75105	Environment and Natural Assets 2.37 2.39 and Fig 2.8 describe the internationally designated habitats to which must be added many more important sites scattered across the District and notably on Romney Marsh. 2.40 2.44 and Fig 2.9 describe the unique water environment of the Peninsular and the equally unique and invaluable historical record contained within it predating Roman times.	Noted. Figure 2.8 shows international and European sites, but it also includes local wildlife and nature sites (shown in yellow). Some examples of these sites will be added to the text for additional emphasis.	Some examples of local wildlife and nature sites will be added to the text.
Figure 2.8	470	75105	Environment and Natural Assets 2.37 2.39 and Fig 2.8 describe the internationally designated habitats to which must be added many more important sites scattered across the District and notably on Romney Marsh. 2.40 2.44 and Fig 2.9 describe the unique water environment of the Peninsular and the equally unique and invaluable historical record contained within it predating Roman times.	Noted. Figure 2.8 shows international and European sites, but it also includes local wildlife and nature sites (shown in yellow). Some examples of these sites will be added to the text for additional emphasis.	Some examples of local wildlife and nature sites will be added to the text.
2.38	468	75105	Environment and Natural Assets 2.37 2.39 and Fig 2.8 describe the internationally designated habitats to which must be added many more important sites scattered across the District and notably on Romney Marsh. 2.40 2.44 and Fig 2.9 describe the unique water environment of the Peninsular and the equally unique and invaluable historical record contained within it predating Roman times.	Noted. Figure 2.8 shows international and European sites, but it also includes local wildlife and nature sites (shown in yellow). Some examples of these sites will be added to the text for additional emphasis.	Some examples of local wildlife and nature sites will be added to the text.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.39	469	75105	Environment and Natural Assets 2.37 2.39 and Fig 2.8 describe the internationally designated habitats to which must be added many more important sites scattered across the District and notably on Romney Marsh. 2.40 2.44 and Fig 2.9 describe the unique water environment of the Peninsular and the equally unique and invaluable historical record contained within it predating Roman times.	Noted. Figure 2.8 shows international and European sites, but it also includes local wildlife and nature sites (shown in yellow). Some examples of these sites will be added to the text for additional emphasis.	Some examples of local wildlife and nature sites will be added to the text.
2.40	226	1162685	Figure 2.9 is very difficult to read and does not appear to match the figure in Appendix 4 of the SFRA. Why are areas outside the district apparently more at risk than neighbouring areas inside the district?	Noted. This figure comes from the previous Strategic Flood Risk Assessment. It will be updated for the next version of the Core Strategy Review.	Update Figure 2.9 for the submission version of the Core Strategy Review.
2.40	471	75105	Environment and Natural Assets 2.37 2.39 and Fig 2.8 describe the internationally designated habitats to which must be added many more important sites scattered across the District and notably on Romney Marsh. 2.40 2.44 and Fig 2.9 describe the unique water environment of the Peninsular and the equally unique and invaluable historical record contained within it predating Roman times.	Noted.	No change proposed.
Figure 2.9 Extract from Strategic Flood Risk Assessment 2115 flood risk hazard map	476	75105	Environment and Natural Assets 2.37 2.39 and Fig 2.8 describe the internationally designated habitats to which must be added many more important sites scattered across the District and notably on Romney Marsh. 2.40 2.44 and Fig 2.9 describe the unique water environment of the Peninsular and the equally unique and invaluable historical record contained within it predating Roman times.	Noted.	No change proposed.
2.41	9	1157870	My understanding is that the EA have recently regraded the Risk levels, and Zones have been redefined?	This comment is noted. Figure 2.9 will be updated with the most recent information.	Update Figure 2.9.
2.41	472	75105	Environment and Natural Assets 2.37 2.39 and Fig 2.8 describe the internationally designated habitats to which must be added many more important sites scattered across the District and notably on Romney Marsh. 2.40 2.44 and Fig 2.9 describe the unique water environment of the Peninsular and the equally unique and invaluable historical record contained within it predating Roman times.	Noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.42	289	339712	Folkestone and Hythe District Council (FHDC) has yet to publish a Waterside Cycle Study. This should be an integral part of any Core Strategy as it impacts on homes and businesses in the region. Affinity Water has defined the area as being of acute water shortage and no water company has been able to guarantee supply for such a large increase in population (40%) as is proposed by the existing Local Plan of 8,750 new households plus the extra 10,000 at Otterpool Park. Proposals for building even more new houses, beyond those required to meet local needs, should be halted until water sustainability can be established. FHDC has a duty to protect the health and quality of life of the residents living here now.	The growth proposed in the plan is the result of a number of factors, including the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt the natural change in households. We have worked closely with a wide range of organisations in producing the plan (including water companies, the Environment Agency and Kent County Council, the lead local flood authority). They have taken account of the growing population and the new homes we're planning, and have let us know what we need to provide. In addition, discussions with these organisations are continuing as we prepare the next version of the plan. When requirements are firmed up, as planning applications come forward for the sites in the plan, then the provision of new facilities will be linked to phases of the development so that they will be there in time for the new residents to use.	No change proposed.
2.42	473	75105	Environment and Natural Assets 2.37 2.39 and Fig 2.8 describe the internationally designated habitats to which must be added many more important sites scattered across the District and notably on Romney Marsh. 2.40 2.44 and Fig 2.9 describe the unique water environment of the Peninsular and the equally unique and invaluable historical record contained within it predating Roman times.	Noted.	No change proposed.
2.42	400	1036994	2.42 is totally misleading and only serves to confuse residents wishing to comment. The implication here is that the area only needs a small amount of rain to recharge the aquifers. This is completely untrue. The fact of the matter is, recharge of our aquifers only takes place over the winter months and benefits from prolonged gentle rain as opposed to a deluge. It should also be stated that the Dour region has the least headroom in terms of balanced supply than any other region. In simpler terms, there is very little capacity to act as buffer, which is one of the reasons that this area has the most droughts. See Affinity Water's Drought plan on the draft of WRMP 19. Why has no Water Cycle been produced?	The purpose of this paragraph is to highlight the water constraints of the district and that it has low local levels of rainfall on which it depends to maintain aquifer stocks. This paragraph will be rewritten to make this clearer.	Rewrite paragraph to clarify the meaning.
2.43	474	75105	Environment and Natural Assets 2.37 2.39 and Fig 2.8 describe the internationally designated habitats to which must be added many more important sites scattered across the District and notably on Romney Marsh. 2.40 2.44 and Fig 2.9 describe the unique water environment of the Peninsular and the equally unique and invaluable historical record contained within it predating Roman times.	Noted.	No change proposed.
2.44	475	75105	Environment and Natural Assets 2.37 2.39 and Fig 2.8 describe the internationally designated habitats to which must be added many more important sites scattered across the District and notably on Romney Marsh. 2.40 2.44 and Fig 2.9 describe the unique water environment of the Peninsular and the equally unique and invaluable historical record contained within it predating Roman times.	Noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
<b>2.2 STRATEGIC NEEDS FOR SUSTAINABLE DEVELOPMENT</b>					
2.45	284	339712	In February 2018 the Shepway District Council (SDC) Places and Policies Local Plan revised draft was released for public consultation. It stated that 8,750 new houses will be required in the Shepway area to meet local needs up to the year 2028. The plan also identified sites where the houses could be built and these locations were chosen with careful consideration and consultation with local communities. Quite separately from that plan, SDC had been planning a new town of 12,000 houses, Otterpool Park Garden Town, for over two years. The latest information is that the number of houses at Otterpool would eventually be 10,000. There have been suggestions that the number would be 5,500, less than half the original stated figure. This lower figure may have placated some of the local residents who were shocked at the original proposals, but a new town at any size is not needed, nor is it wanted by local residents. SDC admitted that some of the housing would be for London overspill. Otterpool Park was announced by SDC to the people of Shepway as a 'fait accompli' and the subsequent token public consultations have shown clearly that local communities are opposed to the project which would destroy the rural character of the area.	The Core Strategy Review sets out that proposals for the new garden settlement will deliver around 6,375 new homes within the plan period (to 2036/37) with the potential for future growth to provide a total of 8,000 to 10,000 new homes beyond the end of the plan period (Submission Draft Policy SS6: New Garden Settlement - Development Requirements). The Core Strategy Review has been subject to consultation and will be subject to another consultation for the next version of the plan. Separate consultations have also been held for the proposals for the Otterpool Park Masterplan. The growth proposed in the plan results from a number of factors, including the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt the natural change in households.	No change proposed.
2.45	114	1162696	Absolutely! You can't successfully have one without the other. Economic & social development HAS to run hand in hand to stand a chance of developing trust & a sense of belonging. The town has to provide on many levels.	Noted. Paragraph 2.45 will be updated to refer to the new National Planning Policy Framework (July 2018).	Update paragraph 2.45 to refer to the new National Planning Policy Framework (July 2018).
2.45	308	1036994	See 4.169	See response to paragraph 4.169.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.45	190	1162568	Exactly. There must be a mutual respect shown. This has not been evident in recent years. The Arts (and residential developments) must co-exist alongside the existing music and late night culture. This is why the Agent of Change principle was approved in Parliament in 2018. To provide protection for popular music culture and heritage and recognise its value and importance as part of the social infrastructure of communities.	The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.
2.45	477	75105	2.2 Strategic Needs for Sustainable Development The NPPF both the original and now the revised version with their assumption of sustainable development trumping all other considerations has come to be something of a weasel phrase with the word 'sustainable' used nowadays as a label that justifies almost any form of development where even disappearingly small advantages are used to outweigh serious damage, especially where environmental issues are in the frame. Paras 2.45 to 2.62 and including Policy DSD will be individually addressed when we respond to the 'Regulation 19' plan as will we expand on issues such as the 'New Garden Settlement' Otterpool Newtown.	Noted. The definition of sustainable development is set out in the National Planning Policy Framework (July 2018), particularly paragraphs 7 and 8. This section will be amended to refer to the new National Planning Policy Framework.	Update section to refer to the new National Planning Policy Framework (July 2018).

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.46	123	1162696	Agree with this totally. However the phrase "to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system" carries the most weight here I feel. Especially the 'social' part of this. We all need to feel like we belong to our town whether we are born here or migrate here. Developing a town centre and surrounding areas is something that has to involve the requirements & concerns of the community as much as is humanly possible. The current consultation system can make involvement and participation in this very hard, as the documents can be overwhelming and confusing. Involvement from the off is crucial! Sustaining that involvement will be hard but equally crucial. Basically the residents need to be kept properly informed in a completely above board way & not hiding behind yellow A4 on some lampposts and a tiny entry in the local paper.	Noted. The government provides a definition of sustainable development in the National Planning Policy Framework (July 2018) which includes a social objective to: "support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being" (paragraph 5). The council considers that the Core Strategy Review, and the work it undertakes with service providers, helps to deliver this aspect of sustainable development. This section will be updated to reflect the new National Planning Policy Framework (July 2018).	Update section to reflect the new National Planning Policy Framework (July 2018).
2.46	191	1162568	Yes and this MUST be equally applied to all age groups and social groups.	Noted.	No change proposed.
2.49	10	1157870	More should be made of the potential for tourism related opportunities	The council has a long history of working with local societies in heritage and tourism-related projects, as resources allow. For example, the Romney Marsh Visitor Centre which attracts around 12-13,000 visitors a year, was built by the council and we have worked with the Kent Wildlife Trust for over 14 years to manage it. The council has worked with the Friends of the Martello Tower at Dymchurch and has been a key funding partner with projects such as the Folkestone Townscape Heritage Initiative. F&HDC has also directly supported numerous locally led heritage projects through our funding. For example, during 2018 we have awarded over £46,000 to 17 local groups to commemorate the ending of the First World War. Prior to that our Community Chest grant scheme ran for over 10 years, and our Ward Grant scheme has operated for a similar period, both of which supported many heritage projects. Recent examples of funding to local heritage groups includes. Lyminge Historical Society. £5,000 towards displays for the Tayne Field Anglo-Saxon excavation site. Elham Valley Line Trust. £4,095 towards interpretation materials and development costs for the new outdoor learning shelter. Pavement Pounders. £3,000 towards the purchase of video and sound equipment for Folkestone's marine heritage project. Dymchurch and District Heritage Group. £500 towards the exhibition and printing costs to tell the story of people from the area Shepway who went to First World War. Friends of Lydd Museum. £500 towards purchasing display and storage cabinets to display donated items. St Leonards Church, Hythe. £1,000 towards costs of organ restoration Hythe Civic Society. £400 towards their World War One exhibition. The planning policy team is also working with Sandgate Parish Council on piloting a process for identifying local heritage assets.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.49	192	1162568	You won't break this chain until these target audiences can be successfully engaged . Matching taste preferences is key to unlocking this issue. Supporting a thriving nightlife is key to this as shown in destinations around the world.	The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government 's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council 's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.49	546	1163824	<p>Employment The Core Strategy Review as drafted refers that one of the strategic needs for the District is the challenge to improve employment, educational attainment and economic performance '. The most recent Employment Land Review (ELR) published in 2017, states that there has been strong employment growth in the District, particularly noting the growth witnessed in non-B Class jobs and office jobs. For industrial space, this direction of growth has translated into forecasts that there will be a significant surplus supply ranging between 82,205 sqm and 102,845 sqm during 2016-2026. CBRE recognise that Park Farm Industrial estate is identified in the ELR as a key employment area in Folkestone. The ELR however characterises Park Farm as a mixed employment site, which reflects the Council 's assessment in the Submission Draft Places and Policies Local Plan that the nature of the estate is changing. It is apparent that there is a clear need for modern employment premises, digressing from the old and traditional industrial spaces which characterise Park Farm Industrial Estate. As illustrated by the ELR, the future demand for such land is uncertain and in accordance with paragraph 21 of the National Planning Policy Framework (NPPF), Local Plans should comprise policies that are flexible enough to accommodate needs not anticipated in the plan to allow a rapid response to changes in economic circumstances '. Paragraph 22 encourages land allocations to be reviewed to prevent the long term protection of sites. The large vacant industrial land at the former Silver Spring site, represents the need to accommodate other uses within the estate and the absence of demand in industrial land. The site has been vacant since 2013, which has resulted in a draft allocation and pending planning application (Y18/0066/SH) for a mixed-use employment led redevelopment including a hotel and</p>	Noted. See response to Policy SS4.	No change proposed.
2.49	707	1101438	<p>The ESFA welcomes references within the plan to improving educational attainment and to the need for development to facilitate investment in and improvements to the local education system.</p>	Noted. The Education and Skills Funding Agency's support is welcomed.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.50	11	1157870	Adoption of a robust Heritage Strategy and DMP will almost certainly identify opportunities that will address Need B	Noted. Although the Destination Management Plan has not been formally adopted by the council, it has brought together a wide range of tourism groups and businesses to create the Folkestone & Hythe Tourism Board, with representatives from major tourist attractions, accommodation providers, Visit Kent, Folkestone Town Council and F&HDC. The Board has focussed, in the first instance, on marketing the district, working together to produce a tourism website ( www.visitfolkestoneandhythe.co.uk ) which was launched in May 2018. This has provided an important platform to market the district, sitting within the family of the Visit Kent website. The Board is now looking at future projects to take forward for the year ahead. Folkestone & Hythe District Council contributes to a wide variety of other tourist initiatives, helping managing important attractions such as the Coastal Park, Royal Military Canal, Folkestone Warren, the district 's beaches, and supporting other attractions and initiatives such as the Romney Marsh Visitor Centre and the White Cliffs and Romney Marsh Countryside Partnerships, which focus strongly on helping local people and visitors to enjoy the district 's built and natural heritage.	No change proposed.
2.50	125	1162696	Further education needs in the town are under supported. Vocational education has historically been a major part of further education in our town (South Kent/East Kent College) and at a point where the whole region is bristling with talk of HUGE construction developments (this strategic core policy review!), isn't this the perfect time to be acting on education/vocation locally?	Noted. Folkestone College, part of the East Kent College group, specialises in construction, as well as the creative industries and is looking to develop its offer further such as expanding into civil engineering training. The College has recently upgraded its facilities to ensure it remains relevant to the construction sector and can continue to offer relevant courses. The council undertook an employer survey in 2017 which found that employers considered the quality of training from local providers to be very good.	No change proposed.
2.51	282	339712	The provision of healthcare to local communities is a major concern. Local hospitals and surgeries can barely cope with existing population levels. The increased population (40%) outlined in the Local Plan and Otterpool Park would place overwhelming demands on the existing and proposed new medical facilities could provide, even if they could recruit the necessary doctors and medical staff. Hospital care for this region is provided at Ashford and Canterbury, where there are already proposed new large housing developments with resulting major increases in population.	Noted. The council has worked closely with Kent County Council, the NHS and Clinical Commissioning Groups to reflect their requirements and will continue to work with organisations in progressing the plan. The availability of appropriate housing, without problems of damp, poor insulation, overcrowding and substandard accommodation, is also an important factor in people's health and children's wellbeing and educational attainment. Restricting the provision of new homes below the levels needed for new households will not stop migration into the district and will impact most on those least able to access adequate accommodation	No change proposed.
2.51	126	1162696	Yes Yes Yes! Absolutely! The only real way to build community soul & spirit is WITH the community! Remove the obstructions of social constraint. Yes build better housing, more facility, leisure & entertainment for all ages, from the young to the old & all in-between but do this in conjunction WITH the people who are the population. Instill pride in those who'll be the ones to look after what been put in place.	Noted. The council must also plan for future generations; children today will be adults with families by the end of the Core Strategy Review plan period and the council must plan for this future change.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.51	193	1162568	Again matching the cultural taste preferences is key to achieving this. Not just force feeding things they are not interested in. ‹	The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government 's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council 's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.52	128	1162696	<p>Vibrancy, social mix &amp; involvement is of course the aim. All this being achieved with the health of the population as a priority is a very understandable &amp; desirable target.....BUT.....let's not imagine that you get a healthy happier community by having Gyms on every corner! Building into every community a sense of life &amp; living is equally as important as ANY other entry in this governments huge policy document....and it's essential this isn't overlooked! ALL ages need something to do for leisure and/or winding down so this needs to be built into any policy for the future of any expansion or development. We all need to play in some way or other. This is and always has been a totally normal part of all communities the world over. Leisure does and should provide a massive income in every town &amp; must surely be incorporated in policy documents such as this as standard.</p>	<p>Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government 's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council 's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.</p>	<p>Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.52	194	1162568	Any residential development within the town centre must respect the existing night time economy and ecosystem, and acknowledge that as towns grow this future nightlife in central locations will become more vibrant. The Agent of Change amendment by the UK Parliament has had to be introduced in order to provide vital protection to this vital social infrastructure. These venues provide significant social value and that is recognised as exceptionally important to overall health and wellbeing.	The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.
2.57	303	1162196	The narrative is well intentioned but it contrasts sharply with the situation on the ground and the aims of the Core Strategy. Witness the proposed reduction in the proportion of affordable housing on developments of 15+ - from 30% to 22%, which, after developers' use of the viability test to sidestep or reduce their obligations, will result in a proportion far lower than 22%.	Noted. The revised figure for affordable housing provision comes from evidence in the council's updated Strategic Housing Market Assessment (SHMA). Part two of the SHMA assesses the need for affordable housing and finds that, taking demand and supply into account, there is a total annual need for an additional 139 affordable homes a year in the district (paragraph 5.29), an increase on the 100 affordable homes a year identified in the 2013 Core Strategy. This equates to around 22 per cent of all new housing. National planning policies require local planning authorities to take the viability of a development into account when preparing local plans and making decisions on applications (National Planning Policy Framework, paragraph 57); the council cannot ignore this requirement.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.57	134	1162696	<p>The comment 'The district already has a comparatively elderly population, and the appeal of the coast to retirees is well established and not likely to diminish; however this appeal increasingly applies to wider ranging age groups who are able to work on an increasingly mobile basis' is a clear contradiction to the following comments made previously &amp; subsequently in this core report. Migration from London for instance is sited as being hugely out of balance with the number of people leaving this region to head to London for example. These 'mobile workers' are NOT retiring age and are in fact heading to this very desirable corner of the country to bring established family units to a better &amp; (for them) more affordable way of life. They in turn will have offspring who'll treat this as home. If the report is making observations that this town is heading into a seaside of old folks homes &amp; nothing else, then i think that they need to get some more trend assessors at ground level. This current and continuing trend of migration will bring not only those making that choice to move but also their offspring who'll consider this to be home with pride &amp; passion. If &amp; ONLY if this town kept as a vibrant &amp; engaging area for ALL ages! If you allow the incorrectly assumed resignation that our town will turn into Eastbourne, then woe betide, you might actually end up with Eastbourne.....WE ARE NOT THAT TOWN, WE ARE THIS TOWN! Provide reasons for those who now live here as well as those that will be moving into the area, to make it a centre of life &amp; living NOT death &amp; dying!</p>	Noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
2.57	195	1162568	The ageing population is one of the greatest threats to the local economy in the District due to the future healthcare implications. This is why we must retain and attract younger adults to balance out the increasingly skewed age profile of the local population. Rather than designing a retirement district and perpetuating a continuing ageing trend.	The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.
2.58	135	1162696	Agree. Ours is a very unique area as it's coastal & carries huge history relating to that. Lets do all we can together to retain as much of this as possible alongside the need to develop.	Noted. The policies in the Core Strategy Review and Places and Policies Local Plan are intended to provide for future development needs while also preserving and enhancing what makes the district special. The plan requires a high standard of design for the new garden settlement (Policy SS7) and other policies will also apply to new developments, such as those requiring the provision of green infrastructure and high quality design (Places and Policies Local Plan, Policy HB1: Quality Places Through Design and Policy HB2: Cohesive Design).	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy DSD	50	1160254	<p>What does "improvement" to the economic, social and environmental conditions of the area definitively look like? The perspective of an overwhelming number of local residents in what you define as the North Downs area, is that the plans that follow represent the destruction of their social infrastructure (i.e. rural village lifestyle) as well as doing untold damage to the natural environment. How can proposals that stretch water limits beyond capacity and bring thousands more cars onto local roads (people will still want to travel outside of the New Town, while others will want to visit residents within it, whatever "sustainable" travel plans you have inside the Town itself) "improve" the environment</p>	<p>Noted. The wording "improve the economic, social and environmental conditions of the area" is taken from national policy (National Planning Policy Framework, paragraph 38). The NPPF states that the planning system has three overarching objectives (economic, social and environmental) which are independent and need to be pursued in mutually supportive ways, so that net gains can be secured across the objectives. The social objective includes that there is a sufficient number and range of homes to meet the needs of present and future generations. However, the NPPF states that policies in plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)." Given that Policy DSD: Delivering Sustainable Development largely repeats the wording in the NPPF, it is proposed that the policy is deleted.</p>	<p>Delete Policy DSD: Delivering Sustainable Development to avoid unnecessary duplication.</p>
Policy DSD	227	1162685	<p>By titling this policy 'Delivering Sustainable Development' the impression is given that compliance with it is sufficient for a proposal to be classified as 'sustainable'. 'Sustainable' should be defined more clearly than it is in the Glossary in terms against which proposals can be measured. It is regrettable the words 'presumption in favour of sustainable development' are so prominent as they have become a synonym for unsustainable development that councils have felt obliged to permit because of perceived shortfalls in development land supply. CPRE has suggested to central government in its response to the NPPF consultation just closed that reference should be made to the UN Sustainable Development Goals. CPRE objects to the notion that local plan policies can be considered 'out of date' merely by the passage of time. They should remain relevant unless formally dropped, specifically superseded by national policy or rendered irrelevant by circumstance (in which case they would cease to be material). There is no evidence presented of a Duty to Cooperate, in particular with Ashford Borough Council and no Statements of Common Ground, which we would expect to be available at this stage of the process.</p>	<p>Noted. However, the NPPF states that policies in plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)." Given that Policy DSD: Delivering Sustainable Development largely repeats the wording in the NPPF, it is proposed that the policy is deleted.</p>	<p>Delete Policy DSD: Delivering Sustainable Development to avoid unnecessary duplication.</p>



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy DSD	363	894636	The presumption that the measure of sustainability is a reliable and overarching is in itself unsound and the broadest confidence in it as a sole criteria is fundamentally flawed. The process of pre-application discussions with 'developers' and, unspecified, 'partner organisations' increasingly disenfranchises the opportunity for local communities and populations to be effectively engaged and concerned within the planning process. The process becomes a mythology carried out in remote places, using language that is unfathomable to non-specialist audiences, and leading to pre-emptive planning decisions that first reach public gaze as virtual 'fait a'complis'. There is a direct example of this within this consultation document. At proposed Policy CSD9 the former Policy CSD9 from the Adopted Core Strategy 2013 (The adopted policy is at the time of writing in process of being fully implemented as a development of approximately 250 dwellings and associated items). Proposed policy CSD9 promotes additional development to the north and west of the current permissions. The Council has already moved to permit the additional development to the north, even though it was beyond the scope of the adopted policy and involved development outside of the currently defined settlement boundary. This development was not supported by the local community. The decision was taken by the Council less than one week prior to the publication of the consultation document. The decision was 'excused' on the basis that the site was deemed to meet sustainability criteria and that this was 'expressed' by the inclusion of this site within the consultation document. QED. The evaluation of sustainability is not the science that it purports to be. It is biased by a desire to do something, or not to do something. It frequently misdiagnoses the critical content and behavioural characteristics of rural communities in particular, and decisions are often perceived as	The policy reflected the 'presumption in favour of sustainable development' set out in national policy at that time (National Planning Policy Framework, 2012) and was supported by the Inspector at examination. However, the NPPF states that policies in plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)." Given that Policy DSD: Delivering Sustainable Development largely repeats the wording in the NPPF, it is proposed that the policy is deleted.	Delete Policy DSD: Delivering Sustainable Development to avoid unnecessary duplication.
Policy DSD	608	1156328	We support Policy DSD which has a commitment to collaborate with Dover District Council on the sustainable development of the area in accordance with the statutory Duty to Co-operate and in the preparation of joint Statements of Common Ground and confirm that we will do the same.	Noted. The support of Dover District Council is welcomed. However, the National Planning Policy Framework (NPPF) states that policies in plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)." Given that Policy DSD: Delivering Sustainable Development largely repeats the wording in the NPPF, it is proposed that the policy is deleted.	Delete Policy DSD: Delivering Sustainable Development to avoid unnecessary duplication.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy DSD	421	1037073	To ensure that developments are actually built as Sustainable Developments ', as opposed to just being planned as Sustainable Developments ', Core Strategy Policies need to be far more robust than those in the 2013 Core Strategy. This is particularly the case with regard to Infrastructure improvements that are required to support developments. Clearly Infrastructure such as access roads, highway improvements, healthcare including GPs and schooling are required to be in place at the point in time a development is first occupied. The 2013 Core Strategy has failed to provide that essential provision of Infrastructure at the time it is required. In particular 2013 Policy SS5 has not been robust enough to provide the required Infrastructure at the appropriate time. It is therefore concerning that Policy SS5 is proposed to be carried forward unchanged. An example of the failure of 2013 Core Strategy, and in particular Policy SS5, is the current situation regarding the Broad Location development plan north of New Romney, 2013 Policy CSD8. The Masterplan ' that played a significant part in identifying the application as viable and sustainable has completely failed to materialise. A significant number of houses have been built and occupied without any of the Infrastructure improvements identified as necessary having been provided. These include, but are not limited to, an increase in GP capacity to provide healthcare to new residents, no increase has been achieved despite the houses now being occupied, a new access road which has not been provided and highway improvements including a remodelling of the High Street/Station road junction on the A259 which has not materialised. Without these Infrastructure improvements the development cannot be considered to be viable nor sustainable and therefore it is not consistent with National Planning Policy Framework. This has happened because Policy SS5 is not fit	The policy reflected the 'presumption in favour of sustainable development' set out in national policy at that time (National Planning Policy Framework, 2012) and was supported by the Inspector at examination. However, the NPPF states that policies in plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)." Given that Policy DSD: Delivering Sustainable Development largely repeats the wording in the NPPF, it is proposed that the policy is deleted.	Delete Policy DSD: Delivering Sustainable Development to avoid unnecessary duplication.
Policy DSD	481	1037610	Policy DSD Delivering Sustainable Development Comment to the paragraph: When considering development proposals, the council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. How are project measured in order to check that development that improves the economic, social and environmental conditions in the area. '. Is this done at pre or post planning stage or both to check that outcomes have been achieved?	Noted. The NPPF states that policies in plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)." Given that Policy DSD: Delivering Sustainable Development largely repeats the wording in the NPPF, it is proposed that the policy is deleted.	Delete Policy DSD: Delivering Sustainable Development to avoid unnecessary duplication.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy DSD	714	1101438	In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 156), the ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add the ESFA to your list of relevant organisations with which you engage in preparation of the plan. In this respect, the ESFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD) <sup>3</sup> . We are not suggesting that the council produces a separate DPD as Ealing have done, but we do believe that the systematic approach they have taken is informative for local plans. The DPD provides policy direction, establishes the Council's approach to providing primary and secondary school places and helps to identify sites which may be suitable for providing them (including, where necessary and justified, on Green Belt/MOL), whether by extension to existing schools or on new sites. It includes site allocations as well as policies to safeguard the sites and assist implementation and was adopted in May 2016 as part of the Local Plan. The DPD may provide useful guidance with respect to an evidence based approach to planning for new schools in the emerging Local Plan Review (which in this case would draw heavily on the evidence base maintained by Kent County Council), securing site allocations for schools as well as providing example policies to aid delivery through Development Management policies. Ensuring there is an adequate supply of sites for schools is essential and will enable Folkestone & Hythe District Council to swiftly and flexibly respond to the existing and future need for school places to meet the needs of the district over the plan period.	Noted. The council will continue to work with the Education and Skills Funding Agency and Kent County Council, as local education authority, to ensure that the education needs arising from future growth are met. However, the National Planning Policy Framework states that policies in plans should "serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)." Given that Policy DSD: Delivering Sustainable Development largely repeats the wording in the NPPF, it is proposed that the policy is deleted.	Delete Policy DSD: Delivering Sustainable Development to avoid unnecessary duplication.
<b>3.1 DISTRICT PLANNING AIMS</b>					
3.1	58	1162550	The large scale of the proposed does not meet the needs of the local community which requires mixed small scale affordable development for local people. The visual and actual impact on the amenity will be disadvantageous to the local villages which have never supported the Otterpool Park development and have strenuously stated objections to the scale and have been ignored. The cumulative impact on the communities will be adverse in every respect as regards size scale/infrastructure/schools/Traffic/pollution/environment and amenity. The Westenhanger area is a water stressed area and no proper plan has been produced to show how the shortage will be met. Westenhanger will be hugely adversely affected and is only mentioned in reference to the Railway Station and also the impact of it becoming the Town Centre on the Master Plan let alone the site of the of the mentioned Gateway Station to London - i.e not local work for local people -it will become a large commuter town alike greenhithe and swanscombe.	The reasoning behind the proposal for a new garden settlement in the North Downs Area is set out in Section 4.6: Strategic Allocations. Paragraph 3.1 is a general introduction to the chapter.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.1	59	1162550	The large scale of the proposed does not meet the needs of the local community which requires mixed small scale affordable development for local people The visual and actual impact on the amenity will be disadvantageous to the local villages which have never supported the Otterpool Park development and have strenuously stated objections to the scale and have been ignored. The cumulative impact on the communities will be adverse in every respect as regards size scale/infrastructure/schools/Traffic/pollution/environment and amenity. The Westenhanger area is a water stressed area and no proper plan has been produced to show how the shortage will be met Westenhanger will be hugely adversely affected and is only mentioned in reference to the Railway Station and also the impact of it becoming the Town Centre on the Master Plan let alone the site of the of the mentioned Gateway Station to London - I.e not local work for local people -it will become a large commuter town alike greenhithe and swanscombe.	The reasoning behind the proposal for a new garden settlement in the North Downs Area is set out in Section 4.6: Strategic Allocations. Paragraph 3.1 is a general introduction to the chapter.	No change proposed.
3.1	488	1037610	3.1 District Planning Aims These aims are flawed in that the list as there is little or no evidence provided that supports the sustainability of these aspirations	The strategic needs set out in this section express the nature of the challenges that the Core Strategy Review is seeking to address. These are drawn from the identified opportunities and challenges and relate to the issues within the district's places (set out in Section 1.2).	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.2	572	588509	<p>25. The following section sets out our proposed amendments to the CSLPR to ensure the plan is sound. This includes justification on why a policy on the LAA and/or Romney Marsh (including support for LAA) is necessary to make the Plan sound and provided a draft working for the policy. Core Strategy Local Plan Review New Policy for LAA 26. The CSLPR 's Strategic Need A states that the Council will build on economic strengths by supporting key sectors and businesses by promoting further investment and maximising opportunities for growth (our emphasis). 27. The CSLPR states that the District has excellent infrastructure and connections, including by air, with specific reference to LAA. It states that the District is, therefore, well placed to capitalise on this outstanding infrastructure by providing opportunities for business growth and inward investment to the area. 28. Paragraph 1.45 of the CSLPR states that LAA is well established and has attracted significant investment proposals. Table 1.3 sets out the strengths and weaknesses of the Romney Marsh area. One of the weaknesses identified is the limited large-scale employment opportunities. LAA provides stable employment in the area. In order to maximise LAA 's opportunities for growth, the CSLPR must acknowledge LAA 's potential to expand beyond its current planning consents, if the environmental impacts are acceptable. 29. To ensure that the weakness outlined in Table 1.3 are mitigated, LAA should be acknowledged as an opportunity location. LAA 's current positive role as a significant employer in Romney Marsh should be identified as a strength. A specific policy for LAA to recognise its importance and support the principle of further improvements, expansion and investment, subject to environmental considerations, should be included. 30. The CSLPR fails to acknowledge and reasonably balance the long-term economic aspirations of LAA, which will benefit</p>	Noted.	No change proposed.
3.3	44	1162523	<p>Although this list appears to cover many of our aspirations, the document itself does not support the statements. The transport infrastructure requires a total overhaul. We are already at breaking point with many of our roads gridlocked at different times of day and parking impossible. If residents are unable to find parking places, tourists will surely simply drive through Folkestone and onto somewhere they can park. Folkestone needs to be more accessible not less and the whole issue of transport, roads and parking needs addressing before or alongside any further major developments.</p>	Paragraph 3.3 sets out a number of aims including to "Improve accessibility and transport infrastructure". These are general aims and are not intended to list individual infrastructure schemes.	No change proposed.
3.3	127	1162795	<p>The Trust supports the objectives of this policy, in particular recognition of the role that cultural and creative activities play in helping to attract and retain people and jobs within the local area as well as the opportunities for participation and benefits to well-being they bring. We welcome the potential for a vibrant Creative Quarter and should this objective result in works to the existing Tower Theatre or the creation of any new performing arts venues we would encourage the Council to engage with the Trust, or direct applicants to engage with us, at an early stage.</p>	Noted. The Theatres Trust's support is welcomed.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.3	346	1157819	To add an additional aim to the effect of increasing economic prosperity by recognising, and capitalising on, the heritage assets of the area.	Noted. The aim will be added to paragraph 3.4, point 8.	Add reference to heritage tourism to paragraph 3.4, bullet point 8.
3.3	197	1162568	The existing popular music culture and heritage in these areas (Seafront, Tontine Street, The Leas) must be respected and co-exist alongside other cultural offerings. Especially if the aim is to engage the hard to reach deprived segments of the society.	The council notes these comments and the website open letter. The council agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.3	334	1163015	in order to make the following work in a true 360 degree sense - there needs to be more support for existing, responsibly operated venues and bars and an increase in the number of them. A vibrant night time economy will keep all of the new people you plan to attract engaged. music and (late night) entertainment delivered within the 4 licensing objectives will attract and retain all generations. Increase prosperity across the local population; Enhance the viability/vitality and appeal of Town Centres, with Folkestone as a major commercial, cultural and tourism centre featuring upgraded connections and public realm; Achieve real-term increases in gross incomes; Increase the proportion of residents with higher-level qualifications, helping to create an 'innovation district' to provide a distinct employment offer that reflects changing patterns of work; Deliver a flexible supply of 'super-connected' employment space in terms of location, size and type, particularly space that allows businesses to start-up and scale-up their operations; Expand the range of jobs and the skills of the local workforce; Expand cultural and creative activity in the district, with refurbished premises and spaces in Folkestone's old town forming a vibrant Creative Quarter.	The council notes these comments and agrees that a vibrant evening economy can help to attract young people to the area and help to retain them. Town centres contain a mix of uses that need careful control and management. The government's National Planning Policy Framework (July 2018) states that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflect their distinctive character (paragraph 85). The challenge for the council is to produce policies that are flexible enough to respond to rapid change but at the same time minimise conflicts between different uses, such as residential and leisure. The council can provide a supportive policy framework, but much will be down to the investment decisions of individual landowners and venue operators bringing proposals forward. The government 's definition of main town centre uses includes leisure and entertainment uses, bars and pubs, nightclubs, arts, culture and tourism development (including theatres and concert halls). The council 's Places and Policies Local Plan includes a number of policies for town centres, including Folkestone town centre. The policy for Folkestone town centre (Policy RL2) supports these town centre uses within the town and development that would enhance the evening economy. The policy states that residential development will be permitted on upper floors where it would enhance the vitality and viability of the town and not lead to the loss of town centre uses. Nevertheless, it is considered that Policy CSD6: Central Folkestone Strategy and supporting text could be amended to give greater emphasis to the evening economy and music culture.	Amend Policy CSD6: Central Folkestone Strategy and supporting text to give greater emphasis to the evening economy and music culture.
3.3	482	1037610	3.1 District Planning Aims Strategic Need A: The challenge to improve employment, educational attainment and economic performance. Comment : there is insufficient information in the core strategy to provide satisfaction that the core strategy will meet these challenges	Noted. Paragraph 3.2 states that these aims are tailored to broad priorities and mostly can apply district-wide; they are not intended to provide a detailed list of schemes.	No change proposed.
3.3	489	1037610	3.3 Strategic Need A: The challenge to improve employment, educational attainment and economic performance. Comment; How, with the exception of item 10 which is ongoing through the charitable work of the towns benefactor	Paragraph 3.2 states that these aims are tailored to broad priorities and mostly can apply district-wide; they are not intended to provide a detailed list of schemes. They will be achieved through the application of policies in the Core Strategy Review, the investment secured through new development and the work of the council, partner organisations and local groups. Paragraph 3.2 will be amended to emphasise this.	Delete paragraph 3.7 and amend paragraph 3.2 to emphasise the work of a wide range of partners in achieving these aims.
3.4	61	1032113	In respect of aim 4, the aim should be to conserve and enhance ' the Kent Downs AONB in line with the purpose of AONB designation as set out in the Countryside and Rights of Way Act 2000, the primary legislation relating to Areas of Outstanding Natural Beauty, rather than manage ', as currently worded.	Noted. Paragraph 3.4, point 4 will be amended to refer to the need to "conserve and enhance" the Kent Downs Area of Outstanding Natural Beauty.	Amend paragraph 3.4, point 4 to refer to the need to "conserve and enhance" the Kent Downs Area of Outstanding Natural Beauty.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.4	198	1162568	Why are historic venues such as The Leas Pavilion and Dance Easy - (one a Listed Building with significant heritage; and the other an Asset of Community Value) not being more protected? We are asleep at the wheel and allowing the important aspects of the cultural heritage of Folkestone to be wiped from our community.	The Leas Pavilion receives statutory protection as a Grade II Listed Building and since the planning permission for the site expired, the council has been working to safeguard the future of the building. The Dance Easy Studio has been identified by the council as an Asset of Community Value (ACV) after being nominated by the Bayle Residents' Association. The council has also successfully defended the nomination decision in an appeal against the designation. The ACV status is a factor that can be taken into account in deciding any future planning applications for the site. The council has powers to make decisions on sites when planning applications or listed building consent applications are submitted for redevelopment or change of use, balancing the community use of the site against other relevant planning considerations. The council has no powers to force landowners to continue to operate a site for a community use; this is down to the decision of the operator and will be driven by the demand for the space and the commercial viability of the venue.	No change proposed.
3.4	341	1163103	Go Folkestone discussed the demise of the University College of Folkestone which some members were involved in. Certain well-informed members felt that it would be difficult to revive in a similar form as much grant money was lost. However Section 2.35 of the report confirms that Folkestone and Shepway have a lower proportion of degree equivalent holders than the UK average., and probably far lower than the South East. Folkestone is both by the sea and convenient for London which should draw students. The demise of the University College of Folkestone after 5 years (2007-2012?) is regretted and was apparently linked to financial stringencies applied across the board to Canterbury Christ Church and Greenwich, the backers, and a last-in, first chopped approach. It is time to consider again a greater tertiary offer in Folkestone by looking at local demands (Construction? Tourism and Insurance per Saga? Archaeology? Maths?) and potential campuses. It should be a target to look at combining the Kent College site with some spacious and landed new tertiary college building in Otterpool near Westernhanger Station. If a university college is too high a target then private colleges should be encouraged. Earlscliffe has been a success as a private 6th form college. Many similar towns draw in organisations such as osteopathic colleges (Boxley near Maidstone), religious bodies (East Grinstead) and ophthalmic colleges (ABDO in Godmersham near Ashford). One member, Brian Mc Bride said that the Royal College of Needlework had been looking for expansion premises from Hampton Court. The South East has many such specialisms	Noted. The council recognises the importance of the tertiary sector which appears to be less expansionist than it was pre-2008. However, regarding the new garden town, informal approaches have been made to a few universities to assess whether this situation might be changing but it does not appear to be so which makes a satellite campus in the new town difficult to deliver. More locally, universities seem to be centralising around existing premises rather than seeking new satellite campuses; Canterbury Christ Church University, for example, has acquired the former Canterbury prison to develop as future premises, rather than looking further afield. We will continue to monitor the sector to detect any early signs that the consolidation trend is changing and if so how the District might benefit. The new garden settlement will be a long-term project, built over a number of years, and there may be opportunities in the future.	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.4	490	1037610	3.4 Strategic Need B: The challenge to enhance management and maintenance of natural and historic assets. Enhance the character and function of the district's historic towns and villages, and the management of historic assets/visitor attractions; Comment: The Heritage strategy is in draft form and has not been adopted to form the basis of evidence for this review. The District 's track record of management of historic assets is not proven by its determination to ruin the important setting of the Royal Military Canal by building houses and a leisure centre and by approving the mass demolition of Shorncliffe 's military heritage instead of insisting on reuse of buildings which could serve as a unique housing development with enhanced values and community respect.	Noted. The Heritage Strategy is being developed alongside the Core Strategy Review and its draft findings have helped to inform the Regulation 18 consultation version of the plan. Recommendations will be used to inform the next version of the Core Strategy Review, where these are specifically related to planning policy.	No change proposed.
3.4	483	1037610	Strategic Need B: The challenge to enhance management and maintenance of natural and historic assets. Comment : the track record of the district council in past protection of its heritage does not give any comfort that these challenges will be dealt with appropriately i.e. 6. Maintain the sense of openness and tranquillity of the countryside and undeveloped coast; Example Princes Parade an area of international importance due to the setting of the scheduled ancient monument of the Royal Military Canal to be lost forever 8. Enhance the character and function of the district's historic towns and villages, and the management of historic assets/visitor attractions; Example; allowing mass demolition of most of Shorncliffe Garrison, thus losing the military integrity suggested as being vital to keep by Historic England, Victorian Society and the Council for British Archaeology Example also repeated in	Noted. The comment does not refer to any particular asset or development.	No change proposed.
3.5	129	1162795	While we support the premise of this objective, we would caution against the use of 'viable' under part 1 without further detail and would suggest in this context it is unnecessary particularly with Policy SS3.f setting out more detailed and appropriate criteria. This is because 'viable' can be interpreted differently; community and cultural uses can be 'unviable' on a full commercial basis for example, but this does not mean they are not required by the local community and cannot be successful under different operating and funding models. Financial viability can also be manipulated; to demonstrate lack of need and that alternative community uses are not appropriate through thorough assessment is a more appropriate measure.	Noted. This wording will be changed to "valued" to better reflect the revised National Planning Policy Framework (July 2018), paragraph 92.	Delete "viable" in paragraph 3.5, point 1 in reference to community buildings and replace with "valued facilities and services" to better reflect national planning policy.
3.5	199	1162568	Popular culture is absolutely key to engaging these audiences. Content must match cultural taste preferences to be most effective. The Rooftop Disco that we created last year as a collaboration between The Chambers, F.U.S.S. DJs and The Leas Cliff Hall was an example of how popular music culture successfully attracts multiple ages and social classes to a dance based social scene.	Noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.5	484	1037610	Strategic Need C: The challenge to improve the quality of life and sense of place, vibrancy and social mix in neighbourhoods, particularly where this minimises disparities. Create distinctive places and cohesive neighbourhoods and encourage increased voluntary activity, the provision of new community buildings and the retention of existing viable community buildings and civic interest in community development; Comment: Viability for whom the community, district or developer	Noted. This wording will be changed to "valued" to better reflect the revised National Planning Policy Framework (July 2018), paragraph 92.	Delete "viable" in paragraph 3.5, point 1 in reference to community buildings and replace with "valued facilities and services" to better reflect national planning policy.
3.5	491	1037610	3.5 Strategic Need C: The challenge to improve the quality of life and sense of place, vibrancy and social mix in neighbourhoods, particularly where this minimises disparities. Comment to item 4. Healthcare. One health centre and the Otterpool New town serving 12 or 10000 homes is insufficient by any standard	Paragraph 3.5, bullet point 4 refers to healthcare needs in general and does not specify the requirements of any particular scheme. Proposals for healthcare in the new garden settlement are set out in Policy SS6, and these have been developed in partnership with the NHS and local Clinical Commissioning Groups.	No change proposed.
3.6	62	1032113	The AONB Unit has concerns regarding the aim to provide sufficient capacity beyond the plan period for housing, in view of the level of proposed strategic development proposed in the setting of the Kent Downs AONB. Our concerns are expanded on in response to paragraph 4.14.	Noted. The National Planning Policy Framework supports the supply of new homes through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. The government requires local planning authorities to review their plans at least every five years, so this will provide an opportunity to assess progress with implementing the Core Strategy Review and if necessary amend any policies.	No change proposed.
3.6	348	1157819	To add an additional aim to the effect of ensuring that the "rush for development" does not adversely affect the heritage assets of the area. There needs to be a balance between the amount of proposed development and its affects upon the heritage assets of the area.	Noted. Paragraph 3.6 already includes the aim to protect and enhance heritage assets.	No change proposed.
3.6	200	1162568	High quality place-making is achieved when high quality businesses are attracted into the destination. Supportive licensing policies and the protection of all cultural heritage are essential factors.	Noted. The built heritage is dealt with in policies in the Core Strategy Review and Places and Policies Local Plan, including Policy SS3 and policies in chapter 17 of the Local Plan. Decisions about licensing matters are made through other legislation and are not matters that can be determined through the planning system or addressed in local plans.	No change proposed.
3.6	342	1163103	The majority of GF members , including David Noble and Linda Bauer , would expect stronger policies on social and affordable housing , particularly genuine social housing . We have been disappointed by the lack of specificity in this area and the frequent reductions in affordable housing proportions in large developments. Developing poorer shopping areas to provide more flats above and beside modernized but fewer shops is something we support . Shopping space will go down a little in established parades and town centres , due to the internet .That should be planned for , Royal Victoria Hospital housing site area provides a golden site for elderly people , siince it has a park and medical facilities . We feel it must be used for that demographic.	Noted. The Royal Victoria Hospital site is an allocation in the Places and Policies Local Plan; the site is not dealt with in the Core Strategy Review.	No change proposed.
3.6	492	1037610	3.6 Strategic Need D: The challenge to plan for strategic development which fosters high quality place-making with an emphasis on sustainable movement, buildings and green spaces. No Comment	Noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.6	485	1037610	Strategic Need D: The challenge to plan for strategic development which fosters high quality place-making with an emphasis on sustainable movement, buildings and green spaces. Aims arising from Strategic Need D: 2 Include a balanced mix of land uses, housing tenures, community facilities and strategic open spaces with long term stewardship and management arrangements established at an early stage; Comment; as mentioned, investigate community led development using a model similar to Cost Plan Housing at The Meade 3 Promote innovative and distinctive architecture whilst protecting and enhancing unique landscapes and heritage assets. Building construction should be characterised by longevity, smart energy solutions and environmentally adapted materials; Comment: District has failed with Shorncliffe Heights and Princes Parade and Seafront Development.	The council does not accept that these are failures; they have secured the future of heritage assets listed and non-listed, and secured contributions to the restoration of assets such as the Leas Lift. The schemes provide much-needed homes, as well as business space and investment and community facilities and infrastructure improvements.	No change proposed.
<b>3.2 VISION FOR FOLKESTONE &amp; HYTHE DISTRICT</b>					
3.8	486	1037610	3.2 Vision for Folkestone and Hythe District This section lack significant substance on deliverables. It is based on what if 's' such as HS1 stopping at Westenhanger Station and reliant on the Creative Foundation continuing to deliver arts without investment of others including the district and other stakeholders There is no detail on how the new garden town will interact with Folkestone and Hythe, its closeness to Ashford would make it reliant on its centre being there rather than Folkestone unless serious connectivity plans play a key part in the master planning, which is sketchy to say the least. Reports of a University; one health centre; a local centre; job creation quoting limited opportunities make neither for sustainability or a good place to live Folkestone Town Centre has suffered significant decline, particularly Guildhall Street. What evidence is in the strategy for any work to be achieved to take a mend before extend ' growth programme. The town centre has been bereft of investment for many years and it shows. Vision is good but where is the evidence to back up sustainability in any of this talk '. The Town Centre Studies shown as supporting documents/evidence were dismissed as containing errors and inaccuracies at the original time of publication. Have these been updated, the date on them seems to indicated not.	Section 3.2 is intended to set out the broad vision for Folkestone & Hythe District and does this with a short future vision and brief descriptive passages about the three character areas; the section is not intended to list all the projects that are needed or the partners involved.	No change proposed.
3.8	727	1164722	The Parties support the vision for Folkestone and Hythe to "flourish into a distinct area of high quality towns, including a new garden settlement complemented by the contrasting strengths and distinctiveness of attractive countryside and coastal places" (page 42 of the draft Core Strategy Review, 2018).	Noted. This support is welcomed.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.9	651	1042306	While Historic England is broadly supportive of the Aims and Vision for Folkestone and Hythe, we have a particular interest in those relating to Strategic Need B: The challenge to enhance management and maintenance of natural and historic assets, notably bullet 8 relating to protection of the district 's historic environment and heritage assets. Historic England does not have too much difficulty with supporting the principles for Future Vision for Folkestone and Hythe District as expressed in the grey panel on page 42 but finds this hard to reconcile with the text in paragraph 3.16, second sentence, which remains an area of contention for us. We strongly object to the proposals to develop a sport facilities and housing adjacent to the Royal Military Canal in Hythe, which this section promotes, on the grounds that it will seriously harm the significance and setting of the scheduled monument. Historic England has no fundamental concerns about direction set by SSP1 District Spatial Policy subject to the rigorous application of policies to protect and enhance the historic environment set out elsewhere in the development plan. This is essential in attaining the goal of sustainable development required by the National Planning Policy Framework, a core principle of which is to 'conserve heritage assets in a manner appropriate to their significance' (NPPF, paragraph 17, tenth bullet point).	Noted. This support is welcomed.	No change proposed.
3.11	124	1029376	This core strategy fails to achieve the future described below. The garden town specifically pulls the population centre of the area away from the town leaving the central area deprived. There are no proposals within the strategy to achieve this vision	Section 3.2 is intended to set out the broad vision for Folkestone & Hythe District and does this with a short future vision and brief descriptive passages about the three character areas; the section is not intended to list all the projects that are needed or the partners involved. The Core Strategy Review contains policies for the whole district, including Folkestone town centre and Folkestone Seafront.	No change proposed.
3.11	196	1162568	The existing popular music culture and heritage in these areas must be respected. You are ignoring its significant value.	Noted. Paragraph 3.11 will be amended to refer to music alongside culture and artistic festivals.	Amend paragraph 3.11 to refer to music alongside culture and artistic festivals.
3.11	136	1162696	Vibrant, cultural, artistic are all great expectations for Folkestone & being the 'heart of East Kents cultural & economic life' - an 'events town'. Are these events getting leveled at a minority or at the many? No mention of music or the history that has paved the culture of the town through the sixties, seventies & eighties, with a rich heritage under it's belt already, shouldn't we be making sure this continues? Whilst art has always been a very big part of the town with open air exhibitions being a standard every week for decades, music also has. So i feel inclusion is needed for this too.	Noted. Paragraph 3.11 will be amended to refer to music alongside culture and artistic festivals.	Amend paragraph 3.11 to refer to music alongside cultural and artistic festivals.
3.11	335	1163015	you still fail to acknowledge the importance of music and the night time economy (past 11pm!) stating "Folkestone will be a recognised and popular events town", with cultural and artistic festivals" with no acknowledgement of the existing scenes or reference to our rich heritage is just a statement with not depth or meaning. We're already an events town, we already have a growing and vibrant social scene - do we take it that what you mean is that you plan to support it and help it grow and prosper when planning for the future?	Noted. Paragraph 3.11 will be amended to recognise existing operators.	Amend paragraph 3.11 to recognise existing operators.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.11	378	1157838	I completely agree with Dr. Jones' excellent open letter and Mr. Smith's comments. Both have been instrumental in the town's night life, specifically in organizing music events. It is very short-sighted of the Council to exclude music from their definition of events - in fact, it is an insult. The town is really unique in that it has so many excellent venues for live music. What other town, or even city, in Kent can boast as many venues? Certainly Dover, Hythe, Ashford and Canterbury can't. Folkestone is THE place to go for a night life in the District. The rail links operate far later than those to Hastings. The Council should be exploring ways to encourage a vibrant night life - perhaps they should visit Canterbury, where cafes and venues are open until quite late, and take a leaf out of their book? Folkestone has been historically important for music. Many bands visited the Leas Cliff Hall and other long-gone venues such as Toft's and The Odeon, including the Rolling Stones, The Who, Cream and Jimi Hendrix. Jimi's bassist was local, and there have been other successful bands linked with Folkestone. Why is the town not celebrating and boasting these connections? I do hope Dr. Jones' open letter will be read, despite being an external document. I am most concerned to learn of the threat to night entertainment - this must not happen. There are many people who are desperate for another dance music club venue in Folkestone. One of the best locations for this would have been the former Silver Spring premises - out of the way on an industrial estate where nobody would be disturbed at night and school and commercial traffic will not be disturbed. Instead, the land sadly has proposals for fast food restaurants and a motel - the wrong location for such a development, which would be better placed at the Hythe junction of the M20 to catch passing trade. I am very surprised that this large parcel of land was not included in the Core Strategy.	Noted. Paragraph 3.11 will be amended to refer to music alongside culture and artistic festivals.	Amend paragraph 3.11 to refer to music alongside culture and artistic festivals.
3.11	493	1037610	3.11 Major economic opportunities will have been realised, especially through High Speed 1 rail services as the bedrock of an improved low-carbon transport system. Folkestone will be well connected to major European cities Comment: Aspirational; not yet determined to form the basis of this strategy	Section 3.2 is intended to set out the broad vision for Folkestone & Hythe District and does this with a short future vision and brief descriptive passages about the three character areas; the section is not intended to list all the projects that are needed or the partners involved.	No change proposed.
3.12	380	1157838	The wording here is rather concerning: "improved evening attractions will lead to reduced anti-social behaviour and crime" Are you trying to say that improved evening attractions will lead to reduced anti-social behaviour and reduced crime? If so, why not say that? It reads as: improved evening attractions will lead to: reduced anti-social behaviour crime See comments on Paragraph 3.11 regarding the value of music as evening entertainment.	Noted. Paragraph 3.12 will be amended as suggested.	Amend paragraph 3.12 as suggested.
3.13	143	1162805	Please how the are can have the improved evening attractions when local planning are instrumenting earlier venue closure as a norm and propose to alter the current late licence culture? this will in itself inhibit younger people form maintaining a place in Kent and continue to extend the ageing (sleeping) population already earmarks as a challenge to the strategy .	Noted. Paragraphs for the Urban Area will be amended to refer to the evening economy. Licensing is controlled by separate legislation and it is not something that can be addressed through the planning system or in a local plan document.	Amend paragraphs related to the Urban Area in Section 3.2 to refer to the evening economy.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.13	162	1162805	<p>Improving evening attractions will not lead to decrease in crime until the prevalent drug misuse for all ages is curbed and or until a suitable police force contingent is available in each of the districts main locations . (Currently Folkestone is policed by a force based in Ashford) . Reduced police activity means less deterrent against crime. Drugs use in the are is not confined to young people but mostly cover a range from 20 to 50 years (especially cocaine use)</p> <p>We operate a successful early evening music venue which enforces zero drug use policy yet we ourselves are consistently assaulted (verbally and in some case physically) by mail and femail s we believe are under the influence of drug use. and are surprised that such se cover most ages and economic backgrounds . In Folkestone our police force is based in Ashford so in occasions when we may need to seek police support . the perpetrators of criminal disturbance have left long before the police can make there preces felt.</p>	<p>Noted. The Core Strategy Review is principally concerned with development and the use of land and will be used to make decisions on planning applications. The council works with a wide range of organisations in its daily operations, including the police, but the Core Strategy Review cannot directly tackle incidences of drug misuse. Section 3.2 is intended to set out a positive vision of the future of the district, but references to crime will be added to the challenges outlined in Section 1.2.</p>	<p>Add reference to crime as one of the challenges in Section 1.2.</p>
3.13	381	1157838	<p>How does the Council envisage competitively-priced housing? Are they going to provide a subsidy to ensure housing prices in Folkestone are cheaper than Dover? Even Canterbury can be cheaper than Folkestone nowadays. Building more housing will have no effect on house prices. The seafront development in particular will be expensive dwellings due to their location.</p>	<p>The National Planning Policy Framework makes it clear that in preparing local plans, local planning authorities should support the government's objective of "significantly boosting the supply of homes" (paragraph 59). Restricting the housing supply below that needed to meet the anticipated growth in households will not help those in housing need. The council's Strategic Housing Market Assessment considers house prices in its analysis of the housing market area and considers that Folkestone &amp; Hythe and Dover form a distinct housing market area with, in general, lower prices than Ashford, Canterbury and other areas of the sub-region. For clarity, the paragraph will be amended to refer to affordable housing rather than "competitively priced housing".</p>	<p>Amend paragraph 3.13 to refer to the delivery of affordable housing rather than "competitively priced housing".</p>
3.16	350	1157819	<p>The Core Strategy must recognise that there is already a very significant amount of development proposed for Hythe, both in extant planning consents and further development proposals in the submission draft of the Places and Policies Local Plan, that is believed to have an adverse affect on the attractiveness of Hythe as a stand alone town with a historic core.</p>	<p>Noted. The purpose of Section 3.2 is to set out a positive vision for the future of Folkestone &amp; Hythe. The historic nature of Hythe and the limited opportunities for strategic development are acknowledged in Section 1.2 and Table 1.2.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.16	652	1042306	While Historic England is broadly supportive of the Aims and Vision for Folkestone and Hythe, we have a particular interest in those relating to Strategic Need B: The challenge to enhance management and maintenance of natural and historic assets, notably bullet 8 relating to protection of the district 's historic environment and heritage assets. Historic England does not have too much difficulty with supporting the principles for Future Vision for Folkestone and Hythe District as expressed in the grey panel on page 42 but finds this hard to reconcile with the text in paragraph 3.16, second sentence, which remains an area of contention for us. We strongly object to the proposals to develop a sport facilities and housing adjacent to the Royal Military Canal in Hythe, which this section promotes, on the grounds that it will seriously harm the significance and setting of the scheduled monument. Historic England has no fundamental concerns about direction set by SSP1 District Spatial Policy subject to the rigorous application of policies to protect and enhance the historic environment set out elsewhere in the development plan. This is essential in attaining the goal of sustainable development required by the National Planning Policy Framework, a core principle of which is to 'conserve heritage assets in a manner appropriate to their significance' (NPPF, paragraph 17, tenth bullet point).	Noted. This section describes general proposals throughout the district; there are no specific proposals for the Royal Military Canal in Hythe in the Core Strategy Review.	No change proposed.
3.25	228	1162685	Environmental capacity for the proposed garden settlement is a long way from having been established. The scoping document has only just been submitted.	Paragraph 3.25 refers to the supporting evidence in the Growth Options Study, which is outlined further in Section 4.6: Strategic Allocations.	No change proposed.
3.26	53	1160254	Because you refuse to accept that building a town on the very margin of an AONB must inevitably comprise the AONB itself, you are proposing solutions that undermine the very purpose of building the town in the first place. The lower the density of development in those parts of the town most visible from the AONB, the more expensive those houses will be and the less housing you will be able to build overall. Considered alongside the amount of room available, the failure of the recent HIF bid to Government to fund essential infrastructure for Otterpool town, and the desire of developers and landowners to realise the profit, the capacity to provide any significant levels of so-called "affordable" housing for local residences looks pretty slim. The aspiration to make the town "water neutral" is, I believe farcial and in the absence of any Water Cycle Report to support this document, you have no basis to validate the reality of such an aspiration. I also don't understand how bioversity can possibly be enhanced given that total green space in the area will be reduced by at least 60%.	The assessment of strategic options is set out in detail in the council's Growth Options Study and High Level Landscape Appraisal. The council considers that there is a clear and robust evidence base underpinning the strategic allocations in the Core Strategy Review. However, Policy SS7: New Garden Settlement - Place Shaping Principles could be amended to specifically refer to views from the North Downs ridge and wider escarpment.	Amend Policy SS7: New Garden Settlement - Place Shaping Principles to specifically refer to views from the North Downs ridge and wider escarpment.
3.26	131	1029376	The development will create a large number of homes and hence there will be some employment opportunities but it will increase the working age population by a much larger amount than the job opportunities so the number of jobs created is not a positive factor	The aim of this section is to set out a positive vision of the future for Folkestone & Hythe; constraints and weaknesses are dealt with in Section 1.2 of the Core Strategy Review.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.26	81	1032113	Notwithstanding our fundamental concerns regarding the provision of a new garden town in the setting of the Kent Downs AONB, in the event of the allocation coming forward, we welcome the intention that this will include strategic landscaping and lower density development in those parts of the town that are more visible from the North Downs ridge'. The vast majority of the proposed garden town site is visible from the North Downs ridge however and it is not just views from the ridge that are important, but views out from the entire escarpment, much of which is open access land and is traversed by numerous public rights of way.	Noted. Paragraph 3.26 will be amended to refer to views from the wider escarpment.	Amend paragraph 3.26 to refer to views from the wider escarpment.
3.26	494	1037610	3.26 Comment: The new garden settlement will be developer led and not community led development. F&HDC has an opportunity to provide a community led development for a new stock of houses led by the people for the people	The aim of this section is to set out a positive vision of the future for Folkestone & Hythe; the new garden settlement can provide many community benefits and these are outlined in paragraph 3.26.	No change proposed.
3.26	593	329173	3.26, 4.88, Policies SS6 SS8 (1) b & c, Section 5.66 - We welcome the ambition to create a water-neutral development. However this is a concept to be applied at a large scale, not something which is achievable in the context of an individual self-built or custom-built home, as the bottom of page 84 seems to imply, or even a larger new development in isolation. To achieve water neutrality, new water consumption in a development needs to be balanced by consumption reductions elsewhere. Perhaps a definition could be included in the Glossary, and thought given to delineating the wider area over which neutrality is to be achieved?	Noted. The description of the development will be amended to reflect these comments.	Amend references to "water neutrality" in paragraph 3.26 to reflect these comments.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.26	728	1164722	<p>Draft paragraph 3.26 confirms aspects which FHDC expect the new garden settlement to deliver. These can be summarised as follows: Landscape led design; Respects the setting of the AONB by including strategic landscaping and lower density housing in those parts of the town more visible from the North Downs ridge; Low carbon homes and increased resource conservation, including aim to be water-neutral; Will include opportunities to achieve health benefits through walkable neighbourhoods and construction of homes to meet changing needs of occupants; A range of character areas and housing tenures should be delivered (including self-build and custom build homes); Provide a range of employment opportunities; Create an attractive place that is aesthetically, culturally and environmentally rich and stimulating, centred around an attractive park and forming an enhanced setting to Westenhanger Castle; Provide a range of multi-functional green and blue spaces linked in a network that will enhance biodiversity. Overall the Parties are supportive of the above expectations of the Otterpool Park garden settlement and the framework masterplan has sought to address these. It is noted however that there is an aim in paragraph 3.26 for the development to be water neutral. This would be difficult to achieve at the Otterpool Park garden settlement unless the following measures are implemented: treated effluent is fully recycled from a potential new on-site waste water treatment plant for both potable and non-potable usage across the development; and artificial pumping of excess surface water to permeable infiltration Sustainable Urban Drainage System (SuDS) areas in high ground for potable water consumption recovery is carried out; and extensive water efficiency retrofitting measures implementation and education campaigns are conducted within wider Water Resource Planning area beyond the Otterpool</p>	<p>Noted. Paragraph 3.26 will be amended to reflect these comments and those of the Environment Agency.</p>	<p>Amend paragraph 3.26 regarding water neutrality to reflect these comments.</p>
3.28	54	1160254	<p>Regarding housing affordability, see my comments to 3.28 above. In addition, the lack of affordable housing in this country is due to a complex interplay of factors that affect supply and demand including but not limited to the policy of handing the provision of social housing over to profit-making companies being stunningly unsuccessful (what they meet is demand, not need - the two are different), property developers holding onto land on which planning permission has been granted in order to inflate housing prices, multiple home ownership and the greed of private landlords, foreign investors inflating the prices of housing in London etc etc. Otterpool town will not seriously address the local of supply of affordable housing locally and residents in this district are being asked to accept excessive and unsustainable increases in housing development that will destroy their way of life simply to continue feeding the greed of the rich without addressing the needs of the poor. This Core Strategy Review is utterly complicit with that form of exploitation. As for access to healthcare, the creation of a town of 10,000 homes with multiple schools and nurseries but only 1 healthcare centre and no additional hospital provision is only likely to exacerbate the already critical situation we already experience in this area.</p>	<p>The government's National Planning Policy Framework (NPPF) states that the supply of new homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Local planning authorities are directed to set clear expectations for the quality of the development, such as by following garden city principles. This is what the council is undertaking through the Core Strategy Review process. The NPPF makes it clear that in preparing local plans, local planning authorities should support the government's objective of "significantly boosting the supply of homes" (paragraph 59). Restricting the housing supply below that needed to meet the anticipated growth in households will not help those in housing need.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.28	56	1160254	Sorry, the objection I've just made to this point should have started by reading "Regarding housing affordability, see my comments to 3.26 above", not "3.28 above".	Noted.	No change proposed.
3.28	55	1160254	Sorry, the objection I've just made to this point should have started by reading "Regarding housing affordability, see my comments to 3.26 above", not "3.28 above".	Noted.	No change proposed.
3.30	51	1160254	The credibility of this plan is not enhanced by the euphemistic and sometimes misleading use of language. Hawkinge is not a village, it is a town - it became one in 2011 as you point out in 1.50 of this document. And in what sense will it become "more integrated, blending into the landscapel. The West side of the "town" is, unfortunately, a spreading brick carbuncle!	Noted. Paragraph 3.30 will be updated to reflect the status of Hawkinge.	Update paragraph 3.30 to reflect the status of Hawkinge.
3.30	49	1160254	The credibility of this document is not enhanced by the euphemistic and sometimes misleading use of language. Hawkinge is not a village, it is a town - it became one in 2011 as you point out in 1.50 of this document. And in what sense will it become "more integrated, blending into the landscape? The West side of the "town" is, unfortunately, a spreading brick carbuncle!	Noted. The purpose of Section 3.2 is to set out a positive vision for the future of Folkestone & Hythe; section 1.2 describes the district's current challenges and weaknesses including the impact of urban development on existing villages within the Area of Outstanding Natural Beauty. Paragraph 3.30 will be amended to reflect the status of Hawkinge.	Amend paragraph 3.30 to reflect the status of Hawkinge.
3.31	79	1032113	The AONB should be given its correct title - it is referred to as the North Downs AONB, rather than the Kent Downs AONB.	Noted. Paragraph 3.31 will be amended to refer to the Kent Downs Area of Outstanding Natural Beauty.	Amend paragraph 3.31 to refer to the Kent Downs Area of Outstanding Natural Beauty.
3.32	52	1160254	There is no way in which Lympne will be able to retain its "distinct character" with as many as 10,000 homes built on its doorstep. The character of Lympne is essentially rural. It is defined by open vistas across the fields looking North West from Stone Street, panoramic views across the South/South West Coast from the road to the Castle and the Saxon Shore Way, fields to East and West, an active farm in the middle of the village and the presence of livestock in the surrounding fields, and the heritage assets of a medieval castle and church. The so called "mitigation" of a remaining strip of the former airfield will between Lympne and Otterpool town will in no way compensate for the mass of housing located right behind the houses currently sited at the north end of Stone Street, blocking the views to the North West. Newingreen and Westenhanger will be swallowed up and the houses at the North end of Lympne will find themselves perilously close to the main town centre and the extensive development of the junction between the A20 and the A261 that will inevitably have to be undertaken. Lympne will become to Otterpool what Saltwood is to Hythe - a suburb. Village life will have been destroyed.	The National Planning Policy Framework (NPPF) makes it clear that in preparing local plans, local planning authorities should support the government's objective of "significantly boosting the supply of homes" (paragraph 59). The NPPF states that the supply of new homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Local planning authorities are directed to set clear expectations for the quality of the development, such as by following garden city principles. This is what the council is undertaking through the Core Strategy Review process.	No change proposed.
3.32	80	1032113	The AONB should be given its correct title - it is referred to as the North Downs AONB, rather than the Kent Downs AONB.	Noted. Paragraph 3.32 will be amended to refer to the Kent Downs Area of Outstanding Natural Beauty.	Amend paragraph 3.32 to refer to the Kent Downs Area of Outstanding Natural Beauty.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
3.32	554	1164105	Paragraph 3.32 states; Outside the AONB, the provision of a garden town will capitalise on existing infrastructure to open up opportunities for wider communities, while also ensuring that villages such as Lympne and those within the AONB retain their distinct character. Despite the acknowledgement of green infrastructure and siting of the proposed garden town within a landscape setting, its sheer proximity to, for instance Lympne, make this statement difficult to back up on the evidence produced to date.	The Indicative Strategy for the new garden settlement (Figure 4.5) and wording for Policy SS7 (1) are intended to provide separation between the new settlement and Lympne, to help it retain its distinct character.	No change proposed.
<b>4.1 DISTRICT SPATIAL STRATEGY</b>					
4.1	487	1037610	4.1 District Spatial Strategy The district's appeal is primarily based on its connectivity and variety of towns, villages and high quality environments of coast and countryside. The heart of the North Downs and Romney Marsh areas are AONB or Grade 1 classified agricultural land (respectively), both of which have a rich and diverse influence on the landscape character. Accordingly, the district's highest quality rural landscapes need to be maintained as a key part of its attractiveness. Allied to this is the historic influence of the coast on the evolution of settlements and on current perceptions of the district. Comment: The appeal in terms of variety of towns and villages, will be lost when Villages around the Otterpool new town will merge into the new Otterpool town losing their own identity over time with expansion. The coastline in Folkestone will have a skyline that destroys the intention of this plan refer Identified strengths ' Central Folkestone Urban Design and Movement: Summary Points (referred to later in this document)	The Core Strategy Review tries to balance the need for development alongside preserving and enhancing the special character of the district. Policy SS7: New Garden Settlement - Place Shaping Principles provides a very detailed policy to guide the development of the new town, focusing on landscape and design to get the best quality of development.	No change proposed.
4.3	103	1162696	There has been & will be considerably more substantial change to Folkestone & Hythes coast line. Lets hope the 'key aims' retain the natural beauty that remains for the future.	This is the intention of policies in the council's development plan. Core Strategy Review Policy CSD5: Water and Coastal Environmental Management provides a framework for deciding development proposals affecting the coast. The council's Places and Policies Local Plan contains Policy NE8: Integrated Coastal Zone Management which provides further more detailed guidance. For proposals up to the high water line, the Marine Management Organisation's South Inshore and South Offshore Marine Plan will be used to make development decisions.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.4	104	1162696	I think it's important to bear in mind the lack of draw, further educationally & socially that will also have a bearing on these figures over time. University cities & towns will always benefit from a resident audience of younger people. As Folkestone & Hythe don't have large further education options (Though EK college is definitely upping it's catering game these days, historically one of the bigger providers of catering teams in Kent, now getting back in to the frame). Should further education be a must for consideration in the future development of the region..? I say yes.	Noted. The council agrees that further education should be supported and works with organisations to achieve this. Folkestone College (East Kent College) has invested heavily in its site with help from Folkestone & Hythe District Council. The council meets regularly with Folkestone College and other training providers to help with further education provision, which could include the need for new premises if this was to be identified as a priority by the providers. Funding for project could come from a number of sources, including the Local Growth Fund from the Local Enterprise Partnership, EU funding and other sources. However, the tertiary sector appears to be less expansionist than it was pre-2008. Regarding the new garden town, informal approaches have been made to a few universities to assess whether this situation might be changing but it does not appear to be so, which makes a satellite campus in the new town difficult to deliver. More locally, universities seem to be centralising around existing premises rather than seeking new satellite campuses; Canterbury Christ Church University, for example, has acquired the former Canterbury prison to develop as future premises, rather than looking further afield. We will continue to monitor the sector to detect any early signs that the consolidation trend is changing and if so how the District might benefit. The new garden settlement will be a long-term project, built over a number of years, and there may be opportunities in the future.	No change proposed.
4.5	57	1160254	This proves the point that the development of Otterpool town has nothing to do with meeting local need and everything to do with creating a commuter town.	The need for growth is driven by patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt household change. Policies for the new garden settlement are designed to create a sustainable town with a balance of homes and jobs.	No change proposed.
4.6	229	1162685	CPRE commented on the difficulty of understanding the proposed housing numbers in the consultation on the current (2013) Core Strategy. This document can be similarly confusing. This paragraph quotes both 600 and 1300 as the net in-migration in 2015/6 for example.	Paragraph 4.6 outlines trends relating to movements to/from the district and London and movements to/from the district and all areas . This will be made plainer in the text.	Amend paragraph 4.6 to make the existing text clearer.
4.8	233	1162685	The 2013 CS is not, as stated here, delivering a minimum of 8750 new homes at current rates. Less than 280 homes appear to have been completed annually on average over the first 12 years of the plan, vs 400 targetted. This paragraph is also very confusing. It implies that 8750 homes will be built under Core Strategy policies and 'additional development' (ie more than 8750 homes?) will be brought forward under the PPLP. The confusing numbers in the 2013 CS are repeated here. As we understand it, the 350 homes 'target' applies to a different plan period than the 400 homes 'target'. We also noted that figures for completions in KCC's statistics differ from those in your 2016 AMR. It would be useful to get a much clearer picture of delivery rates in recent years in the district to inform the planning process.	Noted. The figure of 350 new homes a year to 2030/31 was a minimum set out in the 2013 Core Strategy Policy SS2: Housing and the Economy Growth Strategy. 400 homes a year to 2026 was set as a target to support housing delivery. The purpose of the 2013 Core Strategy and Places and Policies Local Plan is to deliver these figures as an average across the plan period of the 2013 Core Strategy (2006-2031). Figures for each year will inevitably vary considerably due to the completion of phases on large sites and general trends of the economic cycle. This paragraph will be amended to make this clearer.	Amend paragraph 4.8 to improve clarity.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.9	234	1162685	<p>We find it extraordinary that the SHMA has ignored the influence of Ashford Borough on housing demand in the district. Elsewhere in this document you trumpet the value of good east-west connections via the M20 and the railway yet by ignoring Ashford in the HMA you are discounting the many people who do and would in future live in one district and work in the other. The M20 must surely elongate the housing search area for buyers east-west. The HMA your consultants have adopted doesn't include a square inch of Ashford Borough, let alone the substantial further areas planned for future housing and employment east of Ashford Town and proposed at other places such as Brabourne. The 2016 Internal migration data show that more people moved from this district to Ashford than moved in the other direction and there were a total of 1620 population movements between the two districts, while there were only 1230 between this district and Dover. Ashford must surely be as big an influence on housing demand in the district as Dover. Coupled with the lack of evidence of any cooperation with Ashford Borough Council, we have serious reservations on the basis for the housing need calculations.</p>	<p>The council's SHMA analyses a range of different indicators in coming to conclusions on the most appropriate housing market area, including migration, commuting patterns (including the Office for National Statistics' Travel to Work Areas), house prices and other contextual evidence. It also looks at evidence from neighbouring authorities. Ashford Borough Council's own work (Ashford Borough Council SHMA addendum, 2014) does not suggest that Ashford's housing market area extends into either Folkestone &amp; Hythe or Dover.</p>	No change proposed.
4.10	235	1162685	<p>CPRE objects strongly to the way housing 'need' is being calculated and even more so to the way it is proposed to be calculated in future. This is, however, a national issue and we will not reiterate the arguments in detail here. In brief, CPRE's position is that setting ever higher numbers as targets for new housing delivery will not increase the rate of delivery of new homes. The rate is determined by the capacity of housebuilders to build houses and their need to provide a steady return to their shareholders. Planning authorities have no control over these factors. The historic rate of completion of new homes (about 280 each year over the last decade) provides a good indication of what will actually happen in the district. Current central government policy also punishes local authorities and communities for under-delivery of new homes when they are powerless to do anything about it. The punishment is to have to accept unplanned developments on sites picked by housebuilders for their profitability rather than on the more sustainable sites which have been accepted by the community through the local plan examination process. CPRE also objects to housing need being calculated district-by-district without consideration of the constraints to sustainable development. Such constraints might suggest housing growth would be better concentrated in other districts, nearby or further afield.</p>	<p>Noted. The council is required to meet national planning policy if it is to have its plan found 'sound' at examination by an independent planning inspector.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4. 10	271	559029	In whose interest is the vast increase in numbers of dwellings proposed ? Nearly double the number proposed in the old Core Strategy. More than the Government requires. Not in the interest of local residents, for sure. Not really in the interest of the proposed new inhabitants who would find themselves living in a ' garden town ', but bereft or starved of social and economic infrastructure. Surely what would be more feasible would be smaller developments of high quality design and with services such as health and education which can be shared with existing conurbations and therefore become well integrated into social and economic structures.	The need for growth is driven by patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt these household trends. The figure proposed is not more than the government requires. The government has introduced a new national methodology for determining how many new homes local authorities should plan for. For Folkestone & Hythe district, the methodology indicates that the council should plan for 676 new homes a year on average over the plan period. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period.	No change proposed.
4. 10	352	1157819	Hythe Civic Society wishes to debate the SHMA at an Examination in Public as it appears that the targets are based on assumptions about in-migration from London and other areas which may or may not continue and that the benefit of the in-migration for existing residents is problematical.	Noted. The need for growth is driven by patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt general household trends. The government is requiring local planning authorities to review their plans at least every five years; if different trends emerge in the future these can be taken into account in a future plan review.	No change proposed.
4. 10	315	1162196	The research is self serving, unconvincing and incomplete and clearly the brief to the consultant has been to obtain high housing numbers. This applies to the SHMLA/OAN and to the Sustainability Appraisal. In the latter, objectives have been set which are achievable, while the OAN conclusions are only as good as the assumptions behind the model. Changes to immigration rates (nationally and internationally) and the nature of household formation can easily produce a different result. The mindset of Shepway should be we have natural and legal constraints to growth and our housing needs must be proportionate and based on the nature of local needs. Above all, Shepway should not be actively facilitating the tax exiled Reuban brothers to maximise returns from the land bank associated with Folkestone Racecourse via creating an unsustainable new town. Rather, it should be focusing its attention on innovative solutions to providing the right type of housing in the three character areas of the district.	The need for growth is driven by patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt general household trends. The government is requiring local planning authorities to review their plans at least every five years; if different trends emerge in the future these can be taken into account in a future plan review.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.10	345	1163046	The areas housing 'needs' are based on the Folkestone town area and are not representative of the rural communities at all. Small village developments are being made that retain a sense of community, respect the natural landscape and the farming needs and provide excellent opportunity for small and sustainable growth. The idea that building 12000 homes in the middle of the countryside (even over a number of years) can integrate easily with the existing communities without detrimental impact on those living there is ludicrous. You talk about quality of life but this will simply destroy lives. These houses you propose are not for local need at all - they are simply an attempt to drag people down from London and the sole motive is financial. Do not pretend that there is any respect for local peoples interest at all.	The need for growth is driven by patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt general household trends.	No change proposed.
4.1	706	1101438	The ESFA understands that the Core Strategy Local Plan Review document focuses on strategic policies and strategic site allocations, complementing the Places and Policies Local Plan which sits below the existing Core Strategy and allocates land to meet needs identified in that document as well as setting out development management policies. The ESFA further notes that, based on recent evidence base work by the council and the national consultation on a revised approach to calculating housing need, the district 's annual housing target is anticipated to increase substantially from a minimum of 350 homes per year (2013 Core Strategy) to at least 633 new homes per year. This big increase in housing growth over the plan period to 2037 will place significant additional pressure on social infrastructure such as education facilities. The Local Plan will need to be positively prepared ' to meet the objectively assessed development needs and infrastructure requirements.	Noted. The council is working with a wide range of partners to ensure that the growth is supported by necessary infrastructure and services and is keen to involve the Education and Skills Funding Agency in the work.	No change proposed.
4.12	236	1162685	While we doubt that even 490 new homes a year will be achieved consistently, we would like some clarification of for how long this capped figure would apply and whether the rate thereafter would be 722 or would it be higher so as to make up the deficit in the years the rate was capped? Some tables would help.	Noted. The government has introduced a new national methodology to set out how many homes local authorities should plan for. For Folkestone & Hythe district, this indicates that the council should plan for an average of 676 new homes a year over the plan period. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. This section will be updated to refer to the new National Planning Policy Framework requirements.	Update section to refer to new National Planning Policy Framework proposals.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.12	377	894636	<p>The variety of methodology used in recent years to arrive at a housing requirement figure leads very simply to a questioning of the numbers themselves. The National Housing Federation has now published the results of a report carried out by Heriot-Watt University which identifies a need for a higher number of new homes, at 350,000 per annum for England alone. More significantly it identifies a need for a much higher proportion of homes required on a social rent tariff. That there is a housing shortage is not in debate. The exact number is a fraction academic as what matters is the actual build numbers. What is more important is that it should be the right type of homes, built in the right places and fulfilling the actual need. It is pointless and inadequate to simply build large numbers of properties in the wrong place. There is no indication in the consultation document of where the population is that requires housing, and where they are employed etc etc. Housing provision is not just a matter of number crunching, or at worst glibly pointing at a field, and saying 'build it and they will come'. A much more holistic approach is expected of a Core Strategy.</p>	<p>Noted. The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. For Folkestone &amp; Hythe district, this indicates that the council should be planning for an average of 676 new homes a year. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. This section will be updated to refer to the new National Planning Policy Framework proposals.</p>	<p>Update section to refer to new National Planning Policy Framework requirements.</p>
4.12	693	1165942	<p>Gladman note the proposed approach being taken to dealing with the OAN and housing requirement. The Council is taking a proactive approach, which recognises that the proposed Standard Methodology will be likely to increase when the cap expires on the current proposed figure part way through the plan period. Gladman would however note that the Council will need to fully consider its OAN when the Standard Methodology and revised NPPF are formally published in Summer/Autumn of this year. This will likely be supported by new household projections currently scheduled for release in September 2018. In particular it would be prudent for the Council to note that the Standard Methodology should be the starting point for assessing its OAN, Gladman believe it would still be sound planning for the Council to ensure that its housing and economic needs are aligned. Given the prominent role played by Folkestone, and the transport links and infrastructure within the district, ensuring economic growth is not constrained by housing numbers would be a prudent approach to take.</p>	<p>Noted. The government has introduced a new national methodology to set out how many new homes local authorities should plan for. For Folkestone &amp; Hythe district the new methodology indicates that the council should plan for an average of 676 new homes a year. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. This section will be updated to refer to the new National Planning Policy Framework proposals.</p>	<p>Update section to refer to new National Planning Policy Framework requirements.</p>



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.13	705	1157734	<p>Housing Need The SHMA on which the draft Core Strategy is based identifies two options for the provision of housing for the period 2014 to 2037, which are - the CLG 2014 methodology which would require a provision of 566 dpa for 23 years giving a total of 13,018. - or, an enhanced provision of 633 dpa for 23 years giving a total provision of 14,559. The SHMA recommended that the figure of 633 dpa was adopted, and not the lower figure because of a previous error in the Census data, and increased migration. The Government has set out in draft a new national methodology for calculating housing. It identifies a housing requirement for the District of 490 new homes a year. However, this is a temporary 'capped' figure based on a standard increase to the current Core Strategy requirement. The capped figure is intended as a temporary measure only and is to allow local planning authorities time to allocate sites and grant planning permissions for development to reach the full housing requirement, as the Draft Core Strategy intends to do. Under the proposed methodology, the District's full 'uncapped' need would be an annual target of 722 new dwellings. The Government in 'Planning for the Right Homes in the Right Place' states; "We want to make sure that we give proper support to those ambitious authorities who want to deliver more homes. To facilitate this we propose to amend planning guidance so that where a plan is based on an assessment of local need in excess of that which the standard method would provide, Planning Inspectors are advised to work on the assumption that the approach is sound unless there are compelling reasons to indicate otherwise. We also look to use the Housing Infrastructure Fund to support local planning authorities to step up their plans for growth, releasing more land for housing and getting homes built at pace and scale." The Council's reaction to this is to state; 4.14'</p>	<p>Noted. The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. The National Planning Policy Framework (NPPF, 2018) states that local planning authorities "should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period" (paragraph 65). The supply of new homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Local planning authorities should identify opportunities for supporting rapid implementation, such as through joint ventures or locally-led development corporations. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. This section will be updated to refer to the new National Planning Policy Framework proposals.</p>	<p>Update section to refer to new National Planning Policy Framework requirements.</p>
4.14	63	1032113	<p>The AONB Unit has concerns that the plan proposes housing delivery beyond the plan period there is no justification for this, particularly as housing provision should not be separated from other provision such as employment. Given the constrained nature of the District and the harm that would result to a nationally protected landscape as a result of the level of proposed strategic housing provision in the North Downs Area, we consider it inappropriate that Folkestone and Hythe District Council is seeking opportunities to provide for housing land over and above its assessed need. The Unit also has concerns over the proposed OAN of 633 new homes a year in view of the proposed national methodology for calculating housing need which results in a proposed reduction of need in Folkestone and Hythe District to 490 new homes a year, a reduction of 23% and the only local authority in Kent to have a reduction. It should also be noted that the Government includes the proportion of protected land in each local authority area (i.e. that covered by green belt, national parks, AONBs or SSSIs) in the statistics, perhaps an acknowledgement to paragraph 14 of the NPPF and in particular footnote 9 that not all local authorities will be able to meet their objectively assessed need due to environmental constraints.</p>	<p>Noted. The National Planning Policy Framework supports the supply of new homes through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Local plans will need to be reviewed at least every five years and reviews should be completed no later than five years from when the plan is adopted. There will therefore be the opportunity to monitor progress with the policies and make adjustments as necessary through future plan reviews.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.14	237	1162685	See comment on 4.12 above. What does 'increase quickly' mean?	The government has introduced a new national method to set out how many homes local authorities should plan for. For Folkestone & Hythe district this indicates that the council should be planning for an average of 676 new homes a year over the plan period. This section will be updated to refer to new National Planning Policy Framework requirements.	Update section to refer to new National Planning Policy Framework requirements.
4.14	150	1029376	We have already performed better than most in house building. Building more houses increases immigration to the area thus increasing need for jobs, schools health services etc and infrastructure improvements We are allowing a vicious cycle to develop with no end in sight	Noted. The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. This section will be updated to refer to the new National Planning Policy Framework requirements.	Update section to refer to new National Planning Policy Framework requirements.
4.14	703	1157734	Housing Need The SHMA on which the draft Core Strategy is based identifies two options for the provision of housing for the period 2014 to 2037, which are - the CLG 2014 methodology which would require a provision of 566 dpa for 23 years giving a total of 13,018. - or, an enhanced provision of 633 dpa for 23 years giving a total provision of 14,559. The SHMA recommended that the figure of 633 dpa was adopted, and not the lower figure because of a previous error in the Census data, and increased migration. The Government has set out in draft a new national methodology for calculating housing. It identifies a housing requirement for the District of 490 new homes a year. However, this is a temporary 'capped' figure based on a standard increase to the current Core Strategy requirement. The capped figure is intended as a temporary measure only and is to allow local planning authorities time to allocate sites and grant planning permissions for development to reach the full housing requirement, as the Draft Core Strategy intends to do. Under the proposed methodology, the District's full 'uncapped' need would be an annual target of 722 new dwellings. The Government in Planning for the Right Homes in the Right Place ' states; "We want to make sure that we give proper support to those ambitious authorities who want to deliver more homes. To facilitate this we propose to amend planning guidance so that where a plan is based on an assessment of local need in excess of that which the standard method would provide, Planning Inspectors are advised to work on the assumption that the approach is sound unless there are compelling reasons to indicate otherwise. We also look to use the Housing Infrastructure Fund to support local planning authorities to step up their plans for growth, releasing more land for housing and getting homes built at pace and scale." The Council 's reaction to this is to state; 4.14 '	The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. The National Planning Policy Framework (NPPF, 2018) states that local planning authorities "should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period" (paragraph 65). The supply of new homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Local planning authorities should identify opportunities for supporting rapid implementation, such as through joint ventures or locally-led development corporations. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. The Growth Options Study and High Level Landscape Appraisal show how the council has taken constraints into account in developing the strategy. This section will be updated to refer to the new National Planning Policy Framework requirements.	Update section to refer to the new National Planning Policy Framework requirements.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.15	704	1157734	<p>Housing Need The SHMA on which the draft Core Strategy is based identifies two options for the provision of housing for the period 2014 to 2037, which are - the CLG 2014 methodology which would require a provision of 566 dpa for 23 years giving a total of 13,018. - or, an enhanced provision of 633 dpa for 23 years giving a total provision of 14,559. The SHMA recommended that the figure of 633 dpa was adopted, and not the lower figure because of a previous error in the Census data, and increased migration. The Government has set out in draft a new national methodology for calculating housing. It identifies a housing requirement for the District of 490 new homes a year. However, this is a temporary 'capped' figure based on a standard increase to the current Core Strategy requirement. The capped figure is intended as a temporary measure only and is to allow local planning authorities time to allocate sites and grant planning permissions for development to reach the full housing requirement, as the Draft Core Strategy intends to do. Under the proposed methodology, the District's full 'uncapped' need would be an annual target of 722 new dwellings. The Government in 'Planning for the Right Homes in the Right Place' states; "We want to make sure that we give proper support to those ambitious authorities who want to deliver more homes. To facilitate this we propose to amend planning guidance so that where a plan is based on an assessment of local need in excess of that which the standard method would provide, Planning Inspectors are advised to work on the assumption that the approach is sound unless there are compelling reasons to indicate otherwise. We also look to use the Housing Infrastructure Fund to support local planning authorities to step up their plans for growth, releasing more land for housing and getting homes built at pace and scale." The Council's reaction to this is to state; 4.14'</p>	<p>The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. The National Planning Policy Framework (NPPF, 2018) states that local planning authorities "should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period" (paragraph 65). The supply of new homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Local planning authorities should identify opportunities for supporting rapid implementation, such as through joint ventures or locally-led development corporations. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. The Growth Options Study, High Level Landscape Appraisal and other evidence shows how the council has taken constraints into account in developing the strategy. This section will be updated to refer to the new National Planning Policy Framework requirements.</p>	<p>Update section to refer to new National Planning Policy Framework requirements.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.16	64	1032113	<p>The AONB Unit agrees with the recognition that potential to provide significant new housing is limited due to the statutory designation of the Kent Downs AONB and the high flood risk affecting much of the District. However it is not only land within the AONB designation that is a constraint, but land which is located outside of the AONB but where development of it would impact on the AONB. This is confirmed in the Countryside and Rights of Way Act 2000 where it is specified that the Duty of Regard set out at Section 85 of the Act is applicable in relation to public bodies exercising any functions in relation to, or so as to affect ' AONBs. The Planning Practice Guidance also confirms that The duty is relevant in considering development proposals that are situated outside AONB boundaries, but which might have an impact on the setting of and implementation of the statutory purposes of these protected areas '. Given the environmental constraints of the District, the question arises as to whether Folkestone &amp; Hythe District Council should be looking to meet the full requirements of their objectively assessed need (OAN). In accordance with paragraph 14 of the NPPF, Local Plans are not required to do so where any adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole or where specific policies in the Framework indicate development should be restricted. Given the constraints identified and the significant negative impacts on the Kent Downs AONB that would, in our view, result from the proposed strategic allocations in the North Downs character area at Otterpool and Sellindge, we consider a legitimate case should be made for Folkestone &amp; Hythe District Council not to meet its OAN.</p>	<p>The government is introducing a new method for calculating housing provision and the council is required to reflect this in its plan. The National Planning Policy Framework (NPPF, 2018) states that local planning authorities "should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period" (paragraph 65). The supply of new homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. The Growth Options Study, High Level Landscape Appraisal and other evidence shows how the council has taken constraints into account in developing the strategy. This section will be updated to refer to the new National Planning Policy Framework requirements.</p>	<p>Update section to refer to new National Planning Policy Framework requirements.</p>
4.16	362	1163046	<p>You acknowledge that the area will struggle to meet housing demands due to the AONB and flood risk areas. Whilst I applaud the AONB designation I think further protection for the areas rural character as 'the garden of England' is entirely necessary. Developments outside of the AONB still have a significant impact on it, Otterpool Park is a case in point. The building of such a sizeable development that aims to encourage people from outside of the area to move to the region will have a significant and detrimental impact on the AONB, the rural communities that live there and the lives of local people. Surely, given the constraints identified and the significant negative impacts on the Kent Downs AONB that would result from the proposed developments in the North Downs character area at Otterpool and Sellindge, there is a legitimate case for Folkestone &amp; Hythe District Council not to meet its housing requirement.</p>	<p>The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. The new national methodology indicates that, for Folkestone &amp; Hythe district, the council should plan for an average of 676 new homes a year. The National Planning Policy Framework (NPPF, 2018) states that local planning authorities "should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period" (paragraph 65). The supply of new homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. The Growth Options Study, High Level Landscape Appraisal and other evidence shows how the council has taken constraints into account in developing the strategy. This section will be updated to refer to the new National Planning Policy Framework requirements.</p>	<p>Update section to refer to new National Planning Policy Framework requirements.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.17	238	1162685	This paragraph seems to have things the wrong way round. Employment opportunities are not supporting infrastructure. Unless 'Otterpool Park' is to become a soulless dormitory town for London, employment needs to be provided as a driver for prosperity in the district, not as a consequence of building (too many) homes. The wording is not wrong, but betrays a 'housing first' attitude which not helpful if the garden settlement idea is to have any chance of success.	Noted. Paragraph 4.17 will be amended to make the meaning clearer.	Amend paragraph 4.17 to clarify meaning.
4.17	318	1162196	Shepway should be accommodating these natural and legal constraints and be arguing for limited development and be taking constructive action to provide innovative solutions to providing the right type of housing in local areas. Housing is not the constraint, rather, suitable housing. Sufficient houses are being built in places like Romney Marsh but they are largely being sold to: (a) individuals who can afford investment portfolios, (b) those outside the area wanting second homes and (c) wealthy outsiders wishing to retire to the area. Londoners can sell a house in Wandsworth or Fulham and raise £1.5- £2m, buy a new house on Romney Marsh of almost the same size for £500,000 and have £1m - £1.5m left for their pension. When a bidding war occurs with a local person they have sufficient equity to outbid them. Local people cannot get on to the housing ladder and more housing will not satisfy their needs. In addition, since the area is heavily populated with retirees suitable housing is needed for elderly people. Shepway should be focussing its attention on innovative solutions to providing the right type of housing in the three character areas of the district. For example, all housing estates with over 25 houses should be allocated 50% to local people and 50% to the open market. The market would continue to preside in setting the nature of the houses on the estates, but 50% of the houses could only be sold to local people (for example on Romney Marsh a local person could be defined as someone who has lived (principal residence) within the area bordering the Royal Military Canal for the last 10 years). A covenant would be attached to the title of the house mandating that it could only be on-sold to another local. The prices for these houses would remain lower than the remaining houses on the estate which would be available to the open market. There could be some reciprocation between areas (say	The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. The new national method indicates that for Folkestone & Hythe district the council should be planning for an additional 676 new homes a year. The National Planning Policy Framework (NPPF, 2018) states that local planning authorities "should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period" (paragraph 65). The supply of new homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. The Growth Options Study, High Level Landscape Appraisal and other evidence shows how the council has taken constraints into account in developing the strategy. This section will be updated to refer to the new National Planning Policy Framework requirements.	Update section to refer to new National Planning Policy Framework requirements.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.17	319	1162196	<p>Shepway should be accommodating these natural and legal constraints and be arguing for limited development and be taking constructive action to provide innovative solutions to providing the right type of housing in local areas. Housing is not the constraint, rather, suitable housing. Sufficient houses are being built in places like Romney Marsh but they are largely being sold to: (a) individuals who can afford investment portfolios, (b) those outside the area wanting second homes and (c) wealthy outsiders wishing to retire to the area. Londoners can sell a house in Wandsworth or Fulham and raise £1.5- £2m, buy a new house on Romney Marsh of almost the same size for £500,000 and have £1m - £1.5m left for their pension. When a bidding war occurs with a local person they have sufficient equity to outbid them. Local people cannot get on to the housing ladder and more housing will not satisfy their needs. In addition, since the area is heavily populated with retirees suitable housing is needed for elderly people. Shepway should be focussing its attention on innovative solutions to providing the right type of housing in the three character areas of the district. For example, all housing estates with over 25 houses should be allocated 50% to local people and 50% to the open market. The market would continue to preside in setting the nature of the houses on the estates, but 50% of the houses could only be sold to local people (for example on Romney Marsh a local person could be defined as someone who has lived (principal residence) within the area bordering the Royal Military Canal for the last 10 years). A covenant would be attached to the title of the house mandating that it could only be on-sold to another local. The prices for these houses would remain lower than the remaining houses on the estate which would be available to the open market. There could be some reciprocation between areas (say</p>	<p>The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. The new national methodology indicates that for Folkestone &amp; Hythe district the council should be planning for an additional 676 new homes a year. The National Planning Policy Framework (NPPF, 2018) states that local planning authorities "should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period" (paragraph 65). The supply of new homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. The Growth Options Study, High Level Landscape Appraisal and other evidence shows how the council has taken constraints into account in developing the strategy. This section will be updated to refer to the new National Planning Policy Framework requirements.</p>	<p>Updated section to refer to new National Planning Policy Framework requirements.</p>
4.18	107	1162696	<p>The provision of infrastructure can't be overstated and not just on a care and community support level. There needs to be steps taken to develop the existing town centre and provide daytime &amp; nighttime economy opportunities to potential investment in the heart of the town....not just where all the interest is at this moment in time. The town centre is geographically still very close to all the 'new' money being spent on the town and a lack of attention to the opportunities for growth &amp; investment would lead to the Leas for instance just being a pretty dividing line between affluence &amp; other. A missed opportunity in the making if the council are not sharp &amp; wary!!</p>	<p>Noted.</p>	<p>No change proposed.</p>
4.18	239	1162685	<p>Again, this paragraph implies that by increasing the population (is that what 'strategic growth' means?) there will be an expansion of employment in the district. While this may well happen, it is likely to be a secondary effect, because the majority of newcomers are to be deliberately housed where they can easily commute to jobs outside the district. It is not clear how building a garden settlement is going to promote social mobility in the areas identified as most in need. It is also far from clear how a population of, say, 150,000 will provide the 'critical mass' which the current population of 111,000 does not.</p>	<p>The growth in population will generate employment through the demand for services arising from new residents, as well as the provision of new workers, enabling local businesses to start-up, recruit and expand to meet the new demand.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.19	151	1029376	We do need an ambitious development strategy but this should be based on improving the deprived areas by better transport and infrastructure. Develop brownfield sites and allow retail premises to be turned into residential Improve tourism to create jobs	There are a large number of brownfield sites coming forward for development, including major schemes such as Folkestone Seafront (Policy SS10). The Places and Policies Local Plan contains policies allocating brownfield sites and a number of policies encouraging the development of residential accommodation in town centres in the district.	No change proposed.
4.26	240	1162685	identified a number of actions to boost growth sectors' - we could not find any specific actions listed. Can these be detailed? There are no targets for employment growth listed in the box to complement the housing target. 'increasing the supply and quality of employment land' - the district's record in getting employment land developed is not good. There are plenty of allocated sites not being built out at the moment, notably one in the middle of the garden settlement area, and others right by the 'strategic corridor' of the M20. Why does the council think yet more allocations will make a difference? 'regenerating the west/south of the town' - why is regeneration of the south of Hythe necessary? If this means more unaffordable and over-height buildings along the seafront then Hythe is going to lose more of the charm which makes it attractive.	Noted. The council's Economic Development Strategy 2015-2020 sets out a number of actions and interventions that are being pursued to boost economic growth in the district.	No change proposed.
4.26	324	1162196	The number of houses proposed for the district is unsustainable. While there is logic in concentrating development in urban areas close to infrastructure, there is no logic in creating a totally new town. Although it is claimed the growth will be concentrated in this new town, the sheer numbers proposed will have adverse consequences for the rest of the district which is renowned for its unique environmental clusters and landscape strengths. Pressure on scarce water resources, consequential development including new roads, and additional pollution will degrade some of the most unique areas in the South of England. In addition to this, the existing social infrastructure is inadequate. Medical facilities are poor in most areas and housing is not meeting the needs of local people. The sheer weight of these housing numbers means the stated aims can only be conflicting. This applies in particular to the objective: Improve precious habitats, critical landscapes and efficiency of natural resource use (including water) and manage carbon emissions and flood risks in response to climate change. See policies SS1, SS3, CSD4 and CSD5. There has been no attempt to examine the in combination impact of Ashford 's and Otterpool 's growth. Ashford was a new town set up under the previous Labour government and is still growing rapidly. We will now have two new towns on three consecutive junctions of the M20 Ashford on junction 9&10 and Otterpool on Junction 11. It is vital that the in-combination impact of these two towns/cities is assessed either through the Duty to Co-Operate Statement or an especially commissioned report. The assessment criteria should also include contributions from the public to prevent criteria proposed by Shepway, (which it knows it can meet) dominating the basis of the assessment. In addition, although it is stated that growth will be concentrated at Otterpool, the policies are	The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. The new national methodology indicates that, for Folkestone & Hythe district, the council should plan for an average of 676 new homes a year. The National Planning Policy Framework (NPPF, 2018) states that local planning authorities "should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period" (paragraph 65). The supply of new homes can often best be achieved through planning for larger scale development. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. The Growth Options Study, High Level Landscape Appraisal and other evidence shows how the council has taken constraints into account in developing the strategy.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS1	76	1032113	This policy provides for expansion of the village of up to 600 dwellings. This represents a major expansion of the village and we object to this strategic scale of development proposed in the rural North Downs area, given the village 's sensitive setting within the Kent Downs AONB and in view of potential cumulative impacts with the proposed establishment of a new garden town at Otterpool.	The government is introducing a new method for calculating housing provision and the council is required to reflect this in its plan. The supply of new homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. The Growth Options Study, High Level Landscape Appraisal and other evidence shows how the council has taken constraints into account in developing the strategy.	No change proposed.
Policy SS1	92	1160254	One of the key principles of garden town development is that plans should be created in consultation with local residents. At the point of your bid to Government, you had consulted some business and - just the very the evening before the deadline for submitting your bid - you consulted Parish Councillors. The outcomes of that meeting was then later misrepresented. The Council did not consult local residents. Instead, well developed proposals have been imposed on us and the two so-called consultation events you have held since your bid was approved by Government have been tokenistic. Otterpool New Town may be outside the AONB, but see my comments to 3.26: building in immediate proximity to an AONB must inevitably impact upon it, unless you have such a low density of housing that you undermine your aim to provide affordable housing.	The government is introducing a new method for calculating housing provision and the council is required to reflect this in its plan. The supply of new homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. The Growth Options Study, High Level Landscape Appraisal and other evidence shows how the council has taken constraints into account in developing the strategy. The council has undertaken consultation with local people, groups and organisations a number of times during the preparation of the Otterpool Park Masterplan and is carrying out separate consultations as part of this Core Strategy Review.	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS1	242	1162685	CPRE does not object in principle to proposals based on 'garden city principles'. We have reservations about the terminology as 'garden city principles' has in many places become a by-word for the urban sprawl which garden cities were introduced to avoid and CPRE was founded to campaign against. Our CEO said in January 2017: "Done well with genuine local consent, garden villages and garden towns can be part of the solution and certainly preferable to what is currently happening in too many parts of the country - poor quality new estates plonked down on the edge of villages and market towns, in the teeth of local opposition and in defiance of good planning principles." In this case, we have three main concerns. 1. There is no genuine local consent, indeed there is considerable local opposition which the council has not even acknowledged. This is a political issue which the council needs to address. 2. Just like any other housing development of recent years, the design parameters which may be laudable at the outset will in time be watered down with claims of lack of affordability, feasibility or viability until the place looks just like any other 'plonked' housing estate. The accompanying infrastructure, including GI will be pared down. One need only compare the revised proposals for the Folkestone Waterfront to the much more sensitively designed plans in the original outline planning permission to get a sense of where Otterpool Park might end up. 3. The ambitious targets for housing delivery being set in this CS will not be met. This is because there will not be enough capacity in the housebuilding industry and/or housebuilders will not find it in their interest to build that fast. There is also the risk of an economic downturn. It seems to us highly likely the garden settlement will not achieve the 'critical mass' which is necessary to support the associated infrastructure and achieve the aims of the project within the planned timescale. The	The wording "sensitively meeting the needs of communities" is intended to refer to the special landscape designation of the Kent Downs Area of Outstanding Natural Beauty. This will be clarified. The sentence beginning "Within other identified settlements ..." refers to communities preparing Neighbourhood Development Plans. The council cannot require all developers or householders to demonstrate that their proposals "have the support of the local community" for planning permission to be granted; such a requirement would not conform with national planning policy.	Amend Policy SS1: District Spatial Strategy to clarify the bullet point referring to the North Downs Area.
Policy SS1	152	1029376	The development of the garden city will starve folkestone of retail and business trade as the residents will choose Ashford as the location to shop and conduct local business The dangers this presents to the deprived areas of Folkestone cannot be underestimated and it could become a virtual no-go zone which will have effects on the seafront development and associated tourism	Noted. The policies for the new garden settlement set out detailed requirements, including the need to provide for day-to-day needs for future occupants and to undertake an impact assessment to demonstrate that there is no negative impacts on neighbouring centres, including Folkestone, Hythe, New Romney, Dover and Ashford (Policy SS7(2)).	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS1	576	588509	<p>Romney Marsh Area Policy 38. Policy SS1 (District Spatial Strategy) refers to the Romney Marsh Area . LAA is located within this area and this should be identified within the relevant part of the policy. 39. As noted above, we consider that given the socio-economic challenges facing Romney Marsh, it is appropriate to have a policy addressing the area. The inclusion of a bespoke Romney Marsh Area policy will ensure that the Romney Marsh Area continues to have a strong economic focus, even after the decommissioning of the Power Stations. The inclusion of this policy will be consistent with Policy SS1. 40. If a policy for Romney Marsh is progressed, it maybe that the wording in respect of LAA could be incorporated as part of a wider policy. Conclusion 41. LAA is a positive contributor to the District as it provides a significant number of employment opportunities, and these positive contributions and impacts should be recognised by the CSLPR. Moreover, its improvement and expansion should be explicitly allowed for and supported by the CSLPR. Such a policy would reflect the CSLPR 's evidence base. 42. We have set out a suggested wording for bespoke policy to be incorporated within the CSLPR to support LAA and the vital role it plays within the local area, the District and the wider regional area. 43. We also consider that, given the socio-economic challenges facing Romney Marsh, it is appropriate to have a policy addressing the area. This would also reflect the CSLPR 's evidence base. 44. If adequate support is not provided for LAA within the CSLPR, the plan will be unsound. 45. We trust the information above is clear and that the changes required to make the CSLPR sound are made prior to its submission to the Secretary of State. 46. Finally, we are hoping to meet with officers again to agree appropriate text to address LAA concerns. We look forward to hearing from officers as soon as possible.</p>	<p>Noted. Reference will be made in Policy SS1 for the council to work with London Ashford Airport, the local community and other stakeholders to prepare of an Action Area Plan for the site, should development proposals come forward in the future.</p>	<p>Amend Policy SS1: District Spatial Strategy and supporting text to state that the council will work with the airport, local community and other stakeholders to prepare an Action Area Plan for the London Ashford Airport site, should proposals come forward for further expansion.</p>
Policy SS1	382	894636	<p>The policy proposal here is unsound and inconsistent. However seductive the concept of a 'garden town' may be, the reality is much more tuned to dormitory housing estates. The proposal springs from offerings of government funding and is landing in an area that was dismissed during the last Core Strategy processes as unsuitable. The scale of that proposal is withering by the month, setting out as a probable 12000 homes, and now already dropping to 8000. As a prospect it lacks reliability, and is therefore unsound. The supposed District Strategy does not present a cohesive approach, rather a disparate jumble of elements. Nowhere does the document show the proposals for the Garden City SS6-SS9 in context with that for Sellindge CSD9, and nowhere does it consider the further stages in embryo for additional development spreading west towards Stone Hill. The policy is disingenuous. Additionally it is a peculiar amalgam of sites that are already committed, with sites that are now proposed. The risk of linear urbanisation along the M20 is intense. During the last 2013 Core Strategy process there was an identified 'Strategic Corridor'. Although not named as such this is a reinvention of the same.</p>	<p>Noted. The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. For Folkestone &amp; Hythe district, this indicates that the council should plan for an average of 676 new homes a year. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. The housing supply situation at any point in time will depend on sites under construction, sites with planning permission and allocated sites; it is not unusual for these sites to be in the same settlement and the proposed policy reflects this. National planning policy makes it clear that decisions to refuse planning applications until the local plan is adopted on the grounds of "prematurity" will seldom be justified. The Expression of Interest for Otterpool Park identified the area for a maximum of 12,000 homes. Considerable work has been undertaken since the Expression of Interest was submitted in June 2016, and, for a proposal of this scale, it is to be expected that the capacity will be reviewed following further evidence.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS1	431	345899	In your planning decisions it is most important you consider the following points. Please do not overdevelop simply on the ground that more housing is needed and developers are keen to build. It is essential that proper consideration is made of the water and drainage supplies, the likely cost and certain provision of schools and medical facilities, and the cost and effects of road building. Do not allow builders to provide houses mainly for people who can afford to buy. Insist that you will only allow housebuilding where sufficient affordable housing is really included. Agreements are often made but not kept. The Kent Downs area and Romney Marsh are unique areas, and very special parts of Kent which can easily be overdeveloped and spoiled with increased traffic and pollution. Please do not allow this to happen. Thank you for your consideration.	Noted. The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. This indicates that, for Folkestone & Hythe district, the council should plan for an average of 676 new homes a year. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. Policies in the Core Strategy Review, including four detailed policies for proposed garden settlement (SS6-SS9), set out the quality of development that the council will require.	No change proposed.
Policy SS1	548	1163824	Housing The supporting evidence base for the Core Strategy Review includes the Folkestone Hythe & Romney Marsh Strategic Housing Market Assessment (SHMA), published March 2017. The SHMA identifies an Objectively Assessed Housing Need (OAN) of 633 dwellings per annum (dpa) for the period 2014- 2037. It is acknowledged that the Government 's recent consultation on standardising the OAN methodology proposed an OAN of 490 dpa, we support FHDC 's commitment to meeting its full OAN for housing based on the 633 figure. Notwithstanding the proposed new garden settlement and the potential delivery of 5,500 new homes in this location, Policy SS1 (District Spatial Strategy) states that in the District outside of the new garden settlement the priority will be given to previously developed land in the Urban Area of Folkestone. In accordance with paragraph 17 of the NPPF and the Housing White Paper, brownfield land should be reused effectively and should be maximised to provide sustainable development. We therefore consider that the Housing and the Economy Growth Strategy (Policy SS2) should promote residential uses on sustainable brownfield sites in residential areas, and not only rely on the garden settlement which will typically have a slower delivery rate, and the proposed allocations in the Places and Policies Local Plan to meet the OAN of the District. This approach would assist in the Local Plan being considered as positively prepared ' in accordance with the soundness test of paragraph 182 of the NPPF. Summary In light of the above, we consider that the removal of an employment designation on the site would facilitate in providing flexibility to adapt to changing economic circumstances. Park Farm Industrial Estate is, as recognised by the Council, changing in nature, and therefore this should be reflected in the strategic policy to direct appropriate development dependent on	Noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS1	527	1037842	Objection is made to the failure to include provision for 15 % of the increase in housing provision in North Downs rural settlements outside Sellindge and Otterpool new settlement to provide for the continuing vitality of the existing settlements. Whilst reference to the need for development at these settlements is referred to in the draft CS no specific method of delivery is identified. This should be by way of a review of the Places and Policies Plan.	The council's emerging Places and Policies Local Plan allocates a number of small- and medium-sized sites in the North Downs Area that, with existing planning permissions and completions, would deliver around 1,500 new homes in the area over the 2013 Core Strategy plan period (to 2030/31). The Core Strategy Review extends this plan period to 2036/37 including proposals for a new settlement in the North Downs Area. The council considers that this is a suitable balance of sites, given the nationally-designated landscape of the Kent Downs Area of Outstanding Natural Beauty.	No change proposed.
Policy SS1	590	1164872	Folkestone and Hythe District Council Core Strategy Review Consultation Representation on Behalf of The Aspinall Foundation regarding Land North of Aldington Road (Zoo car park) Savills has been instructed by The Aspinall Foundation, to submit representations to the first draft of the Core Strategy Review. This follows detailed representations submitted to the preferred options stage of the Shepway Places and Policies Local Plan in November 2016. Whilst the previous representation related to two sites; Land north of Aldington Road (zoo car park) and Land South of Aldington Road / West of Castle Close, these representations relate solely to the Land north of Aldington Road (zoo car park). The site is located within the Otterpool Park Garden Village proposals. A location plan has been enclosed with this letter The principle of the creation of a garden settlement to provide a significant contribution to the District s housing supply over the Plan period, contained in Policy SS1 District Spatial Strategy and reiterated in Policy SS3 Place-shaping and Sustainable Settlements Strategy is fully supported. Through Policy SS2 Housing and the Economic Growth Strategy of the Core Strategy Review Folkestone & Hythe District Council have re-affirmed their intention to meet the locally identified housing need in the Strategic Housing Market Assessment (as opposed to the lower assessed housing need identified in the standardised methodology consultation). This equates to 633 new homes a year over a 19 year plan period, and 12,030 dwellings in total. The intention to meet the locally identified housing need of 633 dwellings a year on average over the Plan period as a minimum is supported. Policy SS6 New Garden Settlement Development Requirements sets out the principles behind the proposed garden settlement, the requirements of the development and how the development may be brought	Noted. The support of the Aspinall Foundation is welcomed.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS1	675	130445	The Crown Estate supports the general aims of Policy SS1 District Spatial Strategy '. Whilst the strategic focus will be on the main urban areas, the policy also recognises that rural settlements have a proportionate role to play in delivering housing needs. The Crown Estate supports the identification of Brookland as a Primary Village (Policy SS2). This policy concludes that Brookland has potential to grow and can contribute to Folkestone and Hythe 's strategic aims and local needs. Paragraph 3.24 identifies Brookland as an attractive rural community for new visitors and residents with the potential to retain community facilities. Providing critical mass will support service provision in rural areas. Evidence suggests that there is significant upward pressure on housing need which the Core Strategy Review will need to address. This highlights the need for a more positive framework for the delivery of much needed homes to be included in the Core Strategy review to meet the significant needs across all parts of the District, including in smaller rural settlements in the Romney Marsh area. The Government 's recent consultation on further measures set out in the housing white paper to boost housing supply in England suggests a standardised approach to calculating housing needs. The standard methodology for calculating housing needs Indicative assessment of housing need based on proposed formula, 2016 to 2026 ' indicates that the projected need in Shepway is significantly greater than is identified in the Adopted Shepway Core Strategy. This indicates that rather than a need of at least 490 dwellings per annum in Shepway, the annual needs is much greater and is in fact 633 dwellings per annum. There are a number of advantages to a spatial strategy which gives sufficient weight to the role that places such as Brookland can play in meeting significant housing needs in the District which should be recognised in the	Noted. The council's emerging Places and Policies Local Plan allocates a number of small- and medium-sized sites throughout the Romney Marsh Area, including sites in Brookland. Allocated sites, with existing planning permissions and completions, would deliver around 1,400 new homes over the 2013 Core Strategy plan period (to 2030/31) in the Romney Marsh Area. The Core Strategy Review extends this plan period to 2036/37 including proposals for a new settlement in the North Downs Area. The council considers that this is a suitable balance of sites, given the nationally-designated landscape of the Kent Downs Area of Outstanding Natural Beauty and areas of high flood risk in the Romney Marsh.	No change proposed.
Policy SS1	687	332260	The Trustees continue to support the District Spatial Strategy and the focus of the strategically allocated development at Folkestone Seafrost. The same is applicable for the strategic priority for the urban area ' and the promotion of the development of vacant previously developed land within central Folkestone	Noted. The support of The Trustees of Viscount Folkestone is welcomed.	No change proposed.
Policy SS1	672	1160683	Whilst CPIII Shopping Folkestone S.A.R.L (c/o Ellandi LLP) supports Policy SS1 in principle, we are concerned that the use of the terms new development ' and commercial development ' are too generalised and may lead to unintended consequences. Under the current wording, for example, town centre uses could be promoted on inappropriate out-of-centre brownfield sites or such uses in the New Garden Settlement could be of an excessive scale for the local need, leading to adverse impacts on existing centres. Also some sites may be suitable for some types of commercial use but this should not include town centre uses. We therefore consider that the wording of the policy needs to be more specific.	Noted. The policies for the new garden settlement set out detailed requirements, including the need to provide for day-to-day needs for future occupants and to undertake an impact assessment to demonstrate that there is no negative impacts on neighbouring centres, including Folkestone, Hythe, New Romney, Dover and Ashford (Policy SS7(2)). The policy will be amended to refer to town centre uses, in line with the National Planning Policy Framework (2018).	Amend Policy SS1: District Spatial Strategy to clarify refer to "town centre uses" in line with the National Planning Policy Framework (2018).

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.30	385	894636	Either the creation of a new garden settlement (is it a Town? Is it a Village? Is it a Turkey?) is to be the primary, strategically focused location, with fully planned infrastructure provision, or it is not. If it is, then the destructive further expansion of Sellindge is not required. If it isn't then the fundamentals of the draft Core Strategy are so flawed that the whole thing needs to be restarted. If it is, then the District needs to be open about how the details of simple human requirements such as water supply will be dealt with. The District has been told often and loudly that this is an area of water scarcity. What is the plan? To make it rain more?	The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. For Folkestone & Hythe district, this indicates that the council should plan for an average of 676 new homes a year. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. National planning policies state that this can be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. The council is also allocating a range of small- and medium-sized sites throughout the district in the Places and Policies Local Plan. The Growth Options Study, High Level Landscape Appraisal and other evidence shows how the council has developed the strategy in the plan. Table 4.2 shows how the allocations in the plan contribute to overall housing needs. The council undertook a "call for sites" as part of consultation on the Core Strategy Review to identify any alternative sites that may be suitable to provide for future development and these are being assessed. If the respondent knows of alternative sites for the growth that the council is required to plan for, then these can be submitted to the council for consideration.	No change proposed.
4.31	78	1032113	See comments in respect of Policy SS1 and CSD9 in respect of proposed growth at Sellindge. Welcome intention that elsewhere in the AONB, development will be limited, but this intention should be explicitly set out in policy SS1 as it is in Policy SS1 of the current Core Strategy.	Noted. This will be clarified in Policy SS1: District Spatial Strategy to refer to development within the Kent Downs Area of Outstanding Natural Beauty.	Amend Policy SS1: District Spatial Strategy to clarify approach within the Kent Downs Area of Outstanding Natural Beauty.
4.31	93	1160254	Why is there additional expansion of Sellindge in this Strategy beyond that which has been previously proposed? A key argument for Otterpool town has been that a concentrated mass of "strategic" development that is master planned will free us from the need for piecemeal development across the region. This would suggest that the area is about to be subjected to both!	The government is introducing a new method for calculating housing provision and the council is required to reflect this in its plan. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. Table 4.2 in the Core Strategy Review sets out how the different plans and site allocations will contribute to meeting the district's housing need.	No change proposed.
4.31	389	894636	When half of the development consulted on here has been pre-emptively approved by the District as this consultation process began we have to question what is the point of being consulted at all. It is misleading to flag policy CSD9 in this context. Policy CSD9 is the current policy that was welcomed and promoted by the community with the distinct aim of putting a positive heart into Sellindge: to enhance its sense of place. Using the flag CSD9 just looks like an attempt to camouflage additional development. What is being approved, and being proposed will not further enhance its sense of place, it will diminish and damage. The policy is unclear and contradictory with other parts of the document about what degree or form of development is proposed to be allowed or disallowed elsewhere in the North Downs and AONB.	The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. For Folkestone & Hythe district, this indicates that the council should plan for an average of 676 new homes a year. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. The housing supply situation at any point in time will depend on sites under construction, sites with planning permission and allocated sites; it is not unusual for these sites to be in the same settlement and the proposed policy reflects this. National planning policy makes it clear that decisions to refuse planning applications until the local plan is adopted on the grounds of "prematurity" will seldom be justified.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.31	368	1163046	I object strongly to the implication that Sellindge is identified for additional expansion. Sellindge and its surrounding villages and rural communities provide a very welcome green barrier between Ashford and Folkestone. Is it your intension just to build a concrete corridor that joins the two, because that is what the development of Sellindge will mean. The area is environmentally diverse with a wealth of habitats from farmland (both arable and livestock), woodlands, fields etc. A wide variety of species rely on these green spaces, Furthermore, given the recent reports that suggest we are fast running out of farmland, it seems perverse to even think about building on an area of farmland of this size in an extremely fertile area.	Noted. The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. For Folkestone & Hythe district, this indicates that the council should be planning for an average of 676 new homes a year. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. Section 4.6: Strategic Allocations outlines how the council has assessed constraints and opportunities in coming up with the Core Strategy Review proposals.	No change proposed.
4.31	367	1163046	I object strongly to the implication that Sellindge is identified for additional expansion. Sellindge and its surrounding villages and rural communities provide a very welcome green barrier between Ashford and Folkestone. Is it your intension just to build a concrete corridor that joins the two, because that is what the development of Sellindge will mean. The area is environmentally diverse with a wealth of habitats from farmland (both arable and livestock), woodlands, fields etc. A wide variety of species rely on these green spaces, Furthermore, given the recent reports that suggest we are fast running out of farmland, it seems perverse to even think about building on an area of farmland of this size in an extremely fertile area.	Noted. The government has introduced a new method for calculating housing provision and the council is required to reflect this in its plan. For Folkestone & Hythe district, this indicates that the council should be planning for an average of 676 new homes a year. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. Section 4.6: Strategic Allocations outlines how the council has assessed constraints and opportunities in coming up with the Core Strategy Review proposals.	No change proposed.
4.32	153	1029376	as below	Journey times will depend on how the services are planned; for example, high speed services could stop alternately at a new station at Westenhanger and at Folkestone West, resulting in no additional journey times to Folkestone Central and other stations.	No change proposed.
4.34	243	1162685	Do sustainable construction techniques apply only to the Urban Area?	Noted. This reference will be removed, as Places and Policies Local Plan Policy CC2: Sustainable Design and Construction will apply throughout the district.	Delete reference to sustainable construction techniques in paragraph 4.34.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.38	574	588509	<p>25. The following section sets out our proposed amendments to the CSLPR to ensure the plan is sound. This includes justification on why a policy on the LAA and/or Romney Marsh (including support for LAA) is necessary to make the Plan sound and provided a draft working for the policy. Core Strategy Local Plan Review New Policy for LAA 26. The CSLPR 's Strategic Need A states that the Council will build on economic strengths by supporting key sectors and businesses by promoting further investment and maximising opportunities for growth (our emphasis). 27. The CSLPR states that the District has excellent infrastructure and connections, including by air, with specific reference to LAA. It states that the District is, therefore, well placed to capitalise on this outstanding infrastructure by providing opportunities for business growth and inward investment to the area. 28. Paragraph 1.45 of the CSLPR states that LAA is well established and has attracted significant investment proposals. Table 1.3 sets out the strengths and weaknesses of the Romney Marsh area. One of the weaknesses identified is the limited large-scale employment opportunities. LAA provides stable employment in the area. In order to maximise LAA 's opportunities for growth, the CSLPR must acknowledge LAA 's potential to expand beyond its current planning consents, if the environmental impacts are acceptable. 29. To ensure that the weakness outlined in Table 1.3 are mitigated, LAA should be acknowledged as an opportunity location. LAA 's current positive role as a significant employer in Romney Marsh should be identified as a strength. A specific policy for LAA to recognise its importance and support the principle of further improvements, expansion and investment, subject to environmental considerations, should be included. 30. The CSLPR fails to acknowledge and reasonably balance the long-term economic aspirations of LAA, which will benefit</p>	Noted. Paragraph 4.38 will be amended to refer to possible potential for growth beyond the current consented capacity.	Amend paragraph 4.38 to refer to possible potential for growth beyond the current consented capacity.
<b>4.2 HOUSING AND THE ECONOMY GROWTH STRATEGY</b>					
4.2	35	333026	<p>Dear Sir, Does anyone on the Shepway council take any notice what so ever about the dreadful plans to ruin our beautiful views of the North downs or the areas that are of scientific significance, I do not think so, but by the time the council can be voted off it will be too late. Once under concrete that 's is it. There are so many houses being built in and around Folkestone and Hythe area we do not need any more. Each planning application is being looked at by its self instead of the bigger picture. We really do not want the south of London to vacate to Sellindge. I have lived here all my life and the area has been ruined.</p>	The Core Strategy Review balances the need for new development with the need to conserve and enhance the natural and built heritage of the district. The evidence sets out the considerations that the council has taken account of in developing the plan. The council has to plan for new housing to meet the needs of current and future generations; to fail to do so will impact most on those in need of housing who are trapped in poor accommodation, affecting their health and education.	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.41	566	588509	<p>Effective 13. Paragraphs 1.41 to 1.48 relate to the Romney Marsh Area and in paragraph 1.48, the Airport is described as being well established and having attracted significant investment. 14. Paragraph 5.119 states that the Romney Marsh area 's economy will be closely monitored by the Council, given uncertainty about the Power Stations, as well as the economic impact of the expansion of LAA. It states that if the southern part of the District is substantially affected by these changes, the Council will consider amending the Core Strategy as part of a future review. 15. This is not positive planning. It is a failure to plan. Clearly, the decommissioning of the Power Stations and expansion of LAA will have substantial economic, social and environmental affects and these must be recognised in the CSLPR. 16. Without a policy in place to protect and support LAA, and identifying the benefits that will accrue from its future improvement and expansion, planning policy will not be effective in delivering or protecting LAA 's objective of promoting economic growth in an area that the Council has acknowledged could be badly hit by the decommissioning of the Power Stations. 17. Without a policy addressing LAA and the future of Romney Marsh, the CSLPR will be reactive and will not be effective. It will fail to deliver additional jobs. Only the inclusion of a bespoke policy for LAA will allow the Airport to reach its potential as an economic generator and transport hub for Romney Marsh, the District and beyond.</p>	<p>Comment noted. In the absence of clear development intentions for the future of the site, the Council does not consider that a specific policy for London Ashford Airport (LAA) would be justified. However the Council will work with LAA, the local community and other stakeholders to prepare an Action Area Plan for the site, should specific development proposals come forward at some point in the future.</p>	<p>Amend Policy SS1: District Spatial Strategy and supporting text to state that the council will work with the airport, local community and other stakeholders to prepare an Action Area Plan for the London Ashford Airport site, should proposals come forward for further expansion.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.44	558	1164105	<p>The SHMA calculation of need for the district at 633 dwellings per annum is likely to significantly increase and whilst the SHMA takes account of Dover 's needs, it should also take account of the needs of other neighbouring authorities, particularly Ashford. The effect of the proposed garden town on the spatial strategies of Dover and Ashford therefore need to be more carefully examined as a whole. A major issue for Shepway is meeting its housing needs in the short term. The local plan review should be focusing on this, but through its focus on the ' garden town ' in our view represents a long terms strategy only. The emerging plan 's need for greater focus on short term delivery for the district is again highlighted and should be addressed at the next stage of the review and draft Policy SS1-3 reshaped. Given the emphasis on delivery and highlighted question marks about when the proposed garden town will be able to actually translate to completions, it is essential when properly considering spatial options that the housing trajectory profile is evaluated. It is suggested in the Plan at paragraph 4.44 that this will take place later as part of a review process, Hume Planning considers it is crucial to understand the short term supply side before important district wide spatial choices can be properly evaluated and the evidence base to the plan should be frontloaded. As set out above 12% of the to be ' planned growth (which itself is likely to increase for the reasons identified above) will be at the new garden town and Sellinge. This represents an excessive spatial focus with further uncertainty about the translation to completions for many years, given the scale of upfront infrastructure required. The inference that the Housing Infrastructure Fund will be necessary to deliver infrastructure (Page 92) reinforces concerns about deliverability although the policies relating to wider place making and energy are accepted. I would request that these</p>	<p>The Core Strategy Local Plan 2013 (CSLP) should be read in conjunction with the emerging Places and Policies Local Plan (PPLP). The CSLP 2013 allocates strategic long-term housing sites, whilst the PPLP 2018 allocates a number of small sites that are deliverable in the short term. Together these allocate sufficient sites to meet the District's housing need up to and including 2031. The Core Strategy Review (CSR) will replace the existing CSLP 2013. The introduction of the new national methodology for housing increases the housing requirement in the district substantially; this is to be met predominately through the garden settlement proposals. As such, the Council considers that there is adequate provision and flexibility to meet the Folkestone &amp; Hythe District 's housing needs in both the long- and short-term. The Council has prepared and is continually updating an indicative housing trajectory, which it intends to publish in the next draft version of the Core Strategy Review that will support the spatial strategy being pursued. This is provided as Appendix 3 to the Submission Draft (Regulation 19) Plan.</p>	No change proposed.
Table 4.1	244	1162685	<p>If we have understood this table correctly, it indicates a woeful undersupply of completed employment buildings relative to the demand for jobs and relative to the land available for development. Why does the council think that making even more employment land available at Otterpool and building more homes will have any effect on this?</p>	<p>The Employment Land Review (2017) has assessed the future requirements for office and industrial employment land to 2026 based on three scenarios: Labour Demand; Past Completion Rates; and Labour Supply. For each of these three future growth scenarios, the ELR concludes that there is a sufficient supply of employment space from a mix of planning permissions and allocated sites to meet the estimated office and industrial requirements for the period 2016 to 2026, and also beyond to 2031. However, it suggests that many of the existing employment land allocations in the wrong locations to meet current business demand in the sectors identified with growth potential. Folkestone &amp; Hythe District has many assets upon which to build and attract further investment. The Council needs to capitalise on these to attract new businesses that will bring job opportunities to the district and create confidence so that the private sector continues to invest in the Folkestone &amp; Hythe District in the future. Section 4.2: Housing and the Economy Growth Strategy will be updated for the next version of the plan, the Submission Draft (Regulation 19) Core Strategy Review.</p>	Update Section 4.2: Housing and the Economy Growth Strategy with the latest economic data.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.5	245	1162685	We had difficulty finding evidence for the assertions in this paragraph and paragraph 4.51 in the ELR. (ie 'the locations of strategic employment allocations does not maximise opportunities for delivery') These assertions appear to be used to support the proposal to supply yet more employment land, further away from the existing workforce in Folkestone, while large areas of employment land are available, undeveloped and at risk of being re-purposed for speculative 'mixed use' development.	Comment noted. It is agreed that the current wording of paragraph 4.50 doesn't successfully reflect the conclusions / recommendations of the evidence base; and could be made clearer. The final sentence will be amended for the subsequent draft of the Core Strategy Review (Regulation 19) to state that: the ELR also stresses that strategic employment allocations need to be well connected with key motorway junctions and/or transport hubs in order to maximise opportunities for delivery.	Amend paragraph to stress that the Employment Land Review also stresses that the district's strategic employment allocations need to be well-connected with key motorway junctions and/or transport hubs in order to maximise opportunities for their delivery (new paragraph number 4.51).
4.53	246	1162685	The Employment Opportunities Study referenced here seems to be the one which was published in the first week of May.	The National Planning Policy Framework (2018) states that plans should be supported by evidence that is "adequate and proportionate" (paragraph 31). The Employment Opportunities Study referenced in paragraph 4.53 is the final report dated March 2018 (published May 2018). The technical studies used to evidence the Core Strategy Review are made available to view on the council's website.	No change proposed.
4.53	729	1164722	The Parties propose that draft paragraph 4.53 should be updated to ensure flexibility when developing the exact quantum of employment floorspace within the Otterpool Park garden settlement and to ensure that the proposed quantum is based on the most up to date information available at the time of submission.	Noted. The council has completed new evidence on employment and retail need (Lichfields, 2018) which will be used to inform changes to the Core Strategy Review policies for the Submission Draft (Regulation 19) plan.	Update policies on retail and employment land provision to reflect new evidence (Lichfields, 2018) as necessary.
<b>Policy SS2</b>	15	549694	It is unfortunate that the District Council made the decision to develop a garden town at Otterpool before this Core Strategy Review had been completed. This has undermined the credibility of this document and casts doubt on the objectivity of its conclusions.	Comment noted. The Core Strategy Review is going through an independent process of consultation, amendment and consultation on a submission version. The plan will then be examined in public before an independent Inspector appointed by the Secretary of State. Only then, if found 'sound', can it be adopted and used to guide development.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS2	77	1032113	The AONB Unit has concerns over the proposed OAN of 633 new homes a year in view of the proposed spatial strategy implications for the North Downs Area and in view of the proposed national methodology for calculating housing need which results in a proposed reduction of need in Folkestone and Hythe District to 490 new homes a year, a reduction of 23% and the only local authority in Kent to have a reduction. It should also be noted that the Government includes the proportion of protected land in each local authority area (i.e. that covered by green belt, national parks, AONBs or SSSIs) in the statistics, perhaps an acknowledgement to paragraph 14 of the NPPF and in particular footnote 9 that not all local authorities will be able to meet their objectively assessed need due to environmental constraints.	The National Planning Policy Framework was updated in July 2018, confirming the change to a new methodology for local authorities to calculate their housing need. The approach replaces local assessments of need undertaken through SHMAs with a standard national formula, updated annually with new data from the Office for National Statistics (ONS). The Council's SHMA 2017 assessed the need for housing (market and affordable) to be 633 new homes a year for the period 2014 to 2037. The new national methodology indicates that the council should plan for a minimum of 676 new homes a year. It is acknowledged that the NPPF 2012 (Para 14) and in particular footnote 9 states that not all local authorities will be able to meet their housing need due to environmental constraints. It is not felt necessary to include reference to this in the Core Strategy Review as it should be read in conjunction with the NPPF. The council is confident that it is able to meet the new nationally-derived housing requirement, despite the district's constraints. The High Level Options work by AECOM identified an area around the M20 corridor, Lympne and Sellindge that is considered to have potential for strategic development. The High Level Landscape Appraisal (2016) had previously assessed the landscape character areas in this part of the district as being in the low to medium sensitivity category. The Options Study notes that the greatest environmental constraint of the area identified is the proximity to the AONB; although national policy is clear that the proximity of the AONB, though certainly a constraint, does not rule out a more detailed investigation of the extensive land free from designations and direct constraints in this area. A more detailed review of the area concluded that large sections of land are suitable for development subject to suitable mitigation.	No change proposed.
Policy SS2	94	1160254	How are we to trust these figures? The Places and Policies Local Plan is currently aiming to deliver 350 homes a year to meet the 2013 Core Strategy housing requirement (as per 4.8 of the District Spatial Strategy). Now, just five years after the adoption of the 2013 Strategy, with changing Government methodology for calculating housing need, this amount more than doubles to 722 a year. Except that need is initially being capped to 490 homes a year by Government, while our own local assessment says 633 year? But, if the Government methodology finally changes, so will the figures in the next draft of this Core Strategy (so you indicate in 4.45)!! How can anyone seriously regard any of this as the product of "robust" methodology?	The Council accept that there are multiple figures currently being published in relation to the Folkestone & Hythe District's housing need and that this portrays a degree of uncertainty. In September 2017, the government launched, 'Planning for the right homes in the right places: consultation proposals', to supplement the housing White Paper, 'Fixing our broken housing market'. This included a potential new methodology for local planning authorities to calculate their housing needs. Whilst it was anticipated that this new methodology would replace the existing, the council could not be certain of this, or when it would be apply. As a consequence, local planning authorities have had to prepare local plans that take account of both scenarios. The revised National Planning Policy Framework (NPPF) was published in July 2018 confirming the change to the new methodology. As such, figures relating to the old methodology will be deleted in the subsequent version of the Core Strategy Review (Regulation 19). However, the final figure is still subject to change when the revised ONS population and household figures are released in September 2018 and will be kept under review.	Update sections to reflect the new National Planning Policy Framework (July 2018) and new national methodology for calculating housing need.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS2	247	1162685	The discrepancy between the 2013 figures, the revised OAN and the new methodology removes any credibility these figures might have. As noted above, a table showing year-by-year exactly how many houses are targeted is the only way to understand what is proposed. Current central government planning policy is setting up local authorities for failure while there is no incentive for developers to build the houses the community needs. This plan will be no different. Whether it's 350, 490, 633 or 722 homes a year the targets will not be achieved.	Comment noted. The government has introduced a new methodology to set out how many new homes local authorities should plan for. For Folkestone & Hythe district, this indicates that the council should plan for an average of 676 new homes a year over the Core Strategy Review plan period. The Council has prepared and is continually updating an indicative housing trajectory. The trajectory will be included in the Submission Draft (Regulation 19) Core Strategy Review.	Include indicative housing trajectory as an appendix in the Submission Draft (Regulation 19) Core Strategy Review (Appendix 3).
Policy SS2	429	345899	In your planning decisions it is most important you consider the following points. Please do not overdevelop simply on the ground that more housing is needed and developers are keen to build. It is essential that proper consideration is made of the water and drainage supplies, the likely cost and certain provision of schools and medical facilities, and the cost and effects of road building. Do not allow builders to provide houses mainly for people who can afford to buy. Insist that you will only allow housebuilding where sufficient affordable housing is really included. Agreements are often made but not kept. The Kent Downs area and Romney Marsh are unique areas, and very special parts of Kent which can easily be overdeveloped and spoiled with increased traffic and pollution. Please do not allow this to happen. Thank you for your consideration.	Comment noted.	No change proposed.
Policy SS2	499	1037610	Policy SS2 Figures for future housing needs are not substantiated by evidence for employment opportunities; in addition, a set level of provision for community services and facilities are omitted in this strategy. Your words state Allied to this rate of housing delivery, business activity and the provision of jobs will be facilitated through supporting employment opportunities* in the garden settlement, existing town centres**, the protection of sufficient employment land across the district, allocations and concerted efforts*** to deliver rural regeneration (especially in the south and west of the district). ' *what have you in place? **how is your town centre strategy going to deliver this? The work on the evidence links refer to Peter Brett studies which were discounted as extremely inaccurate at the time of publication, have these been updated? The majority of information in these documents is based on findings at that time (2014). Should this now be revised to take in the new centre at Otterpool New Town? In the four years since this study, If the evidence to substantiate this policy is flawed, then how many other policies can be deemed unsound ' *** 'concerted efforts ' do not make for a solid strategy	The figures previously published in the Core Strategy (2013) relating to employment and retail requirements have been removed as these were derived from an out-of-date evidence base. New requirements are included in Policy SS2 in the Submission Draft (Regulation 19) Core Strategy Review to reflect updated evidence. The reference to 'concerted efforts' is the original wording from the 2013 Core Strategy which has gone through examination and been found sound. However, it is agreed that this could be phrased more clearly in the next version of the plan.	Remove reference in Policy SS2: Housing and the Economy Growth Strategy to 'concerted efforts'.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS2	588	1164872	<p>Folkestone and Hythe District Council Core Strategy Review Consultation Representation on Behalf of The Aspinall Foundation regarding Land North of Aldington Road (Zoo car park) Savills has been instructed by The Aspinall Foundation, to submit representations to the first draft of the Core Strategy Review. This follows detailed representations submitted to the preferred options stage of the Shepway Places and Policies Local Plan in November 2016. Whilst the previous representation related to two sites; Land north of Aldington Road (zoo car park) and Land South of Aldington Road / West of Castle Close, these representations relate solely to the Land north of Aldington Road (zoo car park). The site is located within the Otterpool Park Garden Village proposals. A location plan has been enclosed with this letter The principle of the creation of a garden settlement to provide a significant contribution to the District's housing supply over the Plan period, contained in Policy SS1 District Spatial Strategy and reiterated in Policy SS3 Place-shaping and Sustainable Settlements Strategy is fully supported. Through Policy SS2 Housing and the Economic Growth Strategy of the Core Strategy Review Folkestone &amp; Hythe District Council have re-affirmed their intention to meet the locally identified housing need in the Strategic Housing Market Assessment (as opposed to the lower assessed housing need identified in the standardised methodology consultation). This equates to 633 new homes a year over a 19 year plan period, and 12,030 dwellings in total. The intention to meet the locally identified housing need of 633 dwellings a year on average over the Plan period as a minimum is supported. Policy SS6 New Garden Settlement Development Requirements sets out the principles behind the proposed garden settlement, the requirements of the development and how the development may be brought</p>	Support noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS2	549	1163824	<p>The supporting evidence base for the Core Strategy Review includes the Folkestone Hythe &amp; Romney Marsh Strategic Housing Market Assessment (SHMA), published March 2017. The SHMA identifies an Objectively Assessed Housing Need (OAN) of 633 dwellings per annum (dpa) for the period 2014- 2037. It is acknowledged that the Government 's recent consultation on standardising the OAN methodology proposed an OAN of 490 dpa, we support FHDC 's commitment to meeting its full OAN for housing based on the 633 figure. Notwithstanding the proposed new garden settlement and the potential delivery of 5,500 new homes in this location, Policy SS1 (District Spatial Strategy) states that in the District outside of the new garden settlement the priority will be given to previously developed land in the Urban Area of Folkestone. In accordance with paragraph 17 of the NPPF and the Housing White Paper, brownfield land should be reused effectively and should be maximised to provide sustainable development. We therefore consider that the Housing and the Economy Growth Strategy (Policy SS2) should promote residential uses on sustainable brownfield sites in residential areas, and not only rely on the garden settlement which will typically have a slower delivery rate, and the proposed allocations in the Places and Policies Local Plan to meet the OAN of the District. This approach would assist in the Local Plan being considered as 'positively prepared' in accordance with the soundness test of paragraph 182 of the NPPF. Summary In light of the above, we consider that the removal of an employment designation on the site would facilitate in providing flexibility to adapt to changing economic circumstances. Park Farm Industrial Estate is, as recognised by the Council, changing in nature, and therefore this should be reflected in the strategic policy to direct appropriate development dependent on local needs and to ensure</p>	<p>The Core Strategy Review does not rely solely on the garden settlement proposals to meet its development requirements. This should be read in conjunction with the emerging Places and Policies Local Plan (2018) which allocates a sufficient mix of smaller, medium and large sized sites, distributed across the district to meet the identified housing need up to and including 2031, with a focus on existing sustainable settlements. The allocated sites have undergone a detailed assessment through the Strategic Housing Land Availability Assessment and are considered on balance to perform strongest against a range of sustainability criteria one of which is whether it is previously developed land, or not. Whilst the National Planning Policy Framework (paragraph 17) promotes maximising the use of brownfield land for sustainable development, it doesn't limit this to residential uses. To do so would not be consistent with the NPPF. The suggestion that Policy SS2 should solely promote residential uses on brownfield sites is not sound'. There are many types of land uses required within residential areas that are necessary to achieve sustainable development i.e. employment and town centre uses. Promoting residential development on brownfield sites (that is functional and viable employment land) would also potentially undermine the economic strategy detailed in Policy SS2 which amongst other provisions seeks to support business activity and provision of jobs through the protection of employment land.</p>	<p>No change proposed.</p>
Policy SS2	730	1164722	<p>Draft Policy SS2 states: "The core long-term requirement is to deliver 633 dwellings (Class C3) a year on average from 2018/19 to 2036/37, a total requirement of 12,030 new homes over the plan period. This will be achieved by major strategic growth in the district including the delivery of a new garden town. During the first five years of the plan following submission a minimum requirement will be set of 490 new homes a year on average from 2018/19 to 2022/23 to allow for transition to the housing requirement, to be set out within a housing trajectory for the plan period. Allied to this rate of housing delivery, business activity and the provision of jobs will be facilitated through supporting employment opportunities in the garden settlement, existing town centres, the protection of sufficient employment land across the district, allocations and concerted efforts to deliver rural regeneration (especially in the south and west of the district)." The Parties are supportive that FHDC recognise the Otterpool Garden Settlement as an important part of how FHDC will be able to meet their housing needs.</p>	<p>Noted. The Core Strategy Review will be updated to take account of the publication of the National Planning Policy Framework (July, 2018) and the introduction of the new national methodology for housing provision.</p>	<p>Update the Core Strategy Review to reflect the new requirements of the National Planning Policy Framework (2018) and the national methodology for housing provision.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS2	673	1160683	We note that the updated wording of Policy SS2 removes any reference to retail floorspace requirements during the Plan period. It is a requirement of the NPPF that the needs of retail and other main town centre uses are identified and met, and we consider that the continued omission of any such assessment would make the Revised Core Strategy unsound	The figures previously published in the Core Strategy (2013) relating to employment and retail requirements have been removed as these were derived from an out-of-date evidence base. New evidence has been prepared setting out new employment and retail needs (Lichfields, 2018) which has been used to inform amendments to the policies.	Update policies as necessary to reflect updated evidence on employment and retail needs (Lichfields, 2018).
<b>Policy SS2</b>	695	1165942	Policy SS2 will also need to clearly demonstrate that the plan is providing a wide range of sites, in a wide range of locations to encourage the widest possible range of housebuilders to be able to contribute to delivering the plan 's needs. In particular the plan will need to consider the final site size threshold requirements for allocations, which will be set out in the revised NPPF.	Comment noted.	Policy SS2 and supporting text will be amended to clarify that a range of small- to medium-sized sites are allocated in the Places and Policies Local Plan (2018) alongside the strategic growth set out in the Core Strategy Review in order to meet the identified housing need to 2037.
4.57	526	1037842	Whilst the principle of the Garden Settlement and its location is supported the housing delivery is uncertain. In this respect the proposed modification to include further land allocations at the rural settlements would assist in ensuring that housing needs are met whilst the difficult task of delivering the Garden Settlement is achieved. The original Core Strategy (para.7.12) identified a need for 15% of the housing requirement for the District to be met at the rural settlements in the North Downs (see proposed amendment to policy SS1). This amounts to approximately 900 units of the proposed new allocations (that is not including existing allocation in the old CS and the Places and Policies Local Plan nor existing permissions). It is proposed that the new CS should allocate an additional 900 units specifically to the North Downs existing settlements excluding Sellindge.	The emerging Places and Policies Local Plan provides small- and medium-sized sites throughout the district, including in the North Downs area, for development. These sites will be delivered alongside the strategic sites set out in the Core Strategy Review. Much of the North Downs character area within Folkestone & Hythe district is covered by Area of Outstanding Natural Beauty designation, where development is generally restricted to conserve the landscape qualities of the area.	No change proposed.
4.57	731	1164722	Draft paragraph 4.57 provides a table (Table 4.2) showing how FHDC expect to deliver their minimum requirement for 12,030 new homes over the plan period. This table shows 5,500 net dwellings being delivered at the new garden settlement between 2018/19-2036/37. The Parties recognise that this provides the minimum homes expected to be delivered by the Otterpool Park garden settlement between 2018/19-2036/37 and are supportive of this vision. A future planning application for Otterpool Park will demonstrate how these delivery rates could be achieved through a variety of tenures and sizes of homes.	Noted. The support is welcomed. Housing requirements and projected delivery will be updated for the Submission Draft (Regulation 19) Core Strategy Review.	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Table 4.2	95	1160254	In line with my comment at 4.55, how are we to understand these figures? When development at Otterpool was first mooted, the plan was for 12,000 homes. More recently, figures of 10,000 homes have been cited. Now we are talking about 5,500 up until 2036/7. None of this gives any confidence that the Council's approach to strategic development has any consistency or credibility. I also refer again to my comment to 4.31 why the further expansion of Sellindge if Otterpool town is in view? We are getting both strategic development and piecemeal development, when a justification for Otterpool was that it was supposed to be an antidote to piecemeal development.	Projected housing figures reflect the different timescale for the development and progress with plans for the new garden settlement. The Core Strategy Review covers the period to 2036/37, but construction of the new settlement is expected to extend beyond this, into the next plan period, so many of the homes will not be counted towards the current Core Strategy Review requirement. It is to be expected that development totals will change from when the initial expression of interest for the garden settlement was submitted to when more detailed masterplanning work has been undertaken, which analyses opportunities and constraints in more detail, given the scale of the proposals.	No change proposed.
Table 4.2	248	1162685	Further confusion about numbers here. It seems about 3330 out of 8750 homes in the 2013 CS have been built, leaving around 5420 to be built 2018/9 - 2030/1. With 5500 planned for Otterpool, that makes 10,920 homes. Where are the other 1,280 homes going to be built?	Table 4.2 sets out how the different sources of supply contribute towards the overall housing requirement. Most of the allocations within the 2013 Core Strategy have got permission, are under construction or have been completed (including the Folkestone Seafront, Shornccliffe Garrison, New Romney and Sellindge sites). Where sites have permission or are currently under construction they are included in line 5 of the table. The outstanding 2013 Core Strategy site without permission at New Romney is included in line 3 of the table. All of the sites in the 2013 Core Strategy have been accounted for. The table will be updated for the Submission Draft (Regulation 19) Core Strategy Review.	Update Table 4.2 for the Submission Draft (Regulation 19) Core Strategy Review (renumbered 4.3 in the new version).
4.59	249	1162685	How does housing policy contribute 'directly' to securing employment, except by the relatively few construction jobs?	Noted. Housing can contribute to employment through the construction of new homes; residents create a demand for new services which generates new jobs; housing also brings in new workers which can help local firms to recruit and expand their operations.	No change proposed.
<b>4.3 PLACE SHAPING AND SUSTAINABLE SETTLEMENTS STRATEGY</b>					
4.63	250	1162685	maximise use of existing infrastructure' implies there is spare capacity in existing infrastructure for future development. In general, that is not the case in the district, in particular the physical infrastructure of roads, drainage and water supply are strained, as are health and education facilities.	The council has involved infrastructure providers at all stages in drafting the Core Strategy Review, including Kent County Council (the education and transport authority and lead local flood authority for the district), Highways England (which oversees the strategic road network), the Environment Agency, water companies, rail operators, the National Grid, NHS Clinical Commissioning Groups and other organisations. Comments from these providers have been taken into account when drafting the plan. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Core Strategy Review; other improvements will be provided through the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the district.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.68	97	1160254	I find the paragraph about rural and primary villages here very concerning in its complete open-endedness. What is this saying that despite being largely absorbed into Otterpool town, becoming a suburb and losing its distinctive character as an independent rural village, that Lympne may be subject to yet more expansion? (I might add that there is no reassurance in the phrase that that any further growth will be "proportionately limited in scale" That's a pretty meaningless statement once Lympne has been engulfed by Otterpool and effectively ceases to be rural). And is further expansion planned at Saltwood as well, which effectively isn't a village anymore, but already suburb of Hythe? If yes, this all indicates that piecemeal development will continue regardless of the so called "strategic" scale development at Otterpool. And where will there ever be any end to the development only once the whole lot is joined up into one giant urban sprawl from the Western most point of Sellindge right through to the coast at Hythe?	Expansion to rural villages and settlements will be smaller and more limited in scale proportionate to the size of the settlement and given the rural locality and existing built form, in line with the settlement hierarchy in the Core Strategy Review. There is a housing need in rural areas as well as urban areas, so growth in these rural areas needs to be planned appropriately to ensure housing needs are met for the future generation.	No change proposed.
4.69	144	1160254	This place-shaping entails facilitating development where the quality of life and the physical environment is lower, and only encouraging development in locations of high townscape, strategic landscape, established historic or biodiversity value where it reinforces or contributes to local character and sustainability. Viewed in the context of Otterpool town, I find this statement hard to credit. Is the physical environment of Lympne which will be subsumed into this development, and its quality of life obviously lower than in other parts of the region? In what way will building across half of the former Lympne Airfield reinforce the historicity of that site? How will Otterpool town contribute to the local character of Lympne (my comments to 3.32 refer)? How will building over large tracts of Grade 2 agricultural land contribute to our sustainability as a regional community or within the wider chain of national food production?	There is not enough brownfield land to meet the housing requirement need in the district so greenfield land will need to be developed. Options work carried out considered this across the district and concluded that the area identified as Otterpool Park would be most suitable to provide the level of housing required. However, the Council recognise that the text could be amended to clarify that the statement refers to the lower quality landscape designation as opposed to quality of life.	Addition of text in paragraph 4.69 to read This place-shaping entails facilitating development where the quality of life and the physical environment is lower in terms of special landscape designations , and only encouraging development in locations of high townscape, strategic landscape, established historic or biodiversity value where it reinforces or contributes to local character and sustainability .
4.72	251	1162685	Not just 'tidal' flooding events, as recent history has shown.	Comment noted.	Reference to a tidal flooding event will be changed to flooding event to ensure the Sequential Test takes account all forms of flooding, not just tidal.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.72	605	329173	Flood Risk 4.72 & 4.73 - Whilst we welcome the intention to direct development away from the areas of greatest hazard it is important that these paragraphs make it clear that a sequential approach will be undertaken to ensure those sites at lowest risk are considered first. Only if the Sequential Test (ST) demonstrates that there are no reasonably available sites at lower risk for the type of development proposed should development in Flood Zone (FZ) 2&3 be considered. Residential development is to be avoided in the areas identified as Extreme Hazard ' in the Strategic Flood Risk Assessment (SFRA). Reference should also be made to the fact that the ST needs to take account all forms of flooding, not just tidal. NB Romney Marsh modelling - We are currently updating the Romney Marsh tidal model 2017 which will include breach scenarios and National Planning Policy Framework (NPPF) climate change (CC) modelled outputs for the 200yr +CC 2070 and 2115. Once these have been released, it will be important that the SFRA is updated and site specific Flood Risk Assessment (FRAs) use the best and latest information available.	Comment noted.	This paragraph will be revised to make it clear that a sequential approach will need to be undertaken to ensure those sites at lowest risk are considered first.
4.73	579	1162196	Para 4.73 This is a let out clause for inappropriate development and should be taken out of the core strategy. Across the UK houses are repeatedly flooded because councils sanction inappropriate sites for housing. Romney Marsh is a flood plain and development should be minimised. To actually consider housing development in areas where the flood risk is less than extreme should lead to the council being criminally culpable. Not only does this type of clause foster over development but it leads to misery for residents when flooding occurs. Take out paragraph	The council has involved the Environment Agency at all stages in drafting the Core Strategy Review. The Environment Agency have raised no objection to this paragraph. The Council 's Strategic Flood Risk Assessment and the National Planning Policy Framework (NPPF) affirm that development should be directed away from areas that are most at risk from flooding, however where development is to be permitted in areas that may be subject to some degree of flood risk, the NPPF requires the Council to demonstrate that there are sustainable mitigation solutions available that will ensure that the risk to property and life is minimised (throughout the lifetime of the development) should flooding occur.	No change proposed.
4.75	580	1162196	Para 4.75 Another "let out" clause. It is effectively saying that if a developer/government comes up with a proposal (for example the nuclear waste dump) or a farmer is willing to surrender land for housing, outside the prescribed areas, we will support it - rather than make it clear that such proposals will be considered only under exceptional circumstances. Take out paragraph	This paragraph explains and defines the area for applying the Sequential Test for strategic-scale development. With regards to applying the Sequential Test in the preparation of a Local Plan, Paragraph 020 of the Planning Practice Guidance states: As some areas at lower flood risk may not be suitable for development for various reasons and therefore out of consideration, the Sequential Test should be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk . The paragraph contained within the Core Strategy Review is therefore entirely consistent with this approach in that proposed developments should be considered on a district-wide flood risk basis.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS3	130	1162795	It is not clear whether this policy applies to cultural uses. For consistency with the NPPF we recommend that it does and that it is made clear by amending the text to "community, CULTURAL, voluntary or social facilities". On the basis of this policy applying to cultural uses (although equally this comment can also apply to other community uses), the Trust supports part f but would recommend the addition of robust criteria (perhaps within paragraph 4.84) to make clear what evidence is necessary. As a minimum we would recommend evidence of marketing effort covering a period of at least one year at a rental or sale price appropriate to the location and existing use, robust demonstration that alternative community/cultural uses have been considered but are not practical, and robust demonstration that there is no need for the facility by local people.	Comment noted. The Council agree with the suggestion to add cultural uses to the list of criterion (f). With regard to the loss of community facilities, emerging policy C2 Safeguarding Community Facilities in the Places and Policies Local Plan sets out the requirement to market the facility for a minimum period of 12 months, so it is not considered necessary to duplicate this requirement in Policy SS3 of the Core Strategy Review.	Policy SS3 will be updated to add cultural facilities into criterion (f) in line with paragraph 92 of the National Planning Policy Framework (2018).
Policy SS3	253	1162685	In (c), 'should' should be replaced by 'must'. In (c), all of (i),(ii) and (iii) should apply - the 'or' at the end of (i) should be replaced by 'and' at the end of (ii).	Suggestions noted. It is agreed that the or at the end of (c) i) should be replaced, however the and should be placed at the end of i) rather than ii) as suggested because iii) refers only to strategic scale development.	The current policy will be revised to incorporate these suggested changes.
Policy SS3	500	1037610	Policy SS3 e. Proposals should be designed to contribute to local place-shaping and sustainable development by: i) respecting and enhancing key historic features of conservation interest; and Comment: Why has this not taken place at Shornclyffe, which could have been developed as a high quality site on the formula that Deal and Caterham Barracks have used, respecting heritage incorporated into modern living Why has the scheduled ancient monument of the Royal Military Canal been compromised by the proposed District led redevelopment of 150 houses and a leisure centre. The leisure centre would be better accommodated on land at Smiths Medical, Range Road/ Ford Road, which would better serve residents	The site specific policy for the new garden settlement, reference SS7, identifies how the development will enhance local heritage assets and their setting. The application will also be supported by a detailed heritage strategy, setting out how the long term, viable use of heritage assets will be established and where necessary providing mechanisms for their integration into the development. Indeed, the site promoters are keen to make a positive contribution to the local character and distinctiveness of the area, ensuring that heritage shapes the form of development at the garden settlement, and heritage will be a key component of the overall design to ensure it has its own character.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS3	516	1155269	3. Housing generally 'Nobody wants a development in their back yard' but it is happening across the whole country but how much easier that might be if those existing residents directly affected by a large development were consulted at an early stage and continuously thereafter where there is a delay, to see what could be done to mitigate impact. Why can't the strategy acknowledge the needs of existing residents who should be consulted by the district planning authority and developer to see what can be done for them and this takes place not only at pre-planning stage but after outline planning is granted. Often it is a different developer that takes forward the Reserved Matters stage and no further consultation with residents takes place, yet the housing blue-print may have completely changed, so what was the point of the original consultation! The strategy should also address Impact on roads, pavements and verges for larger developments that take several years to complete. There should be some form of continuous assessment between the planning authority and the developer and guidance re remedial action to take when appropriate.	The Council 's Statement of Community Involvement sets out how the Council involves the local community in developing planning policy and making planning decisions, both outline and reserved matters, which is a requirement for all local planning authorities under the Town and Country Planning (Local Planning) (England) Regulations 2012 and Neighbourhood Planning Regulations 2012. It is often the case in larger planning applications that a management plan is required as a planning condition to ensure that ongoing maintenance and future upkeep of the land is acceptable as part of any reserved matters planning application.	No change proposed.
Policy SS3	530	1163318	Policy SS3 Settlements Strategy 3. The policy to create a sustainable garden settlement south of Westenhangar to protect the open countryside and coastline is noted. Given the level of local and central government support a working assumption is made that this is likely to emerge from the scrutiny process as a formal commitment. So, the following submissions are made on that basis.	Comment noted.	No change proposed.
Policy SS3	394	894636	The principle of development on previously developed land should be more likely to be acceptable wherever it lies, not only in "defined settlements'. Issues of design, visual impact and so on remain significant enough controls. There is something rather odd and inconsistent about a policy which permits replacement dwellings in high-risk areas, but effectively vetoes new development, where similar protections, and better, can be incorporated.	While the principle of reusing previously-developed land is supported, the council must also have regard to the location of the proposal. There may be some sites in the rural area of the district that are poorly served by transport links or other services where redevelopment would not be appropriate. The wording of the policy reflects the NPPF (paragraph 118(c)) which states that policies should "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs ..."	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS3	589	1164872	Folkestone and Hythe District Council Core Strategy Review Consultation Representation on Behalf of The Aspinall Foundation regarding Land North of Aldington Road (Zoo car park) Savills has been instructed by The Aspinall Foundation, to submit representations to the first draft of the Core Strategy Review. This follows detailed representations submitted to the preferred options stage of the Shepway Places and Policies Local Plan in November 2016. Whilst the previous representation related to two sites; Land north of Aldington Road (zoo car park) and Land South of Aldington Road / West of Castle Close, these representations relate solely to the Land north of Aldington Road (zoo car park). The site is located within the Otterpool Park Garden Village proposals. A location plan has been enclosed with this letter The principle of the creation of a garden settlement to provide a significant contribution to the District's housing supply over the Plan period, contained in Policy SS1 District Spatial Strategy and reiterated in Policy SS3 Place-shaping and Sustainable Settlements Strategy is fully supported. Through Policy SS2 Housing and the Economic Growth Strategy of the Core Strategy Review Folkestone & Hythe District Council have re-affirmed their intention to meet the locally identified housing need in the Strategic Housing Market Assessment (as opposed to the lower assessed housing need identified in the standardised methodology consultation). This equates to 633 new homes a year over a 19 year plan period, and 12,030 dwellings in total. The intention to meet the locally identified housing need of 633 dwellings a year on average over the Plan period as a minimum is supported. Policy SS6 New Garden Settlement Development Requirements sets out the principles behind the proposed garden settlement, the requirements of the development and how the development may be brought	Support noted.	No change proposed.
Policy SS3	732	1164722	The Parties support the reference within draft policy SS3 to the Otterpool Park garden settlement being located south of the M20 near Westenhanger.	The support is welcomed.	No change proposed.
4. 80	648	1057385	4.80 [page 27] There is a reference to footnote 74 regarding The Water Resources Management Plan but it is the incorrect plan. There is a reference to the correct document in a footnote [page 127] of the Core Strategy Local Plan Review Consultation Document.	Noted. References will be updated.	Update references as highlighted.
4.82	65	1032113	We would like to see reference to proposals within the Kent Downs AONB being expected to follow the guidance and principles set out in the Kent Downs AONB Management Plan and its associated Design Guidance.	Comment noted. See Council's Action.	The Council will include additional reference to the guidance and principles set out in the Kent Downs AONB Management Plan and its associated Design Guidance, as follows: Proposals within the Kent Downs AONB should follow the guidance and principles set out in the Kent Downs AONB Management Plan and its associated Design Guidance .

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.82	254	1162685	CPRE welcomes the aspiration to have the new garden settlement achieve the highest quality of design, landscape and townscape. We are, however, concerned that this will not be achieved through the planning process alone. As a planning authority, FHDC will struggle to enforce any conditions agreed alongside the planning consents. As landowner and joint developer, however, FHDC should have it within its power to enforce these high standards by other means. We suppose these can be enforced by contract and by ensuring, for example, green infrastructure becomes owned by the community. Taking green spaces out of the ownership and control of housebuilders as soon as possible should protect them from erosion by 'viability' arguments as the project progresses. The disappearance of the promised 40% GI (or any target) from SS7 suggests the viability card is already in play. This should be resisted at this early stage and throughout the project.	Comment noted. The overall development is likely to provide the 40% target of Green Infrastructure, but given the development will come forward in phases; each phase could not be judged against the 40% target. Some phases will provide under 40%, whilst other phases will provide over 40%. Green Infrastructure studies are being carried out for both the district and the garden settlement.	No change proposed.
4.88	594	329173	3.26, 4.88, Policies SS6 SS8 (1) b & c, Section 5.66 - We welcome the ambition to create a water-neutral development. However this is a concept to be applied at a large scale, not something which is achievable in the context of an individual self-built or custom-built home, as the bottom of page 84 seems to imply, or even a larger new development in isolation. To achieve water neutrality, new water consumption in a development needs to be balanced by consumption reductions elsewhere. Perhaps a definition could be included in the Glossary, and thought given to delineating the wider area over which neutrality is to be achieved?	Acknowledged. Paragraph 4.88 will be amended to reflect these comments.	Amend paragraph 4.88 to reflect these comments.
4.88	733	1164722	Draft paragraph 4.88 states that "The garden town will achieve the highest possible standards for energy and water efficiency, with an aspiration that the development will achieve water and carbon neutrality." Achieving carbon neutrality (assumed to be the same as carbon zero and does not include non-regulated carbon) is challenging for residential properties and more so for non-residential ones. As context, the London Plan and the draft New London Plan are considered to set one of the most stringent policy relating to energy matters. It required developers of major developments to achieve zero carbon for new residential developments since 2016. The GLA has however subsequently revised this policy for residential developments so that developers of major developments only need to achieve a 35% above 2013 standards on-site carbon reduction above Building Regulations. At present the Otterpool Park garden settlement is aiming to achieve and exceed Building Regulations but the Parties have not yet set a specific carbon reduction target. As explained above in section b), it would be difficult to achieve water neutrality at the Otterpool Park garden settlement.	Acknowledged. The paragraph will be changed to reflect these comments.	Amend paragraph 4.88 to reflect these comments.

**4.4 PRIORITY CENTRES OF ACTIVITY STRATEGY**

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.89	662	1160683	We note that the wording of this policy has been slightly amended from that in the 2013 Core Strategy and the reference to an 'over-arching' approach has been removed. We consider that this is detrimental to the understanding of this paragraph. It now refers simply to 'an approach', when the implication is that it is the preferred approach for the Council.	Comment noted.	The text will be amended in line with the suggested wording to state: "The following policy sets out the council's approach to..."
4.97	66	1032113	The Kent Downs AONB Unit has concerns at proposal to provide major employment sites within the new Garden Settlement and at Hawkinge. Major employment sites at Hawkinge within the AONB would clearly be contrary to the NPPF which, at paragraph 116 clearly advises major development as not being acceptable within AONBs except where in the public interest and in exceptional circumstances. Furthermore, paragraph 110 requires local plans to allocate land with the least environmental or amenity value. With respect to major employment uses at the proposed new settlement, such uses, by virtue of the scale and design of the associated buildings are likely to have significant impact when viewed from the higher elevations of the escarpment of the Kent Downs.	The Council will continue to work alongside the Kent Downs AONB Unit to overcome any major concerns with employment proposals.	No change proposed.
Table 4.4	547	1163824	Employment The Core Strategy Review as drafted refers that one of the strategic needs for the District is 'the challenge to improve employment, educational attainment and economic performance'. The most recent Employment Land Review (ELR) published in 2017, states that there has been strong employment growth in the District, particularly noting the growth witnessed in non-B Class jobs and office jobs. For industrial space, this direction of growth has translated into forecasts that there will be a significant surplus supply ranging between 82,205 sqm and 102,845 sqm during 2016-2026. CBRE recognise that Park Farm Industrial estate is identified in the ELR as a key employment area in Folkestone. The ELR however characterises Park Farm as a mixed employment site, which reflects the Council's assessment in the Submission Draft Places and Policies Local Plan that the nature of the estate is changing. It is apparent that there is a clear need for modern employment premises, digressing from the old and traditional industrial spaces which characterise Park Farm Industrial Estate. As illustrated by the ELR, the future demand for such land is uncertain and in accordance with paragraph 21 of the National Planning Policy Framework (NPPF), Local Plans should comprise policies that are flexible enough to accommodate needs not anticipated in the plan to allow a rapid response to changes in economic circumstances'. Paragraph 22 encourages land allocations to be reviewed to prevent the long term protection of sites. The large vacant industrial land at the former Silver Spring site, represents the need to accommodate other uses within the estate and the absence of demand in industrial land. The site has been vacant since 2013, which has resulted in a draft allocation and pending planning application (Y18/0066/SH) for a mixed-use employment led redevelopment including a hotel and	An updated employment and retail assessment has been produced in order to align the relevant emerging policies with wider strategic objectives (Lichfields, 2018). The principal focus of the study is on 'B Class' employment uses, namely office, light industrial, general industrial and storage and distribution uses. The study also provides analysis (and projections) of retail as a separate employment use. It is recognised that a fresh approach is needed to move away from an over-dependency in policy terms on historic allocations and uses that are poorly located and/or have not come forward to implementation over multiple plan periods.	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Table 4.4	734	1164722	Draft table 4.4 is proposed to state that the new garden settlement should include a major employment site to provide further industrial premises (B-class and similar sui generis uses) and town centres to accommodate the needs for retail, office and leisure uses. The Parties support this and the emerging proposals do include areas of land suitable for providing industrial, retail, office and leisure uses. Similarly, the Parties support the indication of a new strategic town at the Otterpool Park site in draft Figure 4.3.	Noted. The support is welcomed. Policies relating to employment and retail provision will be amended in line with updated evidence (Lichfields, 2018).	Amend policies relating to employment and retail provision as necessary in line with updated evidence for the Submission Draft (Regulation 19) Core Strategy Review.
Table 4.4	663	1160683	We note and welcome the Council 's intention to direct the majority of the District 's identified needs for retail, office and leisure uses towards allocated centres (such as Folkestone Town Centre) in order to claw back trade from neighbouring towns such as Ashford and Canterbury. We are however concerned with references to these types of uses also being directed towards the New Garden Settlement without any indication as to the amount of floorspace that might be permitted in this location. This element of the proposed New Garden Village development needs to be more carefully assessed and should include a consideration of the retail expenditure (convenience and comparison) that might be generated by the emergent community in this location and the extent to which this should be met locally within the new development (taking into account the commercial needs of retailers and operators and the likely impact on existing centres / facilities). Fleeting reference to such development not competing with allocated centres (Para 4.98) is insufficient to prevent against significant amounts of floorspace coming in forward in this location to the detriment of the District 's existing retail hierarchy. The mere threat of an unspecified / unsubstantiated amount of town centre floorspace coming forward in this location is enough to undermine investor confidence in the District 's town centres. Please see our comments in respect of Policies SS6 SS9 and Supporting Text for more detail.	An updated employment and retail assessment has been produced to align the relevant emerging policies with wider strategic objectives (Lichfields, 2018). The principal focus of the study is on ' B Class ' employment uses, namely office, light industrial, general industrial and storage and distribution uses. The study also provides analysis (and projections) of retail as a separate employment use. Policies for the new garden settlement have been updated to provide more detailed guidance on the provision of employment and retail floorspace, to avoid any detrimental impacts on nearby centres, including Folkestone town centre.	Update Policies SS6 and SS7 for the new garden settlement to set out more detailed requirements in relation to the quantity of employment and retail floorspace to be provided.
4.98	154	1029376	The garden settlement residents will not shop in Folkestone, it will be far easier for them to go to Ashford rather than go back to folkestone which has restricted parking and low quality shopping	The text does acknowledge that some shopping expenditure will be lost to competing centres such as Ashford but the intention behind the policies is that as much spending as possible will be captured locally, rather than people being forced to travel long distances to meet their shopping needs.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.98	360	1157819	The economic survival of Hythe as a vibrant town centre is dependent upon an increased footfall. This depends upon there being sufficient car parking availability both for those employed in the town centre but also for shoppers and visitors to the town. The car parks are very nearly at capacity and with the additional housing already granted planning consent and sites allocated there needs to be additional public car parking. At peak times the road system in Hythe, especially the Dymchurch Road/Scanlons Bridge Road/Military Road one way system, is at capacity. This will only get progressively worse as more houses are built and occupied - perhaps to the extent that local residents will choose to spend their money elsewhere to the detriment of Hythe town centre.	The delivery of public realm improvements in Hythe High Street as set out in Policy CSD7 criterion (f) should encourage footfall, improve access and circulation; and increase dwell time within the town centre. Hythe is already well served by a number of car parks within and adjacent to the town centre boundary; public realm improvements could also help to improve their connectivity and legibility with the town centre.	No change proposed.
4.98	664	1160683	We note and welcome the Council's intention to direct the majority of the District's identified needs for retail, office and leisure uses towards allocated centres (such as Folkestone Town Centre) in order to claw back trade from neighbouring towns such as Ashford and Canterbury. We are however concerned with references to these types of uses also being directed towards the New Garden Settlement without any indication as to the amount of floorspace that might be permitted in this location. This element of the proposed New Garden Village development needs to be more carefully assessed and should include a consideration of the retail expenditure (convenience and comparison) that might be generated by the emergent community in this location and the extent to which this should be met locally within the new development (taking into account the commercial needs of retailers and operators and the likely impact on existing centres / facilities). Fleeting reference to such development not competing with allocated centres (Para 4.98) is insufficient to prevent against significant amounts of floorspace coming in forward in this location to the detriment of the District's existing retail hierarchy. The mere threat of an unspecified / unsubstantiated amount of town centre floorspace coming forward in this location is enough to undermine investor confidence in the District's town centres. Please see our comments in respect of Policies SS6 SS9 and Supporting Text for more detail.	An updated employment and retail assessment has been produced in order to align the relevant emerging policies with wider strategic objectives. The principal focus of the study is on 'B Class' employment uses, namely office, light industrial, general industrial and storage and distribution uses. The study also provides analysis (and projections) of retail as a separate employment use. The study has been used to inform amendments to the garden settlement policies in relation to retail and employment floorspace.	Update Policies SS6 and SS7 for the new garden settlement to set out more detailed requirements in relation to the quantity of employment and retail floorspace to be provided.
4.101	155	1029376	The addition of a further train station will diminish the advantage of HS1 to Folkestone businesses which are not really focussed near train stations anyway	The HS service at Westenhanger is not planned within the next franchise period which is until 2027. However, one potential option to ensure this doesn't happen is for the HS service to stop at both Folkestone West and Westenhanger stations alternately to ensure that the service runs from both stations without disadvantaging any stations further down the line by increasing the number of stops. There are other initiatives, including the Creative Quarter in Folkestone, which are looking at other ways to increase footfall from the train station into the town.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.102	255	1162685	See above. Why should increasing the supply of land have any effect while there is lots of empty land available in a range of 'qualities'?	The quality of employment land relates to a number of factors of consideration, including location and nearby transport links. Whilst there may other land available, it may not be considered appropriate for employment use. The aim of the Economic Development Strategy (2015) is to increase the supply of good quality employment land to attract occupier uptake.	No change proposed.
Policy SS4	67	1032113	The Kent Downs AONB Unit has concerns at proposals to provide major employment sites within the new Garden Settlement and at Hawkinge. Major employment sites at Hawkinge within the AONB would clearly be contrary to the NPPF which, at paragraph 116 clearly advises major development as not being acceptable within AONBs except where in the public interest and in exceptional circumstances. Furthermore, paragraph 110 requires local plans to allocate land with the least environmental or amenity value. With respect to major employment uses at the proposed new settlement, such uses, by virtue of the scale and design of the associated buildings are likely to have significant impact when viewed from the higher elevations of the escarpment of the Kent Downs.	The Council will continue to work alongside the Kent Downs AONB Unit to overcome any major concerns with employment proposals.	No change proposed.
Policy SS4	209	1158022	Q+A Planning Ltd act on behalf of Ravensbourne Investments Ltd, who are promoting the development of the site known in the plan as the Former Silver Spring Site, Park Farm, Folkestone ', which benefits from a mixed-use allocation under draft policy RL11 of the submission draft Places and Policies Local Plan for up to 10,000sqm of office space (B1), 3,100sqm of non-food retail (A1) with supporting leisure (D2), restaurants and caf�� (A3) uses and a hotel (C1). It would also fall within the category of an employment site where mixed use developments are acceptable in Policy SS4 of the Core Strategy Review 2018. Our client has worked extensively with the Council since closure of the Silver Spring premises, the demolition of the previous buildings and the refusal of a previous retail led application on the site. Therefore, our client shares the Council 's desire and ambition to see the site developed for a mix of uses to create employment and wider opportunities for the Shepway community, which is envisaged in draft policy RL11 of the submission draft Places and Policies Local Plan. On behalf of our client, we have made separate representations to policy RL11. The Council have resolved to grant planning permission for phase 1 for Redevelopment of the site to provide a hotel (4,979 sqm GIA) (Use Class C1), restaurant and cafe floorspace (847 sqm GIA) (Use Class A3) and two 'drive through' units (total 451 sqm GIA) together with a new vehicular and pedestrian access from Park Farm Road, parking, servicing and all hard and soft landscaping. ' (reference Y18/0066/SH) This application is the first phase of a wider development intended to respond to the emerging policy ambitions and deliverable commercially. It represents a �10 million catalyst investment in Folkestone that can create 200 jobs on a prominent brownfield site and can help deliver a further �20- �30 million of	Policy RL11 Former Silver Spring Site, Park Farm in the Places and Policies Local Plan is a site-specific policy to lead development forward at the Silver Spring Site and should therefore take precedence and be relied upon first and foremost to guide development at this site. Policy SS4 of the Core Strategy Review is a more general policy, and the changes suggested are too site specific in regard to the Silver Spring Site to be included in Policy SS4. That said, the council will insert additional wording in Policy SS4 (see Council's Action).	Additional wording will be inserted into Policy SS4 as follows: ' and where it can be demonstrated that the following criterion is also satisfied, unless other site specific policies apply .

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS4	501	1037610	Policy SS4 Town Centre first policy. No mention of work required to be carried out to our existing towns before the construction of a new town begins	An updated employment and retail assessment has been produced to align the relevant emerging policies with wider strategic objectives, including existing town centres (Lichfields, 2018). This will be reflected in amendments to Policy SS2 and Policies SS6 and SS7 for the new garden settlement.	Update Policy SS2 and Policies SS6 and SS7 for the new garden settlement as necessary to reflect requirements for retail and employment floorspace.
Policy SS4	545	1163824	<p>Employment The Core Strategy Review as drafted refers that one of the strategic needs for the District is the challenge to improve employment, educational attainment and economic performance '. The most recent Employment Land Review (ELR) published in 2017, states that there has been strong employment growth in the District, particularly noting the growth witnessed in non-B Class jobs and office jobs. For industrial space, this direction of growth has translated into forecasts that there will be a significant surplus supply ranging between 82,205 sqm and 102,845 sqm during 2016-2026. CBRE recognise that Park Farm Industrial estate is identified in the ELR as a key employment area in Folkestone. The ELR however characterises Park Farm as a mixed employment site, which reflects the Council 's assessment in the Submission Draft Places and Policies Local Plan that the nature of the estate is changing. It is apparent that there is a clear need for modern employment premises, digressing from the old and traditional industrial spaces which characterise Park Farm Industrial Estate. As illustrated by the ELR, the future demand for such land is uncertain and in accordance with paragraph 21 of the National Planning Policy Framework (NPPF), Local Plans should comprise policies that are flexible enough to accommodate needs not anticipated in the plan to allow a rapid response to changes in economic circumstances '. Paragraph 22 encourages land allocations to be reviewed to prevent the long term protection of sites. The large vacant industrial land at the former Silver Spring site, represents the need to accommodate other uses within the estate and the absence of demand in industrial land. The site has been vacant since 2013, which has resulted in a draft allocation and pending planning application (Y18/0066/SH) for a mixed-use employment led redevelopment including a hotel and</p>	Noted. The council has completed new evidence on employment and retail needs (Lichfields, 2018) which has been used to amend policies and text for the Submission Draft (Regulation 19) Core Strategy Review.	Amend policies relating to employment and retail to reflect updated evidence as necessary.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS4	674	1160683	There is a need for Policy SS4(a) to be updated so that it fully accords with the NPPF. This should include a statement indicating a preference for out-of-centre sites that are accessible by a range of modes of transport other than the car and are well connected to the town centre (NPPF, Paragraph 24) and include a consideration of the impact of a proposal on investment in town centres (NPPF, Paragraph 26).	The comments are noted. See Council's Action.	Policy SS4 will be updated to accord with paragraph 87 of the National Planning Policy Framework (2018) and will be amended to read ' within town centres, then on the edges of centres and only then out of centre with a preference given to accessible sites which are well connected to the town centre . Policy SS4 will also be updated to accord with paragraph 89 of the NPPF (2018) and will be amended to read ' and with regard to their impact on the vitality and viability of, and existing, committed and planned investment in , the defined town, district and local centres
Policy SS4	735	1164722	The Parties request that the proposals map is updated to ensure that the Otterpool Park garden settlement is shown as a Priority Centre of Activity. Albeit, to maintain flexibility, the Parties request that it should not be so specific as to show exactly where in the Otterpool Park garden settlement site the Priority Centre of Activity should be located.	Noted. Figure 4.3 shows the proposed new garden settlement as a priority centre of activity.	No change proposed.
4. 110	665	1160683	Paragraph 4.110 and the Core Strategy Policies Map are out of date, as the NPPF requires Local Planning Authorities to define Primary Shopping Areas as well as Town Centres and Primary and Secondary Frontages (NPPF, Paragraph 23, Bullet 3). This is required to apply the sequential test for retail development (NPPF, Annex 2). We have made similar comments in respect of Policy RL2 and the Folkestone Town Centre Policy Map (associated with the Places and Policies Local Plan).	The Core Strategy Policies Map will be updated following the adoption of the Plan.	No change proposed.
<b>4.5 DISTRICT INFRASTRUCTURE PLANNING STRATEGY</b>					
4.113	296	1163030	Folkestone and Hythe District Council is currently updating its Transport Strategy and testing the impact of growth at Otterpool Park. To date a Red, Amber and Green capacity rating has been produced of all major junctions in the District and the Local Highway Authority will be able to understand what particular junctions will be under stress as a result of the proposed development. Any planning application submitted on the Otterpool Park site will also need to do this same analysis through a Transport Assessment and improvements to the Local Highway Network will be secured through any planning application submitted on the Otterpool Park site either through Section 278 Highway or Section 106 legal agreements. KCC looks forward to working both with the District Council and the applicant(s) to secure these essential highway improvements.	Comment welcomed.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.113	616	1057385	Folkestone and Hythe District Council is currently updating its Transport Strategy and testing the impact of growth at Otterpool Park. To date a Red, Amber and Green capacity rating has been produced of all major junctions in the District and the Local Highway Authority will be able to understand what particular junctions will be under stress as a result of the proposed development. Any planning application submitted on the Otterpool Park site will also need to do this same analysis through a Transport Assessment and improvements to the Local Highway Network will be secured through any planning application submitted on the Otterpool Park site either through Section 278 Highway or Section 106 legal agreements. KCC looks forward to working both with the District Council and the applicant(s) to secure these essential highway improvements.	Comment noted.	No change proposed.
4.113	565	588509	Positively Prepared 7. The consultation documents have not been positively prepared as they fail to meet assessed development infrastructure requirements. The CSLPR states that there is social and economic deprivation in the District, and that LAA provides excellent infrastructure and employment benefits. However, the CSLPR provides no policy support for LAA 's future improvement and expansion. 8. In ignoring one of the District 's key economic drivers, the CSLPR cannot be considered positively prepared and, therefore, it is not in accordance with national guidance. Justification 9. The CSLPR plan period is from 2018/19 to 2036/37. During this period, it is inevitable that there will be further investment in LAA, above and beyond the investment that will be taking place in the next few years. In the context of the socio-economic challenges facing Romney Marsh, it is important Council 's in principle support for appropriate development is acknowledged. 10. The CSLPR is not sound because there is no justification for excluding a policy acknowledging the importance of LAA. Omitting such an important policy is not the most appropriate strategy for the CSLPR in the short, medium and long term. 11. The Transport Strategy is currently being updated for the CSLPR. The most up-to-date Transport Strategy (February 2011) states that the number of passengers at ports and airports is declining, but paragraph 4.2.5 goes onto state that many people recognise the benefit that LAA brings to Shepway (now known as Folkstone and Hythe District Council). The Transport Strategy evidence base supports promoting the use of ports and airports. It states that the Plan should: PA1: Promote Connections This includes both existing links from Shepway 's ports and airports to outside the District (e.g. rail and coach services), and new links both within and outside of the District (including to Europe); and, PA2:	The Core Strategy Review evidence base will include the Transport Strategy prepared as part of the suite of documents to support a planning application for the garden settlement. The Core Strategy Review will be amended to state that the council will work with the airport, local community and other stakeholders to prepare an Action Area Plan for the London Ashford Airport site should development proposals come forward beyond the current permitted expansion.	Amend Policy SS1: District Spatial Strategy and supporting text to state that the council will work with the airport, local community and other stakeholders to prepare an Action Area Plan for the London Ashford Airport site, should proposals come forward for further expansion.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.113	713	1101438	In light of the requirement for all Local Plans to be consistent with national policy, you will have no doubt taken account of key national policies relating to the provision of new school places, but it would be helpful if they were explicitly referenced or signposted within the document. In particular: - The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72). - The ESFA supports the principle of Folkestone & Hythe District Council safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary. - Folkestone & Hythe District Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development '1 (2011) which sets out the Government 's commitment to support the development of state-funded schools and their delivery through the planning system.	The local planning authority is working with both the site promoter and Kent County Council (Education) to define the primary and secondary education requirements necessary to support the scale of growth at the new garden settlement as proposed within the Core Strategy Review. The Infrastructure Delivery Plan will determine the relative timing of new primary and secondary provision as development proceeds. The IDP will also include the phasing of possible off-site school provision, which will include both temporary and permanent school places. Comments in support of the safeguarding of land are noted.	No change proposed.
4.113	721	1101438	The approach to planning for schools should be 'justified' based on proportionate evidence. Please see the ESFA 's comments on evidence base provided in response to the 'Places and Policies' consultation, which complement the comments on the Infrastructure Delivery Plan.	Comments in response to the Places and Policies Local Plan (PPLP) consultation are noted. The Infrastructure Delivery Plan prepared as part of the evidence base to the PPLP has been shared with representatives of the ESFA. A separate infrastructure document has been prepared as part of the evidence base to the Core Strategy Review, and the ESFA has been invited to comment and input to the document.	No change proposed.
<b>Policy SS5</b>	256	1162685	It is difficult to comment on this policy before publication of the Infrastructure Delivery Plan. This should be published as part of this consultation.	The Infrastructure Delivery Plan is regularly updated as schemes are completed and new needs identified. An updated version will be published alongside the Submission Draft (Regulation 19) Core Strategy Review.	No change proposed.
<b>Policy SS5</b>	518	1155269	6. Infrastructure There are real concerns about granting large planning developments when it is known that there are significant issues concerning provision of Health Services and it is felt that the Strategy must make it clearer how these issues are to be addressed so that there is transparency at all levels. Perhaps the Clinical Commissioning Groups or indeed Department of Health should agree and publish their guidance and form part of the Core Strategy concerning pre-application requirements.	The planning policy team has maintained regular dialogue with the South Kent and Coast Clinical Commissioning Group (CCG), as well as Ashford CCG (covering the Sellindge area). The District Council is, therefore, aware that the population growth associated with the plan period needs to be translated into a strategy for health care provision that is flexible to respond to the changing nature of how health care services are being delivered in the short, medium and long term. The South Kent and Coast CCG is to contribute towards defining the strategy for health care provision at the Garden Town	No change proposed.
<b>Policy SS5</b>	398	894636	Without expressing what the infrastructure needs are this policy is currently pointless. What are the District's intentions concerning water supply for an increasing population and commercial activities? ...for distributor roads? ....for schools? ... for community well-being?	The District Council is working on the preparation of an infrastructure plan to sit alongside the Core Strategy Review that will define what items of infrastructure are required according to each phase/sub-phase of development at the Garden Town, and for moderate residual growth at Sellindge.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS5	420	1037073	<p>Policy SS5 needs to be made more robust and better defined. As a policy that is carried forward from the 2013 Core Strategy it 's effectiveness can be historically considered and when it 's history is examined it has proven to be unfit for purpose. It 's main thrust, a notion of ensuring that Infrastructure is provided at the time it is needed ' is exactly what is required and I 'm sure is what the community would expect. On reading the policy it would seem to be clear that Infrastructure such as healthcare, highways or schooling would be definitely be put in place at the time it was required, and that would mean to most in the community, by the time that the development was first occupied. Most would for example consider that GP provision, or a new access road would obviously be needed as soon as development was to be occupied, not many years later, or even never. However the policy has in the past been interpreted by developers and the local authority in a very different way. It appears the wording is in fact very woolly and open to different interpretations, particularly the phrase provided at the time it is needed . Developers and Planners have taken the view that provided at the time it is needed can in fact mean a significant number of houses can be built, sold and occupied before the need ' arises. This is often accompanied by notions that the developer cannot fund infrastructure until significant sales have taken place. This is flawed logic. Apply the same logic to the materials required to build the development, can the bricks to be build the houses not be bought because no sales have taken place? Can the heating systems not be bought because no sales have taken place? Of course these materials are funded in advance of sales as part of the investment of the developer and there is no reason the Infrastructure funding cannot be considered as essential an investment as the materials to build the houses. There</p>	<p>The comments raised against policy SS5 make reference to policy CSD8 (New Romney Broad Location) as an example of a site that is currently under construction. The raised concerns relate to the timing of provision of infrastructure and the perceived wriggle room that is afforded to developers. The respondent cites the need for an alternative funding model to CIL and S106 as both mechanisms are proving ineffective. The legislation does not allow for alternative means of seeking developer contributions. The District Council is working on the preparation of an infrastructure plan to sit alongside the Core Strategy Review that will define what items of infrastructure are required according to each phase/sub-phase of development at the Garden Town, and for moderate residual growth at Sellindge. The timing of when new infrastructure is required is the subject of detailed discussions between a site promoter(s) and the services provider - in the example of healthcare the provider is the Clinical Commissioning Group (CCG). This information is then captured within a S106 legal agreement. Whilst the respondent has requested that all necessary infrastructure is in place ahead of first occupation, it must be recognised that development is required to raise capital receipts to fund necessary infrastructure. When new housing is delivered via the conventional means without significant grant funding it is not plausible for a developer to meet the full costs upfront.</p>	No change proposed.
Policy SS5	688	332260	<p>Policy SS5 advises that developments must reflect the principle that infrastructure should be used more efficiently or demand managed more effectively, before the need to increase capacity or deliver new infrastructure is created . It may be the case that existing infrastructure could be used more efficiently by delivering new infrastructure outside of contributions obtained by either CIL or through Section 106 Obligations. We would comment that the policy may like to reflect, or acknowledge, that developments may have the capacity to bring forward new infrastructure that has the ability to work alongside existing infrastructure and improve its efficiency and/or capacity.</p>	<p>The comments made are noted, and there is scope for certain infrastructure to work alongside existing infrastructure to improve its efficiency and/or capacity. Wastewater is one such example.</p>	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS5	531	1163318	<p>Policy SS5 Infrastructure Planning 4. The principle of securing the timely provision of infrastructure must be right. In regard to Otterpool Park, Canterbury Diocese already has a significant presence in the component parishes with some of the elements set out in the introduction to this submission. The shaping of the emerging communities may well involve some re-shaping of existing structures and re-drawing of boundaries, as well as significant new resources, so the Diocese will need to be fully involved in the formulation of the related plans. 5. The Diocese has a long history of involvement in emerging new communities, including the 5,750 dwelling Chilmington Green settlement at Ashford. Diocesan representatives have played pivotal roles in many aspects of the scheme and not least the formation of the prototype Community Management Organisation. The Ashford Team Ministry has been re-shaped in order to be smart about changing population distribution so that ministerial resources are deployed appropriately. Close working with the Local planning Authority, land owners and developers has secured S106 contributions to the related physical infrastructure that will serve emerging communities. This is an important precedent and a model that can be rolled-out at Otterpool Park in order to foster and enrich vital community formation. It is noted that Otterpool Park will be excluded from the Community Infrastructure Levy requirements in order to maximise S106 funding.</p>	<p>Noted. The Council is aware of the role the Diocese has played at Chilmington Green in the formation of a Community Management Organisation. Discussions are underway on the site promoter side as to how best approach the same kind of important issues at the Garden Town.</p>	

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS5	701	1044196	<p>The District Council 's CIL 123 list identifies the sort of infrastructure types or projects that might be wholly or partially funded by CIL, together with what items might be secured through S106 provisions or S278s, as may be appropriate. Having reviewed the CIL list there is significant potential for duplication. For example, CIL can fund transport, walking and cycling improvements and S106 could also fund off-site transport infrastructure which could include measures under CIL. The Policy wording should therefore be amended to ensure that negotiations in respect of S106 contributions not only take into account viability but infrastructure to be delivered through CIL to ensure S106 contributions meet Reg 122 of The Community Infrastructure Levy Regulations 2010 '. This will ensure that the policy is Consistent with National Policy and therefore Sound . Additionally, CIL funded infrastructure should be clearly identified in the Council 's Infrastructure Delivery Plan (discussed further below) to ensure that planned infrastructure is delivered in a timely fashion (NPPF, para 177) and to ensure when the policy is implemented, that decision takers know how to react (NPPF, para 154). Policy SS5 refers to potential infrastructure requirements of this CS review being identified in the Council 's Infrastructure Delivery Plan. No such document is available with this consultation for comment. The document should be available for review and comment to ensure the CS is Positively Prepared , Consistent with National Policy , Justified and Effective , for the reasons identified above. Furthermore, we note the final paragraph which advises that developments must reflect the principle that infrastructure should be used more efficiently, or demand managed more effectively, before the need to increase capacity or deliver new infrastructure is created. ' Existing infrastructure is generally controlled by the County and District Council and not within</p>	<p>The District Council has prepared a viability study that appraises the cost of infrastructure to come forward in conjunction with growth that is proposed to be allocated within the Core Strategy Review. The study also considers the basis for excluding the Garden Town from Community Infrastructure Levy (CIL) on the basis that required infrastructure shall come forward via S106. The council has involved infrastructure providers at all stages in drafting the Core Strategy Review, including Kent County Council (the education and transport authority and lead local flood authority for the district), Highways England (which oversees the strategic road network), the Environment Agency, water companies, rail operators, the National Grid, NHS Clinical Commissioning Groups and other organisations. Comments from these providers have been taken into account when drafting the plan. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Core Strategy Review; other improvements will be provided through CIL, which is a flat-rate charge payable as part of most new development in the district.</p>	No change proposed.
Policy SS5	711	1101438	<p>The ESFA also broadly supports draft policy SS5 District infrastructure planning, including the requirement for development to "provide, contribute to or otherwise address the district's current and future infrastructure needs" and the use of CIL and developer contributions to secure this. The signposting of the Infrastructure Delivery Plan is useful; this document should be updated to support the next version of the document.</p>	<p>Comments noted. An Infrastructure Delivery Plan forms part of the suite of evidence base documents in support of the Submission Draft (Regulation 19) Core Strategy Review.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.126	156	1029376	The statement appears to imply that the major exercise on infrastructure will be Westenhanger Station which will have a negative impact on Folkestone commuters with respect to journey time. The infrastructure which needs major improvement is the roads system supplying the deprived areas of Folkestone, we should not be spending on residents who have not yet contributed to rates.	The proposed improvements to Westenhanger station are in respect of station facilities and to take advantage of the excellent accessibility it affords via mainline services. It is important to point out that the process to award the next Southeastern franchise (which will operate between 2019 and 2027) is well advanced, and the specification of the next franchise period does not propose the introduction of High Speed services at Westenhanger within the next period. Notwithstanding this, Westenhanger benefits from access to mainline railway services, with a travel time of 56 minutes to London St Pancras via a change at Ashford International. The scale of growth proposed in the Core Strategy Review will require capital investment to fund off-site highway improvements. It will be for the transport modelling appraisal to determine what junctions or sections of the highway network will need to be improved, and at what time. The timing will be based upon the number of built out (and occupied) on the two sites proposed to be allocated within the Core Strategy Review. The transport modelling work and its outputs need to meet with the requirements of the County Council (as local highway authority) and Highways England (as Strategic highway authority). The modelling work will identify if the existing highway infrastructure in parts of Folkestone require upgrading or not. The capital cost of funding infrastructure improvements required to support growth identified within the Core Strategy Review will be generated from capital receipts in the usual fashion. There may be funding opportunities that the site promoters could look to secure to assist in part funding the delivery of necessary infrastructure, but as with any funding pot, such monies are the subject of a competitive bidding process.	No change proposed.
4.128	257	1162685	It is difficult to comment on this policy before publication of the updated Transport Strategy. This should be published as part of this consultation. We have grave reservations about the ability of the roads around the proposed garden settlement to cope with the increased traffic the development will generate. Of particular concern is existing and future heavy goods traffic - how to handle it without destroying the idyllic 'garden town' atmosphere (noise, air quality and visual intrusion). We note that the current proposal from the developer seems to be to re-route the A20 through the proposed town centre, which is extraordinary increased traffic, including heavy traffic, through Sellindge access to the improved Westenhanger station, which can be expected to draw from a larger hinterland, especially if a high-speed service is secured overloading of routes from the garden settlement to Hythe and the Marsh.	The Transport Strategy will be published as part of the consultation into the Regulation 19 version of the Core Strategy Review. The transport modelling undertaken to inform the Transport Assessment that will form part of the planning application suite of documents has taken account of existing vehicle movements across all vehicle types and fully grown up ' the additional traffic that is to be generated by the garden town, to include reassigned movements as a result of (say) improvements to Westenhanger station. It is important to make the distinction that High Speed services have not been secured to call at Westenhanger station. The transport modelling, which will be undertaken in accordance with the national methodology, will predict the distribution of traffic volumes generated by movements to/from the Garden Town and their interaction across the local road network will appropriately covered in the Transport Assessment. If the modelled performance of a junction or road link is shown to exceed an acceptable limit (capacity) as a result of traffic movements generated by the new garden settlement then appropriate highway mitigation will need to be agreed between the site promoter and Kent County Council (as local highway authority) and Highways England (as strategic highway authority) respectively.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.128	568	588509	<p>Consistent with National Policy 18. The Council 's failure to take forward a policy acknowledging and supporting LAA in the Places and Policies Local Plan and/or the CSLPR is a failure to meet the Council 's ambitions as set out in the Shepway Economic Development Strategy (2015-2020). 19. The Shepway Economic Development Strategy states: Lydd Airport is set to bring major economic development opportunities in the future, following Shepway District Council 's granting of planning permission for a new terminal building and for the extension of the runway. This could act as the catalyst for attracting new support and other service based businesses to this area. 20. The CSLPR has failed to acknowledge or pursue the ambition of LAA, in terms of its undoubted ability to act as the catalyst for attracting business and economic development to the area. 21. Paragraph 9 of the NPPF states that pursuing sustainable development means making it easier for jobs to be created and improving conditions where people live, work, travel and take leisure. Paragraph 18 and 19 of the NPPF further state that the Government is committed to securing economic growth in order to create jobs and prosperity and is doing everything to support sustainable economic growth. 22. Omitting a policy addressing the future of LAA, which will include the delivery of jobs and travel opportunities, means the CSLPR is contrary to national policy and is unsound. As noted in paragraph 14 above, stating that the Council will monitor the economic situation before considering addressing the socio-economic challenges faced by Romney Marsh in a future Core Strategy review is not encouraging economic development. Conversely, it is potentially acting as an impediment to sustainable growth. 23. We consider that there should be a specific policy addressing LAA, highlighting its importance for the District and supporting its continued</p>	<p>In the absence of clear development intentions for the future of the site, the council does not consider that a specific policy for LAA would be justified However the council will work with LAA, the local community and other stakeholders to prepare an Action Area Plan for the site, should specific development proposals come forward</p>	<p>Amend Policy SS1: District Spatial Strategy and supporting text to state that the council will work with the airport, local community and other stakeholders to prepare an Action Area Plan for the London Ashford Airport site, should proposals come forward for further expansion.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.128	573	588509	<p>25. The following section sets out our proposed amendments to the CSLPR to ensure the plan is sound. This includes justification on why a policy on the LAA and/or Romney Marsh (including support for LAA) is necessary to make the Plan sound and provided a draft working for the policy. Core Strategy Local Plan Review New Policy for LAA 26. The CSLPR 's Strategic Need A states that the Council will build on economic strengths by supporting key sectors and businesses by promoting further investment and maximising opportunities for growth (our emphasis). 27. The CSLPR states that the District has excellent infrastructure and connections, including by air, with specific reference to LAA. It states that the District is, therefore, well placed to capitalise on this outstanding infrastructure by providing opportunities for business growth and inward investment to the area. 28. Paragraph 1.45 of the CSLPR states that LAA is well established and has attracted significant investment proposals. Table 1.3 sets out the strengths and weaknesses of the Romney Marsh area. One of the weaknesses identified is the limited large-scale employment opportunities. LAA provides stable employment in the area. In order to maximise LAA 's opportunities for growth, the CSLPR must acknowledge LAA 's potential to expand beyond its current planning consents, if the environmental impacts are acceptable. 29. To ensure that the weakness outlined in Table 1.3 are mitigated, LAA should be acknowledged as an opportunity location. LAA 's current positive role as a significant employer in Romney Marsh should be identified as a strength. A specific policy for LAA to recognise its importance and support the principle of further improvements, expansion and investment, subject to environmental considerations, should be included. 30. The CSLPR fails to acknowledge and reasonably balance the long-term economic aspirations of LAA, which will benefit</p>	<p>Given the prominence of designated habitats of environmental importance the wording of paragraph 4.128 is to remain unchanged. Paragraph 177 of the National Planning Policy Framework (2018) is also of relevance, and states: " The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined." Appropriate assessment can apply to any airport-related plan or project: projects like proposals for an extended runway or new terminal, airport master plans, local authority Development Plan Documents. Appropriate assessment will only affect a project or plan if the project/plan will have a significant impact on the ' site integrity ' of a European site: the reason why the site was designated. It is the duty of the airport operator (for projects and airport masterplans) to carry out the appropriate assessment.</p>	No change proposed.
4.129	277	1163046	<p>You talk about encouraging people not to travel by car so why are the current pathway improvements in Selling not including the addition of cycle paths? If you truly had a vision for the future that incorporated sustainable living etc this would have been thought about and included in the current A20 improvements. After all, this will be the main road from the proposed (but not wanted) Otterpool development.</p>	<p>To clarify, the A20 improvement scheme at Sellindge, which is under construction at the time of writing (September 2018), will include a 3 metre wide footway/cycleway for the entirety of the scheme length. The scheme drawings can be readily accessed via the online planning application page.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.129	353	1163103	<p>We have felt for many years that the existing one way system around Folkestone is not very good .. However due to the windy old roads we do have it is difficult to develop a clearly better scheme . Nevertheless some group needs to be set up with planners and others to address any possible improvements . The obvious trigger for this is the seafront development and the obsolescence of the Network Rail Harbour Branch. Councils or developers need to buy up the railway areas, which are of little value Shepway needs to consider how the long thin railway areas in the vicinity of Tram Road and elsewhere can be incorporated for road-widening and car parking . The seafront scheme could thereby be served properly and certain historically isolated areas such as East Cliff , cut off by railway lines can be given better access. .</p> <p>Folkestone is not sympathetic to the railway preservationists, good-hearted though they are . The future of railway history lies in sympathetic improvements to the Harbour Station and not to a preservation railway ending in Highfield Industrial Estate. The railway itself is better pulled up and converted to roads or an attractive walk and cycle way into the harbour . The Council is urged not to delay for the preservationists . The preservationist should shift their energies to the Leas Lift . This is a Grade II* listed building that is in great danger , but which also is necessary to the seafront development . It therefore would repay effort by the council and volunteers. Member Terry Begent , who ran the Lift successfully for some years , feels that there is a potentially insoluble problem . EU legislation will make it impossible to renovate in line with Health and Safety and Light Railway regulations without destroying the listed features. The District should be as helpful; as it can be in helping solve the</p>	<p>The refurbishment of the Leas Lift forms part of the proposals put forward for the Folkestone Seafront scheme. Whilst the Seafront scheme has been an allocated site since the adoption of the Core Strategy in 2013 it is unfortunate that development has not commenced at the time of writing. However, certain preparatory works have been carried out, for example sea defence works. There is an associated level of confidence that the site will come forward for delivery in the short/medium term. The land that formed part of the former railway is privately owned, and so there is no ability for it to be turned over for alternative use for car parking. There have already been alterations made to the road network within Folkestone to access the harbour area. Tontine Street has been made two-way for buses, and The Tram Road has been made two-way for all traffic. Additional alternations might be considered in the future, though there are no firm proposals in the pipeline and the transport strategy work found that addressing the historic one-way network is not a principal priority to improve the highway network and its operation.</p>	No change proposed.
4.135	720	1101438	<p>In light of the proposal for a new Garden Town at Otterpool Park including multiple primary schools and at least one secondary school, emerging ESFA proposals for forward funding schools as part of large residential developments may be relevant, for example if viability becomes an issue. The ESFA aims to be able to clarify forward funding options for schools in 2018. We would be happy to meet to discuss this opportunity further once the options have been finalised and if/when relevant. Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed.</p>	<p>The opportunity to engage with the ESFA with regards to possible forward funding opportunities is welcomed. The funding arrangements are not specifically required for inclusion with the Core Strategy Review, but can be captured within the Infrastructure Delivery Plan as an evidence base report. The site promoter would no doubt be keen to explore such discussions with the ESFA at an appropriate point in time.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.136	258	1162685	There appear to be no positive proposals to increase the number of higher and adult education facilities. Surely this would complement the proposed types of business the council is hoping to attract.	<p>Comment noted. As tertiary education is an optional stage of learning beyond the completion of formal secondary education, coupled with the fact there are no facilities proximate to the Garden Town means there is no obvious generator of demand local to the site. The council works with further education providers, including Folkestone College, to improve the vocational education on offer in the district. There may be some potential in the future to go beyond this given changing government policy, such as apprenticeships which now extend into degree level qualifications. Regarding higher education, there has been a trend towards consolidation around the main campus. Informal approaches have been made to a few universities to assess whether this situation might be changing but it does not appear to be so which makes a satellite campus difficult to deliver. Canterbury Christ Church University, for example, has acquired the former Canterbury prison to develop as future premises, rather than looking further afield. Nevertheless, Canterbury Christ Church University retains some presence within the Creative Quarter along with the University for the Creative Arts which operates a unit as part of undergraduate and postgraduate courses. Some modest expansion of this presence is expected through another University soon. Whilst a more incremental approach, it supports the need to acknowledge the tertiary education sector in the Local Plan</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.136	354	1163103	<p>Go</p> <p>Folkestone discussed the demise of the University College of Folkestone which some members were involved in . Certain well-informed members felt that it would be difficult to revive in a similar form as much grant money was lost . However Section 2.35 of the report confirms that Folkestone and Shepway have a lower proportion of degree equivalent holders than the UK average., and probably far lower than the South East . Folkestone is both by the sea and convenient for London which should draw students . The demise of the University College of Folkestone after 5 years ( 2007-2012?) is regretted and was apparently linked to financial stringencies applied across the board to Canterbury Christ Church and Greenwich ,the backers , and a last-in, first chopped approach .</p> <p>It is time to consider again a greater tertiary offer in Folkestone by looking at local demands ( Construction? Tourism and Insurance per Saga? Archaeology? Maths? ) and potential campuses . It should be a target to look at combining the Kent College site with some spacious and landed new tertiary college building in Otterpool near Westernhanger Station .If a university college is too high a target then private colleges should be encouraged . Earlscliffe has been a success as a private 6th form college . Many similar towns draw in organisations such as osteopathic colleges ( Boxley near Maidstone) , religious bodies (East Grinstead) and ophthalmic colleges ( ABDO in Godmersham near Ashford) . One member , Brian Mc Bride said that the Royal College of Needlework had been looking for expansion premises from Hampton Court .The South East has many such specialisms</p>	Comment noted. As tertiary education is an optional stage of learning beyond the completion of formal secondary education, coupled with the fact there are no facilities proximate to the Garden Town means there is no obvious generator of demand local to the site.	No change proposed.
4.136	710	1101438	The ESFA welcomes references within the plan to improving educational attainment and to the need for development to facilitate investment in and improvements to the local education system.	Comments are welcomed.	No change proposed.
<b>4.6 STRATEGIC ALLOCATIONS</b>					



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.141	287	1163046	<p>The site proposed at Otterpool for the 12000 home development is not the right location. It will destroy local rural communities and continue the trend of 'joining' Folkestone and Ashford. The site is actually much closer to the new developments (Finbury, Waterbrook park) in Ashford than it is to Folkestone. We need a green barrier between the developments of Folkestone and Ashford to ensure the protection of the natural environment, the protection of the rural communities and the preservation of fertile farmland. The proposed site for Otterpool infringes on all of these things. The infrastructure for a development of this size is not present and to put it in place would completely destroy the nature of the local landscape. I wonder why the local villages have not received the detailed plans and brochures that residents of Folkestone Town have? I live in Smeeth and have received NO INFORMATION by post about the Otterpool development or the local plan, yet this proposed site will affect me far more than those that live in Folkestone. I believe that this is purposeful and that the consultation process should begin again ensuring that all of the villages around the site receive the same information as Folkestone Town residents, only then can this process be considered fair and democratic. I understand that the council has been told that if Otterpool were to go ahead then it would fulfill all of its housing needs for the local plan period and would therefore not need any of the other housing developments that it is pursuing. A single site for 12000 homes is not the answer to the districts housing problems. The level of development in the rural area between Folkestone and Ashford is catastrophic to the area, it will not deliver the job opportunities that it purports to, it is pie in the sky to think that this will create new jobs for 12000- 24000 people without the systematic destruction of everything that makes this area a unique</p>	<p>The concerns are noted but the District Council has to plan for future homes to meet the local need of the district, ensuring that there is a sufficient amount and variety of land that can come forward until 2037 and beyond. The government has introduced a new national methodology to set out how many homes local planning authorities should plan for. The national methodology indicates that the council should provide for an average of 676 new homes a year. The district Council seeks to provide for this through the smaller sites allocated in the emerging Places and Policies Local Plan as well as the larger strategic sites, including the Garden Settlement. The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link). The Council has been working closely with Ashford Borough Council and have engaged with the various Parish Councils which adjoin the Folkestone &amp; Hythe District boundary.</p>	<p>No change proposed.</p>
4.141	404	894636	<p>The proposal to build at Otterpool is flawed in terms of degree and extent, however seductive the plans seem to be. There is an accepted need for new housing provision but it is not proven that it needs to be at Otterpool. The proposal is more something of a convenience than the result of cohesive or robust planning. The reports and 'supporting' documentations endorse a politically led notion, not something that has evolved through a proper process. They are to all extents forms of self-fulfilling prophecy. There is scope for development around Westenhanger Station and an argument could be made to consider redevelopment here as a mechanism going some way to repairing the slaughter of the Stanford community brought about by the construction of the M20. The proposals do not adequately take account of context within the district, and do not show any context within the region.</p>	<p>Throughout the preparation of the Core Strategy Review, the Council has been meeting and working with its East Kent neighbouring authorities under the duty to cooperate. A Duty to Cooperate statement will be prepared and published as part of the Regulation 19 consultation. Moreover, the Council is required to prepare Statements of Common Ground to help manage strategic planning matters across local authority areas and strengthen the Duty to Cooperate</p>	<p>A Duty to Cooperate Statement will be prepared and published as part of the Regulation 19 consultation on the Core Strategy Review.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Table 4.5	557	1164105	<p>The SHMA calculation of need for the district at 633 dwellings per annum is likely to significantly increase and whilst the SHMA takes account of Dover's needs, it should also take account of the needs of other neighbouring authorities, particularly Ashford. The effect of the proposed garden town on the spatial strategies of Dover and Ashford therefore need to be more carefully examined as a whole. A major issue for Shepway is meeting its housing needs in the short term. The local plan review should be focusing on this, but through its focus on the 'garden town' in our view represents a long term strategy only. The emerging plan's need for greater focus on short term delivery for the district is again highlighted and should be addressed at the next stage of the review and draft Policy SS1-3 reshaped. Given the emphasis on delivery and highlighted question marks about when the proposed garden town will be able to actually translate to completions, it is essential when properly considering spatial options that the housing trajectory profile is evaluated. It is suggested in the Plan at paragraph 4.44 that this will take place later as part of a review process, Hume Planning considers it is crucial to understand the short term supply side before important district wide spatial choices can be properly evaluated and the evidence base to the plan should be frontloaded. As set out above 12% of the to be 'planned growth (which itself is likely to increase for the reasons identified above) will be at the new garden town and Sellinge. This represents an excessive spatial focus with further uncertainty about the translation to completions for many years, given the scale of upfront infrastructure required. The inference that the Housing Infrastructure Fund will be necessary to deliver infrastructure (Page 92) reinforces concerns about deliverability although the policies relating to wider place making and energy are accepted. I would request that these</p>	<p>The council's SHMA analyses a range of different indicators in coming to conclusions on the most appropriate housing market area, including migration, commuting patterns (including the Office for National Statistics' Travel to Work Areas), house prices and other contextual evidence. It also looks at evidence from neighbouring authorities. Ashford Borough Council's own work (Ashford Borough Council SHMA addendum, 2014) does not suggest that Ashford's housing market area extends into either Folkestone &amp; Hythe or Dover. The government has introduced a new national methodology to set out how many new homes local authorities should plan for. The national methodology indicates that the council should provide an average of 676 new homes a year. The district Council seeks to provide for this through the smaller sites allocated in the emerging Places and Policies Local Plan as well as the larger strategic sites, including the Garden Settlement.</p>	No change proposed.
4.147	22	1161386	<p>The current draft plan has the houses in Barrow Hill, Sellindge being swallowed up on either side of the road by this proposed housing development. The development leaves little division between the current Sellindge village Barrow Hill residents and this new town. It has an overbearing impact on these 70 homes and will remove our village independent community. By increasing the distance between the residents of Barrow Hill and the new development, having woodland or community green space would keep a clear boundary between the current village community and the new proposed town. The Core strategy plan must ensure that substantial G1 buffers are put in and kept to ensure existing communities do not lose their identity and have an overbearing impact on them. No reduction in any G1 buffers should be allowed just to increase housing density, this would make a mockery of Garden town status.</p>	<p>Comment noted. The detail of the proposed garden settlement is to be set out by the detailed Masterplan - this is a separate process from the Core Strategy Review. However, provision is made in draft Policy SS7 Place Shaping Principles, Criteria b) that woodland planting and habitat creation, shall also be designed to prevent the coalescence of the new settlement with Lympne and to separate neighbourhoods within the settlement itself.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.149	407	894636	This is a reiteration of the Strategic Corridor approach that was so soundly debunked by the Inspector at the end of the last Core Strategy process.	The garden settlement proposal is supported by a comprehensive assessment of capacity within the District as detailed in the Growth Options Study 2017 and High Level landscape Appraisal. The Council is required to meet new development targets resulting from an updated National Planning Policy Framework (NPPF). The Inspector will have to consider the current proposals within a different planning context compared to that which was in place at the time when the proposals were previously considered as part of the preparation of the existing 2013 Core Strategy process.	No change proposed.
4.151	386	1163118	The report states that 'Certain statements made in the Report that are not historical facts may constitute estimates, projections or other forward-looking statements and even though they are based on reasonable assumptions as of the date of the Report, such forward-looking statements by their nature involve risks and uncertainties that could cause actual results to differ materially from the results predicted' We are therefore reliant on an Shepway District Council specification for this report, of which we have not been informed and is now likely of out of date. In particular the report is based around Areas of Outstanding Natural Beauty (ANOB), i.e. 'The setting of an AONB is not formally defined, either in Government policy or by AONB Management Plans. Rather, the extent to which the AONB setting is relevant for planning purposes depends on the development proposed'. Essentially a report has been conducted with a number of assumptions in place, none of which can be challenged until detailed plans are available. By which time the process has overtaken opinion.	Every local authority producing a local plan uses projections and other forward-looking estimates (such as population, household projections and economic forecasts) in arriving at their assumptions about growth and how it should be accommodated. This is a part of looking forward and planning to meet anticipated needs. These needs may change as events (economic growth, technological change or government decisions) do not unfold as anticipated over the twenty or so years of the plan period. This is why the government requires authorities to review their plans regularly. National guidance states: Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes to national policy (NPPF 33). The boundary of the AONB is set out on definitive maps. However, the setting of the AONB includes a wider area than the formally defined boundary. The setting is influenced by the relevant topography of the area and the scale and nature of the development proposed (for example whether it is a house extension or major infrastructure development). Our planning policies (for example Core Strategy Review Policy CSD4) require developments to take account of both the formally designated area and the wider setting.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.152	21	1161386	<p>The current development of houses round Barrow Hill Sellindge and Otterpool lane, are out on a limb which will cause commuter traffic heading West bound to Ashford and London to drive through the village of Sellindge and not use junction 11 of the M20. Once the new Junction 10A is completed, no traffic will double back along the A20 towards junction 11 to access the West bound motorway. This would then impede the accessibility of Sellindge village to the rest of the local district as being a community hub for its facilities. The Core strategy aims for Sellindge to become a Village community hub, which in its self will bring significant extra traffic. This will fail under the current strategy, as the A20 through the village of Sellindge is becoming a bottle neck. The traffic calming measures will may slow the traffic down, but the volume of traffic is the main issue, with future growth being unsustainable. Considerable housing construction in Sellindge is currently in progress and further is imminently planned, increasing the housing stoke by almost 500 new properties, with several new junctions from these developments onto the A20 through the village, which creates bottle necks, with traffic turning into and out of these junctions. There are regular M20 incidents between junction 10 and Junction 11, with all motorway traffic having to drive through the village. It is not uncommon for traffic congestion &amp; jams going back all the way to Ashford. When Op Stack was on for 34 days, 80% of GP appointments were not kept on time as patients could not access the village. The last two weeks, at night the M20 has been closed for essential maintenance, requiring all motorway traffic to drive via the A20 through the village. Today the traffic tailbacks were three miles long and the police had to attend (Police report:24/0003).</p>	<p>Comment noted. A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired, the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route. The site promoters have instructed a Transport Consultant to undertake extensive traffic surveys to understand existing traffic movements on the local highway network within and external to the Otterpool Park to define traffic patterns. This is termed the 'baseline' assessment, and the methodology was formally agreed with representatives of both Kent County Council (as local highway authority) and Highways England (as Strategic Highway Authority). Traffic movements generated by resident occupiers and users (e.g. people employed within the site) of Otterpool Park are the subject of transport modelling, and this process shall identify whether any junctions or links on the highway network would be under unacceptable pressure in future. If it is determined that any junction(s) or link(s) will be subject to capacity issues at any point associated with the build-out and occupation</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.153	24	1161386	<p>During consultation with Otterpool Park stakeholders, it appears it is planned to remove the public foot path either side of the A20 Grove Bridge, to allow the remove the traffic lights and make this a two e=way road traffic through road, leaving pedestrians with out a safe foot path from Barrow Hill to the rest of the amenities in Sellindge Village. The A20 at Barrow Hill, Sellindge is down to one-way traffic lights at the railway bridges (Grove bridge) and Motorway bridges. At peak times, the traffic extends East haft way up Barrow hill and also West to Swan. This is just with the current traffic usage. It will not be able to deal with the extra traffic if the current development plan in put into place. When the M20 motorway is closed due to a traffic incident or Op stack, the traffic through Sellindge extends all the way to Ashford. The extra traffic due to this proposed New Town will make this a daily event and traffic congestion all the time through Sellindge. This could be resolved if a through road from the A20, Next to Otterpool lane is put into place to access the new housing development West of Otterpool Lane and West of Barrow Hill. This could then come out onto Harrindge Lane and then back onto the A20. It would move traffic away from the single lane traffic lights on the A20 Barrow Hill, away from the Sellindge school, shops and community areas. This would not have a significant cost to the development, as a road needs to be built in this area to access the new proposed housing.</p>	<p>Options are currently being considered in regards to the footpaths on either side of the A20 Grove Bridge; these include leaving the existing traffic lights and footpath in situ or widening the road to be two-way and re-routing the footpath elsewhere. A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired, the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route.</p>	No change proposed.
4.153	68	1032113	<p>The Kent Downs AONB Unit does not agree with some of the conclusions of the Growth Options Reports, in particular the assessed level of impact on area B and the assertion that the North Downs area has capacity to accommodate the scale of growth proposed, without significantly impacting on the setting of the Kent Downs AONB. In particular, we strongly question the justification for acceptability of the triangle area to the east of Westernhanger on the basis of potential improvement to Junction 11 of the M20 and the justification for proposed high density development on the land between Stone Street and the A20 to the east of Westernhanger on the basis that the effects would be localised.</p>	<p>Comment noted. The High Level Options work by AECOM identified an area around the M20 corridor, Lympne and Sellindge that is considered to have potential for strategic development. The High Level Landscape Appraisal (2016) had previously assessed the LCA 's in these areas as being in the low to medium sensitivity category. The Options Study notes that the greatest environmental constraint of the area identified is the proximity to the AONB; although national policy is clear that the proximity of the AONB, though certainly a constraint, does not rule out a more detailed investigation of the extensive land free from designations and direct constraints in this area. A more detailed review of the area concluded that large sections of land are suitable for development subject to suitable mitigation.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.153	90	1162466	This is open farm land. It is not 'suitable for residential development' ; it currently provides an open aspect and rural character to this area. This development will change that for ever, creating an urban environment. Once built upon it is lost for ever. I also question why this proposal considers the site to be suitable for residential development now, when it did not do so previously?	The concerns are noted but the District Council has to plan for future homes to meet the local need of the district, ensuring that there is a sufficient amount and variety of land that can come forward until 2037 and beyond. The government has introduced a new national methodology to set out how many homes local authorities should plan for. The national methodology indicates that the council should provide an average of 676 new homes a year. The district Council seeks to provide for this through the smaller sites allocated in the emerging Places and Policies Local Plan as well as the larger strategic sites, including the Garden Settlement. The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link).	No change proposed.
4.154	388	1163118	Although this Phase Two report notes the available land, it does not detail the supporting infrastructure to be improved, in particular road networks are commonly highlighted for each proposed development as poor for connection to the strategic road network.	The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link). An Infrastructure Delivery Plan (IDP) has been prepared as part of the CSR evidence base; and is published for the Regulation 19 consultation. The IDP lists the infrastructure needed to cope with the proposed scale of growth, which of those are a priority; and how it is to be funded (or part-funded) through the Community Infrastructure Levy (CIL) and s.106 planning obligations. The IDP will evolve over time to reflect changing circumstances as schemes are completed and new needs are identified.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.154	581	1162196	There is logic in concentrating development but the scale of development is unsustainable given the constraints faced by the district and the in-combination impact of the rapidly growing neighbouring Ashford.	The government has introduced a new national methodology to set out how many homes local authorities should plan for. The national methodology indicates that the council should provide an average of 676 new homes a year. The district Council seeks to provide for this through the smaller sites allocated in the emerging Places and Policies Local Plan as well as the larger strategic sites, including the Garden Settlement. The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link).	No change proposed.
4.155	392	1163118	No detail given as to what constitutes a 'critical mass' in respect to the surrounding areas. More clarification required.	There are many different scales of settlement. These requires varying types and quanta of infrastructure to ensure the sustainability of strategic-scale development. Table 7 of the Phase 2 Growth Options Study assesses the supporting infrastructure requirements for a new settlement of 10,000 dwellings in England.	No change proposed.
4.156	313	1036994	The Garden Town project criteria is supposed to be locally led. Less than 2% of local residents support the development.	Comment noted.	No change proposed.
4.157	330	1157838	I am concerned about the following statement: "Community involvement and participation in the planning of Otterpool Park has been encouraged from the outset." From what I have heard, this is far from the truth. The community feel they are being excluded from decisions. There should be far more community involvement if you are going to tout it as community-led. It is a shame the amount of self-build units is so low. At a presentation recently, we were told that major builders such as Taylor Wimpey will probably have to be involved, which is something the community certainly don't want. A community-led development should use local building companies.	The Council has undertaken consultation with local people, groups and organisations a number of times during the preparation of the Otterpool Park Masterplan and is carrying out separate consultations as part of this Core Strategy Review. The Council has been working closely with Ashford Borough Council and have engaged with the various Parish Councils which adjoin the Folkestone & Hythe District boundary. Given the scale of housing and infrastructure required to deliver the proposals, it is likely that national firms will need to be engaged as part of the implementation. However, there will be opportunities for local building firms with the potential for sub-contracting and the delivery of a significant number of self-build homes. In addition the Places and Policies Local Plan allocates a number of small- and medium-sized sites that will provide employment opportunities for a range of local enterprises throughout the district.	No change proposed.
4.157	175	1160254	To state that community and involvement and participation in the planning of Otterpool Park has been encouraged from the outset is disingenuous.	Comment noted. The council has undertaken consultation with local people, groups and organisations a number of times during the preparation of the Otterpool Park Masterplan and is carrying out separate consultations as part of this Core Strategy Review.	No change proposed.
4.157	409	894636	The expression of community 'involvement' and implied 'support' is completely unrecognisable. From the outset the proposals were given out as going to happen, like it or not, lump it or leave it. Stakeholder consultation did not include the local residents, and at no stage has the proposal been explored for consequential effects on the disadvantaged areas within the district. The perceived likelihood is that a new development along those lines would suck in all of the investment and services, to the detriment of elsewhere.	Comment noted. The Council has undertaken consultation with local people, groups and organisations a number of times during the preparation of the Otterpool Park Masterplan and is carrying out separate consultations as part of this Core Strategy Review. The Council has been working closely with Ashford Borough Council and has engaged with the various Parish Councils which adjoin the Folkestone & Hythe District boundary.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.157	390	1163118	I fully disagree that "Community involvement and participation in the planning of Otterpool Park has been encouraged from the outset." As a resident of Sellindge I have seen very little involvement, more of a dictat from offices located in Folkestone. This development is not supported locally and the residents are remote from any meaningful input.	Comment noted. The Council has undertaken consultation with local people, groups and organisations a number of times during the preparation of the Otterpool Park Masterplan and is carrying out separate consultations as part of this Core Strategy Review. The Council has been working closely with Ashford Borough Council and have engaged with the various Parish Councils which adjoin the Folkestone & Hythe District boundary.	No change proposed.
4.157	653	1042306	There have been detailed discussions between Historic England and the Council and the promoters of the proposed Otterpool Park garden town and these are ongoing. Historic England is not opposed to the principle of development of a new settlement in this location but has highlighted the significant and extensive nationally and locally significant heritage resources in and around the site. We would need to be fully convinced that these heritage assets are protected, integrated with and enhanced where possible as part of the planning and development of the site. We will continue discussions with the council and the promoter on the basis of the material provided separately by them but with consideration of the comments below on the text of the draft Plan on the matter. Charter for Otterpool Park - the green box is a quote from the promotion document but the reference to a garden town with its very own heritage needs to build on the existing history of the place and not be solely about creating a place which may in time be valued in its own right, as early 20th Century garden cities now are.	Comment noted. The Council will continue discussions with Historic England as the Core Strategy Review and garden settlement proposals progress. The text included in the green Charter for Otterpool Park ' box is lifted straight from the forward of the Otterpool Charter document. The document, which sets out the principles to guide development at the new garden settlement, was consulted on with stakeholders, including Historic England, and amended, including with amendments in response to Historic England's comments, prior to being endorsed by Cabinet in 2017. Whilst changes cannot be made to the wording in the forward, the detail of the Otterpool Park Charter does acknowledge the contribution that the existing historic environment will have in creating a distinctive town and landscape for the proposed garden settlement.	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.159	20	1161386	A20 road through Sellindge is not able to take the increase traffic from this development and the current and future traffic pressures from M20 motorway incidents being diverted through the village. A bypass from the A20 leading to the New housing West of Otterpool lane, linking and Expanding Harringe Lane, coming out West of Sellindge Church on the A20, will improve access to the New town and allow Sellindge to become a Village hub for the expanding community district. The current development of houses round Barrow Hill Sellindge and Otterpool lane, are out on a limb which will cause commuter traffic heading West bound to Ashford and London to drive through the village of Sellindge and not use junction 11 of the M20. Once the new Junction 10A is completed, no traffic will double back along the A20 towards junction 11 to access the West bound motorway. This would then impede the accessibility of Sellindge village to the rest of the local district as being a community hub for its facilities. The Core strategy aims for Sellindge to become a Village community hub, which in its self will bring significant extra traffic. This will fail under the current strategy, as the A20 through the village of Sellindge is becoming a bottle neck. The traffic calming measures will may slow the traffic down, but the volume of traffic is the main issue, with future growth being unsustainable. Considerable housing construction in Sellindge is currently in progress and further is imminently planned, increasing the housing stock by almost 500 new properties, with several new junctions from these developments onto the A20 through the village, which creates bottle necks, with traffic turning into and out of these junctions. There are regular M20 incidents between junction 10 and Junction 11, with all motorway traffic having to drive through the village. It is not uncommon for traffic congestion & jams going back all the way to Ashford. When Op	Comment noted. A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired, the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route. The site promoters have instructed a Transport Consultant to undertake extensive traffic surveys to understand existing traffic movements on the local highway network within and external to the Otterpool Park to define traffic patterns. This is termed the 'baseline' assessment, and the methodology was formally agreed with representatives of both Kent County Council (as local highway authority) and Highways England (as Strategic Highway Authority). Traffic movements generated by resident occupiers and users (e.g. people employed within the site) of Otterpool Park are the subject of transport modelling, and this process shall identify whether any junctions or links on the highway network would be under unacceptable pressure in future. If it is determined that any junction(s) or link(s) will be subject to capacity issues at any point associated with the build-out and occupation	No change proposed.
4.159	292	1157838	I am concerned to see that the area on the map includes some of the Port Lympne property North of the road, including their car park. I sincerely hope that this is not to be consumed by the development, as people need somewhere to park. The land adjacent to the car park made an excellent location for music festivals, and it is a shame that the zoo stopped hiring it out. I object to the use of blue shading on diagrams. It looks like water and gives the impression that you are flooding the area!	The land north of Aldington Road (incorporating Port Lympne car park) has been submitted by the landowner for inclusion in the Council's Strategic Housing Land Availability Assessment (SHLAA).	The use of the colour blue to represent the areas of development will be changed to brown to avoid the impression of water.
4.159	260	1162685	Figure 4.5 contains errors and is at odds with the current draft masterplan for Otterpool Park	Figure 4.5 illustrates the indicative strategy for the garden settlement as part of the Core Strategy Review. The Masterplan is a detailed response to the emerging policy prepared by the promoters of the scheme.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.159	655	1042306	<p>Fig 4.5 identifies Heritage Assets by grey triangles and those indicated are all listed buildings. This is misleading as listed buildings are not the only type of designated heritage asset present in the study area, and the triangles sometimes indicate groups of listed buildings not individual assets. One listed building, the grade II listed Royal Oak public House is missing. Westenhanger castle is also a scheduled monument. The grade II registered Sandling Park adjoins the project area but is not identified as a heritage asset (it is indicated correctly as being part of the Kent Downs AONB). Listed buildings at Port Lympne outside the project are indicated but not the grade II* registered landscape, which is also shown as being in the AONB. Designated Heritage Asses are not the full picture. The project has carried out extensive geophysical surveys backed by field evaluation through trenching. It has also considered unlisted buildings which may be candidates for listing but to date no screening or accelerated Listing requests have been made. There are archaeological remains that we would identify as being of equivalent significance to a scheduled monument and these should be identified as heritage assets on Fig 4.5. These include prehistoric barrows in groups some of which survive as very low mounds, i.e. are not wholly ploughed flat. This is unusual in Kent and such mounds are candidate scheduled monuments as they might be concentrations of prehistoric activity. Very recently a probable Roman villa has also been identified. These heritage assets are likely to have consequences for the eventual master plan and should, we suggest, be included in the Indicative Strategy that underpins this.</p>	<p>Comments noted. The Indicative Map (Figure 4.5) will be updated to reflect the majority of comments made by Historic England in regards to the identification and reference of heritage assets. All listed buildings and landscapes will be shown on the map. However, whilst the importance of all heritage assets is recognised, officers do not consider it appropriate to or possible to show everything such as archaeological remains, prehistoric barrows etc on the indicative masterplan. All heritage assets will need to be identified and considered as part of any future planning application and detailed masterplanning exercise. This requirement is set out in draft Policy SS7 (5).</p>	<p>The Indicative Map (Figure 4.5) will be amended to show: Each designated heritage asset will be symbolised by a 'grey triangle', those that are currently missing (i.e. Royal Oak Public House) will be included. Grade II* registered Port Lympne Park and Gardens; and the Grade II registered Sandling Park which adjoin the project area will be shown</p>
4.159	654	1042306	<p>Figure 4.5 is indicative only but there is a key issue that requires changes to it. We have helped the project proposers to understand the historic extent of the deer park to Westenhanger castle and its historic route of approach from the south via a once tree-lined drive that began at the park pale on what is now the A20 road. As currently drawn the indicative plan shows strategic open space around the castle but the depiction of this is too small and shows mixed use neighbourhoods south of the castle including as a continuous area between it and the A20. It is in our view essential that the southern entrance to the castle is reinstated and that a sufficiently large uninterrupted area of undeveloped land is retained between the A20 and the castle, so that an appreciation of the size and character of the deer park is possible. We are at present in discussion with the heritage adviser and seeking a meeting with the master planners as to what this might mean in practice but it is a key request by us. If developed as per Fig 4.5 and policy SS6 new development would press in on all sides to the castle in an unacceptable way. Unless and until we can be satisfied on this point in our ongoing discussions we must raise an objection to the draft plan at this stage.</p>	<p>Comments noted. The Indicative Map (Figure 4.5) will be updated to reflect conversations with Historic England that reinstate the southern entrance to the castle with an uninterrupted area of undeveloped land between the A20 and the castle, so that an appreciation of the size and character of the original deer park is possible.</p>	<p>The Indicative Map (Figure 4.5) will be amended to show: The reinstatement of the southern entrance to Westenhanger Castle with an uninterrupted area of undeveloped land between the A20 and the castle.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.159	736	1164722	There is currently an aspiration to deliver a town centre in the north east of the Otterpool Park site however to allow for flexibility as the detailed proposals emerge, it is considered that the indicative strategy diagram in Figure 4.5 should not so clearly define the location of the town centre. It is considered that a shaded area showing the general indicative location would be more appropriate.	The Indicative Strategy (Figure 4.5) presents an aspiration to deliver a new town centre in the north-eastern corner of the proposed development. It is considered that the shaded areas as currently drawn for the locations of the town centre, as well as the employment and transport hubs are not prescriptive but rather seek to provide a 'feel' of how the Town could develop given the spatial and physical components.	The Indicative Map (Figure 4.5) will be amended to: blur the edges of the shaded areas defining the town centre as well as the employment and transport hubs to further emphasise that these boundaries are flexible and non-prescriptive.
4.160	18	1161386	To achieve the district's Planning Aim's and Vision as outlined in paragraph 3.3 of the core strategy plan on Otterpool park, most of the housing development should be developed towards the M20, junction 11 and not spreading out towards and up to Sellindge village. This new town's traffic must use junction 11 of the M20 to access both coast bound and London bound traffic. The new houses must be developed around the proposed High Street, Railway station, and business infrastructure, within walking and cycling distance of all these amenities. Junction 11 of the M20, would then become the preferred option for all vehicle access and egress to and from this town development. This is also confirmed and highlighted in Savills masterplan appraisal summery report May 2018. The boundaries should include additional land North & East of the M20, Stone Street Stanford & Westernhanger, to which they state These additional land parcels & properties should be included from the outset, as they are currently constraining the street layout in the proposed town centre area. By implementing these additional land parcels, you will increase housing around the key infrastructure and also assist in meeting the strategic needs in section B Aims & Vision, point 2, as you will minimise local carbon emissions, maintain air quality, control pollutants and promote sustainable transport links, via foot, cycle, rail and bus. Any vehicle movements to and from the new town would take place via the M20 Junction 11, reducing any need for use of A or B road usage, thus reducing congestion and carbon pollutants in the environment. 2: The current development of houses round Barrow Hill Sellindge and Otterpool lane, are out on a limb which will cause commuter traffic heading West bound to Ashford and London to drive through the village of Sellindge and not use junction 11 of the M20. Once the new Junction 10A is completed, no traffic will double	Comment noted. A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired, the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route. The site promoters have instructed a Transport Consultant to undertake extensive traffic surveys to understand existing traffic movements on the local highway network within and external to the Otterpool Park to define traffic patterns. This is termed the 'baseline' assessment, and the methodology was formally agreed with representatives of both Kent County Council (as local highway authority) and Highways England (as Strategic Highway Authority). Traffic movements generated by resident occupiers and users (e.g. people employed within the site) of Otterpool Park are the subject of transport modelling, and this process shall identify whether any junctions or links on the highway network would be under unacceptable pressure in future. If it is determined that any junction(s) or link(s) will be subject to capacity issues at any point associated with the build-out and occupation	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.16	19	1161386	To achieve the district's Planning Aim's and Vision as outlined in paragraph 3.3 of the core strategy plan on Otterpool park, most of the housing development should be developed towards the M20, junction 11 and not spreading out towards and up to Sellindge village. This new town's traffic must use junction 11 of the M20 to access both coast bound and London bound traffic. The new houses must be developed around the proposed High Street, Railway station, and business infrastructure, within walking and cycling distance of all these amenities. Junction 11 of the M20, would then become the preferred option for all vehicle access and egress to and from this town development.	Comment noted. A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired, the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route. The site promoters have instructed a Transport Consultant to undertake extensive traffic surveys to understand existing traffic movements on the local highway network within and external to the Otterpool Park to define traffic patterns. This is termed the 'baseline' assessment, and the methodology was formally agreed with representatives of both Kent County Council (as local highway authority) and Highways England (as Strategic Highway Authority). Traffic movements generated by resident occupiers and users (e.g. people employed within the site) of Otterpool Park are the subject of transport modelling, and this process shall identify whether any junctions or links on the highway network would be under unacceptable pressure in future. If it is determined that any junction(s) or link(s) will be subject to capacity issues at any point associated with the build-out and occupation	No change proposed.
4.16	147	1162901	The Otterpool Park has not been available to Adlington and local areas for consultation. Others such as Hythe have been. This is serious omission and should be rectified .	Comment noted. The Council has undertaken consultation with local people, groups and organisations a number of times during the preparation of the Otterpool Park Masterplan and is carrying out separate consultations as part of this Core Strategy Review. The Council has been working closely with Ashford Borough Council and have engaged with the various Parish Councils which adjoin the Folkestone & Hythe District boundary.	No change proposed.
4.161	391	1163118	Large scale 'self build' is not defined.	Policy SS6 currently states that 'at least 10% ' of all dwellings shall be provided as self-build or custom build plots; this is equivalent to approximately 1,000 units. However, it is now proposed that the 10% self-build figure is replaced with a "proportion of the proposed dwellings" ... which would have regard to the need identified by the Council . The Council currently only has approximately 130 people listed on its self-build register. Local appetite for self-build plots would be tested in the initial phases and the proportion reviewed with each phase of the development. Nevertheless, the Council maintains an aspiration of 10% self-build over the course of the plan period. This would remain subject to viability testing.	Amend Policy SS6 as set out above.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.161	495	1037610	The council will explore whether a community-led homes fund can be established to enable local people, and groups of people working together, to build innovative forms of housing to meet their individual needs. In allocating sites for custom-build and self-build homes, priority will be given to people on the council's self-build register, which may include a local connection test. Support: but a higher % needs to be included in this plan refer to my comments on Cost Plan housing as mentioned	Support noted. It is proposed that the 10% self-build figure is replaced with: "A proportion of the proposed dwellings" ... which would have regard to the need identified by the Council . The Council currently only has approximately 130 people listed on its self-build register. Local appetite for self-build plots would be tested in the initial phases and the proportion reviewed with each phase of the development. Nevertheless, the Council maintains an aspiration of 10% self-build over the course of the plan period.	Policy SS6 (2a) to be amended to read: " A proportion of the proposed dwellings shall be provided as self-build or custom build plots, having regard to the need identified by the council , with each substantial phase contributing a proportion of self-build and custom-build housing".
4.162	261	1162685	The Employment Study for Otterpool Park is twice described in this document as in progress, and once implied to be complete. For the record, it actually seems to have been added to the consultation website in the first week of May, with no fanfare. Many people will not have had time to review it.	Comment noted.	No change proposed.
4.163	358	1163115	This paragraph contains very fine but ultimately worthless promises, unless there are concrete plans then it is easy to point out any advantages of any development, limited only by your imagination. These are aspirations rather than policies.	Comment noted.	No change proposed.
<b>Policy SS6</b>	17	549694	Welcome the aspirations for water and carbon neutrality but note that these are only aspirations and the reality is that a development of this size will put a huge strain on the water supply in what is already a water scarce area and will have a large negative impact on the environment generally. Also welcome the aspiration of one new job per dwelling but I am not convinced that this is achievable. I see no reason why Folkestone & Hythe town centres would be able to generate significant numbers of additional jobs. Having High Speed trains stop at Westenhanger Station is key to the success and sustainability of the garden town but it is my understanding that this has not yet been agreed. Without this the strategy is not sustainable. The plans should include a leisure centre with a pool - whether or not a new facility is provided in Hythe. This would reduce car journeys and promote healthy living.	Comment noted. Following the advice of the Environment Agency regarding the achievability of aspirations for water and carbon neutrality, this has now been amended with aspirations for a "highly water efficient and low carbon development". The approach set out in the Core Strategy Review is to positively support employment needs so that the economy is not unduly constrained. Further work on employment and retail requirements has been undertaken (Lichfields, 2018) which has informed amendments to the relevant policies for the Submission Draft (Regulation 19) Core Strategy Review. The proposed improvements to Westenhanger station are in respect of station facilities and to take advantage of the excellent accessibility it affords via mainline services. It is important to point out that the process to award the next Southeastern franchise (which will operate between 2019 and 2027) is well advanced, and the specification of the next franchise period does not propose the introduction of High Speed services at Westenhanger within the next period. Notwithstanding this, Westenhanger benefits from good access to mainline railway services, with a travel time of 56 minutes to London St Pancras via a change at Ashford International. The District Council, working alongside colleagues at Kent County Council, will continue to work together to lobby the new franchisee (once appointed) to seek increased service coverage at Westenhanger Station.	No change proposed.
<b>Policy SS6</b>	28	1162266	This development is in totally the wrong place. The roads, countryside around it and the local population will all suffer if this new town goes ahead.	The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link).	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	29	1162299	<p>There is a real need for homes of all tenures in this part of Kent, particularly if our children wish to have any chance of home ownership. This location has good proximity to the motorway and a railway station. It is a real opportunity to create a great place to live rather than extend the urban sprawl of Ashford and increasingly Folkestone. I would urge the following: That the design of the homes is of the highest standards - both in terms of design and environmental standards. That developers agree to uphold and enhance those standards and do not later change their minds to save on costs. That transport infrastructure on the site and surrounding areas is considered. A development of this size affects not just Shepway, but Ashford too. Road infrastructure needs to ensure that traffic is not directed through the existing communities. That the surrounding communities have some genuine say on the types and design of proposed homes.</p>	<p>Comment noted. The proposed garden settlement must respect and enhance its setting within in the landscape; and in all instances a high-quality and sustainable built environment and green infrastructure should be created which promote security and a sense of place and community. A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired, the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route. The site promoters have instructed a Transport Consultant to undertake extensive traffic surveys to understand existing traffic movements on the local highway network within and external to the Otterpool Park to define traffic patterns. This is termed the 'baseline' assessment, and the methodology was formally agreed with representatives of both Kent County Council (as local highway authority) and Highways England (as Strategic Highway Authority). Traffic movements generated by resident occupiers and users (e.g. people employed within the site) of Otterpool Park are the subject of transport</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	82	1162559	<p>There is inadequate infrastructure to support a new town of 5,500 dwellings. Specifically: - Affinity Water have defined the area as being of acute water shortage, they cannot, without major, currently unplanned, investment in infrastructure support development of a new town - The M20 is currently showing major signs of stress, with large stretches urgently requiring to be resurfaced. Further, analysis conducted on behalf of Eurotunnel and Dover Ports suggest that the M20 will be at full capacity by 2020. The M20 cannot possibly support the additional road traffic associated with development of a new town.</p> <p>- No additional primary care facility is being planned or considered in conjunction with development of the new town. As a consequence, the William Harvey Hospital at Ashford (already acknowledged as being under stress) will be required to support the population of a new town of 12,000 - 15,000 people</p>	<p>The District Council has shared details of the proposals at Otterpool Park with representatives of all relevant services providers. Affinity Water have confirmed they can meet the potable water supply requirements necessary to support the scale of growth set out in the Core Strategy Review Local Plan, alongside growth proposed in the Places and Policies Local Plan. The scale of growth proposed will require capital investment to fund off-site highway improvements. It will be for the transport modelling appraisal to determine what junctions or sections of the highway network will need to be improved, and at what time. The timing will be based upon the number of units built out (and occupied) on the two sites proposed to be allocated. The transport modelling work and its outputs need to meet with the requirements of the County Council (as local highway authority) and Highways England (as Strategic highway authority). The Council has maintained regular dialogue with the South Kent and Coast CCG, as well as Ashford CCG (covering the Sellindge area). The District Council is, therefore, aware that the population growth associated with the plan period needs to be translated into a strategy for health care provision that is flexible to respond to the changing nature of how health care services are being delivered in the short, medium and long term. The South Kent and Coast CCG has been encouraged to share a strategy for health care provision at Otterpool Park with the District Council at the earliest opportunity.</p>	No change proposed.
Policy SS6	45	1162525	<p>There is already Ashford Kent in this area as a growth town expanding into the surrounding countryside. We must not start building another centre of growth so close to Ashford. The proposed development will become contiguous with Ashford and result in a built up area from Ashford to the coast.</p>	<p>Comment noted. The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link). Provision is made in draft Policy SS7 Place Shaping Principles, Criteria b) that woodland planting and habitat creation, shall also be designed to prevent the coalescence of the new settlement with Lympe and to separate neighbourhoods within the settlement itself.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	148	364397	<p>This plan spells the slow death of the historic village and parish of Lympne. Practically half of the parish is taken away to be part of Otterpool leaving it with the present built on land and the AONB. There is no development land left, this is all taken by Otterpool. For the village to be sustainable it needs to build village houses as the average house occupancy is dropping so more houses are needed to maintain the present population. As part of the failed Neighbourhood Plan this was estimated to be at least 50 houses between now and 2026. Not so long ago Lympne parish had a larger population than Sellindge and Aldington, however they have accepted more housing and have benefited from far greater community facilities as a result. Under this plan we get the worst possible outcome - houses on the airfield, after successfully resisting over development for years, BUT they are not our houses!! They are Otterpool houses and yet they are within 5-10 minutes walk of all the Lympne facilities, school, Village Hall, Pub, shop, bistro, castle and church. So Otterpool will receive all the S106 money and the new Otterpool Town Council will receive the council tax precept, this unacceptable. To add insult to injury there is no provision to commemorate our famous WW1 and WW2 airfield used for flying trials, record breaking flights by Amy Johnson and Jean Batten and the first flight by Douglas Bader with his artificial legs organised by Sir Philip Sassoon.</p>	<p>The indicative masterplan is intended to create a landscape break between the proposed new garden settlement / Link Park and the existing settlement of Lympne. It is acknowledged that Lympne has a need to change in the future. Its setting within the AONB will not necessarily prevent future development. The AONB Management Plan states that initiatives which are in line with local plan policies that increase and improve the supply of affordable housing for those with local needs will be supported where proposals are of high quality design, limited quantity and scale and are built to the best current environmental standards (policy VC3). Developments will be expected to apply appropriate design guidance and to be complementary to local character in form, setting, scale, contribution to settlement pattern and choice of materials (policy SD9).</p>	<p>No change proposed.</p>



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	69	1032113	<p>The Kent Downs AONB Unit objects to the proposed allocation for reasons set out in our response to policy SS1. However, in the event of the allocation coming forward, it is essential that potential harm to the nationally important protected landscape of the adjacent Kent Downs AONB is recognised and addressed as a fundamental principle in this initial policy allocating the site for development. As currently worded, the policy fails to acknowledge the site's location in the AONB setting. In view of the scale of development and potential for harm to the AONB, it is not only woodland planting that will be required to help mitigate the impacts, but other forms of landscape mitigation. Suggest inclusion of following wording in the third sentence of the second paragraph: It will be a landscape-led development that responds to its setting within the Kent Downs AONB landscape with an emphasis on woodland and other planting, open space and recreation that supports healthy living and encourages interaction between residents and helps mitigate impact in views from the scarp of the Kent Downs. While we support the requirement for the development to be supported by a Masterplan that is prepared in consultation with others, we note that a Framework Masterplan has already been produced and published that has not been subject to public consultation and establishes some principles which would not, in our view, meet the stated objective in the Charter for Otterpool of responding to its setting close to the Kent Downs AONB', in particular in respect of densities and heights of buildings.</p>	<p>The government is introducing a new method for calculating housing provision and the council is required to reflect this in its plan. The supply of new homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. In October 2016, AECOM was commissioned by the District Council to develop a Strategic Growth Options Study for the district to identify land suitable for strategic scale development across multiple plan periods. The Strategic Growth Options Study comprises three elements: a High Level Options Report, a Phase Two Report and a High Level Landscape Appraisal that informs both the High Level Options Report and the Phase Two Report. The High Level Landscape Appraisal (HLLA) for the whole district was carried out in February 2016 which identified the likely relative impacts of strategic level development in various locations, however this did not relate to specific development sites. The Phase Two Report was published in April 2017 and takes as its starting point the conclusions of the High Level Options Report and adds sufficient detail and site-specific evidence to them in order to determine the boundaries of land considered suitable for strategic-scale development and the extent of land considered unsuitable for such development. The Phase Two Report recognises that the Kent Downs AONB surrounds the study area on three sides, with the impact of development on its setting a key consideration in national and local policy. The report concludes that land within Area B to the north of Lympe has the potential to form a sustainable settlement of the scale needed, with the potential for significant areas of strategic open space to be provided within and surrounding new development, with a green infrastructure strategy exploring and defining the various important roles that such strategic green space would play in</p>	<p>Amend policies to reflect the AONB Unit's comments as appropriate.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	86	1162466	<p>This is a large scale proposal that will affect services and infrastructure that are very much under strain. The A20 is a busy road that is dramatically affected very time there are delays at the ports, or when the M20 is closed for one reason or another. No amount of "landscape led planning" can avoid the impact of imposing 5500 houses into an area that is already strained. All of our local roads connect to the A20 and in many cases the junctions are already hazardous. This development will increase those hazards, not just in the vicinity of the proposed new 'town' but all the way along the A20 towards both Ashford and Folkestone by increasing the number of cars using the road. Your document speaks of 'walking and cycling' within the new town...I'd like to ask exactly what they are going to walk or cycle to? Everyone who lives in Sellindge, Lympne, or Aldington drives to Folkestone or Ashford to do their major shopping, go to school, or visit sport or entertainment facilities. Village shops offer limited choice and increased prices that inhibit most people from using them to meet their full requirements. Public transport is not an option, given that bus routes generally take over an hour to travel a route that can be covered by car in 15 or 20 minutes, and services are being cut anyway, making them less and less attractive. Owning a car is not a luxury in rural areas; it is a necessity. Our local hospitals are under strain. An additional 5500 homes will make this worse. Even if you plan to include a doctor's surgery in this development you will need to recruit the doctors - something that our existing surgeries already struggle with. All residents in this area have received letters informing them of the imminent installation of water meters, as we are living in an area that is suffering water scarcity. How then is it logical to build to encourage more people to live here? I would also like to point out the Folkestone &amp; Hythe District Council have failed to</p>	<p>The District Council has shared details of the proposals at Otterpool Park with representatives of all relevant services providers. The scale of growth proposed in the Core Strategy Review will require capital investment to fund off-site highway improvements. It will be for the transport modelling appraisal to determine what junctions or sections of the highway network will need to be improved, and at what time. The timing will be based on the number of units built out (and occupied) on the two new strategic sites allocated in the Core Strategy Review. The transport modelling work and its outputs need to meet with the requirements of the County Council (as local highway authority) and Highways England (as Strategic highway authority). The Council has maintained regular dialogue with the South Kent and Coast Clinical Commissioning Group (CCG), as well as Ashford CCG (covering the Sellindge area). The District Council is, therefore, aware that the population growth associated with the plan period needs to be translated into a strategy for health care provision that is flexible to respond to the changing nature of how health care services are being delivered in the short, medium and long term. The South Kent and Coast CCG has been encouraged to share a strategy for health care provision at Otterpool Park with the District Council at the earliest opportunity Affinity Water have confirmed they can meet the potable water supply requirements necessary to support the scale of growth set out in the Core Strategy Review, alongside growth proposed in the Places and Policies Local Plan. The Council has undertaken consultation with local people, groups and organisations a number of times during the preparation of the Otterpool Park Masterplan and is carrying out separate consultations as part of this Core Strategy Review. The Council has been working closely with Ashford Borough Council and have engaged with the various Parish Councils which adjoin the Folkestone &amp; Hythe District boundary.</p>	No change proposed.
Policy SS6	157	1029376	<p>The employment development opportunities appear to be overstated, Any opportunities on the Channel Tunnel would be at the expense of Folkestone and Hythe residents There are no plans for a major employer to set up, the jobs created here are likely to be low paid</p>	<p>The approach set out in the Core Strategy Review is to positively support employment needs so that the economy is not unduly constrained. Further work on employment and retail requirements (Lichfields, 2018) has been completed which has been used to inform amendments to Policies SS6 and SS7 for the new garden settlement, to provide greater detail and certainty.</p>	Amend Policies SS6 and SS7 with more detailed employment and retail requirements.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	208	333026	I have a planning map showing houses being built all around Grove House and Field Head which was not mentioned in any previous exhibition. The plans get worse and worse. We are a country village which is being demolished. We will have all the downsides like lack of Doctors , no place for all the children , traffic, pollution of light and air, shortage of water, pot creators on the road, massacre of the wild life, crime, no where for all the cars to park. The artists impression was a great laugh. The list is long and for a development that no one in Sellindge, Stanford and Lympe want. Your plans need to be re thought out	The Core Strategy Review proposes a second phase of development in Policy CSD9 Sellindge Strategy, with an additional 350 dwellings, this is the first public consultation on this document. Having found that more homes are needed, the council has looked in detail at where the development could go. This has involved looking at constraints (places where development would not be suitable) and opportunities (places where there is suitable land and there are roads, railways and other facilities that could cope with growth or could be improved). The district has many constraints: large areas are at serious risk of flooding; some places are protected for their rare habitats or species; some areas are protected for their landscape (for example, a large part of the North Downs is protected under government planning policy as an Area of Outstanding Natural Beauty). Having taken all these things into account, we believe that we have identified the most appropriate places for new development. Development is focused on a new garden town at Westenhanger and more growth at Sellindge.	No change proposed.
Policy SS6	241	559029	We would like to comment on the Core Strategy Local Plan Review and to challenge the scale and type of development in the following ways: The scale of development is unacceptable as it would destroy the valued character of the area. Otterpool would urbanise the character of the area leading to a nearly continuous development from Ashford following the M20 past junction 11. We believe that the majority of Shepway inhabitants do not want to see their environment urbanised in this way. Otterpool would damage the rural character of the North Downs AONB adjacent to it. Its development would necessitate greatly expanding the transport infrastructure, new and enlarged road building that would damage the valued character of our environment. An improved railway station at Westenhanger could only partly alleviate transport problems as a new town however dressed as a garden town would vastly increase the amount of private car transport. Such scale of development would demand an alarming increase in water supply when there is already a shortage in the area. It is difficult to imagine how such a large scale development could fit into the social and economic structure of the area without grossly distorting it. Where would people work? Or would Otterpool become another dormitory town with people commuting mainly to London? Is this what the people of Shepway want? Apart from the proposed provision of new local health and educational facilities, such a large development would put massive strain on such county facilities as hospitals and providers of training and education	Comment noted. The scale of growth is driven by population projections. The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (paragraph 59), and the council is required to plan for the future growth of households. The site for the Garden Settlement and the additional allocation in Sellindge were identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these constraints into consideration. The location of the site was landscape-based taking into account the setting of the AONB (it is outside the AONB).	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	283	559029	<p>In whose interest is the vast increase in numbers of dwellings proposed ? Nearly double the number proposed in the old Core Strategy. More than the Government requires. Not in the interest of local residents, for sure. Not really in the interest of the proposed new inhabitants who would find themselves living in a 'garden town', but bereft or starved of social and economic infrastructure. Surely what would be more feasible would be smaller developments of high quality design and with services such as health and education which can be shared with existing conurbations and therefore become well integrated into social and economic structures. If all the housing required by the government is to be built in a concentrated area such as Otterpool, then it should be logical, and crystal clear, that other areas unsuited to development should be protected. The Romney Marsh exemplifies this point as its infrastructure, transport, economic, health care and educational provision is insufficient to support the development proposed. The District Council is entrusted by its electorate with the wellbeing of this valued environment, renowned for its natural beauty, cultural and historical wealth, its mixture of rural landscape and attractive old towns, villages and historical monuments. Economic development is necessary, but it is also the duty of the Council to preserve and maintain what is valued for future generations. With such a vast scale of development it will no longer be possible to balance development and conservation in the cause of the wellbeing of our inhabitants. This must be more important in the short term and, especially, in the long term, than the perceived need to raise revenue by building, rather than enable a quality living environment.</p>	<p>Comment noted. The scale of growth is driven by population projections. The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council cannot stop people moving into or out of the district; the National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (paragraph 59), and the council is required to plan for the future growth of households. The site for the Garden Settlement and the additional allocation in Sellindge were identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these constraints into consideration. The location of the site was landscape-based taking into account the setting of the AONB (it is outside of the AONB).</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	172	584500	<p>I am trying to make my comments re the 12,500 New homes development known as Otterpool Town. I am not totally opposed to the concept of the site itself but have very strong concerns with the surrounding infrastructure including especially the Roads (hard wired), Hospitals, Staff (doctors, teachers, etc already desperately in short supply in the country), Water, Sewage and not forgetting all the other many thousand house developments in the local area (Canterbury, Hythe, Ashford etc) Otterpool Park / Town whatever 12, 500 homes, with I guess/estimate: 25,000 adults 20,000 cars I can understand, see the benefit of this development in the future (is it to be delivered over 15 years? with phase 1 being what by when? Houses - ? Adults - ? Cars Nice statement Cllr John Collier, Cabinet Member for the District Economy, said: Along with other details, this document explains the opportunity we have to create an attractive and vibrant place at Otterpool Park, build well designed, environmentally friendly homes, and provide new services and amenities, like schools, medical centres and public open spaces . But my MAIN CONCERNS are: Who are these for from London, China, etc. (important for feel/country people) Infrastructure out of the development there are many many issues that I have heard nothing about and are of concern today let alone with this development and the many other local developments Ashford Hythe Sellindge Canterbury Infrastructure issues include: All the local roads these are hard wired and struggling today A20, London Road, Swan Lane, etc. etc Hospitals struggling, long waiting lists, beds, etc. Staff = hospitals and gp surgeries - doctors, nurses and schools Water usage and reservoirs / sewage Electricity ??? All I hear about is the wonderful new Otterpool town designed for the future, creating new jobs, etc. '. I can see how money can be thrown at/invested in the wonderful '</p>	<p>The scale of growth is driven by population projections. The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council cannot stop people moving to or leaving the district nor alter general household trends. The National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (paragraph 59), and the council is required to plan for the future growth of households. The site for the Garden Settlement and the additional allocation in Sellindge were identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these constraints into consideration. The location of the site was landscape-based taking into account the setting of the AONB (it is outside the AONB).</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	177	1037873	<p>There is no way that a new town will "enhance the natural environment," however carefully designed it is! We often read of the problems faced by the wildlife at Singleton Lake (birds found maimed etc) I can't help thinking that similar things would happen to the Otterpool wildlife, with a new town on the doorstep. I have not seen anything to suggest that new, safe riding routes will be provided in the local area. With a new town on the doorstep there is bound to be more traffic on the roads and lanes of the local villages e.g Sellindge and Brabourne. When the M20 or A20 is closed, people that have been diverted onto the local single track lanes, still drive as if they are on an A road! The new town would only make this worse. The local hospital is struggling to cope as it is and our local surgery is trying hard to recruit another Doctor. Just because new surgeries will be built, doesn't mean they will be staffed! Will the Council be able to play God and make it rain sufficiently to provide enough water for the new town and the local area? And when there has been a lot of rain, many places in the area flood. With more land concreted over, this would surely get worse. However many house are built, if people keep breeding, there will never be enough and if all the good agricultural land (like that at Otterpool) has been built on, what will all the people living in these homes eat?! They will probably be far too busy sitting in traffic jams to grow their own food! Rather than building more and more houses, surely it would be better to take steps to limit family sizes and holiday homes (so many homes stand empty for days/weeks and are only occupied for a short amount of time) and encourage house shares/multi-generational living?</p>	<p>The scale of growth is driven by population projections. The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (paragraph 59), and the council is required to plan for the future growth of households. The site for the Garden Settlement and the additional allocation in Sellindge were identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these constraints into consideration. The location of the site was landscape-based taking into account the setting of the AONB (it is outside of the AONB). The council has worked closely with infrastructure providers as part of the Core Strategy Review and is continuing to work with providers in drawing up the next version of the plan. Where infrastructure requirements for a specific site are confirmed, they are identified in relevant policies. Policy SS5: District Infrastructure Planning also sets out a general framework for infrastructure provision.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	328	1162821	<p>The plan submitted appears on the whole to be well thought out except building 10,000 new homes adjacent to Aldington Ridge - would not be in keeping with an area of outstanding natural beauty to say the least. I also cannot see the need for such a huge development especially now that we are leaving Europe. Planning accommodation for people who may be working in Europe is unlikely to be an issue in the future nor does it make sense to make plans for a business hub here. I think we should also be given an opportunity to voice our opinions on the actual planning of the town as it is going to affect us directly. Why was Aldington not consulted on the Otterpool Park project via a community engagement event last year as were residents in most other nearby Parishes?</p>	<p>The concerns are noted, but the District Council has to plan for future homes to meet the local need of the district, ensuring that there is a sufficient amount and variety of land that can come forward until 2037 and beyond. The scale of growth is driven by population projections. The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (Paragraph 59), and the council is required to plan for the future growth of households. The government has introduced a new national methodology for setting out how many new homes local authorities should plan for. For Folkestone &amp; Hythe district this indicates that the council should plan for an average of 676 new homes a year. The district Council seeks to provide for this through the smaller sites allocated in the emerging Places and Policies Local Plan as well as the larger strategic sites, including the Garden Settlement. The site for the Garden Settlement has been identified through the Shepway Growth Options study, which considered options within the district taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link).</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	325	1032226	<p>I wish to raise my objection to the proposed New Town Otterpool Park. Apart from the amount of new housing being proposed, as usual there appears to be no consideration given to infrastructure and the stress this will put on existing Public Services, mainly the already over stretched William Harvey Hospital and Doctor's surgeries in the area. We constantly hear about the need for affordable housing in the area, I see no evidence that this new town will provide sufficient numbers, again it will result in huge profits for the building contractors at no benefit to the local youngsters looking to stay in the area. I also feel that again, the view of Folkestone &amp; Hythe Councillors, as evidenced by the scrapping of the all encompassing Shepway title, is that the Romney Marsh area is either viewed as the 'Poor Relation' or worse still is viewed as being a dumping site for everything and anything that mustn't affect Hythe or Folkestone. You will not be able to get back the Garden of England, once you have concreted over it!! Reconsider your plans and listen for a change to local people.</p>	<p>The District Council has shared details of the proposals at Otterpool Park with representatives of all relevant services providers, ranging from healthcare, education and highways to water supply and disposal. Specifically in relation to healthcare provision, the Council has maintained regular dialogue with the South Kent and Coast CCG, as well as Ashford CCG (covering the Sellindge area). The District Council is, therefore, aware that the population growth associated with the plan period needs to be translated into a strategy for health care provision that is flexible to respond to the changing nature of how health care services are being delivered in the short, medium and long term. The South Kent and Coast CCG has been encouraged to share a strategy for health care provision at Otterpool Park with the District Council at the earliest opportunity. The revised figure for affordable housing provision comes from evidence in the council's updated Strategic Housing Market Assessment (SHMA). Part two of the SHMA assesses the need for affordable housing and finds that, taking demand and supply into account, there is a total annual need for an additional 139 affordable homes a year in the district (paragraph 5.29), an increase from the 100 affordable homes a year identified in the 2013 Core Strategy. This equates to around 22 per cent of all new housing. National planning policies require local planning authorities to take the viability of a development into account when preparing local plans and making decisions on applications (National Planning Policy Framework, paragraph 57); the council cannot ignore this requirement. The council will keep this requirement and the provision of affordable housing under review as part of the monitoring of the plan and review the policy if necessary.</p>	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	176	1160254	<p>Specific comments 1. As per my previous comments, the masterplan has not, to date, been prepared in partnership through any truly meaningful consultation with significant numbers of local residents. Exhibitions limited in their scope and tick box surveys that prescribe the sort of responses that people can make is not the same as truly engaging in consultation. How will the minimum of 22% affordable homes be guaranteed, given the Council's track record in failing to see through the delivery of affordable housing within schemes in other parts of the district? Re the "secondary neighbourhood": Information provided at public events (for example at a meeting of David Monk with the Hythe Civic Society) indicated that this secondary neighbourhood would be located in the South West of the area of search near Otterpool Lane and thus disconnected from the town centre. Is this still the plan? If so, why this disjointed approach, which will not easily support infrastructure development, instead of organic incremental development from the centre outwards? According to this plan, 22% will be affordable housing (this may include the 10% for the elderly?), and 10% will be self build. That leaves 68% market rate housing, with no HIF to underpin the development of necessary infrastructure. Is this development and the ongoing fund you plan for its maintenance affordable? Without access to the Viability Assessment, you are not giving us a clear picture of how all of this is going to realistically funded. Primary care is already critically under capacity within Hythe and the surrounding area and this health centre will inevitably face both picking up the surplus demand that already exists as well as the (say) 16,500 additional people that will populate the initial development of 5,500 homes (with the potential for more). There are also the inhabitants of the 600 new homes in Sellindge say another 1,800. In 2015, the</p>	<p>The council has worked closely with infrastructure providers as part of the Core Strategy Review and is continuing to work with providers in drawing up the next version of the plan. Where infrastructure requirements for a specific site are confirmed, they are identified in relevant policies. Policy SS5: District Infrastructure Planning also sets out a general framework for infrastructure provision.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	262	1162685	<p>While CPRE supports the concept of garden towns, the current proposal seems to pose insurmountable difficulties. We note that it does not meet central government's specification for Garden Villages that it should be a stand-alone settlement. (It will be a long time before the place will be big enough to be classified as a Garden Town and may never be.) Instead, it will join up Stanford/Westenhanger, Lympne and Sellindge into one continuous sprawl. A substantial part of the North Downs Character Area which is not in AONB will lose its rural character completely. That will be clearly visible from vantage points in the AONB, compromising its setting. The A20 will carve through the centre of it, with large trucks having to access Lympne Industrial Estate daily and the prospect of occasional diversions of all traffic from the M20 in emergencies. Westenhanger station, if improved, will become attractive to more London commuters from Lympne, Hythe, Saltwood and Sellindge who will arrive by car in spite of all attempts to encourage cycling. Sellindge will struggle accommodate the increase in traffic from Otterpool on top of that from the proposed developments in the village itself. With between 10,000 and 30,000 extra people in the area, the road to Hythe and Hythe itself will suffer chronic congestion all year round. We have seen no evidence from the draft plans that these traffic problems are going to be addressed and solved. Affinity Water is currently consulting on its draft Water Resources Management Plan for 2020-80. They have allowed for 21% population increase in the Folkestone and Dover area by 2045. A 21% increase in Folkestone &amp; Hythe's population would be around 23,000 or about 9,000 homes. You are planning to build this number of homes by 2032. How is Affinity Water going to respond? A similar issue arises in waste water. Doubtless there are engineering solutions but they will cost money.</p>	<p>The scale of growth is driven by population projections. The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (paragraph 59), and the council is required to plan for the future growth of households. The site for the Garden Settlement and the additional allocation in Sellindge were identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these constraints into consideration. The location of the site was landscape-based taking into account the setting of the AONB (it is outside of the AONB). The council has worked closely with infrastructure providers as part of the Core Strategy Review and is continuing to work with providers in drawing up the next version of the plan. Where infrastructure requirements for a specific site are confirmed, they are identified in relevant policies. Policy SS5: District Infrastructure Planning also sets out a general framework for infrastructure provision. The revised figure for affordable housing provision comes from evidence in the council's updated Strategic Housing Market Assessment (SHMA). Part two of the SHMA assesses the need for affordable housing and finds that, taking demand and supply into account, there is a total annual need for an additional 139 affordable homes a year in the district (paragraph 5.29). This equates to around 22 per cent of all new housing. The council will keep this requirement and the provision of affordable housing under review</p>	No change proposed.
Policy SS6	180	1163011	<p>No attempt has been made to consult with nearby residents of Ashford Borough who will be directly affected by this development. Impacts will be on roads, water and health facilities all of which are overburdened already. No proposals appear for alleviating these impacts or even for assessing them. No attempt is made to share the supposed infrastructure benefits with Ashford Borough residents who are asked to share the negative impacts of this development. Fundamentally flawed planning process.</p>	<p>Comment noted. The Council has undertaken consultation with local people, groups and organisations a number of times during the preparation of the Otterpool Park Masterplan and is carrying out separate consultations as part of this Core Strategy Review. The Council has been working closely with Ashford Borough Council and have engaged with the various Parish Councils which adjoin the Folkestone &amp; Hythe District boundary.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	298	1163030	<p>KCC 's Public Rights of Way and Access Service is keen to ensure that its interests are represented within the local policy frameworks of the Districts and Boroughs in Kent. The team is committed to working in partnership with local planning authorities to achieve the aims contained within the Rights of Way Improvement Plan (ROWIP) (2018-2028) and contribute towards Increasing Opportunities, Improving Outcomes: Kent County Council 's Strategic Statement (2015-2020) . The District Council should be aware that KCC 's ROWIP is currently being reviewed and updated. A new ROWIP is expected to be published later this year. Based on extensive research and public consultation, the plan assesses the extent to which Public Rights of Way (PRoW) meet current demand and how they will need to evolve to meet future requirements. Although largely supported, the Consultation Document makes no reference to the County Council 's ROWIP as the strategic and statutory policy document for PRoW protection and enhancement. The Service strongly urges that Folkestone and Hythe District Council ensures the ROWIP is referenced. This will enable successful joint partnership working to deliver improvements to the District 's PRoW network. The landscape-led approach is supported, alongside the emphasis on open space and recreation that supports healthy living. In addition to areas of open space, the PRoW network can provide opportunities for leisure and recreational activities within the site and provide access to the wider PRoW network, including the Royal Military Canal. Policy SS6 (1) (d): KCC is supportive as this will help to reduce car reliance within the development from the outset. Policy SS6 (1) (e): KCC is supportive. Policy SS6 (4) (a): Community facilities are undefined and whilst this could provide flexibility in decision taking, there is no recognition of the need for certain types of facilities for specific</p>	<p>Comment noted. The Council will include the Public Rights of Way and Access Service in any future discussions as the Core Strategy Review evolves. The County 's comments in relation to the specific educational facilities required to support the proposed garden town are noted. These will need to be reviewed along with the comments received by the ESFA, which conversely supports the educational provision as currently set out in the Core Strategy Review.</p>	<p>The Plan will be amended to include a new paragraph in the preamble to draft Policy SS7 making reference to the Rights of Way Improvement Plan (ROWIP) (2018-2028). The Plan will be amended to include a new paragraph in the preamble to draft Policy SS6 which better defines 'community facilities' and provides greater recognition of the need for certain types of facilities for specific groups in the community i.e. sport venues, open space (including accessible space for the elderly), cultural buildings, libraries, places of worship and public houses. Policy SS6 (4c) will be amended to read: Primary, Secondary, primary special and nursery school facilities shall be provided and fully funded by the development to meet projected needs in accordance with the forecast requirements of the Local Education Authority and shall be delivered in partnership with appropriate providers. This includes the provision of land at nil cost (both on and off site) and the</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	542	75029	<p>The Core Strategy for Folkestone and Hythe District Council was discussed at Stowting Parish Meeting's Annual General Meeting on 17 May 2018. Stowting Parish Meeting recognises that there is a need to provide additional housing in an area which has witnessed an increase in population in recent years and to comply with targets set by Government. Stowting Parish Meeting however has serious concerns that a large proportion of the proposed housing will be centred in a Garden Town with further development in the nearby village of Sellindge. The Garden Town is not situated in the AONB but its position adjoining the AONB means that the area requires special treatment. The size and spread of the proposed Town are such that no amount of landscaping will prevent what is a huge development being seen from the North Downs Ridge affecting the setting of this specially designated area. The Garden Town together with planned development at Sellindge will result in the loss of the rural landscape and atmosphere of that part of the district which will be detrimental to the area as a whole. Furthermore the rural village of Sellindge will become part of the urban sprawl with the loss of its distinct character. There are serious concerns regarding the infrastructure required:- Much of the traffic generated by the proposed development from both sites will use the A20 which will be inadequate to deal with a substantial increase of traffic particularly at peak times. Those wishing to travel to Canterbury will use the B2068 which has been an accident blackspot for many years. The situation will only worsen with increased traffic. Existing GP surgeries have found it difficult to recruit doctors so there is concern that it will be difficult to supply adequate health provision for the increased population. Nearby hospitals are already running at full capacity. The area's water supply struggles to meet existing demand. Without proper policies</p>	<p>The scale of growth is driven by population projections. The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (paragraph 59), and the council is required to plan for the future growth of households. The site for the Garden Settlement and the additional allocation in Sellindge were identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these constraints into consideration. The location of the site was landscape-based taking into account the setting of the AONB (it is outside of the AONB). The council has worked closely with infrastructure providers as part of the Core Strategy Review and is continuing to work with providers in drawing up the next version of the plan. Where infrastructure requirements for a specific site are confirmed, they are identified in relevant policies. Policy SS5: District Infrastructure Planning also sets out a general framework for infrastructure provision. Affinity Water have confirmed they can meet the potable water supply requirements necessary to support the scale of growth set out in the Core Strategy Review Local Plan, alongside growth proposed in the Places and Policies Local Plan. The approach set out in the Core Strategy Review is to positively support employment needs so that the economy is not unduly constrained. The Council has completed new evidence on employment and retail needs (Lichfields, 2018) which has informed changes to the text</p>	No change proposed.
Policy SS6	294	1163068	<p>Whilst a modicum of affordable social housing would be acceptable in this rural area, the proposed development of up to 10,000 new homes (down from 12,000) will destroy the small local communities it will engulf and the surrounding countryside.</p>	<p>The scale of growth is driven by population projections. The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (paragraph 59), and the council is required to plan for the future growth of households. The site for the Garden Settlement and the additional allocation in Sellindge were identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these constraints into consideration. The location of the site was landscape-based taking into account the setting of the AONB (it is outside of the AONB).</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	540	339689	<p>My husband and I have been through the documents separately and found the prospect overwhelming and daunting. Therefore we should like to make comments on the overall Strategy, dealing with issues we would wish to be resolved. Comments: What it will mean, the overall picture: Looking at the strategy for the coming decades it is clear the council is preparing for a new conurbation, absorbing the local villages and possibly encroaching on the boundaries of Hythe, Folkestone and Saltwood. The big increase in population along with the necessary facilities, housing, roads, transport can only lead to massively increased congestion, noise, pollution and increased consumption of natural resources at all these levels. Building on and eradicating good farmland only adds to the loss of natural resource. The area is regarded by many of those who live in London, the Medway towns, Maidstone and even Ashford as a place to get away to and enjoy, because its countryside. Effects on the locality: Those who have properties in Sellindge, on Barrowhill and at Newinggreen already suffer from the increased congestion - the amount of traffic, its speed and the weight of vehicles have become an increasing problem over the last decade. In spite of continual complaints to elected representatives about the constant damage to the environment nothing has been done to resolve any of these issues. Those not resolving the issues include the District Council, the County Council and national government. We have reached the stage where tiles are falling off the fronts of some cottages (due to vibration of heavy vehicles), cracks are appearing in walls, thick dust washes over front walls and paths and the road surface needs constant repair. There is already tremendous stress on the area which cannot cope. On the evening of the May Day Bank Holiday (2018) there was an accident on the M20 just beyond J10, blocking the westbound</p>	<p>The scale of growth is driven by population projections. The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (paragraph 59), and the council is required to plan for the future growth of households. The site for the Garden Settlement and the additional allocation in Sellindge were identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these constraints into consideration. The location of the site was landscape-based taking into account the setting of the AONB (it is outside of the AONB). The council has worked closely with infrastructure providers as part of the Core Strategy Review and is continuing to work with providers in drawing up the next version of the plan. Where infrastructure requirements for a specific site are confirmed, they are identified in relevant policies. Policy SS5: District Infrastructure Planning also sets out a general framework for infrastructure provision.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	413	894636	The impact of the proposal has not been evaluated in context. It is already shrinking as the withdrawal of government funding becomes apparent, and far from being a coherent well planned fully functioning development where every resident will be smiling and happy, it is much more likely to turn into the sporadic form of poorly serviced estate developments that we were told it would put an end to. And no real provisions for water, drainage, community, roads, transport.....	The scale of growth is driven by population projections. The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (paragraph 59), and the council is required to plan for the future growth of households. The site for the Garden Settlement and the additional allocation in Sellindge were identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these constraints into consideration. The location of the site was landscape-based taking into account the setting of the AONB (it is outside of the AONB). The council has worked closely with infrastructure providers as part of the Core Strategy Review and is continuing to work with providers in drawing up the next version of the plan. Where infrastructure requirements for a specific site are confirmed, they are identified in relevant policies. Policy SS5: District Infrastructure Planning also sets out a general framework for infrastructure provision.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	520	1042876	<p>Natural England considers the most significant part of the Core Strategy Review (CSR) is the inclusion of the new garden settlement policy, in the North Downs (Otterpool Park), for up to 10,000 homes. This development bears significant environmental implications, both in terms of impact and opportunity. Please find below our detailed comments relating to the garden settlement policies, and CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation. New Garden Settlement (Otterpool Park) Natural England notes the new garden settlement (Otterpool Park), in the North Downs, is to provide a minimum of 5,500 homes for the Local Plan period up to 2036/37, and for potential growth up to 10,000 homes beyond the plan period subject to detailed masterplanning. The location, scale and complexity of the garden settlement mean there are significant environmental implications, both in terms of impact and opportunity. The site is situated in the setting of the Kent Downs Area of Outstanding Natural Beauty (AONB), surrounded by the AONB to the north, east and south. The setting of the AONB is a special quality for which it is designated. The settlement will be clearly visible from the escarpment to the north, along which runs the North Downs Way National Trail. There are also potential impacts, but also opportunity for enhancement, for the Otterpool Quarry Site of Special Scientific Interest (SSSI), located at the centre of the proposed site, and Lympne Escarpment SSSI approximately 400m to the south of the site. However, as reflected in the CSR, the development offers the chance for an ambitious green and blue infrastructure (GI) strategy, making use of its multiple environmental, social and economic benefits for people and wildlife. This will help mitigate ecological and AONB impacts, but also provide net gain for biodiversity, provide people 's access to nature and recreation, benefit health and</p>	Comment noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	524	1042876	Sustainability Appraisal Report Policy SS6 garden settlement (Otterpool Park) With regard to the Policy SS6 garden settlement indicative strategy, as depicted in Figure 8.1 and conclusions set out in Table 8.3), we note the SA findings of both minor positive and negative effects for landscape (SA3) and biodiversity (SA5), and minor/ major positive effects for GI (SA6). For biodiversity, improvements could be achieved if net gain can be secured for the site, over and above residual losses which are accounted for and addressed. We have asked for the policy wording to be strengthened in this respect, as outlined in Annex One of this letter. We note this is referred to in the mitigation section (Table 8.5). For GI, beneficial effects will largely depend on successful longterm stewardship being secured, of a robust blue/ green strategy for the site. See our detailed comments on this in Annex One of this letter. We suggest the SA adequately reflects this in its commentary on GI. With regard to landscape, natural England considers the settlement is likely to have significant impacts on the views from the Kent Downs AONB escarpment, which will have serious implications for ultimate decisions on location, density and importantly height of buildings. Substantial and innovative avoidance and mitigation measures will be required, which will not just be restricted to structural planting and landscaping, which will be significant and to be completed in advance, but also choice of colours of walls and roofs, and the use of vegetated 'green' roofs and walls which would also provide additional habitat. Please refer to our earlier comments on this aspect in Annex One of this letter. As such we suggest the SA finding for SA3 is amended to reflect possible major negative effects on landscape, and to reflect this in its commentary, to add caution to what can be realistically achieved for the development. We note the mitigation	Comment noted. Policy SS6 (Development Requirements) will be amended to reflect these comments.	Draft Policy SS6 (second paragraph) will be amended to read: "It will be a landscape-led development that responds to its setting within the Kent Downs AONB landscape and the adjacent Lympne Escarpment with an emphasis on a network of green and blue spaces including woodland and other planting, open space and recreation that supports healthy living, encourages interaction between residents, enhances local biodiversity and mitigates impacts on views from the scarp of the Kent Downs ."
Policy SS6	595	329173	We welcome the ambition to create a water-neutral development. However this is a concept to be applied at a large scale, not something which is achievable in the context of an individual self-built or custom-built home, as the bottom of page 84 seems to imply, or even a larger new development in isolation. To achieve water neutrality, new water consumption in a development needs to be balanced by consumption reductions elsewhere. Perhaps a definition could be included in the Glossary, and thought given to delineating the wider area over which neutrality is to be achieved?	Comment noted. The Plan will be amended to achieve a 'development that is highly water efficient', rather than 'water neutral'.	References to water neutrality in Policy SS6 will be amended to 'highly water efficient'.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	384	1163115	Despite the length of this document, this is still not a policy as such, but merely an aspiration. One example: how will the 'one job per dwelling' be measured and ensured? It is far more likely that any development in this area will constitute part of a sprawl from Ashford to the coast along the A20/M20/HS rail corridor, mainly consisting of dormitory settlements for people working either in London, travelling by train, or other parts of Kent travelling by car. The proposed 'settlement' is far too large for any existing infrastructure to handle and it may well prove impossible to create alternatives, certainly water supply will be a problem and the existing road network nearby is already close to capacity. It is hard to resist the conclusion that having come by the land, the council is now trying to fit a new garden town into a most unsuitable space.	The scale of growth is driven by population projections. The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (paragraph 59), and the council is required to plan for the future growth of households. The site for the Garden Settlement and the additional allocation in Sellindge were identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these constraints into consideration. The location of the site was landscape-based taking into account the setting of the AONB (it is outside of the AONB). The council has worked closely with infrastructure providers as part of the Core Strategy Review and is continuing to work with providers in drawing up the next version of the plan. Where infrastructure requirements for a specific site are confirmed, they are identified in relevant policies. Policy SS5: District Infrastructure Planning also sets out a general framework for infrastructure provision.	No change proposed.
Policy SS6	532	1163318	The incorporation in the policy of a requirement to make stakeholders central to the master planning is welcomed. Through its Strategy Group, the Diocese has sought to stay well informed and as engaged as possible in the emerging proposals over the last 18 months. This will need to move up to a new level in order to address the social, environmental and economic challenges to which the garden town is itself a constructive and imaginative response.	Support noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	519	1042876	<p>Core Strategy Review first draft (Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations) Thank you for your consultation on the above dated 29 March 2018 which was received by Natural England on the same date. Thank you also to Ben Geering, Hazel Thomas and Chris Lewis for meeting us at our Ashford office on 16 May 2018 to discuss the Core Strategy Review, net gain and other related planning issues. Natural England is a non-departmental public body. Our statutory purpose is to ensure the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Summary Natural England proposes the following key recommendations to further strengthen the CSR and its Habitats Regulations Assessment (HRA), to ensure its soundness and effectiveness for environmental protection and enhancement: 1. New garden settlement (Otterpool Park) a. Designated sites and protected landscape the requirements for addressing impacts on the Kent Downs Area of Outstanding Natural Beauty (AONB) and Otterpool Quarry and Lympne Escarpment Sites of Special Scientific Interest (SSSIs) should also be expanded on and make clearer expectations for avoiding and mitigating effects, in line with national planning policy, and Core Strategy policy CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation. b. Green infrastructure we believe the CSR can be made substantially more robust in its requirements for a blue/ green infrastructure (GI) strategy for the new garden settlement, which is secured and managed in perpetuity. 2. Biodiversity net gain we are pleased to see inclusion of biodiversity net gain in policy CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation. However the policy wording and its supporting text should be further strengthened to ensure its</p>	Comment noted. Policy SS6 (Development Requirements) will be amended to reflect these comments.	Draft Policy SS6 (second paragraph) will be amended to read: "It will be a landscape-led development that responds to its setting within the Kent Downs AONB landscape and the adjacent Lympne Escarpment with an emphasis on a network of green and blue spaces including woodland and other planting, open space and recreation that supports healthy living, encourages interaction between residents, enhances local biodiversity and mitigates impacts on views from the scarp of the Kent Downs ."
Policy SS6	619	1057385	<p>KCC 's Public Rights of Way and Access Service is keen to ensure that its interests are represented within the local policy frameworks of the Districts and Boroughs in Kent. The team is committed to working in partnership with local planning authorities to achieve the aims contained within the Rights of Way Improvement Plan (ROWIP) (2018-2028) and contribute towards Increasing Opportunities, Improving Outcomes: Kent County Council 's Strategic Statement (2015-2020). The District Council should be aware that KCC 's ROWIP is currently being reviewed and updated. A new ROWIP is expected to be published later this year. Based on extensive research and public consultation, the plan assesses the extent to which Public Rights of Way (PRoW) meet current demand and how they will need to evolve to meet future requirements. Although largely supported, the Consultation Document makes no reference to the County Council 's ROWIP as the strategic and statutory policy document for PRoW protection and enhancement. The Service strongly urges that Folkestone and Hythe District Council ensures the ROWIP is referenced. This will enable successful joint partnership working to deliver improvements to the District 's PRoW network.</p>	Comment noted. The Council will include the Public Rights of Way and Access Service in any future discussions as the Core Strategy Review moves to the next stages.	The text will be amended to include a new paragraph in the pre-ambule to draft Policy SS7 making reference to the Rights of Way Improvement Plan (ROWIP) (2018-2028).

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	621	1057385	Policy SS6 (1) (d) [page 84] Support. This will help to reduce car reliance within the development from the outset. Policy SS6 (1) (e) [page 84] Support.	Support noted.	No change proposed.
<b>Policy SS6</b>	623	1057385	Policy SS6 (4) (c) [page 85] Suggested amendments: Primary, Secondary, primary special and nursery school facilities shall be provided and fully funded by the development to meet projected needs in accordance with the forecast requirements of the Local Education Authority and shall be delivered in partnership with appropriate providers. This includes the provision of land at nil cost (both on and off site) and the safeguarding of additional, suitable land to allow for future expansion in accordance with forecast needs. It is expected that four 2 forms of entry (2FE) primary schools and at least one secondary school will be required within the settlement, together with additional off-site investment in local secondary schools. The re should be a maximum layout of the development should demonstrate that walking distance s of 800 metres/10 minutes from every home to the nearest primary school are achievable , with an aspiration that homes are within a 400 metre/5 minute walking distance. As Local Education Authority and at the request of the District Council, the County Council has previously stated that for a development comprising 8,100 new dwellings, the following Education provision will be required: - 5.4 x 2 Form Entry Primary Schools; - 2 x 6 Form Entry Secondary Schools or 1 x 8 Form Entry Secondary School plus 3 Forms of Entry off site; - 1 x Special School; and - 11.4 Nursery Settings A copy of KCC 's General Site Transfer Requirements is also enclosed.	Kent County Council 's comments in relation to the specific educational facilities required to support the proposed garden town are noted. These will need to be reviewed along with the comments received by the ESFA, which conversely supports the educational provision as currently set out in the Core Strategy Review.	Policy SS6 (4)(c) will be amended to read: Primary, Secondary, primary special and nursery school facilities shall be provided and fully funded by the development to meet projected needs in accordance with the forecast requirements of the Local Education Authority and shall be delivered in partnership with appropriate providers. This includes the provision of land at nil cost (both on and off site) and the safeguarding of additional, suitable land to allow for future expansion in accordance with forecast needs. It is expected that four 2 forms of entry (2FE) primary schools and at least one secondary school will be required within the settlement, together with additional off-site investment in local secondary schools. The re should be a maximum layout of the development should demonstrate that walking distance s of 800 metres/10 minutes from every home to the nearest primary school are achievable , with an aspiration that homes are within a 400 metre/5

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	692	1032813	<p>As with Princes Parade development plans I'm opposed to the building of the Otterpool garden development. There are many obvious reasons for this opposition and they include: building on Greenfield site and the subsequent losses of use and habitats Remote location from amenities Subsequent need for transport to access facilities Poor access to Hythe via single lane road, but this is exactly the same as Nicholls quarry development, so it would appear that one can build many thousands of houses with little consideration to transport links this will lead to increased congestion in and around Hythe, particularly west Hythe even though the water supply has been guaranteed by the water company, this does not mean that others will not be adversely affected Hythe as the local town will be swamped There's no guarantee that the developers will supply the required number of affordable housing units and local amenities this seems to be a common ploy used by developers to get planning permission and when it is granted, the number of affordable units &amp; amenities unsurprisingly is lowered there is a serious issue locally with access to doctors and dentist surgeries with many people on waiting lists. If the proposed Harbour development and Otterpool garden go ahead then there will be many tens of thousands of families looking for medical support that doesn't exist if the council genuinely wishes to increase the stock of housing which supports the local communities, it needs to be far stronger in facing up to the development companies and insisting on time schedules and levels of affordable housing as a non-negotiable. Companies frequently quote the financial climate as a reason to change the development in their favour and reduce the number of affordable housing units and removing community facilities. The Council holds the upper hand in this matter and should put a very strong front in objecting to these</p>	<p>The scale of growth is driven by population projections. The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (paragraph 59), and the council is required to plan for the future growth of households. The site for the Garden Settlement and the additional allocation in Sellindge were identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these constraints into consideration. The location of the site was landscape-based taking into account the setting of the AONB (it is outside of the AONB). The council has worked closely with infrastructure providers as part of the Core Strategy Review and is continuing to work with providers in drawing up the next version of the plan. Where infrastructure requirements for a specific site are confirmed, they are identified in relevant policies. Policy SS5: District Infrastructure Planning also sets out a general framework for infrastructure provision. The revised figure for affordable housing provision comes from evidence in the council's updated Strategic Housing Market Assessment (SHMA). Part two of the SHMA assesses the need for affordable housing and finds that, taking demand and supply into account, there is a total annual need for an additional 139 affordable homes a year in the district (paragraph 5.29), an increase to the 100 affordable homes identified in the 2013 Core Strategy. This equates to around 22 per cent of all new housing. National planning</p>	<p>No change proposed.</p>
Policy SS6	656	1042306	<p>Policy SS6 NGS - The Development Requirements, second paragraph does not reference the historic environment at all. We think that the first sentence could be extended to address this: The settlement will be developed on garden town principles and will have a distinctive townscape and outstanding accessible landscape, both of which will be informed by the historic character of the area '.</p>	<p>Comment noted.</p>	<p>Draft Policy SS6 (second paragraph) will be amended to read: "The settlement will be developed on garden town principles and will have a distinctive townscape and outstanding accessible landscape, both of which will be informed by the historic character of the area."</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	618	1057385	In relation to Policy DM8 of the adopted Kent Minerals and Waste Local Plan 2013-30 and the need to assess safeguarding considerations for waste management facilities, the New Garden Settlement has been assessed. The Minerals and Waste Planning Authority can confirm that the strategic allocation development area coincides with a permitted waste recovery facility (Otterpool Quarry, Countrystyle Recycling Ltd - Composting and Anaerobic Digestion (AD) and Recycling Sites Construction and Demolition Waste). The permission has been implemented but not fully developed to date. The waste management site will be within 250m (essentially coincident) of the proposed strategic allocation area for mixed use neighbourhoods. Policy DM8 of the adopted Kent Minerals and Waste Local Plan 2013-30 requires an Infrastructure Assessment to be prepared to assess whether or not the strategic allocation development would be compatible with the use of the waste facility, particularly in regard to noise, dust, light and air emissions that may legitimately arise from the waste activities that could take place on site. The conclusion of the assessment would have to demonstrate that the new settlement development would not experience an unacceptable level of impact from the legitimate operation of the facility and the associated vehicle movements to and from the facility. It should be demonstrated that the future use of the safeguarded waste management facility would not be constrained by any incompatibility (e.g. amenity impacts) of the proposed development.	Comment noted. An Infrastructure Assessment will be prepared to assess whether or not the strategic allocation development would be compatible with the use of the waste facility in accordance with Policy DM8 of the adopted Kent Minerals and Waste Local Plan 2013-30.	No change proposed.
Policy SS6	620	1057385	The landscape-led approach is supported, alongside the emphasis on open space and recreation that supports healthy living. In addition to areas of open space, the PRoW network can provide opportunities for leisure and recreational activities within the site and provide access to the wider PRoW network, including the Royal Military Canal.	Support noted.	No change proposed.
Policy SS6	622	1057385	Policy SS6 (4) (a) [page 85] Community facilities are undefined and whilst this could provide flexibility in decision taking, there is no recognition of the need for certain types of facilities for specific groups in the community e.g. accessible space for the elderly, facilities for younger people (0-25 years), faith groups/ places of worship, library provision, social care facilities etc.	Comment noted.	The text will be amended to include a new paragraph in the preamble to draft Policy SS6 which better defines 'community facilities' and provides greater recognition of the need for certain types of facilities for specific groups in the community i.e. sport venues, open space (including accessible space for the elderly), cultural buildings, libraries, places of worship and public houses.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	379	1162505	<p>Building 10,000 approx in the area will have a negative impact upon the already stretched healthcare services for our area. The impact on the local roads, the main A20 through Sellindge and London Road into Hythe are already gridlocked with lengthy waiting times at peak commuting times. The development is being sold as to us as a 'commuter town', but in reality not all the inhabitants will be catching the train to London so this will have an impact upon the roads. A bypass should be considered for the village of Sellindge and surrounding rural communities to ease the congestion on the roads. (Not to mention the traffic is regularly diverted to the A20 when there are motorway closures and you want to add additional traffic to this, it's already horrific.) The rural communities need to be protected as they are part of the wonderful character of our area, not to be swallowed up into a large urban sprawl. Town houses have no place in our beautiful landscape and developers seem to prefer homes three storeys in height. If this goes ahead then there should be a large no build zone implemented to protect villages such as Lympne and Sellindge and Barrow Hill losing their identities and rural feel. We are already an area which has water scarcity, to build a settlement of this scale seems somewhat illogical if you cannot support the water demands.</p>	<p>The scale of growth is driven by population projections. The change in households is due to the patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The National Planning Policy Framework states that the government's objective is to significantly boost the supply of housing (paragraph 59), and the council is required to plan for the future growth of households. The site for the Garden Settlement and the additional allocation in Sellindge were identified through the Shepway Growth Options study, which considered options within the district, taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these constraints into consideration. The location of the site was landscape-based taking into account the setting of the AONB (it is outside of the AONB). Provision is sought in draft Policy SS7 Place Shaping Principles, Criterion (b) that woodland planting and habitat creation, shall also be designed to prevent the coalescence of the new settlement with Lympne and to separate neighbourhoods within the settlement itself. The Council proposes to strengthen this wording to include 'existing' and 'new' neighbourhoods within the settlement. The Council has maintained regular dialogue with the South Kent and Coast Clinical Commissioning Group (CCG), as well as Ashford CCG (covering the Sellindge area). The District Council is, therefore, aware that the population growth associated with the plan period needs to be translated into a strategy for healthcare provision that is flexible to respond to the changing nature of how health care services are being delivered in the short, medium and long term. The South Kent and Coast CCG has been encouraged to share a strategy for</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	539	1163366	<p>We are writing as fairly new residents of Barrow Hill in Sellindge, Kent, having moved into our property June 2017. We have taken a keen interest in the plans for expansion in the area both within Sellindge and the surrounding area and would like voice our views regarding the future plans. We understand the need to increase housing capacity and welcome the proposal to keep a green buffer between the proposed new development and the existing properties in Barrow Hill, this will help keep our Sellindge identity and the history of Barrow Hill and Sellindge and allow new and existing properties to benefit from the green spaces we all desire. With the massive increase in housing, from the Otterpool town development (and the current large scale house building next to the Sellindge village hall) this does lead to difficulties along the existing route of the A20. This road is mainly used by through traffic accessing Ashford/Hythe but also the industrial units and businesses in the area. The existing A20 has a bottle neck where it passes under the motorway/railway and with the local school and shops also along this road it does present extra difficulties for local people parking to use these facilities (cars parking on the main road causes congestion) and frustration for those just wanting to get through the village. The extra traffic that the proposed town will generate is going to increase the traffic problems the best example we have is when the M20 is closed temporarily and the tailbacks that ensue through the village. There also exists a speeding problem through the village which increases during the night particularly with the recent overnight M20 closures where HGV's in particular, use the A20 at high speed, despite the restrictions in place on overnight HGV's through the village. The residents of Barrow Hill are also being hugely affected by the passing of HGV's, the surface of the A20 is in particularly poor condition (the</p>	<p>Comment noted. A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired, the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route. The site promoters have instructed a Transport Consultant to undertake extensive traffic surveys to understand existing traffic movements on the local highway network within and external to the Otterpool Park to define traffic patterns. This is termed the 'baseline' assessment, and the methodology was formally agreed with representatives of both Kent County Council (as local highway authority) and Highways England (as Strategic Highway Authority). Traffic movements generated by resident occupiers and users (e.g. people employed within the site) of Otterpool Park are the subject of transport modelling, and this process shall identify whether any junctions or links on the highway network would be under unacceptable pressure in future. If it is determined that any junction(s) or link(s) will be subject to capacity issues at any point associated with the build-out and occupation</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	551	1164105	<p>Secondly, whilst it is acknowledged that strategic scale sites can form a part of a districts spatial strategy, this must be balanced against housing delivery and providing choice for the development industry so that smaller housebuilders, as well as national operators, can work together. The Government has acknowledged this in the draft NPPF and the focus on two main sites Otterpool and Sellindge is considered a high risk approach given infrastructure delivery timeframes and these potential costs threatening viability. The LPAs confidence about the delivery of housing projections is crucial because, if not, the Housing Delivery Test ' will not be met in the future within the district which will lead to speculative applications being submitted to meet short term delivery targets. This scenario would be the opposite of the plan-led system that planning decision makers are collectively striving for. Because of the importance of overall delivery, it is important that smaller sites are selected alongside the strategic opportunities. We would therefore recommend that the Places and Policies Local Plan is advanced alongside the Core Strategy and rolled in to one document. Whilst the likely imminent adoption of the Places and Policies Local Plan can provide some direction up to 2031, the document is based upon an out of date Objectively Assessed Housing Need and is also out of step with the likely Government target for smaller sites to help diversify the number of potential delivery partners of housing and growth. The influence of the M20 strategic road corridor on the selection of the growth options is understood, but the level of landscape constraint (AONB) and need for these sites to be truly complemented with a choice to meet local needs distributed across the district and assist with short term delivery, must also be taken into account as part of a balanced assessment. As a practice, we expect this to be confirmed when the</p>	<p>The adopted Core Strategy Local Plan (CSLP) should be read in conjunction with the emerging Places and Policies Local Plan (PPLP) as a single Development Plan Document. Together these allocate sufficient housing sites to meet the district's need up to and including 2031. The CSLP allocates strategic long-term housing sites, whilst the PPLP allocates a number of small sites that are deliverable in the short term. The CSLP Review will replace the existing CSLP 2013. The increase in housing need to 2037 identified by the introduction of the new national methodology for housing provision is to be met predominately through the garden settlement proposals. As such, the Council considers that there is adequate provision and flexibility across the development plan to meet the Folkestone &amp; Hythe District 's housing needs in both the long- and short-term. The Council has prepared and is continually updating an indicative housing trajectory, which it intends to publish in the Submission Draft Core Strategy Review (Regulation 19) that will support the spatial strategy being pursued.</p>	<p>No change proposed.</p>



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	563	1164722	<p>The Parties are broadly supportive of the wording contained in this draft policy however suggest a number of amendments as shown below. An explanation of these proposed amendments is as follows: The draft policy confirms the aspiration for the garden settlement to be water and carbon neutral. As explained above, the Parties would welcome amendments to the draft policy as shown below in red. To ensure that the mix of housing proposed meets the needs at the time when the applications for reserved matters come forward, the Parties propose the amendment to part 1b of the draft policy as shown below rather than referring specifically to the Strategic Housing Market Assessment currently in place. Given the scale of development proposed at Otterpool Park site and its proximity to Ashford, Canterbury and Dover districts, the policy should also be flexible to reflect the wider East Kent sub-region. The Parties understand the importance of place making and ensuring homes and town centre uses are delivered together early in the development of the garden settlement. To allow flexibility in the phasing of the development however, such as allowing an enabling phase containing purely infrastructure or landscaping works to come forward first, the Parties seek amendments to part 1d of the draft policy as shown below. Part 1g of the draft policy would require 10 percent of homes to be built to meet the needs of the elderly, from active retired people to those requiring intensive nursing care. The Parties request FHDC to provide more clarity on how homes which "meet the needs of the elderly" are defined by confirming which use classes these homes would fall under (in addition to use class C2 which is already referred to). Part 2a of this policy refers to at least 10 percent of all dwellings being provided as self-build or custom-build plots, with each substantial phase contributing a proportion of self-build and custom-build</p>	<p>Comments noted. The Council does not consider the proposed change to Policy SS6, that the garden settlement will aim (rather than will be designed ) to achieve a low carbon, low waste and low water usage development with an overall aspiration towards for water and carbon neutrality , to be appropriate. It is the Council 's view that a development of this scale and stature is an opportunity to deliver an environmentally exemplary model for new settlements, making best use of the technologies currently available, there is no justification for weakening this aspiration. The latter part of the paragraph will be deleted to reflect the comments provided by the EA that delivering water and carbon neutrality would be unachievable. The Council agrees to the proposed changes for Policy SS6 1(b) as these are consistent with Policy CSD1 as currently drafted and the NPPF. The Council agrees to the proposed change for Policy SS6 1(d) that within the early stages (rather than the initial phase ) of the development shall provide homes in neighbourhoods located in and around the town centre. This will ensure an appropriate degree of flexibility when phasing the implementation of the garden settlement. The Council agrees to the changes proposed for Policy SS6 2(a) replacing the 10% self-build figure with a proportion of the proposed dwellings having regard to the need identified by the Council . The Council currently only has approximately 130 people listed on its self-build register. Local appetite for self-build plots would be tested in the initial phases and the proportion reviewed with each phase of the development. Nevertheless, the Council maintains an aspiration of 10% self-build over the course of the plan period. The Council does not agree with the proposed additional criteria to Policy SS6 (2) that planning permissions should include conditions requiring self-build developments to be completed within 3 years of a self-builder purchasing a plot. The NPPF (paragraph 76) allows the LPA to impose a timescale shorter than the relevant default period for the</p>	<p>Draft Policy SS6 will be amended as follows: Second paragraph: "Environmentally, the settlement will be a beacon of best practice, making best use of new technologies, and will be designed to achieve a low carbon, low waste and water efficient development". Policy SS6 (1)(b): "The mix of tenure and sizes of new homes shall be in accordance with Policies CSD1 and CSD2 and evidence in the Strategic Housing Market Assessment, Parts 1 and 2 (PBA, 2016/2017) (or subsequent revision to the evidence base) and shall include build for rent provision to meet identified need. A minimum of 22 per cent of all dwellings should be provided as affordable homes , subject to viability ;" Policy SS6 (1)(d): " Within the early phases , development shall provide homes in neighbourhoods located in and around the town centre (Policy SS7(2)), well-connected to the centre by a walking, cycling and public transport network. Close to the town centre there shall be a</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	587	1164860	<p>Thank you for the opportunity to comment on the Regulation 18 draft CSLP Review. Please note the below represents informal officer comments only, and does not prejudice any future comments or decisions of the City Council. We note the proposals to meet local housing needs within the District and that this is supported by a strategy to improve the quality of, and access to, employment opportunities within Shepway. In this respect, we welcome the approach to maximising the sustainability of proposed growth through high levels of self-containment. Although policies such as SS6 (3) provide some support to the phasing of employment development alongside housing growth, we would support further policy emphasis on the physical delivery of employment development as part of each phase, to ensure that these sustainability objectives are achieved. As regards transport issues, we would query whether any work has been undertaken to assess the potential impacts on key routes into Canterbury as a result of the New Garden Settlement policies. In particular, traffic routing from Otterpool Park to Canterbury is likely to use Stone Street and then Nackington Road to access key routes into the City. This area is already subject to congestion and any assessment should be considered in combination with committed growth in the Canterbury District Local Plan (CDLP) (2017), including the 4,000 home, mixed use allocation at South Canterbury. Unlike with Dover, Folkestone and Ashford, there are no rail connections between Otterpool and Canterbury, and currently no bus service. We would strongly support the inclusion of a frequent, high quality service bus service between Otterpool and Canterbury within policies in the CSLP to ensure that this is delivered through the development. We would point out that such a service could connect to the fast bus route proposed from South Canterbury/Nackington Road to the bus station,</p>	<p>Comment noted. Draft Policy SS6 (3)(c) to be amended to read: "Employment space should be delivered alongside infrastructure and new homes so that job opportunities are available when the first phases of housing are occupied; subsequent phases should show how further employment development will be delivered alongside new housing as agreed with the local planning authority ."</p>	<p>Amend Policy SS6: New Garden Settlement - Development Requirements as set out under Council's Response.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	591	1164872	<p>Folkestone and Hythe District Council Core Strategy Review Consultation Representation on Behalf of The Aspinall Foundation regarding Land North of Aldington Road (Zoo car park) Savills has been instructed by The Aspinall Foundation, to submit representations to the first draft of the Core Strategy Review. This follows detailed representations submitted to the preferred options stage of the Shepway Places and Policies Local Plan in November 2016. Whilst the previous representation related to two sites; Land north of Aldington Road (zoo car park) and Land South of Aldington Road / West of Castle Close, these representations relate solely to the Land north of Aldington Road (zoo car park). The site is located within the Otterpool Park Garden Village proposals. A location plan has been enclosed with this letter The principle of the creation of a garden settlement to provide a significant contribution to the District's housing supply over the Plan period, contained in Policy SS1 District Spatial Strategy and reiterated in Policy SS3 Place-shaping and Sustainable Settlements Strategy is fully supported. Through Policy SS2 Housing and the Economic Growth Strategy of the Core Strategy Review Folkestone &amp; Hythe District Council have re-affirmed their intention to meet the locally identified housing need in the Strategic Housing Market Assessment (as opposed to the lower assessed housing need identified in the standardised methodology consultation). This equates to 633 new homes a year over a 19 year plan period, and 12,030 dwellings in total. The intention to meet the locally identified housing need of 633 dwellings a year on average over the Plan period as a minimum is supported. Policy SS6 New Garden Settlement Development Requirements sets out the principles behind the proposed garden settlement, the requirements of the development and how the development may be brought</p>	<p>Support noted. The Council does not agree however that some peripheral sites be brought forward earlier in the plan period. The main justification is the need to ensure the area develops in a logical and co-ordinated manner in the interests of the proper planning and sustainable development of the area. Moreover, consideration needs to be given to the limitations of existing infrastructure (foul water drainage, water supply, storm water control and roads) to support new development. Finally, the need to ensure that commercial, community and recreational/amenity facilities and services are available at an early stage is an important consideration. Part two of the SHMA assesses the need for affordable housing and finds that, taking demand and supply into account, there is a total annual need for an additional 139 affordable homes a year in the district (paragraph 5.29). This equates to around 22 per cent of all new housing. National planning policies require local planning authorities to take the viability of a development into account when preparing local plans and making decisions on applications (National Planning Policy Framework, paragraph 57); the council cannot ignore this requirement. The council will keep this requirement and the provision of affordable housing under review as part of the monitoring of the plan and review the policy if necessary.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	668	1160683	<p>Whilst CCPIII Shopping Folkestone S.A.R.L (c/o Ellandi LLP) support the principle of the proposed New Garden Settlement within the North Downs area, the proposed policies relating to the development have given insufficient attention to the retail and town centre offer that should be provided. As a result there is a significant risk that an inappropriate scale of development could be promoted which would cause significant harm to the existing town centres in the District and beyond (see also the comments in relation to Paragraph 4.98). It is clearly appropriate for the development to include some retail and town centre uses in order to meet the day-to-day needs of the new residents and those in the surrounding area (Policy SS9(1c)).</p> <p>However, any retail provision must be of a scale appropriate to the retail hierarchy and, as such is likely to be limited to meeting the day-to-day convenience, comparison and service needs of the residents, with less frequent comparison shopping needs continuing to be met in the higher order centres including Folkestone town centre. At the present time the wording in the draft Revised Core Strategy risks promoting the development of a new major retail centre in the North Downs area. Such a proposal could not be supported by the new population alone and thus would rely on trade from further afield. This would not only be contrary to the sustainability principles behind the new development, but would also have an adverse impact on existing town centres, contrary to other policies within the Core Strategy and the aims arising from the Strategic Needs, particularly A and B.</p>	<p>The approach set out in the Core Strategy Review is to positively support employment needs so that the economy is not unduly constrained. Evidence on employment and retail requirements has been updated (Lichfields, 2018) to take account of the latest trends, and this has informed amendments to relevant policies in the Core Strategy Review for the district as a whole and the new garden settlement.</p>	<p>Update relevant policies in the Core Strategy Review to take account of the new employment and retail evidence.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS6	694	1165942	Gladman are fully supportive of the principle of Garden Settlements, they are a sound way of planning for long term strategic needs. We therefore do not seek to comment on the principle of such a settlement, however experience of considering the detail of new Garden Settlements, most notably the three being promoted jointly by Colchester, Braintree and Tendring through their joint Local Plan Part 1, shows that the delivery of such settlements is incredibly challenging. The bar for the green infrastructure, services, design etc. is rightly set high, however such desires inevitably mean the costs of development is high. The peak levels of debt associated with the North Essex Garden Communities is extremely troubling, so high that questions have been raised through the examination of that joint plan as to their viability and deliverability. These issues will need to be carefully balanced in Folkestone and Hythe. The delivery of the sites and the infrastructure will inevitably take significant time, there will be prolonged periods for both planning, site preparation, disposal and delivery. Gladman question whether the settlement will be capable of delivering 5,500 dwellings by the end of the plan period in 2036/37. We consider it would be prudent to take a very cautious approach to the delivery of the Garden Community, with minimal housing from it being delivered in this plan period circa 1,000-2,500 units (depending on up to date evidence on deliverability). The rest should be seen as being the main component of the next plan. Policy SS2 will also need to clearly demonstrate that the plan is providing a wide range of sites, in a wide range of locations to encourage the widest possible range of housebuilders to be able to contribute to delivering the plan 's needs. In particular the plan will need to consider the final site size threshold requirements for allocations, which will be set out in the revised NPPF. Gladman are therefore supportive of many elements of the	Comment noted.	No change proposed.
Policy SS6	715	1101438	The draft plan sets out a series of strategic site policies. Key amongst these are the policies relating to the proposed new Garden Town at Otterpool, which is an important part of the revised growth strategy required to meet the anticipated rise in the housing target. The ESFA supports the specification of anticipated requirements for new schools as part of the new settlement in policy SS6 New Garden Settlement - Development Requirements. This indicates the need to meet projected needs in accordance with the LEA 's forecast requirements and suggests this is anticipated to equate to four 2FE primary schools and at least one secondary school, plus additional off-site investment in local secondary schools. The revised Infrastructure Delivery Plan should set out the latest information on anticipated education infrastructure requirements for this and other sites and clearly explain how the need has been calculated.	The support is welcomed.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.164	36	1160697	Accessibility and enjoyment of our countryside is vital to existing residents in the area as well as new ones coming in. Bridlepaths, footpaths and cycle paths must feature heavily in the new development and be part of phase one building. Advice must be sort from experts to ensure the paths are situated away from traffic and high volume residential and business areas to enable access and safety. Advice from the British Horse Society Access Officer should be sort.	It is usually the construction phasing which releases the funding available for new accesses and bridleways which is often following occupation of the dwellings. The council has involved statutory consultees, including KCC Public Rights of Way and Natural England, at all stages in drafting the Core Strategy Review. Comments from these providers have been taken into account when drafting the plan.	No change proposed.
4.164	657	1042306	Pararaph 4.164 fails to reference the historic environment and we suggest that an addition is to the text is included: a landscape-led approach to development that respects topography, views and historic character '. In the following sentence reference to the historic environment should be included as something to be sustained and enhanced. It can be seen as a facet of green infrastructure but is not so referenced here.	Comment noted.	The current text will be revised to incorporate these suggested changes as follows: a landscaped approach to development that respects topography, views and historic character , together with more reference to the historic environment.
4.165	658	1042306	Para 4.165 includes a welcome reference to heritage assets making a contribution to creation of a strong sense of place. An emphasis on Westenhanger castle as the most highly graded designated asset at the heart of the project area is also welcome, but it would be better to also reference how other heritage assets (designated or not) can inform the character of the new settlement and provide for it a sense of belonging to a place with a past as well as a future.	Comment noted.	The Council will include a reference to how other heritage assets (designated or not) can inform the character of the new settlement and provide for it a sense of belonging to a place with a past as well as a future.
4.166	23	1161386	The current draft plan has the houses in Barrow Hill, Sellindge being swallowed up on either side of the road by this proposed housing development. The development leaves little division between the current Sellindge village Barrow Hill residents and this new town. It has an overbearing impact on these 100 homes and will remove our village independent community. By increasing the distance between the residents of Barrow Hill and the new development, having woodland or community green space would keep a clear boundary between the current village community and the new proposed town. The Core strategy plan must ensure that substantial G1 buffers are put in and kept to ensure existing communities do not loose their identity and have an overbearing impact on them. No reduction in any G1 buffers should be allowed just to increase housing density, this would make a mockery of Garden town status.	The Framework Masterplan is landscape-led and shows how green infrastructure will interact with the site albeit indicatively shown at this stage. Appropriate care will be taken to integrate existing settlements into the Framework Masterplan; more precise detail will emerge as and when planning applications come forward. Based on the illustrative Masterplan that was produced in March 2018, it is assumed that the A20 will be diverted through the site and the current road through Newingreen will be downgraded. Further details will emerge at the time planning applications for the site come forward. Without prejudice, there is scope for the internal road alignments to respond to predicted traffic movements around the site, however the section of Harringe Lane that is north of the M20 falls outside of the site boundary and so the site promoters have no control or ability to upgrade this section of Harringe Lane. There are other constraints such as narrow width and roadside tree planting that define the character of Harringe Lane as a rural lane. Accordingly Harringe Lane could be worthy of retention in its current arrangement. Transport modelling work commissioned by the site promoters will ultimately determine an appropriate layout.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.166	87	1162466	I very much doubt this will be commercially viable; established shops in Evedgate, Sellindge, Lympne and Aldington struggle to maintain enough footfall and to compete with supermarkets. The people who come to live in this development will drive to Folkestone or Ashford, just as the rest of us do. There may be a place for take-away restaurants, which we do not have in the area - but this is hardly a major contribution to the healthy living this proposal aspires to!	The Council has appointed consultants to undertake a viability assessment of the Core Strategy Review proposals. Allocated sites within the plan have active developer interest indicating that proposals are likely to come forward. If economic conditions change, or social trends suggest that development requirements will be superseded, this can be dealt with by a review of the plan - the government requires that local planning authorities review their plans at least once every five years or sooner if evidence suggests that a review is needed.	No change proposed.
4.166	297	1157838	I don't see how a garden town with 10,000 homes (approx. 24,000 population) will have a town centre that will not detrimentally impact neighbouring town centres such as Ashford (population 73,000) Folkestone (population 52,000), Dover (population 48,000) and Hythe (population 15,000). If the town centre is as nice as described, people will want to travel to see its unique shops, markets and such. That said, I have already commented to planning officers that they should look at Marlborough in Wiltshire for inspiration. Marlborough is an historic market town, so probably fits the vision nicely. The high street is a very wide road with parking on either side. In the middle is a central car park area, with cars parking almost perpendicular to the flow of traffic, on a slight diagonal. This area is closed on certain days and used for markets and occasionally fairs. Both sides of the road are one-way, but wide enough for two cars to be side-by-side with a third car parked on the kerbside. At one end, there is an attractive town hall. A similar building could make a good community hall. In fact, it would be worth taking inspiration from Brownsword Hall in Poundbury. This market hall was paid for by Andrew Brownsword, who happens to be an ex Harvey Grammar pupil. The entire town of Poundbury, known as the town Prince Charles built, might be worth looking at to see what works and what doesn't in the realms of modern town design with a classical feel. The planners were keen to look at how high the buildings were in Marlborough's high street to give the correct feel. They are generally three storeys, occasionally four.	Comment noted. Examples of garden towns elsewhere in the country and abroad have been looked at for examples of best practice; this has included Poundbury. The site promoters will use these examples to assist with the conception of the planning application for the new garden settlement. Regarding competing town centres, an updated Employment and Retail assessment has been completed (Lichfields, 2018) which has been used to inform amendments to policies for the district as a whole and the new garden settlement.	No change proposed.
4.166	263	1162685	The words 'high street' are too restrictive for the town centre. Consideration should be given to different layouts for the commercial hub such as the squares common on the continent. Creating a new trafficked high street (as shown on the current draft masterplan) seems an odd design choice when so many town high streets have been pedestrianised.	The site promoters are currently working on draft concept schemes for the high street which is an evolving piece of work that is likely to develop further following the completion of additional evidence base studies. The design of the high street is therefore subject to change once further work is completed.	The Council will amend the diagram to blur the edges of the colours used in the diagrams to indicate that the areas are subject to change.
4.167	46	1162523	If the high speed train from London St Pancras was to stop at Westenhanger then surely there will be no need for the train to stop at both Folkestone West and Folkestone Central. These are both very busy stations and the current commuters must be taken into account and the trains are already full. You cannot have too many stops on a high speed line.	The HS service at Westenhanger is not planned within the next franchise period which is until 2027. However, one potential option to ensure this doesn't happen is for the HS service to stop at both Folkestone West and Westenhanger stations alternately to ensure that the service runs from both stations without disadvantaging any stations further down the line by increasing the number of stops.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.167	295	1163030	Suggested amendments to second sentence:	The text will be amended in line with suggested changes from Kent County Council.	Update the text to reflect KCC amendments as follows: The council is pursuing this with the train operating companies, which are bidding for the new South Eastern franchise , infrastructure providers and also with Network Rail and other stakeholders
4.167	307	1163030	Suggested amendments to second sentence: The council is pursuing this with the train operating companies , which are bidding for the new South Eastern franchise , infrastructure providers and also with Network Rail and other stakeholders	The text will be amended in line with suggested changes from Kent County Council.	Update the text to reflect KCC amendments as follows: The council is pursuing this with the train operating companies, which are bidding for the new South Eastern franchise , infrastructure providers and also with Network Rail and other stakeholders
4.167	617	1057385	Suggested amendments to second sentence: The council is pursuing this with the train operating companies , which are bidding for the new South Eastern franchise , infrastructure providers and also with Network Rail and other stakeholders	The text will be amended in line with suggested changes from Kent County Council.	Update the text to reflect Kent County Council's suggestions as follows: "The council is pursuing this with the train operating companies, which are bidding for the new South Eastern franchise , infrastructure providers and also with Network Rail and other stakeholders."
4.167	737	1164722	To maintain flexibility at this stage the Parties would not want to limit provision to 2 form entry schools and instead 3 form entry schools should remain a potential option. In some cases these can be a more sustainable way of managing growth. It is proposed that to avoid over or under provision, the school forecasting policy should include the need to monitor and manage rather than provide a fixed FE target.	Noted. Insert new paragraph to state that the required community infrastructure will need to be provided at the appropriate phase of development.	Insert new paragraph to state that the required community infrastructure will need to be provided at the appropriate phase of development.
4.168	582	1162196	Para 4.168 Shepway needs to commit to the 40% Green Space it mandated before the percentage was eliminated in the Expression of Interest at the behest of the Reuben Brothers as such a commitment would reduce their capacity to maximise profit. It is not Shepway 's job to use taxpayers ' money to help facilitate the brothers ' objective to maximize returns from the land bank associated with Folkestone Racecourse which they closed down for this purpose.. Public utility plus environmental and landscape considerations come first.	Comment noted. The overall development is likely to provide the 40% target of Green Infrastructure, but given the development will come forward in phases; each phase could not be judged against the 40% target. Some phases will provide under 40%, whilst other phases will provide over 40%. Green Infrastructure studies are being carried out for both the district and the garden settlement.	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS7	37	1160697	SS7 6d - Bridlepath locations must be carefully considered to ensure they can be used, guidance from individuals such as the British Horse Society Local Access Officer much to sort before finalising locations to ensure they are safe to use and suitable for local riders. I agree that they should link to existing rights of way. This infrastructure should be put in place during phase one so existing local residents and new residents can enjoy these rural activities. Providing safe off road riding will remove the need to ride on roads that will become busier when construction starts for this development thus making it safer for all concerned.	It is usually the construction phasing which releases the funding available for new accesses and bridleways which is often following occupation of the dwellings. The council has involved statutory consultees, including KCC Public Rights of Way and Natural England, at all stages in drafting the Core Strategy Review. Comments from these providers have been taken into account when drafting the plan.	No change proposed.
Policy SS7	149	364397	The plan does not achieve what is said in this statement, '... shall also be designed to prevent the coalescence of the new settlement with Lympne...' See comment under SS6. There is no mention about the protection of farm land so that the village can maintain a sustainable mixed farm.	The indicative masterplan identifies a landscape break between the proposed new garden settlement / Link Park and the existing settlement of Lympne. This is to ensure there is no coalescence of Lympne and the new garden settlement. The District is currently the second least developed district in Kent with only 8% developed. The majority of the district is farmland (78%) or natural areas (11%). The land lost through the proposed garden settlement would only be a small percentage of the farmland in the district.	No change proposed.
Policy SS7	70	1032113	The Kent Downs AONB Unit objects to the proposed allocation of a new garden settlement at Otterpool for the reasons set out in our response to policy SS1. However in the event of the allocation coming forward, we consider that this policy fails to incorporate sufficient safeguards to ensure development here would mitigate, in so far as is possible, the impacts of the proposal on the Kent Downs AONB. In criterion 1 we would expect greater reference to be made to proposals respecting views from the AONB and in particular from the escarpment of the Kent Downs. We consider clarification should be provided that the views include those from outside of the site looking towards the site and in particular in views from the Kent Downs AONB and that this does not only relate to a requirement for woodland planting. We would also point out that the site is visible from extensive tracts of the North Downs escarpment and all views out from this are deemed important. A fundamental part of ensuring a truly landscape led design approach will be to consider impacts on the AONB and accordingly, an essential starting point in the master-planning will be to ensure that areas of highest density and commercial buildings which are harder to mitigate are located so as to minimise impact on views from the AONB and in particular in views from the north. In addition to ensuring developable areas are located to minimise impact on the AONB, it will also be important to ensure that densities are such that effective mitigation such as tree planting in-between buildings can be carried out and that heights are comparable to existing settlements i.e. two stories to reflect local character and minimise impact. Orientation of streets and buildings should also be considered in relation to minimising impact on views from the AONB. This was acknowledged as being important in the Feasibility and Capacity study where it was stated that it was intended	Overall comments noted. The Council, together with Otterpool site promoters, will continue to engage with Kent Downs AONB Unit during pre-application discussions and work alongside them in order to overcome any major concerns. In terms of building heights, the policy states that proposals shall demonstrate a landscape-led approach that respects topography and views, particularly from the Kent Downs AONB. Building heights will therefore be assessed against this criteria and it is considered the inclusion of specific building criteria is too prescriptive for the policy. The improvement of gateways into the town will be discussed at master plan / planning application stage, and it is considered that the policy criteria is adequate to steer this development in the right direction.	Add additional reference to the AONB in the supporting text of Policy SS7 and criteria (1) a. of Policy SS7. Include reference to local landscape character in criteria (1) b. (i) of SS7 Include requirement for mature tree planting in criteria (4) c. of SS7

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS7	264	1162685	<p>The promise of 40% green infrastructure appears to be missing from this document. There is nothing in its place, not even a reduced target. This must be reinstated. The current masterplan draft includes '40% of the masterplan comprising of green infrastructure (excluding private gardens)' albeit 'approximately' and the Sustainability Appraisal was done on the same basis. This fundamental principle must not be relaxed. The 'green and blue infrastructure strategy' should be submitted as part of the outline planning permission. An effective legal framework must also be in place to ensure no watering-down of the strategy as the various neighbourhoods are built out. (1)(b)(iii) 'enhances the historic setting' should read 'by evoking the historic surroundings enhances the setting' (1)(b)(iv) add 'and nearby existing settlements' (2)(a) see comment above on 'high street' (3)(d) Neighbourhoods should be designed so as to respect the characteristics of existing neighbourhoods which should be either integrated into the new development or clearly distinguished from it. These design choices must be made with the full cooperation of existing communities. (5)(c) should read '.. and shall protect and restore key historic views.' (6)(c) not just junctions but also links are likely to need upgrading (6)(e) This does not seem compatible with maintaining the A20 as main road open to all classes of traffic and as an occasional diversion route should the M20 be blocked. Some sort of grade-separation will surely have to be applied to the A20 to allow safe connections between the different parts of the project.</p>	<p>Comment noted. The overall development is likely to provide the 40% target of Green Infrastructure, but given the development will come forward in phases; each phase could not be judged against the 40% target. Some phases will provide under 40%, whilst other phases will provide over 40%. Green Infrastructure studies are being carried out for both the district and the garden settlement.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS7	299	1163030	<p>Policy SS7 (1) (v): Suggested addition following the first sentence: Existing PRow will be protected and improved, and new PRow created to provide walking, equestrian and cycling access to places of work, education and facilities throughout the settlement, as well as providing leisure and recreational opportunities and offering access to the wider countryside. Policy SS7 (6): Support, notwithstanding the comment on criterion (e) and suggested amendments to criterion (g). Policy SS7 (6) (e): High quality, traffic-free walking and cycling routes should be provided within new developments and effectively integrate with the wider transport network. Walking and cycling links should provide realistic travel alternatives to short distance car journeys, offering direct and convenient access between residential estates, local amenities, shops, schools, open green spaces and major areas of employment. In line with Kent Design guidance, provision for walkers and cyclists should be provided within traffic free, wide green corridors of open space, and should not be confined behind rear gardens but overlooked by adjoining properties to help facilitate a safer environment for path users. All pedestrian and cycle routes within the development should be delivered in line with this guidance.</p> <p>Policy SS7 (6) (g): Suggested amendments to first sentence: ' to provide the capacity required to enable a high speed service ready and integrated transport hub ' Suggested amendment to second sentence: The council will continue to work with Network Rail the rail operator to introduce high-speed services from Westenhanger '</p>	The text will be amended in line with suggested changes from Kent County Council.	<p>Update the text to reflect KCC amendments as follows to first sentence of Policy SS7 (1) (v): Existing PRow will be protected and improved, and new PRow created to provide walking, equestrian and cycling access to places of work, education and facilities throughout the settlement, as well as providing leisure and recreational opportunities and offering access to the wider countryside . Reference will be made to the Kent Design Guide to ensure all pedestrian and cycle routes within the development are delivered in line with this guidance. Update the text to reflect KCC amendments as follows to first sentence of Policy SS7 (6) (g): ' to provide the capacity required to enable a high speed service ready and integrated transport hub ' Amendments to second sentence of Policy SS7 (6) (g) as follows: The council will continue to work with Network Rail the rail operator to introduce high-speed services from Westenhanger '</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS7	164	1160697	<p>Existing infrastructure in the area around this proposed development needs to be protected. Rural lanes are not suitable for higher volumes of traffic which is inevitable with a development of this size. Harringe Lane is a very narrow, single track lane with very few passing bays. This development will result in more traffic being diverted onto Harringe Lane during the construction phase of the development and when the development is completed. This lane is a popular cycle route and very popular with walkers and horse riders. An increase in traffic on the lane will make it very dangerous for other users. Due to the position of the lane with regards to the proposed development, this lane would be more suited to becoming an access only road to the residents and form part of the new bridlepath and cycle path network. Thus protecting it from high volume traffic which will lead to higher maintenance costs and potentially numerous accidents. Fly tipping is also a problem on this lane, people can enter from one end, dump their rubbish and then continue along the lane and leave from the other end, generally going unnoticed. Due to how narrow the lane is if you close one end you will prevent vehicles being able to dump rubbish as they will be unable to turn around to leave again. Harringe Lane passes very close to Harringe Brook woods, an ancient woodland which you have highlighted in the studies you have already carried out to have a variety of protected species, an increase in traffic will further pollute the lane and put these species at risk.</p>	<p>This is a matter to be discussed between Otterpool site promoters and the highway authority (KCC). The policy guides what will be developed on the site and therefore a stopping order is not under the remit of a local plan policy. Without prejudice, there is scope for the internal road alignments to respond to predicted traffic movements around the site, however the section of Harringe Lane that is north of the M20 falls outside of the site boundary and so the site promoters have no control or ability to upgrade this section of Harringe Lane. There are other constraints such as narrow width and roadside tree planting that define the character of Harringe Lane as a rural lane. Accordingly Harringe Lane could be worthy of retention in its current arrangement.</p>	<p>No change proposed.</p>
Policy SS7	496	1037610	<p>SS7 (5) Enhanced heritage assets Comment: The newly discovered Roman Villa should play a major plan in shaping Otterpool new town along with the Castle at Westenhanger The Military aspects of Shorncliffe could be greatly enhanced and are being destroyed by the developer with full permission of the district. The Heritage Strategy is in draft and this Core Strategy document should only be adopted once that piece of work has been completed and adopted as a guiding principle</p>	<p>Comments noted. See Council's Action.</p>	<p>In line with comments from Historic England, the policy criteria will be amended to ensure it is made clear that the master plan and heritage strategy must be read together as part of the outline planning application. Policy SS7 (5) paragraph (b) will be re-phrased to say that the heritage strategy should include an archaeological strategy which needs to be kept under active review as new information or circumstances are revealed, but which needs in the first instance to include an assessment of the nature and significance of the archaeology of the area and an initial archaeological research agenda to help inform decisions about preservation in situ or investigation.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS7	522	1042876	<p>SS7 New garden settlement place shaping principles We note the key policy wording under (1) Landscape-led approach, refers to the need for a Landscape and Visual Impact Assessment (LVIA) and a blue/ green infrastructure strategy. Our comments on both aspects are provided below. Kent Downs AONB/ LVIA The garden settlement policies refer little to potential impacts of the development on the AONB, which is surprising given the development presents a significant, new and dramatic insertion of built environment in the setting of the AONB, which is currently an expanse of semi-natural landscape as viewed from the escarpment. The settlement will be clearly visible along a substantial distance of the Downs, a much visited stretch especially along the North Downs Way National Trail. Considerable detailed assessment will be required to adequately assess the potential effects and options for mitigation, through the LVIA, which will have implications for location, density and height of buildings. It will involve exploration of various means of avoiding and mitigating effects which reach beyond planting and landscaping, including suitable colours of roofs and walls, and vegetated green roofs and walls which would also have the additional benefit of providing habitat. The LVIA will form a critical part of the forthcoming application. Natural England has already provided some pre-application advice to the Masterplanning team, alongside the AONB Unit, on suitable viewpoints and methodology. However we have urged the need to obtain specific data on proposed location, density and height of built development, in order to be able to ascertain the potential impacts on the views from the AONB. This will need to include in combination with other plans and projects, including the Sellindge extension and the M20 Lorry Park (Operation Stack). Blue/ green infrastructure strategy We welcome the several key principles</p>	<p>Support for several key principles of the policy to safeguard and enhance environmental assets of the site is noted. The Council, together with Otterpool site promoters, will continue to engage with Natural England during pre-application discussions and work alongside them in order to overcome any major concerns.</p>	<p>The pre-amble and criteria in Policy SS7 will include a key principle for the specific long term security and management of the GI estate, which is also set up in a way which gives the community control and custodianship, avoids fragmentation and degradation in future years, and ensure features provided as specific mitigation measures remain intact and functioning. Principle (1)(b)(i) advanced planting and habitat creation will also be reflected in the supporting text which currently refers to advanced structural planting for the motorway and rail corridor (paragraph 4.164). Principle (1)(b)(ii) net gain, ancient woodland, SSSIs. For net gain, under principle (1)(b)(ii), the policy wording will be made clearer that gains for biodiversity should be over and above residual losses which are accounted for and addressed in the forthcoming outline application. The policy will specifically reference Harringe Brooks Wood given its size and proximity to the settlement, to seek</p>
Policy SS7	393	1163118	<p>There should be no 'opportunity for revisions and amendments as the development is delivered'. There shall be 'opportunity for revisions and amendments as the development is delivered' and appropriate processed implemented and communicated as required by residents. 'Should' infers a recommendation. I would like to see this enforced.</p>	<p>The policy sets out the overarching criteria that will need to be met in any subsequent planning application, however each phase of construction will need to go through a planning application and will therefore be subject to a statutory public consultation period where the public will have the opportunity to comment on any potential revisions and/or amendments.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
<b>Policy SS7</b>	659	1042306	Policy SS7 NGS - Place Shaping Principles - as per the above we suggest that (1)a should require a landscape-led approach that additionally respects historic character. We welcome (1)b(iii) and reference to a strategic open space that enhances the historic landscape setting of Westenhanger castle. There is room for debate as to what this means in practice (see the comments above regarding the deer park) but we are pressing for Westenhanger castle to be made a part of the project so that what is needed is not just respect for its setting but also significant heritage benefit to the castle to complete its conservation and provide for it a sustainable future as an integral part of the new settlement. We are arguing for the red line project area to include the high grade heritage assets instead of wrapping around these, so that when weighing harm to benefit we can balance inevitable harm to setting with major heritage gains for the assets themselves. Repair of the historic site and its successful, sustainable future would enhance the new settlement. Section 5 Enhanced Heritage Assets - we can welcome the commitment to producing a Heritage Strategy as part of Paragraph (a) but we need to stress that this must be considered in tandem with the master plan so that we have an iterative process and not an imposition of the latter with the heritage of the site made to fit. This process is on-going and can be progressed as knowledge of archaeological remains increases as a result of assessments by the project. The policy needs to be clear that the master plan and a heritage strategy must be read together as part of the outline planning application. Paragraph (b) could be re-phrased to say that the heritage strategy should include an archaeological strategy which needs to be kept under active review as new information or circumstances are revealed, but which needs in the first instance to include an assessment of the nature and	Historic England argue that the red line site boundary for Otterpool Park should include Westenhanger Castle to ensure it is conserved and remains an integral part of the new settlement. This is something for the Otterpool site promoters to engage with Historic England on. Figure 4.5 of the Core Strategy Review (Indicative Strategy Garden Settlement North Downs) shows the building complex within the allocated site boundary. Historic England also suggest that archaeological finds should be displayed; however this is a detailed requirement that is not suitable for the Core Strategy Review policy and is something that Otterpool site promoters will need to engage with Historic England on.	Re-phrase Paragraph (b) to say that the heritage strategy should include an archaeological strategy which needs to be kept under active review as new information or circumstances are revealed, but which needs in the first instance to include an assessment of the nature and significance of the archaeology of the area and an initial archaeological research agenda to help inform decisions about preservation in situ or investigation. Remove public art from Paragraph (b) and create a new criterion for public art. Amend text in Paragraph (d) to read will be evaluated, conserved and where appropriate enhanced . Under subparagraph (e)(i) amend text to include the term conserve the heritage assets at Westenhanger castle and evidence of its associated historic landscape, and a specific reference to the need to achieve appropriate sustainable uses for the asset and its setting so that it can play a full part in the character and use of the new
Policy SS7	625	1057385	Policy SS7 (6) [page 89] Support, notwithstanding the comment on criterion (e) and suggested amendments to criterion (g).	Overall support from Kent County Council is welcomed.	No change proposed.
<b>Policy SS7</b>	627	1057385	Policy SS7 (6) (g) [page 89] Suggested amendments to first sentence: ' to provide the capacity required to enable a high speed service ready and integrated transport hub ' Suggested amendment to second sentence: The council will continue to work with Network Rail the rail operator to introduce high-speed services from Westenhanger '	The text will be amended in line with suggested changes from Kent County Council.	Update the text to reflect Kent County Council's suggestions as follows to first sentence: ' to provide the capacity required to enable a high speed service ready and integrated transport hub ' Suggested amendment to second sentence: The council will continue to work with the rail operator to introduce high-speed services from Westenhanger '

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS7	609	1156328	<p>Policy SS7 (6) has an aspiration to upgrade Westenhanger Station at the earliest opportunity to provide a high speed service for the Otterpool Development in partnership with Network Rail. It will be essential that Dover District Council is involved as soon as possible and throughout, these discussions with Network Rail. We will be seeking assurances that such provision on no way degrades or otherwise impacts existing high speed provision within Dover District or is detrimental to future high speed enhancements within the District. This includes our aspiration for at least one high speed train an hour, with a journey time to London of less than an hour, to and from Dover Priory Station. It is also vital that any new service provision at Westenhanger Station is phased at an appropriate point for the wider Otterpool Development and does not come forward prior to sufficient demand. Accordingly, sufficient flexibility should be incorporated into the phasing of such provision to account for any unexpected delays to the development.</p>	<p>The Council will continue to engage with neighbouring authorities at regular Duty to Cooperate meetings. There will also be a Statement of Common Ground prepared to ensure neighbouring authorities are in agreement with the Council 's aspirations. Notwithstanding this, the HS service at Westenhanger is not planned within the next franchise period which is until 2027. However, one potential option to ensure this doesn 't happen is for the HS service to stop at both Folkestone West and Westenhanger stations alternately to ensure that the service runs from both stations without disadvantaging any stations further down the line by increasing the number of stops.</p>	No change proposed.
Policy SS7	740	1057385	<p>In relation to Policy DM8 of the adopted Kent Minerals and Waste Local Plan 2013-30 and the need to assess safeguarding considerations for waste management facilities, the New Garden Settlement has been assessed. The Minerals and Waste Planning Authority can confirm that the strategic allocation development area coincides with a permitted waste recovery facility (Otterpool Quarry, Countrystyle Recycling Ltd - Composting and Anaerobic Digestion (AD) and Recycling Sites Construction and Demolition Waste). The permission has been implemented but not fully developed to date. The waste management site will be within 250m (essentially coincident) of the proposed strategic allocation area for mixed use neighbourhoods. Policy DM8 of the adopted Kent Minerals and Waste Local Plan 2013-30 requires an Infrastructure Assessment to be prepared to assess whether or not the strategic allocation development would be compatible with the use of the waste facility, particularly in regard to noise, dust, light and air emissions that may legitimately arise from the waste activities that could take place on site. The conclusion of the assessment would have to demonstrate that the new settlement development would not experience an unacceptable level of impact from the legitimate operation of the facility and the associated vehicle movements to and from the facility. It should be demonstrated that the future use of the safeguarded waste management facility would not be constrained by any incompatibility (e.g. amenity impacts) of the proposed development.</p>	<p>Comment noted. The site promoters and the Council are aware of the proximity of the site to the Otterpool Quarry and this will be taken into account when submitting any future planning application.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS7	624	1057385	Policy SS7 (1) (v) [page 87] Suggested addition following the first sentence: Existing PRow will be protected and improved, and new PRow created to provide walking, equestrian and cycling access to places of work, education and facilities throughout the settlement, as well as providing leisure and recreational opportunities and offering access to the wider countryside.	The text will be amended in line with suggested changes from Kent County Council; however the suggested wording will be amended to be better incorporated into the existing policy wording.	Update the text to reflect Kent County Council's suggestions as follows: This shall be informed by an access strategy that seeks to protect and enhance existing PRow, and create new PRow, whilst balancing demands for public access with ecological and landscape protection, taking into account the impacts of increased access on the Kent Downs AONB and Folkestone to Etchinghill Escarpment Special Area of Conservation and other protected areas
Policy SS7	626	1057385	Policy SS7 (6) (e) [page 89] High quality, traffic-free walking and cycling routes should be provided within new developments and effectively integrate with the wider transport network. Walking and cycling links should provide realistic travel alternatives to short distance car journeys, offering direct and convenient access between residential estates, local amenities, shops, schools, open green spaces and major areas of employment. In line with Kent Design guidance, provision for walkers and cyclists should be provided within traffic free, wide green corridors of open space, and should not be confined behind rear gardens but overlooked by adjoining properties to help facilitate a safer environment for path users. All pedestrian and cycle routes within the development should be delivered in line with this guidance.	Comment noted.	Include reference to Kent Design guidance as requested by Kent County Council.
Policy SS7	533	1163318	Garden Settlement Policies: SS7 Place Shaping, SS8 Sustainability and SS9 Infrastructure 7. Taken together these policies eloquently set the tone for a landscape led approach in such a sensitive setting. There is a recognition that high quality place making will be very important and that sustainable development principles must be adopted throughout. Early delivery of key pieces of infrastructure such as primary schools are properly highlighted. However, the question of community formation could be given a good deal more prominence. The fact that it is addressed with a very light-touch right at the end of the section on the garden settlement perhaps underplays its importance to the ultimate "success" of the new town assuming that the social dimension has at least as much priority as economic and environmental aims and objectives.	Comment noted. The supporting text and policy will be amended to add reference to the post of a community development worker to help new residents in the early years of the development of the new settlement. Discussions are underway on the site promoter side as to how best approach the important issues such as community formation at Otterpool Park. The Council also recognise the importance of community and cohesion as identified in the Core Strategy Review 's Strategic Needs C and D.	Amend Policy SS9: New Garden Settlement - Infrastructure, Delivery and Management and supporting text to reference the creation of a post of community development worker.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS7	738	1164722	The Parties are broadly supportive of this policy however propose the following amendments as shown below. The amendments shown in red below can be summarised as follows: The removal of reference to 'village' when describing neighbourhoods in section 3 of the draft policy has been proposed to better reflect the size and character of the neighbourhoods that may come forward over the course of delivering the Otterpool park garden settlement.	Noted. While the term 'village' is not intended to be prescriptive, it does follow the general vision and wording of the Charter for Otterpool Park which has informed the policies in the Core Strategy Review.	No change proposed.
Policy SS7	743	1057385	KCC 's Public Rights of Way and Access Service is keen to ensure that its interests are represented within the local policy frameworks of the Districts and Boroughs in Kent. The team is committed to working in partnership with local planning authorities to achieve the aims contained within the Rights of Way Improvement Plan (ROWIP) (2018-2028) and contribute towards Increasing Opportunities, Improving Outcomes: Kent County Council 's Strategic Statement (2015-2020). The District Council should be aware that KCC 's ROWIP is currently being reviewed and updated. A new ROWIP is expected to be published later this year. Based on extensive research and public consultation, the plan assesses the extent to which Public Rights of Way (PRoW) meet current demand and how they will need to evolve to meet future requirements. Although largely supported, the Consultation Document makes no reference to the County Council 's ROWIP as the strategic and statutory policy document for PRoW protection and enhancement. The Service strongly urges that Folkestone and Hythe District Council ensures the ROWIP is referenced. This will enable successful joint partnership working to deliver improvements to the District 's PRoW network.	Noted; reference will be made in the supporting text. See Council's Action.	The Council will include reference in the supporting text to Kent County Council 's Public Right of Way (PRoW) document titled Rights of Way Improvement Plan (ROWIP) (2018-2028) to ensure successful joint working to deliver improvements to the District 's PRoW network.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS7	669	1160683	<p>Whilst CCPIII Shopping Folkestone S.A.R.L (c/o Ellandi LLP) support the principle of the proposed New Garden Settlement within the North Downs area, the proposed policies relating to the development have given insufficient attention to the retail and town centre offer that should be provided. As a result there is a significant risk that an inappropriate scale of development could be promoted which would cause significant harm to the existing town centres in the District and beyond (see also the comments in relation to Paragraph 4.98). It is clearly appropriate for the development to include some retail and town centre uses in order to meet the day-to-day needs of the new residents and those in the surrounding area (Policy SS9(1c)).</p> <p>However, any retail provision must be of a scale appropriate to the retail hierarchy and, as such is likely to be limited to meeting the day-to-day convenience, comparison and service needs of the residents, with less frequent comparison shopping needs continuing to be met in the higher order centres including Folkestone town centre. At the present time the wording in the draft Revised Core Strategy risks promoting the development of a new major retail centre in the North Downs area. Such a proposal could not be supported by the new population alone and thus would rely on trade from further afield. This would not only be contrary to the sustainability principles behind the new development, but would also have an adverse impact on existing town centres, contrary to other policies within the Core Strategy and the aims arising from the Strategic Needs, particularly A and B.</p>	The council has completed new evidence on retail and employment needs (Lichfields, 2018). This has been used to inform amendments to policies in the Submission Draft (Regulation 19) Core Strategy Review.	Update policies relating to retail and employment needs for the Submission Draft (Regulation 19) Core Strategy Review as necessary.
4.169	598	329173	4.169 "severe water stress" - The EA report uses the term "serious water stress", not severe.	Noted. The council will amend the paragraph accordingly.	Amend the text as set out under Council's Response.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.169	396	1036994	POTABLE WATER SUPPLY. I would begin by prefacing this document with a brief description of where we are now in terms of water scarcity and potable water supply for a growing community. The South East of England has always been, in relation to the rest of the UK, water stressed. With a growing local population, certainly over the past 30 years, measures have been taken to try to limit water usage which has, for the most part, been successful. Metering has played a big part in the water intake of households, made compulsory by the designation of our local water company, Affinity Water, of having Water Scarcity Status'. Some 90% of supplies are now metered. Over recent years we have seen drought measures instigated by way of hose pipe bans, Car washing facilities restricted or shut down and so forth. Affinity Water has persuaded us to use hippo bags in WC Cisterns, and even today, are promoting (FOC) water saving shower heads and similar products to save water. There was even a plan to import water through the channel tunnel fire hydrant system and tow water filled barges across the North Sea from Scandinavia in the mid nineties, given the local drought situation. The scenario of severe drought has not yet fully been experienced, but with a growing local population, measures of resilience could be adopted to alleviate and reduce such a situation happening in the near future. Migration from cities is definitely not one of them and would only serve to exacerbate the water scarcity situation even further. The Folkestone and Dover area is known as the Dour region (WRZ 7) and is the most water stressed area in the UK. Formerly known as the Folkestone and Dover Water Company, then Veolia, and now Affinity Water, it is reliant mostly (some 90%) on groundwater supply. Unlike other water companies, there are no sizable reservoirs as such, which means we are dependant on rainfall	The District Council has published an updated version of the Water Cycle Study, which can be accessed via the Council 's website. The study report has been the subject of ongoing dialogue and feedback from the Environment Agency, Affinity Water, Southern Water, South East Water, Natural England and Kent County Council as principal stakeholders. The Council is looking to prepare a Position Statement jointly with Affinity Water to explain that the water supply demand attributed to Otterpool Park Garden Town can be provided, an exercise that will also define what network reinforcements are needed and at when, i.e. the trigger points. Proposals in the Core Strategy Review will be subject to an examination-in-public and will be assessed by an independent planning Inspector appointed by the Secretary of State as part of the process of preparing the plan.	No change proposed.
4.169	660	1042306	Paragraph 4.169 NGS Sustainability Principles onwards and Policy SS8 NGS - Sustainability and Healthy New Town Principles: the definition of sustainable development adopted here is mostly about green ' issues; however, the environmental dimension of sustainability set out in the NPPF includes the historic environment (ref. NPPF paragraph 7, third bullet point) and should be reflected here.	The issue of historic environment is dealt with specifically in Policy SS7; however it is noted that the historic environment is part of the environmental aspect of sustainability.	Supporting text to Policy SS8 to be amended to include new opening paragraph that includes reference to the National Planning Policy Framework and the historic environment.
4. 170	395	1163118	With the area undergoing 'severe water stress', it is not sufficient to state that the area has 'the potential for the garden settlement to become a beacon of best practice for environmental sustainability'. A detailed plan and strategy should be in place, approved, financed and sanctioned prior to any development work being undertaken.	The District Council has published an updated version of the Water Cycle Study, which can be accessed via the Council 's website. The study report has been the subject of ongoing dialogue and feedback from the Environment Agency, Affinity Water, Southern Water, South East Water, Natural England and Kent County Council as principal stakeholders. The Council is looking to prepare a Position Statement jointly with Affinity Water to explain that the water supply demand attributed to Otterpool Park Garden Town can be provided, an exercise that will also define what network reinforcements are needed and at when, i.e. the trigger points.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.172	300	1163030	The safeguarded minerals are not correctly identified. The proposed strategic allocation is located within the Shepway Minerals Safeguarded Area (MSA) as defined by Policy CSM5 Land-won Minerals Safeguarding of the adopted Kent Minerals and Waste Local Plan 2013-30. The safeguarded economic minerals are: Solid geology: Limestone Hythe Formation (Kentish Ragstone) Sandstone Sandgate Formation Silica Sand/Construction sand Sandstone: Folkestone Formation Superficial geology: Sub Alluvial River Terrace Deposits	The paragraph will be amended accordingly.	Amend text to reflect objection.
4.172	628	1057385	4.172 [page 90] The safeguarded minerals are not correctly identified. The proposed strategic allocation is located within the Shepway Minerals Safeguarded Area (MSA) as defined by Policy CSM5 Land-won Minerals Safeguarding of the adopted Kent Minerals and Waste Local Plan 2013-30. The safeguarded economic minerals are: Solid geology: - Limestone Hythe Formation (Kentish Ragstone) - Sandstone Sandgate Formation - Silica Sand/Construction sand Sandstone: Folkestone Formation Superficial geology: - Sub Alluvial River Terrace Deposits	Amend paragraph according to Kent County Council's suggestions.	Amend text to reflect Kent County Council's suggestions.
<b>Policy SS8</b>	71	1032113	This policy includes a requirement for an energy strategy that includes the potential for a site wide heat and power network. Such a facility, by its nature, has the potential to be particularly harmful on the AONB landscape and would only be appropriate if it could be designed and located so as to conserve and enhance the AONB, in accordance with the NPPF paragraph 115 and the Countryside and Rights of Way Act 2000.	The energy strategy and proposals within would need to take into account the AONB and its setting.	Amend Policy SS8 - add to end of 1 (a) "taking into account the AONB and its setting."

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS8	312	1157838	<p>Paragraph B is not achievable. The Building Regulations 2010 Paragraph 36(2)(b) states: "36. "(1) The potential consumption of wholesome water by persons occupying a dwelling to which this regulation applies must not exceed 125 litres per person per day, calculated in accordance with the methodology set out in the document The Water Efficiency Calculator for New Dwellings , published in September 2009 by the Department for Communities and Local Government(1)." Here are some facts regarding common water usage: Average household water usage in the UK - 330 litres per day With 1 resident - 149 litres With 2 residents - 276 litres With 3 residents - 367 litres With 4 residents - 450 litres With 5 residents - 523 litres With 6 residents - 592 litres With 7 residents - 655 litres It is clear that a maximum usage of 90 litres per person per day is not achievable. Here are some facts: Recommended drinking water per day - 2 litres Cooking - 8 litres Toilet (per flush) - 6 litres (modern, efficient toilet) - 10 litres (older toilet) Washing hands - 3 litres Cleaning teeth - 18 litres (running tap for 2 minutes) Filling kettle - 2 litres Showering (8 mins) - 50 litres Filling bath - 80 litres - 115 litres Washing machine - 6 litres/kilogram (modern efficient machine) - 14.5 litres/kilogram (average 9.5 litres/kilogram) Equivalent per load - 50 - 95 litres (modern, efficient machine) - 150 - 170 litres (older machine). Average 80 litres Dishwasher - 15 litres Washing up (per bowl) - 6 litres Therefore, one person could consume 10 litres in drinking and cooking, 6 litres washing the dishes, 12 litres using the toilet twice, 6 litres washing their hands twice, 50 litres taking a shower and be at 84 litres water consumption! This person would have to either skip showering on any day they want to do laundry, or only do it once every fortnight... but so much laundry would have accumulated that they would have to do several loads, still pushing</p>	<p>The target was previously assessed as achievable in Core Strategy 2013, therefore it is considered that this remains the case.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS8	301	1163030	Policy SS8 (1): The importance of maintaining the integrity of water quality is referred to at paragraph 2.42 [page 33] and should also be reflected in this policy. Policy SS8 (1) (b) i: The policy states: ' minimise water use and maximise the recycling and reuse of water resources with the aim of achieving water neutrality across the settlement [ emphasis added] This has also been referred to as an aspiration [e.g. paragraph 5.159, page 146] and this is more realistic. Water neutrality involves retrofitting enough existing properties with water saving fittings to offset the entire water demand from the new development and, because the savings achievable in each existing home are relatively small, this means retrofitting a significant number of properties. In the case of Otterpool Park, there are nowhere near enough existing properties across the settlement to achieve this. The Water for Sustainable Growth Study estimated that achieving water neutrality for all new homes in the Folkestone and Hythe District Council area would require retrofitting 43% of the existing housing stock. In the delivery of new schools, the Local Education Authority generally seeks to achieve the BREEAM ' Good ' standard. Given the proposed policy requirement for non-residential development to achieve the ' Outstanding ' standard, there is likely to be a notable increase in the build cost of new schools and this must be fully funded by the development. Policy SS8 (1) (h): The Minerals and Waste Planning Authority notes that the policy requires a Minerals Assessment to be undertaken to fully comply with the adopted Development Plan for Kent. This includes the adopted Kent Minerals and Waste Local Plan 2013-30 with particular reference to Policy DM7 Safeguarding Minerals Resources that sets out the criteria for establishing an exemption from the presumption to safeguard the identified economic minerals. Policy SS8 (2) (a) i: The PRoW network	Please see responses for comments numbers 629/630/631/632/633.	Please see actions for comments numbers 629/630/631/632/633.
<b>Policy SS8</b>	265	1162685	(1)(g) Supported in principle but unnecessarily restrictive. Some movement of soils from immediately adjacent sites may make sense. Clause is also potentially in conflict with (h).	Disagree as there are no immediately adjacent sites proposed within the same time frame. It is also unclear how this criteria conflicts with (h).	No change proposed.
<b>Policy SS8</b>	596	329173	3.26, 4.88, Policies SS6 SS8 (1) b & c, Section 5.66 - We welcome the ambition to create a water-neutral development. However this is a concept to be applied at a large scale, not something which is achievable in the context of an individual self-built or custom-built home, as the bottom of page 84 seems to imply, or even a larger new development in isolation. To achieve water neutrality, new water consumption in a development needs to be balanced by consumption reductions elsewhere. Perhaps a definition could be included in the Glossary, and thought given to delineating the wider area over which neutrality is to be achieved?	The wording will be updated to reflect water neutrality as an aspiration. The council does not consider that delineating a wider area would be feasible.	Amended text to reflect water neutrality as an aspiration.
<b>Policy SS8</b>	610	1156328	Policy SS8 states that the Otterpool development is to be informed by a Water Cycle Strategy. Folkestone and Hythe District Council will be aware of areas of identified water stress within our shared water catchment areas. Dover District Council would like an early discussion with Folkestone and Hythe District Council and other key duty to co-operate partners in order to ensure the early identification of cross-boundary water supply and quality issues.	Noted. Folkestone & Hythe District Council will continue to work with Dover District Council and other partners as required by the duty to co-operate.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS8	599	329173	Policy SS8 (1) b & c, Section 5.66 - We commend the ambition to aim for water use as low as 90 litres per person per day, noting that, as explained in section 5.66, this is above and beyond what is recommended in the Building Regulations, being more ambitious than their optional higher water efficiency standard. Similarly we applaud the intention that non-residential development should achieve BREEAM Outstanding standard.	The support is welcomed.	No change proposed.
Policy SS8	534	1163318	Garden Settlement Policies: SS7 Place Shaping, SS8 Sustainability and SS9 Infrastructure 7. Taken together these policies eloquently set the tone for a landscape led approach in such a sensitive setting. There is a recognition that high quality place making will be very important and that sustainable development principles must be adopted throughout. Early delivery of key pieces of infrastructure such as primary schools are properly highlighted. However, the question of community formation could be given a good deal more prominence. The fact that it is addressed with a very light-touch right at the end of the section on the garden settlement perhaps underplays its importance to the ultimate "success" of the new town assuming that the social dimension has at least as much priority as economic and environmental aims and objectives.	Agree that the question of community creation is important. The supporting text and policy will be amended to add reference to the post of a community development worker to help new residents in the early years of the development of the new settlement. The policy provides the provision of facilities and spaces to support this. Strategies to accompany this document will be required e.g. creating a sense of place through public art that will aid the creation of a new community whilst integrating it with the existing community.	Amend Policy SS9: New Garden Settlement - Infrastructure, Delivery and Management and supporting text to add reference to the creation of a post of community development worker.
Policy SS8	629	1057385	Policy SS8 (1) [page 91] The importance of maintaining the integrity of water quality is referred to at paragraph 2.42 [page 33] and should also be reflected in this policy.	Amend Policy SS8 (1)(b)(ii) according to Kent County Council's suggestions.	Amend text of Policy SS8 (1)(b)(ii) to include reference to integrity of water supply.
Policy SS8	631	1057385	Policy SS8 (1) (c) [page 91] In the delivery of new schools, the Local Education Authority generally seeks to achieve the BREEAM Good ' standard. Given the proposed policy requirement for non-residential development to achieve the Outstanding ' standard, there is likely to be a notable increase in the build cost of new schools and this must be fully funded by the development.	Noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS8	633	1057385	<p>Policy SS8 (2) (a) i [page 92] The PRow network provides opportunities for leisure and recreational activities and should be referred to in this policy in addition to public open spaces. In addition to walking and cycling, it is important that the Core Strategy Local Plan Review seeks improvements to equestrian access provision within the area. Research of the PRow resource in Kent has identified a shortage of opportunities for higher right use, with relatively limited off-road equestrian routes compared to the national average. The development of a high quality equestrian access resource could bring economic benefits to the region and address safety concerns. Consideration should be given to the impact of future development on Non Motorised Users (NMUs) along rural lanes, as these routes provide vital connections for equestrians and cyclists travelling between off-road PRow routes. The New Garden Settlement is likely to increase vehicular traffic along these routes and raise safety concerns for NMUS, who may then be deterred from travelling along the rural lanes and using the PRow network.</p>	<p>This issue is covered under Policy SS7: New Garden Settlement - Place Shaping Principles.</p>	<p>SS7 (1) (v) will be amended as follows: Publicly accessible, well-managed and high quality open spaces, which are linked to the open countryside and adjoining settlements. This shall be informed by an access strategy that seeks to protect and enhance existing public rights of way, and create new public rights of way. The strategy shall balance demands for public access with ecological and landscape protection, taking into account the impacts of increased access on the Kent Downs AONB and Folkestone to Etchinghill Escarpment Special Area of Conservation and other protected areas, which might necessitate the need for mitigation to be secured;</p>
Policy SS8	744	1057385	<p>KCC 's Public Rights of Way and Access Service is keen to ensure that its interests are represented within the local policy frameworks of the Districts and Boroughs in Kent. The team is committed to working in partnership with local planning authorities to achieve the aims contained within the Rights of Way Improvement Plan (ROWIP) (2018 2028) and contribute towards Increasing Opportunities, Improving Outcomes: Kent County Council 's Strategic Statement (2015-2020). The District Council should be aware that KCC 's ROWIP is currently being reviewed and updated. A new ROWIP is expected to be published later this year. Based on extensive research and public consultation, the plan assesses the extent to which Public Rights of Way (PRow) meet current demand and how they will need to evolve to meet future requirements. Although largely supported, the Consultation Document makes no reference to the County Council 's ROWIP as the strategic and statutory policy document for PRow protection and enhancement. The Service strongly urges that Folkestone and Hythe District Council ensures the ROWIP is referenced. This will enable successful joint partnership working to deliver improvements to the District 's PRow network.</p>	<p>Noted; the supporting text will be amended to refer to the Rights of Way Improvement Plan.</p>	<p>Amend supporting text to refer to Kent County Council's Rights of Way Improvement Plan (POWIP).</p>



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS8	630	1057385	Policy SS8 (1) (b) i [page 91] The policy states: ' minimise water use and maximise the recycling and reuse of water resources with the aim of achieving water neutrality across the settlement [ emphasis added] This has also been referred to as an aspiration [e.g. paragraph 5.159, page 146] and this is more realistic. Water neutrality involves retrofitting enough existing properties with water saving fittings to offset the entire water demand from the new development and, because the savings achievable in each existing home are relatively small, this means retrofitting a significant number of properties. In the case of Otterpool Park, there are nowhere near enough existing properties across the settlement to achieve this. The Water for Sustainable Growth Study estimated that achieving water neutrality for all new homes in the Folkestone and Hythe District Council area would require retrofitting 43% of the existing housing stock.	The wording will be updated to reflect water neutrality as an aspiration.	Amend text of Policy SS8 to reflect water neutrality as an aspiration.
Policy SS8	632	1057385	Policy SS8 (1) (h) [page 91] The Minerals and Waste Planning Authority notes that the policy requires a Minerals Assessment to be undertaken to fully comply with the adopted Development Plan for Kent. This includes the adopted Kent Minerals and Waste Local Plan 2013-30 with particular reference to Policy DM7 Safeguarding Minerals Resources that sets out the criteria for establishing an exemption from the presumption to safeguard the identified economic minerals.	Noted.	No change proposed.
Policy SS8	535	1163318	Garden Settlement Policies: SS7 Place Shaping, SS8 Sustainability and SS9 Infrastructure 7. Taken together these policies eloquently set the tone for a landscape led approach in such a sensitive setting. There is a recognition that high quality place making will be very important and that sustainable development principles must be adopted throughout. Early delivery of key pieces of infrastructure such as primary schools are properly highlighted. However, the question of community formation could be given a good deal more prominence. The fact that it is addressed with a very light-touch right at the end of the section on the garden settlement perhaps underplays its importance to the ultimate "success" of the new town assuming that the social dimension has at least as much priority as economic and environmental aims and objectives.	See response to comment number 534.	See Council's action under comment number 534.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS8	670	1160683	<p>Whilst CCPIII Shopping Folkestone S.A.R.L (c/o Ellandi LLP) support the principle of the proposed New Garden Settlement within the North Downs area, the proposed policies relating to the development have given insufficient attention to the retail and town centre offer that should be provided. As a result there is a significant risk that an inappropriate scale of development could be promoted which would cause significant harm to the existing town centres in the District and beyond (see also the comments in relation to Paragraph 4.98). It is clearly appropriate for the development to include some retail and town centre uses in order to meet the day-to-day needs of the new residents and those in the surrounding area (Policy SS9(1c)).</p> <p>However, any retail provision must be of a scale appropriate to the retail hierarchy and, as such is likely to be limited to meeting the day-to-day convenience, comparison and service needs of the residents, with less frequent comparison shopping needs continuing to be met in the higher order centres including Folkestone town centre. At the present time the wording in the draft Revised Core Strategy risks promoting the development of a new major retail centre in the North Downs area. Such a proposal could not be supported by the new population alone and thus would rely on trade from further afield. This would not only be contrary to the sustainability principles behind the new development, but would also have an adverse impact on existing town centres, contrary to other policies within the Core Strategy and the aims arising from the Strategic Needs, particularly A and B.</p>	<p>The council has completed new evidence on retail and employment needs (Lichfields, 2018). This has been used to inform amendments to policies in the Submission Draft (Regulation 19) Core Strategy Review. In addition Policy SS7 (as amended for the Regulation 19 draft) states: "An impact assessment shall be undertaken to demonstrate that there would be no detrimental impacts on the vitality and viability of nearby local village centres and other town centres including Folkestone, Hythe, New Romney, Dover and Ashford, by the scale and/or phasing of town centre development, particularly where provision above these indicative thresholds is proposed ..."</p>	<p>Amend policies for the Submission Draft (Regulation 19) Core Strategy Review as necessary following updated evidence on employment and retail needs.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS8	741	1057385	<p>In relation to Policy DM8 of the adopted Kent Minerals and Waste Local Plan 2013-30 and the need to assess safeguarding considerations for waste management facilities, the New Garden Settlement has been assessed. The Minerals and Waste Planning Authority can confirm that the strategic allocation development area coincides with a permitted waste recovery facility (Otterpool Quarry, Countrystyle Recycling Ltd - Composting and Anaerobic Digestion (AD) and Recycling Sites Construction and Demolition Waste). The permission has been implemented but not fully developed to date. The waste management site will be within 250m (essentially coincident) of the proposed strategic allocation area for mixed use neighbourhoods. Policy DM8 of the adopted Kent Minerals and Waste Local Plan 2013-30 requires an Infrastructure Assessment to be prepared to assess whether or not the strategic allocation development would be compatible with the use of the waste facility, particularly in regard to noise, dust, light and air emissions that may legitimately arise from the waste activities that could take place on site. The conclusion of the assessment would have to demonstrate that the new settlement development would not experience an unacceptable level of impact from the legitimate operation of the facility and the associated vehicle movements to and from the facility. It should be demonstrated that the future use of the safeguarded waste management facility would not be constrained by any incompatibility (e.g. amenity impacts) of the proposed development.</p>	Noted.	Insert new text to refer to Policy DM8 of the adopted Kent Minerals and Waste Local Plan 2013-2030.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS8	739	1164722	As noted in the above sections of these representations, achieving water neutrality at the Otterpool garden settlement will be challenging to achieve. The amended wording shown in red below is therefore proposed. Part 1c of draft policy SS8 states that non-residential development shall achieve the BREEAM 'Outstanding' standard including addressing maximum water efficiencies under the mandatory water credits. Achieving 'Outstanding' is a particularly challenging rating. It requires the adoption of innovative design, materials and technology to achieve a minimum of 85% of credits. For context, currently less than 1% of UK non-domestic buildings achieve this standard. A number of credits are likely to be difficult to achieve at the Otterpool Park garden settlement, for example: LE01 Site Selection to achieve this credit, at least 75% of the proposed development must be on land that has been previously occupied (excludes agricultural land, parks, recreation grounds, allotments, mineral extraction or landfill where the land has been restored and structures that have been reclaimed by nature (typically more than 50 years); POL02 Local Air Quality The proposed location for the Otterpool Garden settlement is in an area BREEAM classes as high pollution and therefore the NOx, particulate and VOC emissions from heating and hot water plant are more stringent. This may therefore make this credit difficult to achieve; POL03 Flood and surface water management Building in flood zones 2 & 3 will reduce the credits achievable (flooding from all sources and not just river flooding). WAT01 and WAT02 Water efficiencies - Maximum water efficiencies under WAT01 requires a 55% improvement over the baseline building water consumption. This is achievable but it will be challenging as it will require rain/grey water harvesting, waterless urinals and very low flow taps and WCs. These require careful building design to ensure	The Otterpool Charter states that the development will meet challenging standards. Whilst the proposal would lose credits for being a greenfield site, it is possible for it to pick up credits against other criteria, for example biodiversity improvements. It is not clear what the respondent means by "POL02 Local Air Quality The proposed location for the Otterpool Garden settlement is in an area BREEAM classes as high pollution". POL02 has the aim To encourage the supply of heat from a system that minimises NO x emissions, and therefore reduces pollution of the local environment. Given that there are no Air Quality Management Areas in the district it is unclear as to why the respondent refers to the location as being in an area classed by BREEAM as high pollution. It may be appropriate to refer to BREEAM and/or another industry standard to ensure a high quality development is built given that there are BREEAM categories that would not necessarily result in a better building.	No change proposed.
4.173	179	1163011	No attempt has been made to consult with nearby residents in Aldington about the affects of this new town. Aldington is already overstretched on transport (almost no buses, roads severely overloaded and poor quality), energy (no gas), water, health (no surgery, hospital at full stretch and then some). This development will lead to rat-running traffic through Aldington, trying to avoid the congestion around Ashford on the A20 and junctions 10 and 10a of the M20. The plan envisages improvements in Shepway but allocates no resource to address adverse affects in Ashford Borough which are close and directly affected.	Details of the consultation held between 29 March and 18 May 2018 were sent all parish councils that fall within the administrative area of Ashford Borough in advance of the consultation period.	No change proposed.
4.174	314	1157838	Surely funding can still be arranged through S106 and S278 agreements alongside CIL payments? I do not agree with zero rating large developments and excusing the developers from CIL payments, when the rest of us would have to pay if we wanted to construct smaller developments. The same goes for the Folkestone seafront development, Shornccliffe camp and any similar developments that have been zero rated.	The Council considers that strategic and key development sites are more appropriately addressed by s106 contributions, given their scale and stage in the planning process.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.174	266	1162685	It is not clear what the mechanism for obtaining the money which would otherwise have been raised by CIL will be. Why not leave CIL as is and hypothecate the money raised to the garden settlement project? We do not understand why a 'tariff-based' approach depends on securing HIF funds.	The mechanism for securing developer contributions, be it capital sums or physical infrastructure, will be via S106 legal agreement or a S278 Highways Agreement. As Housing Infrastructure Fund money was not secured the funding arrangements for the Garden Town will need to be revisited and the Core Strategy Review updated accordingly.	Update supporting text regarding the Housing Infrastructure Fund.
4.174	160	1029376	Have all archaeology studies been performed, will finding affect design of settlement, are there risks if they find Roman settlement	The comments are noted. The site promoter has commissioned various archaeological studies, and has conducted site visits with representatives of Heritage England. Upon the receipt of advice from Heritage England any policy changes, if required, will be made accordingly. The scheme design will be for the site promoter to decide upon, which may need to incorporate changes to reflect the presence of archaeological features, should any be identified.	No change proposed.
4.174	302	1163030	Following the March 2018 Housing Infrastructure Fund announcement, this section will require updating.	Noted. The section that refers to the Housing Infrastructure Fund will be updated.	Update supporting text relating to the Housing Infrastructure Fund (HIF).
4.174	497	1037610	4.174 In order to capture the uplift in land value created by the new settlement, the garden settlement will be excluded from the application of the Community Infrastructure Levy (CIL). Comment: Why, if the development is being constructed by national housebuilders earning a significant profit on each house?	The development will be delivered by a variety of different housebuilders and will contribute a significant proportion of affordable housing and plots for people to build their own homes, or commission their own builders to build their home to their specific designs. The total capital cost to deliver the wide range of infrastructure needs at the garden settlement is significant; the council has commissioned viability consultants to help inform the implementation and delivery aspects of the proposals.	No change proposed.
4.174	634	1057385	New garden settlement and the Community Infrastructure Levy [page 92] Following the March 2018 Housing Infrastructure Fund announcement, this section will require updating.	Noted. The section that refers to the Housing Infrastructure Fund will be updated.	Update supporting text referring to the Housing Infrastructure Fund (HIF).
4.174	722	1101438	One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. Please see the ESFA 's comments on developer contributions provided in response to the 'Places and Policies' consultation.	Comments noted. A detailed cost appraisal of all infrastructure items is being undertaken involving the various stakeholder representatives, the District Council (as planning authority) and the promoter (which includes the District Council as a major landowner). The financial cost of meeting the education need across a construction/occupation phase that could last up to 30 years if the subject to detailed discussions, as is the mechanism(s) by which contributions, be it financial or the provision of a serviced building, are the subject of negotiations as items for inclusion as draft S106 Heads of Terms. This information will be finalised and the cost assumptions will be recorded within an Infrastructure Delivery Plan for consultation and comment.	No change proposed.
4.174	726	1164722	It is confirmed that the Council 's Community Infrastructure Levy (CIL) Charging Schedule will shortly be updated. The amendments will confirm that the Otterpool Park garden settlement will be excluded from the application of the CIL. The Parties support this proposed amendment.	Noted. The council will amend the Community Infrastructure Levy Charging Schedule to exclude the new garden settlement allocation, following the approach to Folkestone Seafront, Shorncliffe Garrison and other strategic sites in the adopted 2013 Core Strategy.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.175	310	1036994	See 4.169	The below response has been provided by Affinity Water in response to the Core Strategy Review Local Plan: Planned growth to the region (to specifically include Folkestone and Hythe District and assigned growth within the emerging Core Strategy Review Local Plan to 2037 and the Places and Policies Local Plan to 2031) to 2080 is catered for in our Water Resources Management Plan 2019. This water resources management plan sets out how we will balance supply and demand over this period. In that time our supply resource in our WRZ7 will not change significantly. Future demand is based on new property growth as provided from local plans (to 2045) and modelled thereafter. We forecast that occupancy rates will reduce with overall per property consumption reduction. Individual consumption will increase as occupancy rates decrease and will need further schemes to encourage further reductions in potable water use. There is a current small surplus in resources and the water resources management plan puts in measures to maintain this. We currently utilise two minor imports from South East Water and Southern Water for emergency purposes. There is no requirement to increase these imports and to make them part of our resource base. Our water resources planning is at zonal level. There will be the requirement to transfer water internally to meet the local development needs. Following on from our draft plan (WRMP19) we will be publishing a revised draft for further consultation in Spring 2019.	No change proposed.
4.175	267	1162685	Delete 'where feasible'. Of course it is feasible, but may be costly over such a wide area.	Comments noted. The phrase 'where feasible' relates to the ability for high speed internet technology to be made available to the neighbouring communities of Lympne, Postling, Stanford, Westenhanger and Barrow Hill. Until this is investigated further it cannot be assumed that it is feasible to connect with all properties in outlying settlements.	No change proposed.
4.176	309	1036994	See 4.169	This duplicates an earlier response under ID 310.	See under comment number 310.
4.177	338	1163103	Brief comment on Otterpool .	There is no designated Green Belt within Folkestone & Hythe district. Concerns raised over water supply have been raised by a number of parties, and the Council is preparing a Statement of Common Ground with Affinity Water to explain that the scale of growth at the garden settlement will be planned for in terms of water supply demand.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS9	72	1032113	The strategic scale of the proposed new settlement and resultant increase in population, married with the proximity of the site to the Kent Downs AONB, will inevitably result in significant increased use of the AONB by the new population and potential pressure and over use of sensitive parts of the AONB including additional use of rural lanes within the AONB boundary. This is confirmed in the framework Masterplan produced for the Otterpool site where it is confirmed that leisure routes will link to the wider landscape, providing opportunities to enjoy the surrounding AONB. Accordingly, it is considered necessary for potential conflicts/issues to be identified and appropriate monetary contributions/physical improvements to be provided towards the costs of managing the impact of increased visitors to the AONB through Section 106 Agreements. While we agree a strategy for the long term maintenance of strategic and local open spaces will be required, it will be crucial to ensure mechanisms are also put in place to maintain landscape features such as trees provided in highways and in private gardens in perpetuity, where these provide mitigation in views from the AONB, in addition to those in public space.	Comments noted. The next version of the Core Strategy Review will include a suitably-worded reference that the increase in population at the Garden Town, given its proximity to the AONB, shall result in increased use of the AONB which might necessitate the need for mitigation to be secured. The response from the AONB unit has been shared with the site promoter side. The derivation of S106 contributions, if required to be provided towards the cost of managing the direct impact of increased visitors to the AONB, would form part of discussions relating to the planning application, albeit it is recognised that upfront reference could be made within the Core Strategy Review.	Amend Policy SS7 1(a)(v) to take account of comments.
Policy SS9	89	1162466	Hospitals, emergency services, secondary and further education are all shared services that will not be available within this 'self sufficient garden town'. Our services are all under considerable strain. There needs to be much more joined up thinking when planning major development such as this. There should also be joint planning between Ashford Borough Council and Folkestone & Hythe District Councils as there is no hard boundary between the two and decisions made by one affect services in the other.	The District Council has shared details of the proposals at the Garden Town settlement with representatives of all relevant services providers, ranging from waste water disposal (Southern Water) to education and highways. The duty to cooperate is a legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. Accordingly, under the Duty to Co-operate there is a formal requirement for Folkestone & Hythe District Council to engage with neighbouring authorities to make them aware of future growth objectives for the District. Duty to Co-operate meetings have taken place over the past 12 months in respect of the emerging Core Strategy Review Local Plan. There is no statutory requirement for neighbouring authorities to jointly prepare local plans, although this can be done if authorities agree and the timetable of plan reviews can be coordinated.	No change proposed.
Policy SS9	88	1162466	Adjacent villages currently governed by Ashford Borough Council with regard to planning should also benefit directly from any S106 funding as all will be directly impacted by this proposal if it goes ahead.	The District Council notes the comments made. The closest settlement to the proposed Garden Town that falls within the Ashford Borough administrative area is Aldington, which is 3km to the west of the western site boundary, although the distance by road is greater than 3km. A fundamental objective in the promotion of the Garden Town is that it will be self-sufficient in respect of access to everyday services and facilities of its resident population. As a result, there is no realistic prospect that future residents of the Garden Town would make use of any facilities within Aldington, which is a small-scale village with limited facilities and services.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS9	304	1163030	<p>Policy SS9 (1) (a): Suggested amendments to first sentence: ' allowing for the expansion and improvement of nearby community facilities such as secondary education and waste ' Policy SS9 (2) (a): Support. This will prevent the need for the retrospective installation of fibre to the cabinet which has a significant cost implication and provides inferior connectivity when compared to the performance of new fibre networks. The policy is also supported by the proposed revisions to the National Planning Policy Framework (paragraph 112) subject to recent consultation by the Ministry of Housing, Communities and Local Government. Commercial deployment of 5G connectivity will take place over the next decade, requiring full-fibre cabling in the ground. The proposed policy will help facilitate the deployment of 5G and incorporate the latest advances in connectivity in each phase of development. In KCC 's experience, the majority of infrastructure providers do not charge of the installation of FTTP in schemes comprising 30 or more dwellings and consequently, there should be no adverse impact on viability and deliverability. Policy SS9 (2) (d): Support. This will ensure that the impact on the public highway both in relation to roadworks and maintenance repairs is kept to a minimum as a result of the maintenance and repair of these services. Policy SS9 (3) (a): Please note that any route that is not a Public Right of Way or cycle route which is adopted highway will not be maintained by KCC. Suggested amendments to first sentence: Infrastructure, the urban realm, open spaces including informal pedestrian and cycle pathways, and facilities shall be designed to take into account long-term management and maintenance requirements ' Policy SS9 (3) (b): Other infrastructure may also include: Public art Street furniture Policy SS9 (3) (b) vi: With the new Sewers for Adoption 8 th Edition</p>	Comments noted and the suggested changes will be made.	Amend Policy SS9 as suggested.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS9	210	1032349	I strongly disagree with the Shepway core strategy for housing development in Rural areas . Especially, the proposals for the Otterpool development near the old Folkestone Race course, adjacent to the M11 on the M20. Central government pressures and incentives should not be given into, being outweighed by common sense and present lack of local community essential services. These would be overwhelmed by a sudden and increased boom in population in the proposed area New Romney town is a case in point, where a Church Lane Doctors surgery, has closed and the Oak Hall surgery has had increase its patient levels to over 5,000 with only three part time doctors. The new current development, under construction, in the town of new homes, is going to overwhelm, the already overwhelmed, practice. Even if the building plans for the Otterpool development includes the building of a GP surgery and infant school, it will takes years for them to be fully staffed to be able to offer service to the new population. Until then, the new comers will have use existing medical and schooling facilities, causing the upheaval the people of New Romney are currently experiencing. New town housing developments in South Eastern Rural areas are not sustainable as the national shortage of Doctors and Teachers needs to be addressed and resolved before any more development are allowed. It is total madness for central government to push local authorities for more housing and equally stupid for local authorities to give in their ridiculous demands.	The comments raised by the respondent in respect of a deficiency of health facilities in New Romney are noted, and policy RM5 of the Places and Policies Local Plan supports the provision of a healthcare 'hub' on land adjacent to The Romney Marsh Academy. Whilst the provision of a policy supporting the implementation of a healthcare 'hub' in New Romney does not automatically bring forward the implementation of such a project, as delivery will require the CCG/NHS and the landowner to take a leading role, it does nevertheless do everything that can be reasonably be expected of a local plan document. The timing and breadth of infrastructure to come forward at the garden settlement will ensure the scheme is self-sufficient insofar as the on-site infrastructure will cater for the requirements of its resident population.	No change proposed.
Policy SS9	536	1163318	Garden Settlement Policies: SS7 Place Shaping, SS8 Sustainability and SS9 Infrastructure 7. Taken together these policies eloquently set the tone for a landscape led approach in such a sensitive setting. There is a recognition that high quality place making will be very important and that sustainable development principles must be adopted throughout. Early delivery of key pieces of infrastructure such as primary schools are properly highlighted. However, the question of community formation could be given a good deal more prominence. The fact that it is addressed with a very light-touch right at the end of the section on the garden settlement perhaps underplays its importance to the ultimate "success" of the new town assuming that the social dimension has at least as much priority as economic and environmental aims and objectives.	Noted. While the Core Strategy Review is concerned with the use of land and will be used to judge applications for new development, it is acknowledged that the social dimension has at least as much importance as economic and environmental objectives. The policy and text will be amended to refer to the creation of a post of community development worker to assist new residents as the town begins to be built and communities grow around new schools and facilities.	Amend Policy SS9: New Garden Settlement - Infrastructure, Delivery and Management and supporting text to refer to the creation of a post of community development worker.
Policy SS9	635	1057385	Policy SS9 (1) (a) [page 94] Suggested amendments to first sentence: ' allowing for the expansion and improvement of nearby community facilities such as secondary education and waste '	Noted. Amend Policy SS9: New Garden Settlement - Infrastructure, Delivery and Management as suggested.	Amend Policy SS9: New Garden Settlement - Infrastructure, Delivery and Management, part 1(a) as suggested.
Policy SS9	637	1057385	Policy SS9 (2) (d) [page 94] Support. This will ensure that the impact on the public highway both in relation to roadworks and maintenance repairs is kept to a minimum as a result of the maintenance and repair of these	Comment welcomed.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS9	639	1057385	Policy SS9 (3) (b) [page 94] Other infrastructure may also include: - Public art - Street furniture	Comments noted. These minor additions will be made to the Submission Draft (Regulation 19) Core Strategy Review.	Amend Policy SS9: New Garden Settlement - Infrastructure, Delivery and Management as suggested.
Policy SS9	742	1057385	In relation to Policy DM8 of the adopted Kent Minerals and Waste Local Plan 2013-30 and the need to assess safeguarding considerations for waste management facilities, the New Garden Settlement has been assessed. The Minerals and Waste Planning Authority can confirm that the strategic allocation development area coincides with a permitted waste recovery facility (Otterpool Quarry, Countrystyle Recycling Ltd - Composting and Anaerobic Digestion (AD) and Recycling Sites Construction and Demolition Waste). The permission has been implemented but not fully developed to date. The waste management site will be within 250m (essentially coincident) of the proposed strategic allocation area for mixed use neighbourhoods. Policy DM8 of the adopted Kent Minerals and Waste Local Plan 2013-30 requires an Infrastructure Assessment to be prepared to assess whether or not the strategic allocation development would be compatible with the use of the waste facility, particularly in regard to noise, dust, light and air emissions that may legitimately arise from the waste activities that could take place on site. The conclusion of the assessment would have to demonstrate that the new settlement development would not experience an unacceptable level of impact from the legitimate operation of the facility and the associated vehicle movements to and from the facility. It should be demonstrated that the future use of the safeguarded waste management facility would not be constrained by any incompatibility (e.g. amenity impacts) of the proposed development.	Comments noted, and these have been passed on to the site promoter. The site promoters are preparing a Minerals Assessment and a Minerals Assessment. Subject to clarification with Kent County Council, an infrastructure assessment may also be carried out. This work will provide technical responses to the points raised by the respondent. Kent County Council's Supplementary Planning Document contains further details of what an Infrastructure Assessment entails (see p.21).	Amend supporting text to clarify requirements regarding permitted waste recovery facilities.
Policy SS9	636	1057385	Policy SS9 (2) (a) [page 94] Support. This will prevent the need for the retrospective installation of fibre to the cabinet which has a significant cost implication and provides inferior connectivity when compared to the performance of new fibre networks. The policy is also supported by the proposed revisions to the National Planning Policy Framework (paragraph 112) subject to recent consultation by the Ministry of Housing, Communities and Local Government. Commercial deployment of 5G connectivity will take place over the next decade, requiring full-fibre cabling in the ground. The proposed policy will help facilitate the deployment of 5G and incorporate the latest advances in connectivity in each phase of development. In KCC's experience, the majority of infrastructure providers do not charge of the installation of FTTP in schemes comprising 30 or more dwellings and consequently, there should be no adverse impact on viability and deliverability.	Comments in support are welcomed.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS9	387	1163115	While i agree that, should this development be built, infrastructure should be in place and integral and not added piecemeal afterwards, there is no mention here of how this will be funded. It is certain that any cost estimates so far completed will prove to be hopelessly unrealistic and that to complete this as proposed will require more resources than the council can provide and not prove a sound investment for builders.	Comments noted. The timing of infrastructure will be related to the cumulative number of 'built out' (i.e. occupied) units at the site. It is critical that infrastructure needed to support the garden town is in place in a timely fashion to support the new (and growing) resident population, such that the garden town is self-sufficient from the early phase of development onwards.	No change proposed.
Policy SS9	537	1163318	Garden Settlement Policies: SS7 Place Shaping, SS8 Sustainability and SS9 Infrastructure 7. Taken together these policies eloquently set the tone for a landscape led approach in such a sensitive setting. There is a recognition that high quality place making will be very important and that sustainable development principles must be adopted throughout. Early delivery of key pieces of infrastructure such as primary schools are properly highlighted. However, the question of community formation could be given a good deal more prominence. The fact that it is addressed with a very light-touch right at the end of the section on the garden settlement perhaps underplays its importance to the ultimate "success" of the new town assuming that the social dimension has at least as much priority as economic and environmental aims and objectives.	Comments noted. An additional criteria has been added to policy SS7 (1)(b) of the Submission Draft (Regulation 19) version of the Core Strategy Review, as repeated below: "vii. A long-term security and management plan of the Green Infrastructure estate which ensures community involvement and custodianship"	Amend Policy SS7 as detailed under Council's Response.
Policy SS9	661	1042306	Policy SS9 NGS Infrastructure, Delivery and Management: specifically in relation to a Community Trust, there is a need to make provision for a heritage facility such as museum/archive storage; this might be added to the list of critical infrastructure. Where the proposed trust is responsible for open spaces which may have been designed to respond to heritage assets, e.g. the need to preserve and enhance archaeological remains, then the trust must understand the significance of what it is managing and be appropriately resourced to deliver management for the long term. This may mean an endowment funded via income from development and front loaded to get such infrastructure established early. A key decision, depending on the future use of Westenhanger castle, is whether it should be vested with such a trust. Historic England would strongly advise that the Council's own conservation staff are closely involved throughout the preparation of the draft Local Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 126). These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.	Comments noted. It may be appropriate to provide for such a facility if the range and number of artefacts of suitable historical significance warrant its provision. Amend Policy SS9: New Garden Settlement - Infrastructure, Delivery and Management (3)(b)(viii) to include reference to a heritage facility, such as a museum or archive storage.	Amend Policy SS9 (3)(b)(viii) as set out under Council's Response.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS9	638	1057385	Policy SS9 (3) (a) [page 94] Please note that any route that is not a Public Right of Way or cycle route which is adopted highway will not be maintained by KCC. Suggested amendments to first sentence: Infrastructure, the urban realm, open spaces including informal pedestrian and cycle pathways, and facilities shall be designed to take into account long-term management and maintenance requirements '	Noted. Amend Policy SS9: New Garden Settlement - Infrastructure, Delivery and Management as suggested.	Amend Policy SS9: New Garden Settlement - Infrastructure, Delivery and Management, part 3(a) as suggested.
Policy SS9	640	1057385	Policy SS9 (3) (b) vi [page 94] With the new Sewers for Adoption 8th Edition soon to be published, in some instances there may be an opportunity or situation where a surface water drainage system is adopted by a sewerage undertaker. It may be advisable to recognise that infrastructure delivery for water, wastewater and surface water may be provided and managed by an appropriate adopting authority.	Comments noted.	No change proposed.
Policy SS9	716	1101438	The ESFA also supports policy SS9 New Garden Settlement - Infrastructure, Delivery and Management which relates to the same site. The emphases on early delivery of critical infrastructure, notably including primary education, "to support investment and community development"; and on the careful phasing of development so that it "does not disadvantage early residents or neighbouring communities through placing pressure on existing infrastructure in the local area" are especially welcomed. The ESFA also supports the approach of prioritising s106 and s278 agreements to secure infrastructure delivery at the appropriate phase of the development for the garden town (while removing liability to pay CIL). However, the council will need to plan this carefully to ensure that they can work within the pooling constraints on use of s106 contributions (albeit proposals for reform of s106 indicate that these restrictions may be loosened in future).	The support given to policy SS9 is welcomed. The Council considers that the use of S106 to secure developer contributions to fund necessary infrastructure within the Garden Town settlement can be appropriately managed with reference to the pooling restrictions.	No change proposed.
Policy SS9	745	1057385	KCC 's Public Rights of Way and Access Service is keen to ensure that its interests are represented within the local policy frameworks of the Districts and Boroughs in Kent. The team is committed to working in partnership with local planning authorities to achieve the aims contained within the Rights of Way Improvement Plan (ROWIP) (2018-2028) and contribute towards Increasing Opportunities, Improving Outcomes: Kent County Council 's Strategic Statement (2015-2020). The District Council should be aware that KCC 's ROWIP is currently being reviewed and updated. A new ROWIP is expected to be published later this year. Based on extensive research and public consultation, the plan assesses the extent to which Public Rights of Way (PRoW) meet current demand and how they will need to evolve to meet future requirements. Although largely supported, the Consultation Document makes no reference to the County Council 's ROWIP as the strategic and statutory policy document for PRoW protection and enhancement. The Service strongly urges that Folkestone and Hythe District Council ensures the ROWIP is referenced. This will enable successful joint partnership working to deliver improvements to the District 's PRoW network.	Noted. Reference to Kent County Council's Rights of Way Improvement Plan will be added to the supporting text.	Amend the supporting text to reference Kent County Council's Rights of Way Improvement Plan (new paragraph 4.183).

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS9	671	1160683	<p>Whilst CCPIII Shopping Folkestone S.A.R.L (c/o Ellandi LLP) support the principle of the proposed New Garden Settlement within the North Downs area, the proposed policies relating to the development have given insufficient attention to the retail and town centre offer that should be provided. As a result there is a significant risk that an inappropriate scale of development could be promoted which would cause significant harm to the existing town centres in the District and beyond (see also the comments in relation to Paragraph 4.98). It is clearly appropriate for the development to include some retail and town centre uses in order to meet the day-to-day needs of the new residents and those in the surrounding area (Policy SS9(1c)).</p> <p>However, any retail provision must be of a scale appropriate to the retail hierarchy and, as such is likely to be limited to meeting the day-to-day convenience, comparison and service needs of the residents, with less frequent comparison shopping needs continuing to be met in the higher order centres including Folkestone town centre. At the present time the wording in the draft Revised Core Strategy risks promoting the development of a new major retail centre in the North Downs area. Such a proposal could not be supported by the new population alone and thus would rely on trade from further afield. This would not only be contrary to the sustainability principles behind the new development, but would also have an adverse impact on existing town centres, contrary to other policies within the Core Strategy and the aims arising from the Strategic Needs, particularly A and B.</p>	The council has completed new evidence on retail and employment needs (Lichfields, 2018). This has been used to inform amendments to policies in the Submission Draft (Regulation 19) Core Strategy Review.	Amend policies for the Submission Draft (Regulation 19) Core Strategy Review regarding retail and employment needs as necessary.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS9	691	1165852	This site is within Southern Water's statutory wastewater service area. In accordance with paragraph 162 of the National Planning Policy Framework (NPPF), and National Planning Practice Guidance, Southern Water has undertaken a preliminary assessment of the impact of the proposed development on the existing public sewer network. This investigation indicates that network reinforcement will be required at the "practical point of connection" (as defined in the New Connections Services implemented from 1st April 2018). Whilst Policy SS9 aims to support the delivery of infrastructure, we can see no current provision that would adequately support the delivery of wastewater infrastructure, which is funded through mechanisms other than CIL or Section 106 agreements. Any upgrades in treatment capacity at Southern Water's Wastewater Treatment Works (WWTs) that may be required to service the New Garden Settlement would be funded and delivered through the water industry's five yearly price review process, and would align with the provisions of Policy SS5 of the Core Strategy Review. The requisite network reinforcement will be provided through the New Infrastructure charge but Southern Water will need to work with site promoters to understand the development program and to review if the delivery of infrastructure upgrades aligns with the occupation of the development. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure. In addition, our assessment also revealed that Southern Water's infrastructure crosses the site, and this needs to be taken into account when designing the site layout. Easements would be required, which may affect site layout or require diversion. These easements should be	Comments noted. The points raised are all practical considerations, none of which preclude the principle of development the garden settlement. The information has been included within the Infrastructure Delivery Plan that forms part of the evidence base for the Core Strategy Review.	
4.178	268	1162685	Delete reference to possible removal of this policy. There will not be sufficient progress within the timescale.	Comment noted.	The Core Strategy Review will be amended to include a factual update on the progress of the Folkestone Seafront proposals. Reference to the possible deletion of Policy SS10 will also be removed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.178	204	1157838	As per footnote 22, Policy SS10 was originally called Policy SS6. There have been many documents released over the past 5 years that refer to Policy SS6 and it is absolutely ludicrous to rename it. When referencing the adopted Core Strategy after reading one of these documents, people will be confused as Policy SS6 has no bearing on this development. The garden town policies should have been placed at the end of the existing policies and numbered accordingly. Therefore, the policy has changed, as it is no longer Policy SS6. Whilst the policy has been left unchanged, there are elements that are no longer valid. Paragraph H states that a 30% contribution of affordable housing should be delivered for central Folkestone, but appears to have been superseded by the S106 agreement. Part F Paragraph 1 states that a minimum of 8% of the dwellings should be developed on-site as affordable housing. Paragraph I states that a minimum water efficiency of 90 litres per person per day should be achieved. However, Y12/0897/SH Condition 9 was amended in S96A application Y16/0044/NMC to a maximum of 110 litres per person per day. Both paragraphs are confusing as they talk about minimums and maximums, and should be clarified if they have been superseded.	Comment noted. It was considered that the proposed garden settlement, as the most significant on the planned strategic allocations, should be positioned at the beginning of the chapter. The Council is of the view that Policy SS10 should remain as currently drafted. The policy exists to provide a basis for assessing and determining a planning application. As set out in the National Planning Policy Framework (paragraph 47) there may be material considerations at the point the planning application comes in which mean the planning permission departs in certain aspects from the adopted policy.	The typographical error in paragraph 4.178 (green box) will be amended.
4.182	201	1162568	Agree. Any new residential development must acknowledge that this area has a long history as an area of nightlife. Where necessary adequate sound proofing must be installed. In January 2018 Housing Secretary Sajid Javid announced the National Planning Policy Framework, with which local authorities are legally bound to comply, will be amended to include detailed reference to Agent of Change, making housing developers building new homes near UK venues responsible for addressing noise issues.	Comment noted.	No change proposed.
4.182	337	1163103	The future of the Harbourmasters' House etc	Comment noted. The matters raised concerning the retention of the Harbourmaster's House has since moved on through the recent approval of the s.73 planning application, which includes the demolition of the building. The Fishermans' Museum however has permission for permanent retention. The future of the Princess Royal is not something that can be considered as part of the Core Strategy Review as it falls outside of the area covered by Policy SS10.	No change proposed.
4.183	336	1163103	Go Folkestone wishes to see the seafront scheme succeed and be popular	Comment noted. Outline planning permission was granted on 30 January 2015. Ref: Y12/0897/SH.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.184	161	1029376	This area is major problem with respect to communications and needs urgent action to make it all work. The roads to the harbour will be subject to construction traffic in near future. The lift is not working. Proposals for the Remembrance line makes the situation increasingly confused Links between harbour and station need improving The green link for cyclists is not practical noting all the gradients involved and there is insufficient space for vehicles	Infrastructure needs related to the seafront are set out as part of the application and provision will be triggered when the development reaches the appropriate phase. Details of the car parking will come forward as part of the reserved matters application. The former harbour railway line is allocated for a linear park, promoting active travel by providing a cycle and pedestrian route to the harbour area, together with visitor car parking. A planning application for the linear park on the southern extent was approved as part of the seafront development and has already been implemented. In relation to the Leas Lift, the restoration of the lift will be secured using contributions from the Seafront development and so this is tied into the timescales for that scheme. Folkestone will be a key stopping place on the National Cycle Network Route 2, a long distance cycle route which, when complete, will link Dover with St. Austell in Cornwall along the south coast of England, a distance of some 360 miles, with considerable variation in elevation along the route. It is recognised that there are level variations between the town and the seafront. The establishment of new cycle routes will be considered in detail when proposals come in for improvements to routes and signage. Standalone projects such as making Tram Road two-way have also been implemented in recent years in order to phase out the one-way system that once serviced the Ferry Terminal and improve traffic flow and connections in and around Folkestone.	No change proposed.
4.185	679	332260	The Trustees support the Reasoned Justification to Policy SS10 and the Core Strategy 's advice that local partners should work together to further improve connectivity and seafront and town centre . The Trustees continue to support the exciting regeneration proposals at Folkestone Seafront and in line with the provisions of Policy SS10. (Is it appropriate at Criterion (i) to refer to the Code for Sustainable Homes which would be contrary to Paragraph 5.65 of the Core Strategy, (and other parts of the Plan) as drafted).	Supported noted. Following the Housing Standards Review, the Code for Sustainable Homes was withdrawn effective from 26.03.15.	Reference to the Code for Sustainable Homes to be deleted.
4.187	205	1157838	This paragraph is outdated. The proposal to redirect the England Coastal Path along the road was rejected, and it has now been suggested that the boardwalk would be a suitable alternative. I believe the proposal to "re-imagine" Marine Parade has now been scrapped. With respect, making people walk along the former railway line is hardly to be considered "connections from the Harbour area to East Folkestone" - in fact, the line has not been redeveloped past the viaduct. A proper connection to East Folkestone would have been to reopen the harbour station and a halt at the former Folkestone East site, or develop a park-and-ride system with a car park at Folkestone East and a tram running down the line. This would be more inclusive of the elderly and disabled, who cannot walk this distance.	The council cannot control the decisions of operators such as the rail companies in reopening stations or closing lines; these are commercial decisions taken by the operators. Network Rail have yet to relinquish control of the harbour line past the viaduct.	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS10	163	1029376	Is this still valid?	The Council is of the view that Policy SS10 should remain as currently drafted. The policy exists to provide a basis for assessing and determining a planning application. As set out in National Planning Policy Framework (paragraph 47) there may be material considerations at the point the planning application comes in which mean the planning permission departs in certain aspects from the adopted policy.	No change proposed.
Policy SS10	316	1036994	POTABLE WATER SUPPLY. I would begin by prefacing this document with a brief description of where we are now in terms of water scarcity and potable water supply for a growing community. The South East of England has always been, in relation to the rest of the UK, water stressed. With a growing local population, certainly over the past 30 years, measures have been taken to try to limit water usage which has, for the most part, been successful. Metering has played a big part in the water intake of households, made compulsory by the designation of our local water company, Affinity Water, of having 'Water Scarcity Status'. Some 90% of supplies are now metered. Over recent years we have seen drought measures instigated by way of hose pipe bans, Car washing facilities restricted or shut down and so forth. Affinity Water has persuaded us to use hippo bags in WC Cisterns, and even today, are promoting (FOC) water saving shower heads and similar products to save water. There was even a plan to import water through the channel tunnel fire hydrant system and tow water filled barges across the North Sea from Scandinavia in the mid nineties, given the local drought situation. The scenario of severe drought has not yet fully been experienced, but with a growing local population, measures of resilience could be adopted to alleviate and reduce such a situation happening in the near future. Migration from cities is definitely not one of them and would only serve to exacerbate the water scarcity situation even further. The Folkestone and Dover area is known as the Dour region (WRZ 7) and is the most water stressed area in the UK. Formerly known as the Folkestone and Dover Water Company, then Veolia, and now Affinity Water, it is reliant mostly (some 90%) on groundwater supply. Unlike other water companies, there are no sizable reservoirs as such, which means we are dependant on rainfall	The District Council has published an updated version of the Water Cycle Study, which can be accessed via the Council's website. The study report has been the subject of ongoing dialogue and feedback from the Environment Agency, Affinity Water, Southern Water, South East Water, Natural England and Kent County Council as principal stakeholders. The Council is looking to prepare a Position Statement jointly with Affinity Water to explain that the water supply demand attributed to Otterpool Park Garden Town can be provided, an exercise that will also define what network reinforcements are needed and at when, i.e. the trigger points.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS10	311	1036994	<p>POTABLE WATER SUPPLY. I would begin by prefacing this document with a brief description of where we are now in terms of water scarcity and potable water supply for a growing community. The South East of England has always been, in relation to the rest of the UK, water stressed. With a growing local population, certainly over the past 30 years, measures have been taken to try to limit water usage which has, for the most part, been successful. Metering has played a big part in the water intake of households, made compulsory by the designation of our local water company, Affinity Water, of having Water Scarcity Status '. Some 90% of supplies are now metered. Over recent years we have seen drought measures instigated by way of hose pipe bans, Car washing facilities restricted or shut down and so forth. Affinity Water has persuaded us to use hippo bags in WC Cisterns, and even today, are promoting (FOC) water saving shower heads and similar products to save water. There was even a plan to import water through the channel tunnel fire hydrant system and tow water filled barges across the North Sea from Scandinavia in the mid nineties, given the local drought situation. The scenario of severe drought has not yet fully been experienced, but with a growing local population, measures of resilience could be adopted to alleviate and reduce such a situation happening in the near future. Migration from cities is definitely not one of them and would only serve to exacerbate the water scarcity situation even further. The Folkestone and Dover area is known as the Dour region (WRZ 7) and is the most water stressed area in the UK. Formerly known as the Folkestone and Dover Water Company, then Veolia, and now Affinity Water, it is reliant mostly (some 90%) on groundwater supply. Unlike other water companies, there are no sizable reservoirs as such, which means we are dependant on rainfall</p>	<p>The District Council has published an updated version of the Water Cycle Study, which can be accessed via the Council 's website. The study report has been the subject of ongoing dialogue and feedback from the Environment Agency, Affinity Water, Southern Water, South East Water, Natural England and Kent County Council as principal stakeholders. The Council is looking to prepare a Position Statement jointly with Affinity Water to explain that the water supply demand attributed to Otterpool Park Garden Town can be provided, an exercise that will also define what network reinforcements are needed and at when, i.e. the trigger points.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS10	331	1157838	As mentioned above, the renaming of this policy from SS6 to SS10 is, quite frankly, ludicrous. Many documents already reference Policy SS6 and it will be confusing for people reading these documents who look up the policy, only to find it is completely irrelevant. Sui generis use is mentioned in the opening paragraph. This is not defined in the approval document for Y12/0897/SH. Is it included? If not, it should be removed. A2 use is most certainly NOT granted, thus "A use classes" is inappropriate and this document should never have been approved. As mentioned above, Paragraphs H and I have been altered in the S106 agreement and S96A amendment. It is unclear whether these still stand as minimum/maximum values, or should be corrected. Either way, clarification should be made. It is unclear whether people should expect to get 110 litres of water per person per day, or merely the minimum 90 litres. Likewise, it is unclear whether the minimum of 8% affordable housing is to be provided, or 30% as mentioned in this policy. Many local people have commented on the fact that both Y12/0897/SH and Y17/1099/SH were approved by the Council despite violating several parts of this policy, e.g. A, B, C, D, F, H and J. This is for the following reasons: The developer wanted to remove the sea and beach sports facilities, thus were to fail to deliver planned incremental redevelopment. Building a fountain and creating a walkway along a viaduct between part of the development and the fountain is not directly contributing to the regeneration of Folkestone by reconnecting the town centre to the Seafront. Repairing the Leas Lift would have contributed to this, but the developer initially refused to contribute and the attraction closed. Evicting the fishing museum detracted from the town's appeal as a cultural and visitor destination, complementary to existing traditional maritime activities. The phasing has been ignored, with one of the last	Comment Noted. It was considered that the proposed garden settlement, as the most significant on the planned strategic allocations, should be positioned at the beginning of the chapter. The Council is of the view that Policy SS10 should remain as currently drafted. The policy exists to provide a basis for assessing and determining a planning application. As set out in National Planning Policy Framework (paragraph 47) there may be material considerations at the point the planning application comes in which mean the planning permission departs in certain aspects from the adopted policy. The Council cannot control the decisions of operators such as the rail companies in reopening stations or closing lines; these are commercial decisions taken by the operators. Network Rail have yet to relinquish control of the harbour line past the viaduct. In regards to heritage, the custom house has secured permanent permission as an exhibition space, the signal box has been retained. The harbour arm has now been brought forward and is seeing considerable activity, with the lighthouse now in active use and businesses operating along the length of the harbour arm. The Seafront scheme will also secure substantial investment in the town, and provide contributions to infrastructure and the town's heritage, such as the restoration of the Leas Lift.	No change proposed.
Policy SS10	600	329173	Policies SS10 paragraph i, SS11 paragraph j - As above we commend the 90 litres per day target, but the Code for Sustainable Homes mentioned here is no longer in use (as explained in section 5.65). This should also be made explicit in the Glossary on p161.	Support noted. Following the Housing Standards Review, the Code for Sustainable Homes was withdrawn effective from 26.03.15.	Reference to the Code for Sustainable Homes to be deleted.
Policy SS10	502	1037610	Folkestone Strategic Allocations As both Shorncliffe Heights and Folkestone Seafront have received outline (and some areas detailed) planning permission, is this a case of horse stable door bolted! Planning permission with new amendments should be included in this document. It alters the intention of preserving Heritage (Harbour Masters House) . 4.1.6 quotes n a historic maritime environment. This won 't be the case if the last building associated with its maritime heritage is demolished The height of buildings does not comply with comments in the heritage comments about the historic Leas and its views Policy SS10 will need to be updated in view of changes	The Council is of the view that Policy SS10 should remain as currently drafted. The policy exists to provide a basis for assessing and determining a planning application. As set out in the National Planning Policy Framework (paragraph 47) there may be material considerations at the point the planning application comes in which mean the planning permission departs in certain aspects from the adopted policy.	No change proposed.
Policy SS10	555	1164105	The focus on Folkestone Seafront (SS10) and Shorncliffe Garrison site at Folkestone (SS11) is fully supported.	Support noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS10	681	332260	The Trustees support the Reasoned Justification to Policy SS10 and the Core Strategy 's advice that local partners should work together to further improve connectivity and seafront and town centre . The Trustees continue to support the exciting regeneration proposals at Folkestone Seafront and in line with the provisions of Policy SS10. (Is it appropriate at Criterion (i) to refer to the Code for Sustainable Homes which would be contrary to Paragraph 5.65 of the Core Strategy, (and other parts of the Plan) as drafted).	Supported noted. Following the Housing Standards Review, the Code for Sustainable Homes was withdrawn effective from 26.03.15.	Reference to the Code for Sustainable Homes to be deleted.
4. 190	269	1162685	Policy should remain in force until completion of the project.	Comment noted. Policy SS10 will remain as part of the Core Strategy Review until the scheme has been completed.	No change proposed.
4.199	697	1044196	As strategic allocations, we have no objection in principle in respect of the retention of policies (SS11 and CSD9) which continue to allocate Shorncliffe Garrison and Sellindge for residential development. However, Policies SS11 and CSD9 must be updated to reflect the consented developments and updated National guidance. The applications that have been submitted in respect of these Sites, have been positively determined against the most up to date planning guidance and subsequently considered acceptable in the form proposed. Additionally, both applications have been implemented. In these circumstances it would not be Justified or Effective of the CS to retain policies unchanged, where they no longer align with the consented and implemented development. Furthermore, elements of the policies are no longer Consistent with National Policy . Policies SS11 and CSD9 should therefore be amended accordingly in line with the comments below. Figure 4.7 substantially reflects the consented development. However, reference to the provision of allotments should be removed and the area of green space at The Stadium should also be adjusted to reflect the consented scheme. The annotation at the bottom of the plan should refer to 'Policy SS11' not 'Policy SS7' .	The Council is of the view that Policy SS11 should remain as currently drafted. The policy exists to provide a basis for assessing and determining a planning application. As set out in the National Planning Policy Framework (paragraph 47) there may be material considerations at the point the planning application comes in which mean the planning permission departs in certain aspects from the adopted policy.	The annotation at the bottom of Figure 4.7 will be amended to SS11.
4.201	504	1037610	Further investigation may reveal opportunities for confirmation of, and improvements to, features of military interest for visitors. The planning authority seems perfectly happy to allow the developer to demolish all but 4 listed buildings on this site, retaining and using the officers mess for apartments is welcome. , there are many other buildings which could be reused as accommodation to ensure the military integrity is retained as recommended by Historic England, Victorian Society and the Council for British Archaeology amongst others therefore 'Military interest' for visitors is minimal. Tourism could be greatly improved for the district if the developer were encouraged to retain the last remaining stable block to World War 1; unfortunately, this also is destined for demolition yet could be a catalyst for the tourism in the district and provide a range of direct and indirect jobs.	Historic England were consulted as part of the hybrid planning application (Ref: 14/0300). An investigation and/or assessment of the site by Historic England resulted in four buildings / structures being Grade II Listed; as well as others identified as worthy of retention. Historic England were supportive overall of the proposals, subject to requiring that developers record and advance understanding of the significance of any heritage asset to be lost, in accordance with the National Planning Policy Framework (paragraph 141), by way of condition. Whilst Historic England still have some reservations over the detailed aspects of the scheme; these objectives can be addressed by careful handling of the reserved matters applications.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
4.201	698	1044196	<p>As strategic allocations, we have no objection in principle in respect of the retention of policies (SS11 and CSD9) which continue to allocate Shorncliffe Garrison and Sellindge for residential development. However, Policies SS11 and CSD9 must be updated to reflect the consented developments and updated National guidance. The applications that have been submitted in respect of these Sites, have been positively determined against the most up to date planning guidance and subsequently considered acceptable in the form proposed. Additionally, both applications have been implemented. In these circumstances it would not be Justified or Effective of the CS to retain policies unchanged, where they no longer align with the consented and implemented development. Furthermore, elements of the policies are no longer Consistent with National Policy . Policies SS11 and CSD9 should therefore be amended accordingly in line with the comments below. Para 4.201, advises that buildings on the Site are not listed. This is now out of date, since following the release of the Site by the MOD, a thorough investigation/assessment of the Site has been completed by Heritage England, resulting in four buildings/structures being Grade II Listed (as below) and are to be retained: i, The Racquets Court; i, Concrete Barrack Block; i, Sir John Moore Library; and i, Risborough Gates.</p>	<p>The Council is of the view that Policy SS11 should remain as currently drafted. The policy exists to provide a basis for assessing and determining a planning application. As set out in the National Planning Policy Framework (paragraph 47) there may be material considerations at the point the planning application comes in which mean the planning permission departs in certain aspects from the adopted policy.</p>	<p>Paragraph 4.201 will be updated to acknowledge the newly designated heritage assets (The Racquets Court, Concrete Barrack Block, Sir John Moore Library and Risborough Gates) following the investigation/assessment by Historic England.</p>
Policy SS11	332	1157838	<p>As per Policy SS10, the renaming of Policy SS7 to Policy SS11 is absurd. It would have been far easier, and better, to have put the garden town policies after the existing ones and named them appropriately. Any documents referring to the old names will be confusing. I feel like Marty Di Bergi talking to Nigel Tufnel about an amplifier that goes to 11 in This is Spinal Tap - common sense is not getting through! There is extreme concern locally that the heritage features of the site are not being preserved and that proper archaeological investigation is not being carried out, particularly with regard to the Napoleonic redoubt. This is, of course, exacerbated by the lack of a Heritage Strategy, Local List and Heritage Officer. It is apparent in the ridiculously short and inappropriate phrasing of Paragraph G regarding heritage: "Townscape, heritage and archaeological analysis should be undertaken prior to the demolition of any buildings. This should ensure good place-making through the retention of important features, including heritage assets and reference to former uses on the site" Why should analysis only be conducted prior to demolition of buildings? What about the features that don't have any buildings around them? These are at risk and unsympathetic work has already commenced in close proximity to some of them. This clause has done nothing to safeguard these features.</p>	<p>Comment noted. It was considered that the proposed garden settlement, as the most significant on the planned strategic allocations, should be positioned at the beginning of the chapter. Historic England were consulted as part of the hybrid planning application (Ref: 14/0300). An investigation and/or assessment of the site by Historic England resulted in four buildings / structures being Grade II Listed, as well as others identified as worthy of retention. Historic England were supportive overall of the proposals, subject to requiring that developers record and advance understanding of the significance of any heritage asset to be lost, in accordance with National Planning Policy Framework (paragraph 141), by way of condition. Whilst Historic England still have some reservations over the detailed aspects of the scheme (including any potential impact on the setting of those identified heritage assets to be retained); these objectives can be addressed by careful handling of the reserved matters applications. A Heritage Strategy has been prepared and has informed the preparation of the emerging Places and Policies Local Plan (PPLP) and the Core Strategy Review (CSR). This strategy will be consulted on shortly.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS11	498	1037610	Land at Seabrook Valley as shown in Figure 4.7 is released from military use for public and natural open space purposes, and a management strategy is in place to enhance biodiversity and to increase accessibility to the countryside where appropriate. Development proposals shall include an appropriate recreational access strategy to ensure additional impacts to Natura 2000 site(s) are acceptably mitigated, in accordance with policy CSD4 Comment: there is no mention of heritage in this statement. The site contains a scheduled ancient monument in the form of a Napoleonic Earth Redoubt, First World War Training Trenches and other heritage artefacts which would provide heritage and tourism interest. Please include reference in this policy for Seabrook Valley	The Council is of the view that Policy SS11 should remain as currently drafted. The policy exists to provide a basis for assessing and determining a planning application. As set out in the National Planning Policy Framework (paragraph 47) there may be material considerations at the point the planning application comes in which mean the planning permission departs in certain aspects from the adopted policy. Policy SS11 acknowledges Seabrook Valley at criterion (f) in the context of public and natural open space purposes including the enhancement of biodiversity. Policy SS11 acknowledges at criterion (g) that there is heritage value associated across the site (including Seabrook Valley) and that the retention of important features, including heritage assets and reference to former uses contributes to good place-making. Moreover, if an alternative to the consented scheme be proposed, then the heritage and tourism policies included in the Places and Policies Local Plan would also apply.	No change proposed.
Policy SS11	512	1037610	NPPF has not been adhered to when it comes to the Shorncliffe Garrison site delivering an historic interpretation, or the Royal Military Canal at Princes Parade Policy HE1 You say, The issues set out in the National Planning Policy Framework were considered as part of the planning application for Shorncliffe Garrison and in the consideration of the site at Princess Parade. Additional text will be added to the supporting text for Princes Parade in the Urban Area chapter to clarify this. Additional supporting text is to be added to the Princes Parade Policy to reflect the importance Yet, you still insist on building adjacent to a SAM The Heritage Strategy quotes (SEE PDF) The district could use these assets to boost heritage tourism yet it seems you are you intent on destroying both the internationally important setting of the Royal Military Canal and removing any opportunity for heritage led regeneration through its biggest heritage asset in Shorncliffe garrison, birthplace of the modern British Army under Sir John Moore and a significant draw for tourism with three centuries of military history including two World Wars	The council does not accept that these are failures. Schemes at Folkestone Seafront, Shorncliffe Garrison and Princes Parade have secured the future of heritage assets listed and non-listed, and secured contributions to the restoration of assets such as the Leas Lift. The schemes provide much-needed homes, as well as business space and investment and community facilities and infrastructure improvements.	No change proposed.
Policy SS11	601	329173	Policies SS10 paragraph i, SS11 paragraph j - As above we commend the 90 litres per day target, but the Code for Sustainable Homes mentioned here is no longer in use (as explained in section 5.65). This should also be made explicit in the Glossary on p161.	Support noted. Following the Housing Standards Review, the Code for Sustainable Homes was withdrawn effective from 26.03.15.	Reference to the Code for Sustainable Homes to be deleted.
Policy SS11	556	1164105	The focus on Folkestone Seafront (SS10) and Shorncliffe Garrison site at Folkestone (SS11) is fully supported.	Support noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy SS11	503	1037610	Folkestone Strategic Allocations As both Shorncliffe Heights and Folkestone Seafront have received outline (and some areas detailed) planning permission, is this a case of horse stable door bolted! Planning permission with new amendments should be included in this document. It alters the intention of preserving Heritage (Harbour Masters House) . 4.1.6 quotes n a historic maritime environment. This won 't be the case if the last building associated with its maritime heritage is demolished The height of buildings does not comply with comments in the heritage comments about the historic Leas and its views Policy SS10 will need to be updated in view of changes	The Council is of the view that Policy SS10 should remain as currently drafted. The policy exists to provide a basis for assessing and determining a planning application. As set out in the National Planning Policy Framework (paragraph 47) there may be material considerations at the point the planning application comes in which mean the planning permission departs in certain aspects from the adopted policy.	No change proposed.
Policy SS11	677	1044196	Please see attached document for the full representation. As strategic allocations, we have no objection in principle in respect of the retention of policies (SS11 and CSD9) which continue to allocate Shorncliffe Garrison and Sellindge for residential development. However, Policies SS11 and CSD9 must be updated to reflect the consented developments and updated National guidance. The applications that have been submitted in respect of these Sites, have been positively determined against the most up to date planning guidance and subsequently considered acceptable in the form proposed. Additionally, both applications have been implemented. In these circumstances it would not be Justified or Effective of the CS to retain policies unchanged, where they no longer align with the consented and implemented development. Furthermore, elements of the policies are no longer Consistent with National Policy . Policies SS11 and CSD9 should therefore be amended accordingly in line with the comments below. Criterion i. should be amended to refer to provision of 18% affordable housing in line with outcomes of the agreed viability assessment. Reference to 30% affordable, further fails to accord with CS Policy CSD11 which amended the affordable requirement to 22%. Criterion j. should be amended to remove reference to the Code for Sustainable Homes, in line with the provisions of the Deregulation Act 2015.	The Council is of the view that Policy SS11 should remain as currently drafted. The policy exists to provide a basis for assessing and determining a planning application. As set out in National Planning Policy Framework (paragraph 47) there may be material considerations at the point the planning application comes in which mean the planning permission departs in certain aspects from the adopted policy. Specifically, the Council acknowledges that the requirement for 30% affordable housing fails to accord with Policy CSD11 which amends the affordable housing requirement to 22%. However, it is considered that as a planning consent already exists and is being implemented, based on the original affordable housing requirement position, that the policy should remain unchanged. Following the Housing Standards Review, the Code for Sustainable Homes was withdrawn effective from 26.03.15.	Reference to the Code for Sustainable Homes to be deleted.
<b>5.1 CORE POLICIES FOR PLANNING</b>					

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.3	347	1163103	<p>GF feels that some more inclusion or pepper-potting of residential stock among the shops in the town centre , particularly the poorer bits , and in Cheriton will be necessary to avoid large levels of shopping vacancy in the future and boost housing stock . It will only work if new car parks are provided , perhaps by underground or multi-storey existing car parks . Otherwise residents and shops will both not have enough car parking . People desert town centres if the shops lose parking to new residents . Pretending the latter don 't have cars doesn 't cut it . At the very least their visitors do .The bus station and the surface parking behind Lidl and in Pleydell Gardens are both possible areas to look for increased parking by going up or down . Some shopping parts of the centre look better suited to a part -residential future , as they are even now under-performing e.g. Town Walk , Guildhall Street and the far end of Sandgate Road . The majority of GF members , including David Noble and Linda Bauer , would expect stronger policies on social and affordable housing , particularly genuine social housing . We have been disappointed by the lack of specificity in this area and the frequent reductions in affordable housing proportions in large developments. Developing poorer shopping areas to provide more flats above and beside modernized but fewer shops is something we support . Shopping space will go down a little in established parades and town centres , due to the internet .That should be planned for .</p>	<p>Noted. Regarding residential uses in town centres, the National Planning Policy Framework sets out that planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allow a suitable mix of uses (including housing) and reflect the distinctive character of the centres. The Places and Policies Local Plan contains policies for town centres, including Folkestone town centre, that encourage the provision of residential accommodation on upper floors where it will enhance the vitality and viability of the centre and not lead to the loss of town centre uses or shop frontages. Development proposals would need to meet the parking standards set out in chapter 13 of the local plan. However, it should be recognised that some changes can be made through permitted development rights and would not require planning permission.</p>	<p>No change proposed.</p>
5.7	270	1162685	<p>The existing policy figure of 30% affordable homes must have taken account of the impact that would have on the viability of typical housing developments and must have been found acceptable. We can therefore see no justification for reducing that unless the market situation changes significantly. We expect that nowhere near the 633 homes will be completed annually. The supply of affordable homes will therefore be reduced both by the inability to deliver the target overall rate and by the reduction from 30% to 22%. The figure should remain at 30% until it can be shown that the annual target of 139 affordable homes is being achieved. It is not clear what 'broadly' in 'broadly equivalent value' means. It should be deleted - para 5.9 is clearer on this.</p>	<p>The Core Strategy Review proposes an increase in affordable housing provision from a target of 100 dwellings a year (in the 2013 Core Strategy) to 139 affordable dwellings a year (in the Consultation Draft Core Strategy Review). This will be made more prominent in the next version of the plan.</p>	<p>Amend section 5.1: Core Policies for Planning to set out the target of 139 affordable homes a year more clearly.</p>



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.7	355	1157838	<p>I agree with Mr. Horner's comments - the amount of affordable housing should not have been reduced. This is further reduced on some key sites, e.g. the Folkestone seafront development has dropped to 8%. This is unacceptable. There should be clear definition in a policy about affordable housing delivery as to what constitutes affordable housing, and what mix will be expected of different kinds of affordable housing. The officers who conducted workshops were very vague on this. The public expects more social housing, as schemes such as shared ownership are still not affordable to many.</p>	<p>The revised figure for affordable housing provision comes from evidence in the council's updated Strategic Housing Market Assessment (SHMA). Part two of the SHMA assesses the need for affordable housing and finds that, taking demand and supply into account, there is a total annual need for an additional 139 affordable homes a year in the district (paragraph 5.29), an increase on the 100 affordable homes identified in the 2013 Core Strategy. This equates to around 22 per cent of all new housing. National planning policies require local planning authorities to take the viability of a development into account when preparing local plans and making decisions on applications (National Planning Policy Framework, paragraph 57); the council cannot ignore this requirement. The National Planning Policy Framework defines affordable housing in Annex 2. The glossary of the Core Strategy Review will be updated to reflect the new definition.</p>	<p>Amend the glossary of the Core Strategy Review to reflect the definition of affordable housing given in Annex 2 of the National Planning Policy Framework.</p>
Policy CSD1	73	1032113	<p>The Kent Downs AONB Unit support the proposed lower threshold for affordable housing provision on sites proposing 5 to 10 dwellings within the Kent Downs AONB. Such an approach is in accordance with the nPPG and Written Ministerial Statement (November 2014). There is a general lack of affordable housing in rural areas however there is a need for social provision of affordable homes in such areas, and particularly in AONBs where AONBs generally have higher house prices than the regional average (research by Lloyds TSB in 2012). While the primary purpose of AONB designation is to conserve and enhance the natural beauty of the landscape, a secondary purpose, as identified in a policy statement in 1991 by the Countryside Commission that further defined the purpose of AONB designation, is taking into account the needs of land based and rural industries and the economic and social needs of local communities. The provision of affordable local needs housing falls within this category and in recognition of this, the Kent Downs AONB Management Plan policy VC3 states: Initiatives that are in line with existing policies of the Local Planning Authority that increase and improve the supply of affordable housing for (i) those with proven local needs, and (ii) workers whose activities directly contribute to the purposes of the AONB designation, will be supported where it is demonstrated that the proposals are of high quality design, limited quantity and scale and are built to the best current environmental standards. The incorporation of a lower threshold for affordable housing on sites in the AONBs would help achieve the objectives of this Management Plan policy and in doing so would help demonstrate compliance with S85, the Duty of Regard set out in the Countryside and Rights of Way Act. However, in order to comply with advice in the nPPG and Written Ministerial Statement (November 2014), we would recommend the policy is amended to</p>	<p>Noted. The Kent Downs AONB Unit's support is welcomed.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD1	259	559029	Affordable housing in all areas should be maintained, at least, at 30% to provide houses for local families who may otherwise be forced into the exorbitant rental market. The Core strategy should make provision for a robust revival of Council Housing with affordable rental.	The revised figure for affordable housing provision comes from evidence in the council's updated Strategic Housing Market Assessment (SHMA). Part two of the SHMA assesses the need for affordable housing and finds that, taking demand and supply into account, there is a total annual need for an additional 139 affordable homes a year in the district (paragraph 5.29). This equates to around 22 per cent of all new housing. The National Planning Policy Framework defines affordable housing in Annex 2; the council is required to reflect this definition in its policies.	Update section to reflect the new National Planning Policy Framework (July 2018).
Policy CSD1	430	345899	In your planning decisions it is most important you consider the following points. Please do not overdevelop simply on the ground that more housing is needed and developers are keen to build. It is essential that proper consideration is made of the water and drainage supplies, the likely cost and certain provision of schools and medical facilities, and the cost and effects of road building. Do not allow builders to provide houses mainly for people who can afford to buy. Insist that you will only allow housebuilding where sufficient affordable housing is really included. Agreements are often made but not kept. The Kent Downs area and Romney Marsh are unique areas, and very special parts of Kent which can easily be overdeveloped and spoiled with increased traffic and pollution. Please do not allow this to happen. Thank you for your consideration.	National planning policies require local planning authorities to take the viability of a development into account when preparing local plans and making decisions on applications (National Planning Policy Framework, paragraph 57); the council must have regard to this requirement. Policy CSD1 will be updated to reflect the new National Planning Policy Framework (July 2018).	Update Policy CSD1: Balanced Neighbourhoods and supporting text to reflect the new National Planning Policy Framework (July 2018).
Policy CSD1	505	1037610	Core policies Affordable housing Provision at 22 per cent is considered to be realistic and deliverable; this will be assessed further through viability assessment of the plan. If, over the course of implementing the Core Strategy Review, monitoring identifies that targets are not being met this will be reviewed as part of a future review of the plan. 30% should be required. Refer to my comment earlier about accountability at the end of projects where if proved, financial viability proves that affordable housing could have been provided, then payment must be made in lieu of. Bonuses far in excess of affordability are being made at the loss of affordable housing. F&HDC need to lead on enforcing quotas for affordable housing, or provide a method of Cost Plan housing as previously mentioned See <a href="http://www.dailymail.co.uk/news/article-5185257/Chairman-UKs-biggest-housebuilder-resigns-bonuses.html">http://www.dailymail.co.uk/news/article-5185257/Chairman-UKs-biggest-housebuilder-resigns-bonuses.html</a> <a href="https://www.premier.org.uk/News/UK/Housebuilder-Persimmon-boss-will-give-some-of-bonus-to-charity-after-church-criticism">https://www.premier.org.uk/News/UK/Housebuilder-Persimmon-boss-will-give-some-of-bonus-to-charity-after-church-criticism</a>	The revised figure for affordable housing provision comes from evidence in the council's updated Strategic Housing Market Assessment (SHMA). Part two of the SHMA assesses the need for affordable housing and finds that, taking demand and supply into account, there is a total annual need for an additional 139 affordable homes a year in the district (paragraph 5.29), an increase from the 100 affordable homes a year identified in the 2013 Core Strategy. This equates to around 22 per cent of all new housing. National planning policies require local planning authorities to take the viability of a development into account when preparing local plans and making decisions on applications (National Planning Policy Framework, paragraph 57); the council cannot ignore this requirement. The National Planning Policy Framework defines affordable housing in Annex 2; the council is required to have regard to this in developing its policies.	Update Policy CSD1: Balanced Neighbourhoods and supporting text to reflect the new National Planning Policy Framework (July 2018).

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD1	515	1155269	<p>2. Housing for first time buyers We are beginning to see more and more houses being built but who would have thought that this far from London most are out of the reach of first time buyers unless they have a very well paid job, a very big deposit or get help from the bank of 'mum &amp; dad'. Folkestone and Hythe District has higher unemployment and lower wages than the rest of the country and needs more single occupancy dwellings, yet there are many 3 and 4 bedroom dwellings. Why can't there be more 1 &amp; 2 bedroom terrace, semi-detached, flats and maisonettes at a price that is in reach of first time buyers? Shared ownership is not the answer, it merely gives them a share which actually diminishes as the house value increases unless they can afford to buy more at an early stage. Why can't the strategy acknowledge this need and provide some direction to developers to meet this need? The national average property price is £225,047 and £279,000 on the Marsh, yet the average property price in New Romney is now likely to be over £400,000 as more and more larger expensive houses are being built and proving difficult to sell.</p>	<p>The revised figure for affordable housing provision comes from evidence in the council's updated Strategic Housing Market Assessment (SHMA). Part two of the SHMA assesses the need for affordable housing and finds that, taking demand and supply into account, there is a total annual need for an additional 139 affordable homes a year in the district (paragraph 5.29), an increase on the 100 affordable homes a year indicated in the 2013 Core Strategy. This equates to around 22 per cent of all new housing. National planning policies require local planning authorities to take the viability of a development into account when preparing local plans and making decisions on applications (National Planning Policy Framework, paragraph 57); the council cannot ignore this requirement. The National Planning Policy Framework defines affordable housing in Annex 2; the council is required to have regard to this in developing its policies. Core Strategy Policy CSD2: District Residential Needs sets out the types and sizes of houses that the council expects to see delivered; this mix is based on evidence from the Strategic Housing Market Assessment, which has looked at patterns of supply and demand and future household formation.</p>	<p>Update Policy CSD1: Balanced Neighbourhoods and supporting text to reflect the new National Planning Policy Framework (July 2018).</p>
Policy CSD1	583	1162196	<p>Comments CSD1 The affordable allocations are too low for areas which are constrained such as Romney Marsh. The percentage overall has been lowered from 30% to 22% and this proportion will decline because the viability test has been made too easy for developers to reduce or eliminate their affordable housing obligations. On Romney Marsh and the AONB the proportion should be increased to 30% with another 20% allocated for retirement homes. All these properties must be first offered to local people, say at a 20% discount to the market price. If they are not sold they can be sold to a wider market, but the covenant on the property must state that when they are sold they must be sold on the same basis i.e. at 20% discount to the then market price and if there is no response from local people they can be marketed at the market price. Alternatively, 50% of the houses can only go to local people (see earlier comment - this is written into the covenant attached to the title) with no discount offered, with the remainder being sold on the open market. Since only local people can buy 50% of the properties this cohort of houses ought to be cheaper than the remaining 50% of the houses on the estate which will be subject to full market forces. None of the Core Strategy statements in CSD1 should say 'subject to viability' as this is a green light to developers to exercise their right to use the viability test. The Core Strategy should say, for example, development proposing (or land of 0.5ha or more in size) 15 or more dwellings (net gain) at any location within the district should provide 22 per cent affordable dwellings on-site. The council should make it known that it will strongly resist the viability test and use consultants that have no connection to builders - i.e. are working for the buy side rather than the sell side so will not be conflicted and therefore be more likely to pick up the manipulations used to meet the thresholds</p>	<p>The revised figure for affordable housing provision comes from evidence in the council's updated Strategic Housing Market Assessment (SHMA). Part two of the SHMA assesses the need for affordable housing and finds that, taking demand and supply into account, there is a total annual need for an additional 139 affordable homes a year in the district (paragraph 5.29), an increase on the 100 affordable homes identified in the 2013 Core Strategy. This equates to around 22 per cent of all new housing. National planning policies require local planning authorities to take the viability of a development into account when preparing local plans and making decisions on applications (National Planning Policy Framework, paragraph 57); the council cannot ignore this requirement. The National Planning Policy Framework defines affordable housing in Annex 2; the council is required to have regard to this in developing its policies.</p>	<p>Update Policy CSD1: Balanced Neighbourhood and supporting text to reflect the new National Planning Policy Framework (July 2018).</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD1	683	332260	Policy CSD1, as drafted, would not appear to take into consideration proposed revisions to the NPPF with regard to the definition of affordable housing '. The policy 's requirement for the starting point to provide a 30/70 shared equity/affordable rent/social rent will, potentially, be inappropriate for a number of allocations (strategic or otherwise) and may not meet the policy 's aim of providing balanced neighbourhoods . As such, Policy CSD2 will require revision also.	Noted. Policy CSD1: Balanced Neighbourhoods will be updated to reflect the new National Planning Policy Framework (July 2018) and the new definition of affordable housing in Annex 2.	Update Policy CSD1: Balanced Neighbourhoods and supporting text to reflect the new National Planning Policy Framework (July 2018).
Policy CSD1	678	1159255	RE: FOLKESTONE AND HYTHE DISTRICT COUNCIL CORE STRATEGY REVIEW 2018 We represent Rentplus UK Ltd , an innovative company providing affordable rent to buy housing for working people aspiring to home ownership with an accessible route to achieve their dream through the rent - save - own model. We are writing in response to this consultation to draw attention to the emerging national policy position as set out in the draft proposed changes to the NPPF, also out for consultation at present. As the main policy reference for new developments, it is important that the review of the Core Strategy reflects the Government 's policy approach to ensure long term effectiveness. Policy CSD1 The Council 's intention to review this policy and to take account of the Government 's wider definition of affordable housing is supported. The publication of a full revised text of the NPPF has fallen at a useful time for the review of the Council 's planning policy, following on from a number of significant national consultations conducted over the past couple of years. The Government has indicated that it intends to implement the draft changes later this year and while the draft NPPF includes transition arrangements as the majority of the changes, and in particular those relating to affordable housing, are not new ideas and the Plan is still in the early stages of production now is a prime opportunity to absorb those proposals and reflect these in the amended policies. This will ensure that the Core Strategy will remain effective and consistent with national policy in the long term, and not require further review. We welcome the acknowledgement within Paragraph 5.3 that affordable housing should be provided covering a wide variety of tenures "especially intermediate tenures alongside affordable rent which allows staircasing to full ownership". The Rentplus model of affordable rent to buy fits this definition and we are	Noted. This policy and supporting text will be updated to reflect the new National Planning Policy Framework (July 2018).	Update Policy CSD1: Balanced Neighbourhoods and supporting text to reflect the new National Planning Policy Framework (July 2018).

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD1	746	1164722	Draft policy CSD1 states that all housing development should, subject to viability, include a broad range of tenures wherever practicable. The draft policy states that for developments proposing 15 or more dwellings at any location in the district, should provide 22 per cent affordable dwellings on site, subject to viability. The draft policy states that, as a starting point, for sites providing 15 dwellings or more, approximately 30 per cent of the affordable housing provisions shall be shared equity and 70 per cent affordable rent/social rent. The parties support the provision of 22 per cent affordable housing on sites providing over 15 dwellings, subject to viability. The Parties welcome the acknowledgement that the shared equity and affordable rent/social rent split proposed in the draft policy is only a starting point and as such may vary from this as required to ensure the viability and delivery of the development.	Noted. Policy CSD1: Balanced Neighbourhoods will be updated to reflect the new National Planning Policy Framework (July 2018) and the new definition of affordable housing in Annex 2.	Update Policy CSD1: Balanced Neighbourhoods and supporting text to reflect the new National Planning Policy Framework (July 2018).
Policy CSD1	723	1044196	As set out in the Introduction to this statement, given the stage the CS has reached, it is unlikely to be submitted for examination within 6 months of the new NPPF coming into effect. As such, policies in the CS should be prepared in the context of the consultation NPPF to ensure the policies are consistent with National Policy and therefore Sound. Even if the CS is submitted within the 6 month period, policies should be assessed in the context of the consultation NPPF (para 208) to ensure they are consistent with the Framework so due weight can be given to them and to avoid conflicts between policies which may frustrate development coming forward. In the context of the above, the consultation NPPF makes clear that there are a range of models of housing which can be considered to be affordable. This includes starter homes, discounted market sales housing and other affordable routes to home ownership such as shared ownership and rent to buy. Policy CSD1 as currently drafted does not reflect the broader range of affordable housing as set out in the consultation NPPF. The policy should therefore be amended to provide flexibility to take account of these forms of affordable housing and what proportion of each should be provided to ensure the policy is Sound in line with the above.	Noted. The policy and supporting text will be updated to reflect the new National Planning Policy Framework (July 2018).	Update Policy CSD1: Balanced Neighbourhoods and supporting text to reflect the new National Planning Policy Framework (July 2018).
5.1	272	1162685	As noted above, it is astonishing that Ashford is ignored in this HMA analysis.	The council's Strategic Housing Market Assessment analyses a range of different indicators in coming to conclusions on the most appropriate housing market area, including migration, commuting patterns (including the Office for National Statistics' Travel to Work Areas), house prices and other contextual evidence. It also looks at evidence from neighbouring authorities. Ashford Borough Council's own work (Ashford Borough Council SHMA addendum, 2014) does not suggest that Ashford's housing market area extends into either Folkestone & Hythe or Dover.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.10	344	1163112	So convenient to ignore the 5,750 houses planned for Chilmington Green in Ashford, putting more pressure on services and infrastructure. Why is Ashford out of the picture??	The council is not ignoring developments in Ashford - Ashford Borough Council is seeking to meeting its own need for housing in its Local Plan 2030. Folkestone & Hythe District Council is seeking to meet its own housing needs in the Core Strategy Review. The council's SHMA analyses a range of different indicators in coming to conclusions on the most appropriate housing market area, including migration, commuting patterns (including the Office for National Statistics' Travel to Work Areas), house prices and other contextual evidence. It also looks at evidence from neighbouring authorities. Ashford Borough Council's own work (Ashford Borough Council SHMA addendum, 2014) does not suggest that Ashford's housing market area extends into either Folkestone & Hythe or Dover.	No change proposed.
5.14	40	1162408	The large scale of the proposed does not meet the needs of the local community which requires mixed small scale development. The visual and actual impact on the amenity will be disadvantageous to the local villages which have never supported the Otterpool Park development and have strenuously stated objections to the scale and have been ignored. The cumulative impact on the communities will be adverse in every respect as regards size scale/infrastructure/schools/Traffic/pollution/environment and amenity. The Westenhanger area is a water stressed area and no proper plan has been produced to show how the shortage will be met Westenhanger will be hugely adversely affected and is only mentioned in reference to the Railway Station and also the impact of it becoming the Town Centre on the Master Plan let alone the site of the oft mentioned Gateway Station to serve London and other parts,	The need for growth is driven by patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt these household trends. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period.	No change proposed.
5.14	41	1162408	The large scale of the proposed does not meet the needs of the local community which requires mixed small scale development. The visual and actual impact on the amenity will be disadvantageous to the local villages which have never supported the Otterpool Park development and have strenuously stated objections to the scale and have been ignored. The cumulative impact on the communities will be adverse in every respect as regards size scale/infrastructure/schools/Traffic/pollution/environment and amenity. The Westenhanger area is a water stressed area and no proper plan has been produced to show how the shortage will be met Westenhanger will be hugely adversely affected and is only mentioned in reference to the Railway Station and also the impact of it becoming the Town Centre on the Master Plan let alone the site of the oft mentioned Gateway Station to serve London and other parts,	The need for growth is driven by patterns of people moving into and out of the district, as well as the changing nature of the existing population (rates of births and deaths) and other factors (such as the trend for smaller households). The council is required to plan for these changes in providing homes for future generations; it cannot stop people leaving or coming to the district or halt these household trends. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. The site for the Garden Settlement has been identified through the Growth Options study, which considered options within the district taking account of the constraints (such as the AONB in the north of the district and the internationally important wildlife designations and higher flood risk areas in Romney Marsh) and the opportunities (such as utilising the existing transport links). The Otterpool area was the best location when taking all these into consideration (as it is outside the Flood Zones 2 and 3 and the AONB and is close to the M20 and High Speed Rail link).	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD2	48	1162523	If we are building homes merely to get a grant and these homes are not for the local population, should the council not be asking the public what is their preference, to pay more rates or to build more houses. Building a large number of homes could well lead to a surfeit and houses being unoccupied. Is it the intention of the council to own these houses and rent them out to residents unable to purchase 'affordable' housing? I have heard discussion that older residents will have a better option to sell their current larger homes to downsize and yet with a surfeit of housing surely this will cause a problem for these owners to sell their property.	The mix and types of housing included within Policy CSD2: District Residential Needs derive from the council's Strategic Housing Market Assessment, which analysed the current supply of housing and the future demand arising from changing households over the next 20 years or so, to 2036/37. The government's National Planning Policy Framework (July 2018) gives a definition of affordable housing in Annex 2. Affordable housing may be provided through a number of different means and may take a number of different forms, to meet the differing needs of the population. There is a low level of long-term empty homes in the district, and there is no evidence to suggest this will be a problem in the future, given the predicted rise in the numbers of households seeking homes.	No change proposed.
Policy CSD2	514	1155269	1. Elderly It is recognised that there is a high percentage of elderly people in and around New Romney (above the national average) and we are living longer. The Government has acknowledged we have an aging population which as a nation we are not caring for adequately, not just in respect of their health issues but also their day to day requirements ie: where they live, what they do, respect and concern from all parts of the community, their involvement in the community etc. a common comment - nobody cares about me/us or what 's the point, nobody is interested in what I have to say . It is not just the Government 's responsibility to take the initiative for our elderly people, we should all be doing it, we need to show more respect. It is felt that the strategy should acknowledge this responsibility and indicate what should be done to accommodate the needs of a growing elderly population. For example a) Housing there should be some emphasis to provide houses/flats suitable for older people flats, bungalows, maisonettes able to meet the needs of a person getting older assistance should be available to enable them to move from properties they struggle to manage to a property that better suits their needs b) Retirement villages/communities/sheltered accommodation we see very little of these around The Marsh yet they are a wonderful place for elderly to live, it can be peaceful and friendly and there are opportunities to become involved with the community if encouraged. Such places are increasing in and around London and other cities/towns why not here?	Noted. The policy highlights provision of these types of housing as part of the strategic allocations in the Core Strategy Review at the new garden settlement and at Sellindge. This is not intended to restrict any development for the elderly to these locations. The policy will be amended to make this clearer.	Amend Policy CSD2: District Residential Needs to reflect the comments.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD2	724	1044196	<p>Definition In accordance with representations made in respect of Policy CSD1, the policy should be updated to reflect the broader definition of affordable housing, as contained in the consultation NPPF. Tenure Mix The CS advises that the Strategic Housing Market Assessment (SHMA) 2016, provides the evidence base for Policy CSD2. It is noted at paras 4.8-4.14 of Part 2 of the document, sets out the requirement for different forms of housing including private rented housing. Para 6.28of the report goes into identify that the private rented sector has not only expanded but the households in it diversified. Overall it is concluded that the private rented sector is fairly stable. Within the context of para 6.28 of the SHMA, it is clear that the private rented sector is responding to demand on its own without intervention. This is best illustrated in Figure 7.1 in the report which provides recommendations in respect of tenure split and it is notable that it does not include specific provision for private rented accommodation. The requirement for 23% of new homes to be private rented is therefore considered to be unnecessary and Unjustified ', introducing an element of control which will prevent the private rented sector (already self-regulating) from being responsive to changes in market conditions, need and demand for this form of accommodation which will also change from settlement to settlement. This level of intervention could represent a significant burden on developments, if dwellings on a particular site are not attractive to that sector of the market. Additionally, it raises further questions as to how the sale of dwellings to the private rented sector are regulated and remain rented. The same principle applies to the owner-occupied units (55%) i.e. they could be brought for rent. The policy therefore also fails to be Effective . Reference to the requirement for 23% of new homes to be private rented should be deleted to make the CS</p>	<p>Noted. The policy will be updated to reflect the new National Planning Policy Framework (July 2018). The policy will be simplified to make its operation clearer. It is acknowledged that it is not clear how the fourth paragraph beginning "Development should maintain ..." would be applied to applications; this will be deleted.</p>	<p>Update Policy CSD2: District Residential Needs to reflect the new National Planning Policy Framework (July 2018). Simplify the policy to make its operation clearer.</p>
Policy CSD2	748	1164722			



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD2	747	1164722	Draft policy CSD2 provides an objective that provision of new homes should meet the following targets of new homes across the plan period: i. Owner-occupied - 55 per cent of new homes; ii. Private rented - 23 per cent of new homes; iii. Shared ownership - 7 per cent of new homes; and iv. Social rented/affordable rent - 15 per cent of new homes. The Parties note that the above is a target mix. Although the mix to be proposed at Otterpool Park will look to meet these, the actual mix proposed will be dependent on viability, deliverability and ensuring flexibility to allow future phases to meet the needs at that time. Draft policy CSD2 also contains Table 5.1 which provides an expected unit size mix to be followed when proposing new dwellings. The Parties consider that the above mix [Table 5.1] is too prescriptive and instead the policy should set targets in terms of the maximum percentage of 1 bed units and a minimum percentage of 3+bed units that should be provided. The Parties would also welcome amendments to draft policy CSD2 so that housing is delivered to meet the latest housing requirements. It is therefore suggested that the policy is revised to include a reference to the latest SHMA and note that any subsequent revisions to this should be taken into account when proposing residential development.	Noted. The policy will be updated to simplify it and make its implementation clearer. The policy will also be updated to reflect the new National Planning Policy Framework (July 2018).	Update Policy CSD2: District Residential Needs to simplify the policy and make its implementation clearer. Also update the policy to reflect the new National Planning Policy Framework.
Table 5.1	169	1029376	The housing needs and the affordability is strongly linked to the performance of the economy and in particular to the wages offered locally. It is difficult to forecast this too far in advance. How frequently will housing requirements be addressed and the strategy adjusted	The policy has developed from evidence in the council's Strategic Housing Market Assessment regarding previous housing provision, current housing demand and anticipated future demand from household trends, looking at the period to 2036/37. The government has introduced a requirement that local planning authorities must review their plans at least every five years. If new evidence emerges policies can be reviewed to take account of this.	No change proposed.
Table 5.1	273	1162685	We would question whether the garden settlement and Sellindge are the best (and only?) places to consider specialist units for older people.	The intention of the policy is not to limit provision to these locations but to highlight that they are the main strategic allocations in the Core Strategy Review not already with planning permission or under construction. The policy will be amended to make this clearer.	Amend Policy CSD2: District Residential Needs to reflect the comments.
Table 5.1	343	1163112	The shortfall in affordable housing, whether it be rented or by way of mortgage is partly due to wealthier members of our communities buying up properties and becoming private Landlords. Rents should be capped to allow the less wealthy members of our society in low paid jobs to afford a home and also have a little more disposable income to live. This would discourage the wealthy from buying up properties, leaving houses in the system available for low paid workers to rent or buy. It should be noted that FHDC Council Leader and Deputy Leader have 13 houses between them. Shouldn't they be setting an example on this?	The new National Planning Policy Framework (July 2018) sets out a definition of affordable housing in Annex 2. The council is required to follow this in developing its policies. The definition includes 'affordable housing for rent' where "the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent or is at least 20% below local market rents (including service charges where applicable)". The council will secure properties for affordable rent, alongside other forms of affordable housing, as a proportion of homes on new market developments.	Update Policy CSD2: District Residential Needs to reflect the new National Planning Policy Framework (July 2018).
5.17	349	1163103	Go Folkestone feels that RVH site is a special one for independent living . Discussed at our meetings as ideal with parkland and medical facilities . It would be a waste for ordinary housing , except as a balancing factor	Noted. The Core Strategy Review does not contain proposals for the Royal Victoria Hospital. The site is an allocation in the Places and Policies Local Plan Submission Draft (Policy UA3) and will be assessed by the planning Inspector examining the plan in due course.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.19	359	1157838	This paragraph is not sound. If Government guidance was released three years ago, why have you not completed your assessment? This policy cannot be made without such data, so this approach is unacceptable. Why are we creating sites for travellers? How do these differ from regular campsites? Surely travellers will not agree to pay to stay on a site? Is the taxpayer going to foot this bill? Will the travellers be taxed if they stay on such sites? It would appear that the Council is accepting those who wish to avoid paying tax, which is worrying.	The council is required to plan for the needs of gypsies and travellers and travelling showpeople, as set out in the government's 'Planning Policy for Traveller Sites'. The council must address this need as it must the general need for housing. The council is undertaking an updated needs assessment in partnership with the other east Kent authorities. Most traveller and travelling showpeople provision in the district is on privately-owned sites. Council tax is payable on all pitches.	No change proposed.
5.26	47	1162523	Tourism is mentioned and yet we have a serious lack of public toilets in the area. If we are to encourage tourism which I believe is vital to the economy, surely it is essential to have basic needs met. Local residents also have an issue with this serious lack of facilities.	Comment noted. Although this is an important issue, the Core Strategy focuses more on strategic development across the district, and the issue of providing specific facilities do not fall within the remit of a local plan policy, however this does not stop the Council encouraging toilet facilities to come forward by other means where possible.	No change proposed.
5.26	274	1162685	Windmill at Stanford (Grade II*) is missing from map.	Comment noted. See Council's Action.	The Grade II* listed Windmill at Stanford will be added to the map.
5.28	170	1029376	When will the Heritage strategy be signed off	The draft Heritage Strategy is available to view on the District Council 's website. The final draft of the Heritage Strategy will be published for public consultation in due course.	No change proposed.
5.28	506	1037610	5.28 The Heritage Strategy identifies the positive role heritage can play in the district's future, including: - Acting as a catalyst for economic and social regeneration; - Encouraging tourism and visitors; and - Contributing to improved public health and wellbeing. Comment: This piece of work is in draft and would form an important document for the future of the district when completed and adopted. The Destination Management has also not been adopted, making a mockery of the aim to encourage tourism and visitors	The Heritage Strategy is an evolving document and will be subject to further consultation with key stakeholders in its own right as the Local Plan progresses. While the primary purpose of the Heritage Strategy is to address local planning needs, it also sets out a wider policy context. It has been written to explain the substantial benefits that conservation of the historic environment and heritage assets, their recognition and use can bring to the district. The emerging Strategy has informed the development of this plan and provides evidence that ensures a positive approach to heritage. The draft Heritage Strategy is available to view on the District Council 's website. The final draft of the Heritage Strategy will be published for public consultation in due course.	No change proposed.
5.28	361	1157838	WHAT Heritage Strategy?! There is no Heritage Strategy. Are you referring to the recently published document that has Working Draft stamped all over it? Do not refer to it as a Heritage Strategy until it is final. What is the timeline for rolling out the Heritage Strategy? It was absent from the timeline shown for the Core Strategy, PPLP etc. at the recent workshops.	The Heritage Strategy is an evolving document and will be subject to further consultation with key stakeholders in its own right as the Local Plan progresses. While the primary purpose of the Heritage Strategy is to address local planning needs, it also sets out a wider policy context. It has been written to explain the substantial benefits that conservation of the historic environment and heritage assets, their recognition and use can bring to the district. The emerging Strategy has informed the development of this plan and provides evidence that ensures a positive approach to heritage. The draft Heritage Strategy is available to view on the District Council 's website. The final draft of the Heritage Strategy will be published for public consultation in due course.	No change proposed.
5.29	364	1157838	This is why we need a Local List. Why is there no timeline for its implementation?	The Council will be working alongside local communities to establish a local list following the adoption of the Places and Policies Local Plan. Once adopted, local listing will be an ongoing piece of work.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.29	507	1037610	5.29 However, while proposals affecting heritage assets will be considered positively, some assets are worthy of conservation for their significance alone and some may be incapable of re-use or being made viable. Places and Policies Local Plan policy HE1 supports proposals that provide, where possible, a viable use that assists in social and economic regeneration and ensures the long term protection, conservation and, where appropriate, the enhancement of heritage assets in line with legislation. Comment: Heritage assets are not being considered positively Royal Military Canal; Military buildings suitable for reuse at Shorncliffe. Please deliver what you propose!	The Heritage Strategy has been written to explain the substantial benefits that conservation of the historic environment and heritage assets, their recognition and use can bring to the district. The emerging Strategy has informed the development of this plan and provides evidence that ensures a positive approach to heritage.	No change proposed.
5.3	508	1037610	5.30 This approach will be complemented by the restoration and enhancement of historic military landmarks within towns, and the upgrade of cultural attractions in the Urban Area. Events in and around the town centres, such as the third Folkestone Triennial (2017), are drawing in new visitors. Improvements to the public realm and the retail, leisure and cultural mix of centres, and maintaining sufficient accommodation will underpin tourism in the Urban Area in line with policies CSD 6, CSD 7 and SS 10. See my comment for 5.29 and deliver and support your own proposals	The Heritage Strategy has been written to explain the substantial benefits that conservation of the historic environment and heritage assets, their recognition and use can bring to the district. The emerging Strategy has informed the development of this plan and provides evidence that ensures a positive approach to heritage.	No change proposed.
Policy CSD3	509	1037610	Policy CSD3 Rural and Tourism Development Comment: needs to incorporate findings of the DMP and Heritage Strategy	Comment noted. Although the Destination Management Plan has not been formally adopted by the council, it has brought together a wide range of tourism groups and businesses to create the Folkestone & Hythe Tourism Board, with representatives from major tourist attractions, accommodation providers, Visit Kent, Folkestone Town Council and F&HDC. The Board has focussed, in the first instance, on marketing the district, working together to produce a tourism website ( <a href="http://www.visitfolkestoneandhythe.co.uk">www.visitfolkestoneandhythe.co.uk</a> ) which was launched in May 2018. This has provided an important platform to market the district, sitting within the family of the Visit Kent website. The Board is now looking at future projects to take forward for the year ahead. Folkestone & Hythe District Council contributes to a wide variety of other tourist initiatives, helping managing important attractions such as the Coastal Park, Royal Military Canal, Folkestone Warren, the district 's beaches, and supporting other attractions and initiatives such as the Romney Marsh Visitor Centre and the White Cliffs and Romney Marsh Countryside Partnerships, which focus strongly on helping local people and visitors to enjoy the district 's built and natural heritage.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.31	74	1032113	As recognised in paragraph 5.33, there is a particular sensitivity around new buildings and structures in the countryside. Port Lympne Reserve lies both within the countryside within the Kent Downs AONB and therefore opportunities for any major new development here, are limited. Furthermore, there have been a number of planning applications for new development at Port Lympne that cumulatively could have a detrimental impact upon the landscape character of the AONB. The Kent Downs AONB Management Plan states incremental land use change can result in cumulative impacts which are seemingly insignificant but over time can bring about considerable change in character from developments (page 54). Assessing the potential for future development and policies must consider the impact upon the Kent Downs. In cases like Port Lympne strategic landscape plans should be developed.	The government has introduced a new national methodology to set out how many new homes local authorities should plan for. For Folkestone & Hythe district, this indicates that the council needs to plan for an average of 676 new homes a year. The supply of new homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. In the Core Strategy Review the council is planning for the long-term to 2036/37 and must consider how housing can be provided over this whole period. In October 2016, AECOM was commissioned by the District Council to develop a Strategic Growth Options Study for the district to identify land suitable for strategic scale development across multiple plan periods. The Strategic Growth Options Study comprises three elements: a High Level Options Report, a Phase Two Report and a High Level Landscape Appraisal that informs both the High Level Options Report and the Phase Two Report. The High Level Landscape Appraisal (HLLA) for the whole district was carried out in February 2016 which identified the likely relative impacts of strategic level development in various locations, however this did not relate to specific development sites. The Phase Two Report was published in April 2017 and takes as its starting point the conclusions of the High Level Options Report and adds sufficient detail and site-specific evidence to them in order to determine the boundaries of land considered suitable for strategic-scale development and the extent of land considered unsuitable for such development. The Phase Two Report recognises that the Kent Downs AONB surrounds the study area on three sides, with the impact of development on its setting a key consideration in national and local policy. The report concludes that land within Area B to the north of Lympne has the potential to form a sustainable settlement of the scale needed, with the potential for significant areas of strategic open space to be provided within and surrounding new development, with a green	No change proposed.
Policy CSD4	366	1157819	There is a need to include Scheduled Ancient Monuments alongside SSSIs and Ancient Woodland to meet recreational needs. Specifically the Royal Military Canal should be recognised as contributing significantly to green infrastructure.	Noted.	No change proposed.
<b>Policy CSD4</b>	607	329173	Fisheries, Biodiversity and Geomorphology We welcome the focus on the natural environment throughout the strategy and the policies to protect and enhance biodiversity.	The support is welcomed.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD4	521	1042876	Annex One: Folkestone and Hythe DC Core Strategy Review first draft Natural England considers the most significant part of the Core Strategy Review (CSR) is the inclusion of the new garden settlement policy, in the North Downs (Otterpool Park), for up to 10,000 homes. This development bears significant environmental implications, both in terms of impact and opportunity. Please find below our detailed comments relating to the garden settlement policies, and CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation. New Garden Settlement (Otterpool Park) Natural England notes the new garden settlement (Otterpool Park), in the North Downs, is to provide a minimum of 5,500 homes for the Local Plan period up to 2036/37, and for potential growth up to 10,000 homes beyond the plan period subject to detailed masterplanning. The location, scale and complexity of the garden settlement mean there are significant environmental implications, both in terms of impact and opportunity. The site is situated in the setting of the Kent Downs Area of Outstanding Natural Beauty (AONB), surrounded by the AONB to the north, east and south. The setting of the AONB is a special quality for which it is designated. The settlement will be clearly visible from the escarpment to the north, along which runs the North Downs Way National Trail. There are also potential impacts, but also opportunity for enhancement, for the Otterpool Quarry Site of Special Scientific Interest (SSSI), located at the centre of the proposed site, and Lympne Escarpment SSSI approximately 400m to the south of the site. However, as reflected in the CSR, the development offers the chance for an ambitious green and blue infrastructure (GI) strategy, making use of its multiple environmental, social and economic benefits for people and wildlife. This will help mitigate ecological and AONB impacts, but also provide net gain for biodiversity, provide	In addition to policy CSD4 and policies SS6-9 the Green Infrastructure for the new garden settlement will be informed by a strategy produced by the applicant and a revised Council strategy.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD4	523	1042876	<p>Policy CSD4 'Green Infrastructure of Natural Networks, Open Spaces and Recreation' This policy contains good description of GI, and sound principles for protection and enhancement of the District 's environmental assets including the coast, through planning and development. We are pleased to see provision for biodiversity net gain also included. For the latter, in order for this policy to be effective and in line with national policy, the wording and principles can be strengthened to ensure net gain can ultimately be achieved on the ground. There has been significant recent movement towards net gain as a means of reversing the trend of biodiversity decline, which is continuing at an alarming rate, with potentially serious consequences for the resilience of ecosystem functions on which humans depend '1. This has continued to occur despite planning policy aimed towards no residual loss in biodiversity. As such it is necessary for the Council 's Core Strategy Review and Local Plan need to embed provision for biodiversity net gain through development. The Council should also consider including more detailed guidance for developers on achieving net gain, and we suggest the following measures are incorporated into the Local Plan, either through the CSD4 policy, or a more detailed Supplementary Planning Document. These are as follows: : i, Biodiversity metric developers should apply the Defra biodiversity metric, which is a clear and methodical calculation for net gain in biodiversity for individual planning proposals. The metric is currently being updated by Defra and Natural England to include a wider range of habitat types and incorporate wider benefits of Green Infrastructure (GI). It should be available this autumn. i, Net gain plans development applications are required to submit a net gain plan which clearly sets out the ecological issues of the proposals, including clearly accounting for residual biodiversity loss and how this</p>	<p>Noted, amend (a) as suggested: "Development must avoid a net loss of biodiversity achieve net gain over and above residual loss." The council considers that more detailed proposals are better included in a Supplementary Planning Document or in a more detailed local plan policy. Paragraph 3.4, aim 3 for biodiversity should be strengthened to seek overall gain in biodiversity, as opposed to it being sustained '.</p>	<p>Text amended as detailed under Council's response.</p>
Policy CSD4	649	1157486	<p>Thank you for consulting us on the Folkestone and Hythe District Council Core Strategy Review 2018. The RSPB will not be taking objection to the councils core strategy documentation, however we would like to reiterate our support on the development of a robust strategy for mitigating issues of recreational disturbance to the European designated sites (Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation). We are aware that stage 2 of the Sustainable Access and Recreation Management Strategy has now been completed and that we will continue being consulted by Folkestone and Hythe District Council on taking the best approach to reducing any significant impacts to the Dungeness complex. Please do not hesitate to contact me if you have any questions.</p>	<p>Noted.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD4	680	1044110	<p>Thank you for consulting Sport England on the above named document. Please find herein our formal comments for your consideration. Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.</p> <p>Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future. We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice:  <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/">http://www.sportengland.org/facilities-planning/planning-for-sport/</a>            Site allocations and playing field provision Development that would either involve the loss of playing field or prejudice the use of the playing field would be strongly resisted by Sport England. I note that the document acknowledges the important role that playing field plays. I also note the intention to remedy any deficiencies in sports provision, and provide new and upgraded facilities where appropriate. These intentions should be informed by a robust and up to date assessment such as the Playing Pitch Strategy which I understand is currently in progress. I also fully support the proposed intention to secure additional community use of school sporting facilities - the</p>	Noted and amend to include reference to Sport England's Active Design Guidance	Supporting text to CSD4 amended to refer to Sport England's Active Design Guidance.
5.52	211	1029376	The coastal park is the top attraction according to Trip Advisor, currently there is adequate parking there but this may disappear with the Seafront Development	Noted. Policy SS10: Spatial Strategy for Folkestone Seafront is kept largely unchanged from the 2013 Core Strategy as the site now has planning permission.	No change proposed.
5.57	602	329173	Section 5.57 - refers to "a special Water Scarcity Status (formally designated in 2006)". Could this please be referenced? I suspect it is no longer relevant. In 2006, Folkestone and Dover Water (as was) was given "water scarcity status" so as to allow it to introduce compulsory metering. Since then, the situation has changed so that all water companies in an area of "serious water stress" are required to consider compulsory metering in their plans. South East Water has an ongoing programme and Southern Water's programme is largely complete. Affinity (ex Folkestone and Dover) completed its compulsory metering programme some time ago. Ref <a href="http://news.bbc.co.uk/1/hi/england/4763206.stm">http://news.bbc.co.uk/1/hi/england/4763206.stm</a> .	As drawn from Affinity Water 's draft WRMP (2018): Our Southeast region was designated an area of water scarcity in 2006 and we have now completed our metering programme with 90% of properties fitted with a meter. ' All new-build properties are automatically put onto water meters, and so there remains a degree of relevance to the 2006 designation. The comment made is more about the context.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.58	611	1165473	<p>We are puzzled by the statement that the water planning directive presents a serious challenge to deliver sufficient upgrades in the quality of water (including groundwater) in a relatively short period'. We question how this should be interpreted in the light of proposals to build over 20,000 new homes in the district. We further question how the future water demand in the district can be reconciled with the UN Sustainable Development Goals. Goal 6 deals with water supply and is backed by the following targets 6.4 - ensure sustainable withdrawals and supply of freshwater to address water scarcity 6.5 - integrated natural water management 6.8 - support and strengthen the participation of local communities in improving water quality Although the SDG 's are not mandatory, we would expect them to be addressed in the planning framework of one of the most advanced global economies like the UK.</p>	<p>The content of paragraph 5.58 actually reads: The Water Framework Directive (9) presents a serious challenge to deliver sufficient upgrades in the quality of water bodies (including groundwater) in a relatively rapid timescale, and one where local planning decisions can assist. The protection of water supply and quality falls under the jurisdiction of a number of bodies: notably the Environment Agency, Kent County Council, the council, the Romney Marshes Area Internal Drainage Board and water companies. ' The housing requirement over the period 2018/19 to 2036/37 (19 years) under the government's new national methodology for housing is 12,845 additional homes, and not the 20,000 that the respondent has cited. Reference to the 'relatively rapid timescale' is in the context of a key target of the WFD to aim for a 'good' status for all water bodies by 2015, where this is not possible the aim is to achieve 'good' status by 2021 or 2027. The aim is also to achieve 'good' ecological potential and 'good' surface water chemical status for heavily modified water bodies and artificial water bodies. The respondent cites the UN Sustainable Development Goals and questions how the District 's growth objectives can be reconciled with the objectives relating to water supply. The respondent also clarifies that the Sustainable Development Goals are not mandatory, and so the District Council has no statutory obligation to satisfy such targets, although they do serve as useful guidelines. The District Council has updated its Water Cycle Study, and so the reader is directed to this document which includes broader coverage of the Water Framework Directive.</p>	No change proposed.
5.63	275	1162685	<p>The current draft WRMP out to consultation does not cater for the housing numbers proposed in this plan.</p>	<p>The below response has been provided by Affinity Water in response to the Core Strategy Review Local Plan: Planned growth to the region (to specifically include Folkestone and Hythe District and assigned growth within the emerging Core Strategy Review Local Plan to 2037 and the Places and Policies Local Plan to 2031) to 2080 is catered for in our Water Resources Management Plan 2019. This water resources management plan sets out how we will balance supply and demand over this period. In that time our supply resource in our WRZ7 will not change significantly. Future demand is based on new property growth as provided from local plans (to 2045) and modelled thereafter. We forecast that occupancy rates will reduce with overall per property consumption reduction. Individual consumption will increase as occupancy rates decrease and will need further schemes to encourage further reductions in potable water use. There is a current small surplus in resources and the water resources management plan puts in measures to maintain this. We currently utilise two minor imports from South East Water and Southern Water for emergency purposes. There is no requirement to increase these imports and to make them part of our resource base. Our water resources planning is at zonal level. There will be the requirement to transfer water internally to meet the local development needs. Following on from our draft plan (WRMP19) we will be publishing a revised draft for further consultation in Spring 2019.</p>	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.64	322	1036994	I object to this document being used within the Core Strategy Review as it does not allow for recent housing figures/projections including Otterpool Park New Town. The WRMP19 2018 draft document has allowed for the local housing needs of 14, 560 homes but can only allow to supply water for the first 1000 homes should a New Town be developed. And this would only be applied during a non drought period.	The District Council has published an updated version of the Water Cycle Study, which can be accessed via the Council 's website. The study report has been the subject of on-going dialogue and feedback from the Environment Agency, Affinity Water, Southern Water, South East Water, Natural England and Kent County Council as principal stakeholders.	No change proposed.
5.64	326	1036994	Re: 2018 Core Strategy Review. It has been brought to my attention from a number of Parishioners that the FHDC Core Strategy review, currently in circulation, is lacking in detail, outdated and incomplete, therefore making it impossible for parishioners to seriously comment on the document. The documents brought to my attention include the following on pages 165-167. Duty to Co-operate. Infrastructure delivery plan / Infrastructure table. Playing Pitch strategy. Green Infrastructure report. 5.Viability assessment (whole plan) Water Cycle Report/Study. I would draw your attention to item 6, Water Cycle Report. The core strategy review states at 5.57 that the region suffers from water stress and low rainfall. At 5.64 it states that the Water Cycle report is being updated and at page 166 it sates 'In preparation'. You will of course be aware that the Folkestone and Hythe District falls within the Dour region (WRZ 7) of the Affinity water area, one of the most water stressed areas in the UK. You will also be aware that, per head of population, the South East has less fresh water than Morocco. Given a history of hose pipe bans and constant threats of drought (evidenced by the Drought Management Plan), together with reminders of using water wisely, it is incumbent upon you and your Council to issue an up to date strategy on dealing with water deficit and proposed resilience measures, given the proposed housing increase over the next 19 years of some 24,650 - 26,650 new dwellings. A population increase of over 50%. I would respectfully ask that the Core Strategy Review be suspended forthwith until ALL relevant information is presented to the Residents of the District. As time is of the essence, I look forward to your considered response. Regards, Leslie Barratt. Vice Chair. Monks Horton Parish Meeting.	The National Planning Policy Framework states that local plans should be underpinned by an "adequate and proportionate" evidence base. The council has published numerous studies on its webpages that have informed the development of the Core Strategy Review. Further evidence will be added for consultation on the Regulation 19 version of the plan. The government has introduced a new national methodology to set out how many new homes local authorities should plan for. For Folkestone & Hythe district, this indicates that the council should provide an average of 676 new homes a year. The housing requirement over the period 2018/19 to 2036/37 (19 years) is 12,845 additional homes, and not 24,650-26,650 homes. The below response has been provided by Affinity Water in response to the Core Strategy Review: Planned growth to the region (to specifically include Folkestone and Hythe District and assigned growth within the emerging Core Strategy Review Local Plan to 2037 and the Places and Policies Local Plan to 2031) to 2080 is catered for in our Water Resources Management Plan 2019. This water resources management plan sets out how we will balance supply and demand over this period. In that time our supply resource in our WRZ7 will not change significantly. Future demand is based on new property growth as provided from local plans (to 2045) and modelled thereafter. We forecast that occupancy rates will reduce with overall per property consumption reduction. Individual consumption will increase as occupancy rates decrease and will need further schemes to encourage further reductions in potable water use. There is a current small surplus in resources and the water resources management plan puts in measures to maintain this. We currently utilise two minor imports from South East Water and Southern Water for emergency purposes. There is no requirement to increase these imports and to make them part of our resource base. Our water resources planning is at zonal level. There will be the requirement to transfer water internally	No change proposed.
5.64	410	1036994	The Water Cycle study cited here is 7 years out of date. How on earth do you expect Residents to comment on something which is currently being updated. Affinity Water have had no representation by FHDC about this and I suspect that this document which is supposedly being updated is not even in the system. This Core Strategy review is nothing of the sort. Disgraceful.	The District Council has published an updated version of the Water Cycle Study, which can be accessed via the Council 's website. The study report has been the subject of ongoing dialogue and feedback from the Environment Agency, Affinity Water, Southern Water, South East Water, Natural England and Kent County Council as principal stakeholders. The Council is looking to prepare a Position Statement jointly with Affinity Water to explain that the water supply demand attributed to Otterpool Park Garden Town can be provided, an exercise that will also define what network reinforcements are needed and at when, i.e. the trigger points.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.64	369	1157819	The use of grey water in new developments appears not to have been considered but this can contribute significantly to water supplies in an acknowledged area of water shortage.	Criterion (b)(l) of Policy SS8 'New Garden Settlement - Sustainability and Healthy New Town Principles' sets out requirements for an integrated water management solution in order to maximise the recycling and reuse of water resources, as repeated below: All new build housing shall be built to water efficiency standards that exceed the current building regulations so as to achieve a maximum use of 90 litres per person per day of potable water (including external water use). The development shall be informed by a Water Cycle Strategy which includes detail of: i. Water efficiency, and demand management measures to be implemented to minimise water use and maximise the recycling and reuse of water resources (i.e. through the use of 'grey' water) with the aim of achieving water neutrality across the settlement, utilising integrated water management solutions;	No change proposed.
5.66	320	1036994	POTABLE WATER SUPPLY. I would begin by prefacing this document with a brief description of where we are now in terms of water scarcity and potable water supply for a growing community. The South East of England has always been, in relation to the rest of the UK, water stressed. With a growing local population, certainly over the past 30 years, measures have been taken to try to limit water usage which has, for the most part, been successful. Metering has played a big part in the water intake of households, made compulsory by the designation of our local water company, Affinity Water, of having 'Water Scarcity Status'. Some 90% of supplies are now metered. Over recent years we have seen drought measures instigated by way of hose pipe bans, Car washing facilities restricted or shut down and so forth. Affinity Water has persuaded us to use hippo bags in WC Cisterns, and even today, are promoting (FOC) water saving shower heads and similar products to save water. There was even a plan to import water through the channel tunnel fire hydrant system and tow water filled barges across the North Sea from Scandinavia in the mid nineties, given the local drought situation. The scenario of severe drought has not yet fully been experienced, but with a growing local population, measures of resilience could be adopted to alleviate and reduce such a situation happening in the near future. Migration from cities is definitely not one of them and would only serve to exacerbate the water scarcity situation even further. The Folkestone and Dover area is known as the Dour region (WRZ 7) and is the most water stressed area in the UK. Formerly known as the Folkestone and Dover Water Company, then Veolia, and now Affinity Water, it is reliant mostly (some 90%) on groundwater supply. Unlike other water companies, there are no sizable reservoirs as such, which means we are dependant on rainfall	The District Council has prepared an updated version of the Water Cycle Study, which is published alongside the Regulation 19 version of the Core Strategy Review. The content of the WCS has been the subject of ongoing dialogue and feedback from the Environment Agency, Affinity Water, Southern Water, South East Water, Natural England and Kent County Council as principal stakeholders. The below response has been provided by Affinity Water in response to the Core Strategy Review Local Plan: Planned growth to the region (to specifically include Folkestone and Hythe District and assigned growth within the emerging Core Strategy Review Local Plan to 2037 and the Places and Policies Local Plan to 2031) to 2080 is catered for in our Water Resources Management Plan 2019. This water resources management plan sets out how we will balance supply and demand over this period. In that time our supply resource in our WRZ7 will not change significantly. Future demand is based on new property growth as provided from local plans (to 2045) and modelled thereafter. We forecast that occupancy rates will reduce with overall per property consumption reduction. Individual consumption will increase as occupancy rates decrease and will need further schemes to encourage further reductions in potable water use. There is a current small surplus in resources and the water resources management plan puts in measures to maintain this. We currently utilise two minor imports from South East Water and Southern Water for emergency purposes. There is no requirement to increase these imports and to make them part of our resource base. Our water resources planning is at zonal level. There will be the requirement to transfer water internally to meet the local development needs. Following on from our draft plan (WRMP19) we will be publishing a revised draft for further consultation in Spring 2019.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.66	305	1163030	The paragraph states: ' with an aim that water neutrality is achieved . [ emphasis added] This has also been referred to as an aspiration [e.g. paragraph 5.159, page 146] and this is more realistic. Water neutrality involves retrofitting enough existing properties with water saving fittings to offset the entire water demand from the new development and, because the savings achievable in each existing home are relatively small, this means retrofitting a significant number of properties. In the case of Otterpool Park, there are nowhere near enough existing properties across the settlement to achieve this. The Water for Sustainable Growth Study estimated that achieving water neutrality for all new homes in the Folkestone and Hythe District Council area would require retrofitting 43% of the existing housing stock.	Comments noted. The wording shall be updated to reflect water neutrality as an aspiration.	Update text in relation to water neutrality.
5.66	597	329173	3.26, 4.88, Policies SS6 SS8 (1) b & c, Section 5.66 - We welcome the ambition to create a water-neutral development. However this is a concept to be applied at a large scale, not something which is achievable in the context of an individual self-built or custom-built home, as the bottom of page 84 seems to imply, or even a larger new development in isolation. To achieve water neutrality, new water consumption in a development needs to be balanced by consumption reductions elsewhere. Perhaps a definition could be included in the Glossary, and thought given to delineating the wider area over which neutrality is to be achieved?	Comments noted. The wording will be updated to reflect water neutrality as an aspiration.	Update text as suggested under Council's Response.
5.66	641	1057385	5.66 [page 127] The paragraph states: ' with an aim that water neutrality is achieved . [ emphasis added] This has also been referred to as an aspiration [e.g. paragraph 5.159, page 146] and this is more realistic. Water neutrality involves retrofitting enough existing properties with water saving fittings to offset the entire water demand from the new development and, because the savings achievable in each existing home are relatively small, this means retrofitting a significant number of properties. In the case of Otterpool Park, there are nowhere near enough existing properties across the settlement to achieve this. The Water for Sustainable Growth Study estimated that achieving water neutrality for all new homes in the Folkestone and Hythe District Council area would require retrofitting 43% of the existing housing stock.	Comments noted. The wording related to water neutrality will be deleted, given that it is set out elsewhere in the Core Strategy Review (paragraphs 4.94 and 5.162).	Delete final part of sentence relating to water neutrality.
<b>Policy CSD5</b>	276	1162685	(a) The current CS requires a designed water efficiency of 105l/day. Why not at least stick to this? Why not indeed require 90l/day as proposed for the strategic developments in this plan? Note that very little will force people to use less water, but the infrastructure should be built so that they can achieve low water usage without difficulty. (b) remove 'technically feasible' - a published standard must be feasible. (c) should this read 'peak rate of surface water runoff'?	Policy CSD5 and supporting text have been updated to reflect the withdrawal of the Code for Sustainable Homes and the introduction of new standards through the Building Regulations - these are national changes that the council has to have regard to.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD5	604	329173	Groundwater and Contaminated Land Policy CSD5 - The main policy covering groundwater protection is Policy CSD5. This and the supplementary points; 5.70 and 5.71 cover the quality of groundwater reasonably, however it is important to emphasis for a lot of the area covered by the plan there are limited foul sewer provisions. Development must ensure that adequate provision in extended capacity is tied in to development timetables. Brownfield development must also ensure appropriate approaches are taken to addressing past contamination, but on a risk assessed basis. However this can lead to conflicts between the implementation of SuDS, as infiltration drainage is not always appropriate on brownfield sites. Policy should make this distinction clear where possible in both policy areas.	Noted. Additional text will be introduced into the plan to reflect these comments.	Amend the supporting text to reflect these comments (new paragraph number 5.69).
Policy CSD5	606	329173	Fisheries, Biodiversity and Geomorphology We welcome the focus on the natural environment throughout the strategy and the policies to protect and enhance biodiversity. Water Framework Directive We are pleased to note the references to the requirements of the Water Framework Directive, although it is not directly referred to within Policy CSD5.	Noted. The support is welcomed.	No change proposed.
5.68	27	1161386	Affinity water recently have informed Sellindge residents that the local water aquifers are one third of what they should be and we should. If this is the case, where is the district going to get the water to supply ten thousand extra houses and businesses? Why is there no report from Affinity water or the council explaining this?	The below response has been provided by Affinity Water in response to the Core Strategy Review Local Plan. Planned growth to the region (to specifically include Folkestone and Hythe District and assigned growth within the emerging Core Strategy Review Local Plan to 2037 and the Places and Policies Local Plan to 2031) to 2080 is catered for in our Water Resources Management Plan 2019. This water resources management plan sets out how we will balance supply and demand over this period. In that time our supply resource in our WRZ7 will not change significantly. Future demand is based on new property growth as provided from local plans (to 2045) and modelled thereafter. We forecast that occupancy rates will reduce with overall per property consumption reduction. Individual consumption will increase as occupancy rates decrease and will need further schemes to encourage further reductions in potable water use. There is a current small surplus in resources and the water resources management plan puts in measures to maintain this. We currently utilise two minor imports from South East Water and Southern Water for emergency purposes. There is no requirement to increase these imports and to make them part of our resource base. Our water resources planning is at zonal level. There will be the requirement to transfer water internally to meet the local development needs. Following on from our draft plan (WRMP19) we will be publishing a revised draft for further consultation in Spring 2019	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.70	690	1165852	Under the terms of the New Connections Services implemented from 1 April 2018, a developer now pays a standard connection charge for new domestic water and wastewater connections (for more information see <a href="https://www.southernwater.co.uk/infrastructure-charges">https://www.southernwater.co.uk/infrastructure-charges</a> ). Therefore a requirement for the development to connect off site to the nearest point of adequate capacity is no longer appropriate for planning conditions. However, in instances where Southern Water's preliminary site investigations have indicated that network reinforcement would be required at the "practical point of connection" (as defined in the New Connections Services), Southern Water would need to work with site promoters to understand the development program and to review if the delivery of network reinforcement aligns with the occupation of the development. Planning policies and planning conditions, therefore, still play a key role in ensuring that development is coordinated with the provision of necessary infrastructure.	Comments noted. Southern Water is working closely alongside the District Council (as Local Planning Authority with a remit of preparing the emerging Local Plan) and the site promoters to understand and define the programme of ensuring that development is coordinated with the provision of necessary waste water infrastructure. The Core Strategy Review will be modified to include reference to the need to ensure development is coordinated with the provision of necessary infrastructure, to include wastewater.	Amend supporting text as indicated.
5.71	603	329173	5.71 - "Pollution prevention measures are required in areas of high groundwater" - Is this incomplete? Should it perhaps read high groundwater vulnerability?	Comment noted. The suggested amendment will be incorporated into the Submission Draft (Regulation 19) Core Strategy Review.	Amend paragraph as set out under Council's Response.
5.75	278	1162685	Core Strategy policy may also require...' This is the Core Strategy - does it require these things or not?	Comments noted. The relevant extract from paragraph 5.75 is repeated below: Core Strategy policy may also require that developments strengthen the green infrastructure network through measures such as the improvement of water courses, coastal environmental management, or flood prevention; developer contributions to this end will be explored where appropriate (in line with SS5). 'The justification for the wording may require ' is because certain development sites may not be positioned in a location where it is feasible or practical to join up with or strengthen the green infrastructure network, i.e. a site might be physically separated from the green infrastructure network and not capable of connecting with it.	No change proposed.
<b>5.2 AREAS OF STRATEGIC CHANGE</b>					
Table 5.1 Priority areas for regeneration	218	1029376	Totally agree with the priorities given, particular attention to be given to seafront development and connectivity. Unclear however over how this is to be implemented and the resources available	These priorities have fed through into the policies identified in the table. Implementation will be dependent on a range of stakeholders, including particularly developers bringing forward schemes for redevelopment in the areas.	No change proposed.
5.84	708	1101438	The ESFA welcomes references within the plan to improving educational attainment and to the need for development to facilitate investment in and improvements to the local education system.	Noted. The Education and Skills Funding Agency's support is welcomed.	No change proposed.
5.91	365	1157838	If the town failed to fully utilise the advantages of its coastal location, why was the desecration of transport links such as the ferry terminal / pier linkspan and the harbour railway line allowed? Why are we building skyscrapers on the beach instead of using it to attract tourists to a seaside town?	The council cannot control the decisions of operators such as the ferry or rail companies in closing lines; these are commercial decisions taken by the operators. The Seafront scheme will secure substantial investment in the town, provide homes on a derelict, brownfield site, provide commercial space for cafes, restaurants and offices, boost trade more generally by attracting new residents and visitors, and provide contributions to infrastructure and the town's heritage, such as the restoration of the Leas Lift.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.93	225	1029376	The views from the Leas are likely to be downgraded for 30 years, the period for development of the seafront	The council does not consider that views from the Leas are likely to be downgraded for 30 years, the period of development for the Seafront. Issues of the design and views were considered carefully at the planning application stage before a decision was made to approve the scheme. While there will be some temporary disruption during construction, the scheme will deliver the regeneration of an important brownfield site, provide new homes and businesses and secure considerable enhancements for the area.	No change proposed.
5.93	686	332260	The Trustees continue to support the Central Folkestone Strategy as provided by Policy CSD6 and, in particular, the requirement for new development to improve connectivity both to, and within, the town centre in line with other policies. In this particular regard, support is provided to the Reasoned Justification at Paragraph 5.93 and that investment in the restoration of the historic and Grade II* Listed Leas Lift should be a priority albeit within the first phase of the plan period as opposed to over the plan period .	The support of the Trustees of the Viscount Folkestone is welcomed. In relation to the Leas Lift, the restoration of the lift will be secured using contributions from the Seafront development and so this is tied into the timescales for that scheme. A Community Interest Company has recently been set up to deliver the scheme.	Amend paragraph to state that the restoration of the Leas Lift should be a priority, rather than a "priority over the plan period."
5.93	510	1037610	5.93 Inner Folkestone presents a varied environment and contrasting opportunities, as outlined in the following summary box. Areas notable for their appealing built form and greenery, such as Folkestone's West End, adjoin the core of the town centre. However, the highway network is complex, with numerous one-way streets and a ring road system that encloses the commercial heart. The topography of the town has also impeded its growth and regeneration,* adding vertical distance to places in close physical proximity. It has poor pedestrian connectivity between the Harbour, the Seafront, the Leas, the Town Centre and the bus and railway stations, with recent changes to the circulatory system seeking to improve connectivity and reduce journey times for public transport. Further investment in restoring historic cliff paths is proposed, while investment in the restoration of the historic and Grade II* listed Leas Lift should be a priority over the plan period. *Comment: Coastal towns have different weaknesses in terms of regeneration. These should have been identified in previous decades and addressed. Unfortunately not, now to the detriment of the town. I would draw your attention to your comments also on	Noted.	No change proposed.
5.93	511	1037610	Central Folkestone Urban Design and Movement: Summary Points Identified strengths: - The coastal setting of The Leas offers quality public open space with impressive views**. Comment: ** This now needs re-writing as you have taken away one of the town 's strengths having given permission for the multi storey /high rise blocks on Folkestone Seafront	The council does not consider that views from the Leas are likely to be downgraded. Issues of design and views were considered carefully at the planning application stage before a decision was made to approve the scheme. While there will be some temporary disruption during construction, the scheme will deliver the regeneration of an important brownfield site, provide new homes and businesses and secure considerable enhancements for the area.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD6	684	332260	The Trustees continue to support the Central Folkestone Strategy as provided by Policy CSD6 and, in particular, the requirement for new development to improve connectivity both to, and within, the town centre in line with other policies. In this particular regard, support is provided to the Reasoned Justification at Paragraph 5.93 and that investment in the restoration of the historic and Grade II* Listed Leas Lift should be a priority albeit within the first phase of the plan period as opposed to over the plan period .	The support of the Trustees of the Viscount Folkestone is welcomed. In relation to the Leas Lift, the restoration of the lift will be secured using contributions from the Seafront development and so this is tied into the timescales for that scheme. A Community Interest Company has recently been set up to deliver the scheme.	Amend the paragraph to state that the restoration of the Leas Lift should be a priority, rather than "a priority over the plan period."
Policy CSD6	370	1157838	Such policy comes rather too late, as various Councils over the past several decades have allowed the systematic desecration of a large chunk of the Bayle and Leas Conservation Area, including such monstrosities as Glendale, No. 1 The Leas, West Terrace and the hideous Madeira Court tacked onto the end of Clifton Crescent. There was even a mediaeval building standing on The Bayle in the early 20th century, which was demolished to build offices.	Noted. These redevelopments date back a number of decades, when different national and local planning policies applied. The Core Strategy Review, and design policies in the Places and Policies Local Plan, will set policies for decision-making for the coming decades and the purpose of the consultation is to give local people and organisations opportunities to improve their wording.	No change proposed.
Policy CSD6	612	1165505	The Creative Foundation has reviewed the consultation draft of the Core Strategy and welcomes the references to the Creative Quarter but considers more needs to be done in this area to provide a long term encouraging and supportive development framework for creative and digital industries. It is considered this might be achieved by particular reference to Policy CSD6. The creative and digital sector has achieved recognition as being the vanguard for regenerating more deprived areas. Achieving a critical mass of such activity creates momentum in the development sector and creates higher property values. However, maximising property values has resulted in an 'affordability' issue for creative industries which are easily displaced by other uses such as residential only premises (and the residents find one of the reasons they wished to remain or relocate to the area has disappeared). Significant progress has been made to develop the creative sector in Folkestone 's Creative Quarter and the momentum needs to be continued. Currently the Creative Foundation has control of 90 buildings which will remain for creative or education use for the next 100years. However, experience in London and other places suggests higher value uses displace creative industries which have been central to forming the character of the eponymous creative quarters. Therefore, it is proposed that planning policy should align the Creative Quarter with principles relating to creative enterprise zones. To deliver this, planning policy should aim to: secure permanent, affordable, creative workspace and live-work space and ensure current provision is not eroded recognise the creative quarter mix also includes training, museums, space for meetings and performances, retail, visitor attractors and maker-space support provision of the fastest broadband infrastructure to support digital and creative industries encourage development for the creative sector	The comments are agreed for the reasons set out in the representation. The District Council wishes to continue to support the Creative Foundation; the text will be amended to reflect this.	Amend text to reflect the representation, including reference to 'Enterprise Zone' rather than 'creative regeneration arc'.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD6	717	1101438	<p>The references to meeting needs for education infrastructure in Policy CSD6 Central Folkestone Strategy are also welcomed and supported. The next version of the Local Plan should seek to provide further information on education infrastructure requirements within the site-specific policies, where possible, to clearly communicate expectations to developers and wider stakeholders. This should include seeking to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. For an example of the latter, see draft policy CC7 in Milton Keynes 's Plan: MK Preferred Option draft from March 2017. While it is important to provide clarity and certainty to developers, retaining a degree of flexibility about site-specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. The ESFA therefore recommend the Council consider highlighting in the next version of the Local Plan that: - specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that - requirements to deliver schools on some sites could change in future if it was demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use. The ESFA would like to be included in discussions on potential site allocations, as there may be pipeline school projects in Folkestone &amp; Hythe District which may be appropriate for specific designation. The local planning authority</p>	<p>Noted. The council will continue to work with the Education and Skills Funding Agency and Kent County Council, the local education authority, in developing the plan.</p>	<p>No change proposed.</p>



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.97	351	1163103	<p>Go</p> <p>Folkestone discussed the demise of the University College of Folkestone which some members were involved in . Certain well-informed members felt that it would be difficult to revive in a similar form as much grant money was lost . However Section 2.35 of the report confirms that Folkestone and Shepway have a lower proportion of degree equivalent holders than the UK average., and probably far lower than the South East . Folkestone is both by the sea and convenient for London which should draw students . The demise of the University College of Folkestone after 5 years ( 2007-2012?) is regretted and was apparently linked to financial stringencies applied across the board to Canterbury Christ Church and Greenwich ,the backers , and a last-in, first chopped approach .</p> <p>It is time to consider again a greater tertiary offer in Folkestone by looking at local demands ( Construction? Tourism and Insurance per Saga? Archaeology? Maths? ) and potential campuses . It should be a target to look at combining the Kent College site with some spacious and landed new tertiary college building in Otterpool near Westernhanger Station .If a university college is too high a target then private colleges should be encouraged . Earlscliffe has been a success as a private 6th form college . Many similar towns draw in organisations such as osteopathic colleges ( Boxley near Maidstone) , religious bodies (East Grinstead) and ophthalmic colleges ( ABDO in Godmersham near Ashford) . One member , Brian Mc Bride said that the Royal College of Needlework had been looking for expansion premises from Hampton Court .The South East has many such specialisms</p>	<p>Noted. The council recognises the importance of the tertiary sector which appears to be less expansionist than it was pre-2008. However, regarding the new garden town, informal approaches have been made to a few universities to assess whether this situation might be changing but it does not appear to be so which makes a satellite campus in the new town difficult to deliver. More locally, universities seem to be centralising around existing premises rather than seeking new satellite campuses; Canterbury Christ Church University, for example, has acquired the former Canterbury prison to develop as future premises, rather than looking further afield. We will continue to monitor the sector to detect any early signs that the consolidation trend is changing and if so how the District might benefit. The new garden settlement will be a long-term project, built over a number of years, and there may be opportunities in the future.</p>	No change proposed.
5.99	230	1029376	<p>The map correctly show the barrier to movement created by the cliff but the access to the lower sites is also very restricted due to the roads system in and around this area and the poor access from the lower sites to the motorway and rail system Parking on the lower sites will be a major issue</p>	<p>Paragraph 5.99 is setting out the kinds of improvements that new development should provide. The custom house has secured permanent permission as an exhibition space, the signal box has been retained. The harbour arm has now been brought forward and is seeing considerable activity, with the lighthouse now in active use and businesses operating along the length of the harbour arm. The Seafront scheme will also secure substantial investment in the town, and provide contributions to infrastructure and the town's heritage, such as the restoration of the Leas Lift.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.99	357	1163103	<p>Folkestone is facing a near future in which new shopping is expanded or provided at both the Silver Springs site at Park Farm and the De Haan seafront site . The seafront is well separated from the town centre as suggested , and even more Park Farm. . And yet retail in the UK is in trouble from internet shopping and forecast for a decline in physical space . This is more an area that should have been covered by the People and Places Consultation . But that basically said, inadequately,,that a wider range of uses such as gyms and offices should be countenanced for the town centre . The CS highlights 'ageing and inappropriate commercial and retail stock ' Go Folkestone agrees but there are central areas in which larger , new stores might be inserted without removing attractive buildings ..Members Roger Joyce and Brian MC Bride have suggested redevelopments of the bus station or of parts of Guildhall Street and St Eanswythe 's Way . We applauded the relative if ugly success in the past when ASDA and Bouverie Place were fitted in close to the existing peak shops . Dover by comparison has built a centre just a little too far from the existing centre . Ramsgate and Margate have been shattered as shopping destinations by the too dramatic escalation of Westwood . Development of shopping in the seafront and Park Farm needs to be done as there is a place for it . But it needs to be limited to a scale that does not push the town centre into Ramsgate/Margate territory.. Member Ian Stone , Les Smith and others highlight the traffic problems of putting too much in narrow , school congested Park Farm Road .</p> <p>GF feels that some more inclusion or pepper-potting of residential stock among the shops in the town centre , particularly the poorer bits , and in Cheriton will be necessary to avoid large levels of shopping vacancy in the future . It will only work if new</p>	<p>Although the concern is noted, the policy for the Silver Spring site in the emerging Places and Policies Local Plan identifies a number of uses for this site that falls within the Park Farm industrial estate. The application that was grated for this site is primarily for a hotel and eateries in the first phase and business in the second. Whilst Park Farm has developed over a long period of time with some retail, this type of retail is large warehouse and not suitable for town centre retail. Westwood Cross is a purpose-built retail development (with the purpose of becoming a new town centre), which is not comparable to that being proposed at Silver Spring site. Whilst the problems with the town centre and the proposed solutions are noted, it is not possible to implement this. The Town Centre Study (2015) identified the bus station and Guildhall Street as possible development areas. The emerging Places and Policies Local Plan identifies these areas as possible areas for development, when uses can be relocated and sites become available. In regard to residential with the town centre, this is noted and the emerging policies in the Places and Policies Local Plan do address this. The National Planning Policy Framework does identify that residential is an important element of town centres. In regard to parking, it is considered that Folkestone is catered for with numerous public car parks located around the town and on the seafront, including the large multi-storey car parks at Bouverie Place and Sainsbury's Bouverie Road West. The emerging Places and Policies Local Plan also identifies an additional area that could also be used for parking. In addition to the parking, buses terminate at the centre of the town, adjacent to Bouverie Place. The public transport contributions for the seafront has provided funding to facilitate two-way bus movements along Tontine Street. This has made it financially viable for a public transport operator to run a service to the seafront once there is sufficient demand to warrant the new service.</p>	No change proposed.
5.99	371	1157838	<p>What measures are being taken to reintegrate Folkestone's maritime environment into the town? The fishing museum was closed by the developer of the seafront and a suitable new location has not been found. The same developer had an act passed allowing them to close the harbour to work on the seafront. I fail to see any contribution to the reintegration of maritime activities by the harbour owner.</p>	<p>Paragraph 5.99 is setting out the kinds of improvements that new development should provide. The custom house has secured permanent permission as an exhibition space, the signal box has been retained. The harbour arm has now been brought forward and is seeing considerable activity, with the lighthouse now in active use and businesses operating along the length of the harbour arm. The Seafront scheme will also secure substantial investment in the town, and provide contributions to infrastructure and the town's heritage, such as the restoration of the Leas Lift.</p>	No change proposed.
5. 100	279	1162685	<p>In figure, SS6 should read SS10.</p>	<p>Noted. Figure 5.5 will be amended to correct this reference.</p>	<p>Amend Figure 5.5: Central Folkestone Strategy to correct policy reference.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5. 100	614	1165505	It is also worth noting that the University Centre Folkestone is now the Sixth Form Centre. Perhaps another strategy for attracting students could be devised?	Regarding higher education, there has been a trend towards consolidation around the main campuses of Universities post 2008. Informal approaches to a few universities indicates this situation is not changing significantly which makes a satellite campus difficult to deliver. Canterbury Christ Church University, for example, has acquired the former Canterbury prison to develop as future premises, rather than looking further afield. Nevertheless, Canterbury Christ Church University retains some presence within the Creative Quarter along with the University for the Creative Arts which operates a unit as part of undergraduate and postgraduate courses. Some modest expansion of this presence is expected through another University soon. Whilst this is a more incremental approach, it supports the need to acknowledge the tertiary education sector in the Local Plan.	No change proposed.
5.101	231	1029376	When considering cycling it needs to be recognised that there are considerable level variations between the town and the seafront The Road of Remembrance is not suitable for cycling as it is too steep, other roads are similarly too steep One solution may be to combine road tram and cycle paths on tram road and adjacent railway	Noted. It is recognised that there are level variations between the town and the seafront. The establishment of new cycle routes will be considered in detail when proposals come in for improvements to routes and signage. Folkestone will be a key stopping place on the National Cycle Network Route 2, a long distance cycle route which, when complete, will link Dover with St. Austell in Cornwall along the south coast of England, a distance of some 360 miles, with considerable variation in elevation along the route. The text will be amended to refer to the National Cycle Network.	Amend text to refer to the National Cycle Network.
5.101	682	332260	The Trustees acknowledge that the vacant previously developed land at Folkestone Seafront presents a major opportunity to improve connections to the sea and visitor attractions from, and to, the town centre and Creative Quarter. However, the previously developed land at Folkestone Seafront cannot deliver such connections alone and a simple revision to the wording of this Reasoned Justification is required. It is suggested that Paragraph 5.101 reads: In line with objectives set out in Policy SS10, the vacant previously developed land at Folkestone Seafront presents a major opportunity, in connection with the strategic seafront site, to improve connections to the sea and visitor attractions, and generate additional pedestrian footfall to the town centre and Creative Quarter. This would support the Reasoned Justification to Policy SS10 as provided at Paragraph 4.185.	Noted. The paragraph relates to the land within the allocated boundary for Policy SS10 which includes the seafront site. Policy CSD6: Central Folkestone Strategy seeks to relate this to the wider context of central Folkestone and promotes improved connections throughout this area.	No change proposed.
Policy CSD7	16	549694	Welcome the plans to improve bus links to railway stations but question whether this is deliverable given that the bus company is privately owned. I understand that the intention is to use developer contributions to establish such a bus service - have any such contributions been earmarked for this?	Support noted.	No change proposed.
Policy CSD7	375	1157819	Recognition of the need for additional footfall, parking and ease of access for shoppers and visitors to the High Street and town centre to ensure its future viability.	The delivery of public realm improvements in Hythe High Street as set out in Policy CSD7 criterion (f) should encourage footfall, improve access and circulation; and increase dwell time within the town centre. Hythe is already well served by a number of car parks within and adjacent to the town centre boundary; public realm improvements could also help to improve their connectivity and legibility with the town centre.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD7	718	1101438	The references to meeting needs for education infrastructure in Policy CSD7 Hythe Strategy are also welcomed and supported. The next version of the Local Plan should seek to provide further information on education infrastructure requirements within the site-specific policies, where possible, to clearly communicate expectations to developers and wider stakeholders. This should include seeking to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. For an example of the latter, see draft policy CC7 in Milton Keynes 's Plan: MK Preferred Option draft from March 2017. While it is important to provide clarity and certainty to developers, retaining a degree of flexibility about site-specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. The ESFA therefore recommend the Council consider highlighting in the next version of the Local Plan that: - specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that - requirements to deliver schools on some sites could change in future if it was demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use. The ESFA would like to be included in discussions on potential site allocations, as there may be pipeline school projects in Folkstone & Hythe District which may be appropriate for specific designation. The local planning authority should note that there are	Support noted. The Council has also received representation from the local education authority (KCC) stating that the education requirements already set out in some site policies are over-prescriptive and as such the plan lacks flexibility. Therefore, the Council considers it appropriate to keep references to education provision general. The Council will include the ESFA in any future discussions of potential site allocations.	No change proposed.
Policy CSD7	709	1101438	The ESFA welcomes references within the plan to improving educational attainment and to the need for development to facilitate investment in and improvements to the local education system.	The support is welcomed.	No change proposed.
5.108	372	1157819	Hythe Civic Society fully supports the recognition of the traffic issues at the A259/261 junction. This needs to include the traffic to be generated from the development at Martello lakes but also the development at the proposed Otterpool Park garden town.	Comment noted. Junction improvements have already been undertaken to the A259/A261 Scanlon 's Bridge junction to mitigate the impacts of the Martello Lakes development. However, the Council recognises that the junction remains near to capacity and will continue to monitor the situation and investigate opportunities to improve traffic flow where possible.	Paragraph 5.108 is to be amended to acknowledge the recent improvements to the A259/A261 junction; but also that the Council recognises that the junction remains near to capacity and will continue to be monitored whilst investigating further opportunities to improve traffic flow where possible.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.117	577	1159434	<p>Core Strategy Review Draft Plan Consultation Representation on behalf of the Nuclear Decommissioning Authority (NDA) We are writing to you to provide a representation to the current Draft Plan consultation, on behalf of the Nuclear Decommissioning Authority (NDA). GVA is the appointed property advisor for the NDA and provides planning advice across the NDA 's UK-wide estate. We have made representations to various local plan consultations across the UK, affecting various NDA sites. This representation is made in respect of NDA Dungeness A ' site, which is perated by Magnox Limited (the Site License Company) on the NDA 's behalf in order to carry out the decommissioning and remediation process. Recent Representations in respect of the Places and Policies Plan GVA has made representations to the Preferred Options consultation on behalf of the NDA and Magnox in November 2016 and to the Submission Draft consultation in March 2018. In summary, the representations requested that a site specific policy and allocation should be included within the Places and Policies Local Plan to support both the decommissioning and remediation of the Dungeness A ' site, together with employment (B1/ B2/ B8) uses and development associated with energy generation. Response to Current Consultation The policy position sought for Dungeness A ' would be most appropriately addressed through the Places and Policies Local Plan, hence our previous representations. In response to the current consultation, we make the following minor observations:</p>	<p>Overall support is noted. It is considered that the supporting text already demonstrates that the council is keen to support development proposals and uses associated with the decommissioning of Dungeness A '.</p>	<p>Suggested changes to the text will be incorporated to ensure the information is factually correct.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.118	575	588509	<p>25. The following section sets out our proposed amendments to the CSLPR to ensure the plan is sound. This includes justification on why a policy on the LAA and/or Romney Marsh (including support for LAA) is necessary to make the Plan sound and provided a draft working for the policy. Core Strategy Local Plan Review New Policy for LAA 26. The CSLPR 's Strategic Need A states that the Council will build on economic strengths by supporting key sectors and businesses by promoting further investment and maximising opportunities for growth (our emphasis). 27. The CSLPR states that the District has excellent infrastructure and connections, including by air, with specific reference to LAA. It states that the District is, therefore, well placed to capitalise on this outstanding infrastructure by providing opportunities for business growth and inward investment to the area. 28. Paragraph 1.45 of the CSLPR states that LAA is well established and has attracted significant investment proposals. Table 1.3 sets out the strengths and weaknesses of the Romney Marsh area. One of the weaknesses identified is the limited large-scale employment opportunities. LAA provides stable employment in the area. In order to maximise LAA 's opportunities for growth, the CSLPR must acknowledge LAA 's potential to expand beyond its current planning consents, if the environmental impacts are acceptable. 29. To ensure that the weakness outlined in Table 1.3 are mitigated, LAA should be acknowledged as an opportunity location. LAA 's current positive role as a significant employer in Romney Marsh should be identified as a strength. A specific policy for LAA to recognise its importance and support the principle of further improvements, expansion and investment, subject to environmental considerations, should be included. 30. The CSLPR fails to acknowledge and reasonably balance the long-term economic aspirations of LAA, which will benefit</p>	<p>Comment noted. In the absence of clear development intentions for the future of the site, the council does not consider that a specific policy for LAA would be justified. However the council will work with LAA, the local community and other stakeholders to prepare an Action Area Plan for the site, should specific development proposals come forward at some point in the future.</p>	<p>Amend Policy SS1: District Spatial Strategy and supporting text to state that the council will work with the airport, local community and other stakeholders to prepare an Action Area Plan for the London Ashford Airport site, should proposals come forward for further expansion.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.119	567	588509	<p>Effective 13. Paragraphs 1.41 to 1.48 relate to the Romney Marsh Area and in paragraph 1.48, the Airport is described as being well established and having attracted significant investment. 14. Paragraph 5.119 states that the Romney Marsh area 's economy will be closely monitored by the Council, given uncertainty about the Power Stations, as well as the economic impact of the expansion of LAA. It states that if the southern part of the District is substantially affected by these changes, the Council will consider amending the Core Strategy as part of a future review. 15. This is not positive planning. It is a failure to plan. Clearly, the decommissioning of the Power Stations and expansion of LAA will have substantial economic, social and environmental affects and these must be recognised in the CSLPR. 16. Without a policy in place to protect and support LAA, and identifying the benefits that will accrue from its future improvement and expansion, planning policy will not be effective in delivering or protecting LAA 's objective of promoting economic growth in an area that the Council has acknowledged could be badly hit by the decommissioning of the Power Stations. 17. Without a policy addressing LAA and the future of Romney Marsh, the CSLPR will be reactive and will not be effective. It will fail to deliver additional jobs. Only the inclusion of a bespoke policy for LAA will allow the Airport to reach its potential as an economic generator and transport hub for Romney Marsh, the District and beyond.</p>	<p>Comment noted. In the absence of clear development intentions for the future of the site, the council does not consider that a specific policy for LAA would be justified. However the council will work with LAA, the local community and other stakeholders to prepare an Action Area Plan for the site, should specific development proposals come forward at some point in the future.</p>	<p>Reference will be made in Policy SS1 and paragraph 5.118 for the council to work with London Ashford Airport, the local community and other stakeholders to prepare of an Action Area Plan for the site, should development proposals come forward in the future.</p>
Policy CSD8	252	559029	<p>Romney Marsh should not be seen as suitable for large scale development as it is valued locally, nationally and internationally as a rural and tranquil agricultural place. It is particularly valuable for its natural environment and functions as a green lung for people living in the surrounding more developed and urbanised areas. Only small scale developments should be considered and these need to be affordable and aimed at providing housing for local people. In small scale developments on the Marsh, affordable housing needs to revert to, at least, the 30% specified in the old Core Strategy Document. It should not be subject to viability test that enable developers to get round the need to provide the affordable housing that is needed locally. The revival of interest in the Council for a possible nuclear dump on the Marsh should be countered and put to rest for good in the Core Strategy plan. The plan has already been shown to be totally unacceptable and impractical in the areas of lack of transport infrastructure, safety to health, water supplies, loss of agricultural land and industrialisation of the Romney Marsh.</p>	<p>To support the Government's objective of significantly boosting the supply of homes, it is important for the District Council to identify a sufficient amount and variety of land that can come forward to meet the local needs. The government has introduced a new national methodology to set out how many new homes local authorities should plan for. For Folkestone &amp; Hythe district, this indicates that the council should provide an average of 676 new homes a year. The council has identified strategic sites within this Plan to meet it (other non-strategic sites are identified in the emerging Places and Policies Local Plan). The New Romney Strategy was allocated in the adopted 2013 Core Strategy and now has outline and full planning permissions and work has commenced. The policy has been kept in the Core Strategy Review to guide the remaining phases of development. This Review does not seek to allocate any further development sites over and above the adopted strategy and the emerging Places and Policies Local Plan. The Romney Marsh will remain rural in character. With regard to nuclear waste storage, this is considered under a separate process (this is a national issue) and does not form part of the Core Strategy Review.</p>	<p>Concerns noted no amendments to the policy are proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD8	168	1035723	<p>Dear Sir Having seen the proposed housing developments for the district I am appalled that any development is considered without any plans to improve the infrastructure or the services for this area. Romney High Street at all times is congested with restricted access and this is a main highway. The schools are overcrowded, the Doctors at Church Lane are in crises and unsure if that surgery will even stay open, the sister surgery in Dymchurch has already closed. Has Shepway taken into account the amount of already passed and as yet undeveloped plans already in the pipe line, I know of several brown field sites with long term outlying planning permission still not developed. Also it would be exceeding interesting to know the numbers of properties standing empty paying no council tax in the New Romney area, I can see three from my own house no doubt someone owns them but no one lives in them but just how many are there? Are the amount of residential mobile home on camp site 's taken into the accommodation in the home numbers? Your argument will no doubt be the government has said all these homes are necessary but they have been wrong many times before and fail to take into account, that not one piece of legislation takes into account one size does not fit all situations. Developers coming into the New Romney area should be giving a substantial amount of their profits to the improvement of road, schools and local services instead of creating problems then walking away leaving local government to solve them.</p>	<p>To support the Government's objective of significantly boosting the supply of homes, it is important for the District Council to identify a sufficient amount and variety of land that can come forward to meet the local needs. The government has introduced a new national methodology to set out how many new homes local authorities should plan for. For Folkestone &amp; Hythe district, this indicates that the council should plan for an average of 676 new homes a year. The council has identified strategic sites within this Plan to meet this target (other non-strategic sites are identified in the emerging Places and Policies Local Plan). The New Romney Strategy was allocated in the adopted 2013 Core Strategy and now has outline and full planning permissions and work has commenced. The policy has been kept in the Core Strategy Review to guide remaining phases of the development. In identifying these sites, the District Council has involved infrastructure providers at all stages in drafting the Core Strategy Review (and the Places and Policies Local Plan), including Kent County Council (the education and transport authority and lead local flood authority), Highways England (which oversees the strategic road network), the Environment Agency, water companies, rail operators, the National Grid, NHS Clinical Commissioning Groups and other organisations. Comments from these providers have been taken into account when reviewing the plan. Where improvements have been identified by these organisations to make development acceptable, these have been included as criteria within the policies for the strategic allocations (or other allocations in the emerging Places and Policies Local Plan). Other general requirements are also set out in development management policies in the emerging Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the District Transport Study that commenced in 2016 will be implemented through funding secured via the Community Infrastructure Levy (CIL). Other improvements will also be</p>	Concerns are noted but no amendments to the policy are proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD8	216	1163038	<p>I am attaching a copy of the letter sent to Councillors and MP Damien Collins regarding the problems of access to the A259 from the sea front of Romney Marsh. There is only one road that all residents must use to vacate the whole of Littlestone, Greatstone and Lydd on Sea. This road is mainly in the flood zone and when questioning Folkestone Hythe and District Councillors (nee Shepway) regarding the amount of resident that would need to use this road in the event of an emergency they had no idea!! This road also serves access to a power station and has an airport within the boundaries. Whilst I am not against building new houses, it should not be done without roads being built to the main highway first. I have lived in Littlestone for 38 years and the amount of housing and flats that have been built over this time has been enormous and yet no thought given to how we would all evacuate this area in time of need. As I understand that the highways have to approve planning by looking at access I am writing to you to point out the fact that although there are plenty of roads they all have to join the Dungeness, Coast Drive and B2071 to reach the A259 the nearest main road not in the extreme flood zone as indicated on the core strategy maps. If the need for roads is ignored, sooner or later there will be an incident that will prove fatal for those in this area.</p>	<p>When the District Council identifies new sites for development in their plans, the risk of flooding is taken into account as part of its assessment. The Council has to consider sites sequentially, ensuring any development is located in lower risk areas (this is set out in the Government's Planning Practice Guidance). For a the assessment of sites the District Council has to produce a more detailed study of flooding in the district, the Strategic Flood Risk Assessment. This is used to identify sites suitable for development and takes into account flood defences. This is available to view on the Council's website. Settlements such as Lydd, New Romney and Littlestone, as well as the main access routes out, are not within the predicted areas of high risk flooding (for the year 2115). In identifying these sites, the District Council involved infrastructure providers at all stages in drafting the Core Strategy (and the Places and Policies Local Plan), including Kent County Council (the education and transport authority and lead local flood authority), Highways England (which oversees the strategic road network), the Environment Agency, water companies, rail operators, the National Grid, NHS Clinical Commissioning Groups and other organisations. Comments from these providers have been taken into account when reviewing the plan.</p>	<p>Concerns noted but no amendments are proposed to the policy.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD8	584	333951	<p>Land North of Cockreed Lane, New Romney Folkestone and Hythe District Council Core Strategy Review Consultation Representation on Behalf of Christ Church, Oxford Savills has been instructed by Christ Church, Oxford to submit representations to the first draft of the Core Strategy Review (Regulation 18). This follows a representation submitted to the Preferred Options ' stage of the Shepway Places and Policies Local Plan in November 2016. This representation seeks the amendment of Policy CSD8 New Romney Strategy ' to support the extension of the allocation to include Land North of Cockreed Lane. Land North of Cockreed Lane represents a sustainable location on the edge of New Romney, adjacent to existing residential development. It would therefore be in the interests of proper and comprehensive planning to include this as part of Policy CSD8. Not only would this deliver much needed housing within the District, but also reinforce the supply of housing which at present only marginally exceeds the District 's 19-year requirement (2018/19 2036/37). A location plan has been enclosed with this letter. The site is outlined in red, and comprises an area of 4.7 hectares. Site Description The site is approximately 4.7 hectares and currently comprises an agricultural field. The topography of the site is generally flat. The site is located north of Cockreed Lane from which it can be accessed. The site is bounded by Hope Lane to the north, Cockreed Lane to the south/east, and the Wallingham Drain and tree planting to the west. Adjacent land to the north and west is in agricultural use. Residential development lies to the south and playing fields and an open field to the east. The site is within close proximity to New Romney which contains a number of services and facilities including a range of shops on the High Street (Dymchurch Road), primary and secondary schools and doctors surgeries. A number of bus services</p>	<p>As discussed in the representation, this site has already been assessed as part of the District Council's Strategic Housing Land Availability Assessment (SHLAA). It is considered that the site could not be allocated in the Core Strategy Review as it would not play a strategic role in the District or the Marsh Character Area. The estimated capacity (188 dwellings at a higher density of 40 dph) of the site would fall short of the 250 identified in the Core Strategy for strategic sites and it is unlikely that this development would bring any benefits to the town or wider Marsh Area in terms of highway benefits or other infrastructure provision due to its peripheral location. The area identified in the Broad Location is still under construction and this should be completed first to ensure that the necessary infrastructure is in place before any further development in this location could be considered. Smaller sites have also been allocated in the emerging Places and Policies Local Plan to ensure sufficient and a variety of land can come forward where it is needed. Therefore, it is considered that the circumstances have not changed and the assessment of the site in the SHLAA stands. Development here would be encroachment into the countryside and sites identified in the Core Strategy and PPLP should be developed before any other sites are considered in this part of New Romney.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD8	383	1042554	<p>I object in the strongest possible terms to New Romney being designated as a 'residential-led development area'. By all means develop residential housing on a brownfield site (for example, the old Romney Marsh Potato Company site), but to seek to carve up yet more farmland in Cockreed Lane (in addition to the development going on at the moment in Rolfe Lane) and lose all of the open green spaces as proposed for still more housing, will irrevocably change the character of New Romney. Tourists will not be encouraged to come here if every green space in and around the town is built upon and the unique rural character of the town is lost. I have lived here since 1962 and find the changes happening now untenable and unsustainable. The road infrastructure, schools, doctor's surgeries are insufficient to cope with increased demand. Nor would I wish, as a resident, to have further roads built to accommodate the extra traffic generated by the hundreds of additional people that would be living in all the proposed, and ongoing, developments in the area. The term 'green infrastructure' is a nonsense. I love New Romney and Romney Marsh. I do not want to see it changed beyond recognition nor do I wish to live in a polluted and congested environment.</p>	<p>To support the Government's objective of significantly boosting the supply of homes, it is important for the District Council to identify a sufficient amount and variety of land that can come forward to meet the local needs.</p> <p>The government has introduced a new national methodology to set out how many new homes local authorities should plan for. For Folkestone &amp; Hythe district, this indicates that the council should provide for an average of 676 new homes a year. The council has identified strategic sites within this Plan to meet this requirement (other non-strategic sites are identified in the emerging Places and Policies Local Plan). The New Romney Strategy was allocated in the adopted 2013 Core Strategy and now has outline and full planning permissions and work has commenced. The policy has been kept in the Core Strategy Review to guide the remaining phases of development. In identifying these sites, the District Council has involved infrastructure providers at all stages in drafting the Core Strategy (and the Places and Policies Local Plan), including Kent County Council (the education and transport authority and lead local flood authority), Highways England (which oversees the strategic road network), the Environment Agency, water companies, rail operators, the National Grid, NHS Clinical Commissioning Groups and other organisations. Comments from these providers have been taken into account when reviewing the plan. Where improvements have been identified by these organisations to make development acceptable, these have been included as criteria within the policies for the strategic allocations (or other allocations in the emerging Places and Policies Local Plan). Other general requirements (such as design and parking standards) are also set out in development management policies in the emerging Places and Policies Local Plan. The NHS Clinical Commissioning Group are aware that there is a deficiency of health facilities in the Romney Marsh area and have, with other partners including the District Council, have identified a possible site</p>	<p>Concerns are noted but no amendments to the policy are proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD8	517	1155269	<p>4. New Romney Town Council The Town Council Acts in the interests of its residents yet it seems it has little involvement/influence in the planning process other than being able to respond to a planning application in the same way that residents can the perception of residents is that it 's a waste of time responding because the responses are ignored. The Government is putting great pressure on planning authorities so that more houses etc are built and is accepted but the impact of this for a local community should not be underestimated. Most people will accept the inevitable if it is achieved in a way that involves them and they are given the opportunity to voice their opinions, views and ideas, and know that they are listened to and accommodated where possible even a small accomplishment goes a long way! Apart from has been said above why can 't the Town Council be allowed to be directly involved in the process provided that they have taken steps to canvass the opinions etc of their residents especially those directly affected? What 's happening across the country in respect of housebuilding etc is major and is/will affect the landscape of the country and the communities on it. Surely a more proactive approach towards community involvement can only improve relationships and what is achieved. 3 5. New Romney The strategy talks about investment in New Romney High St, providing additional crossing points, increasing the ability of shoppers and visitors to circulate along the retail frontage, improving the setting of historic buildings and minimising the environmental impact of through traffic within the High Street, wonderful words BUT we all know that the High Street presents serious problems for traffic already. What is envisaged for New Romney and the wider areas of this part of Kent will add to the volume of traffic significantly. How can we expect the High Street to cope with this in the future when it can 't cope now!</p>	<p>Whilst the concern is noted, Town and Parish Councils' comments relating to planning issues are carefully considered when preparing local plans and making decisions on planning applications. In addition, if the parish or town council object to an application, the application will go to committee to be considered. The District Council does consider comments by town and parish councils and tries to reflect any concerns in policies and plans. The District Council, however, also needs to consider government policy, set out in the National Planning Policy Framework (July 2018), and more detailed guidance contained in the government's online Planning Practice Guidance, in preparing its plans and making decisions on planning applications. Provisions in the Localism Act 2012 also provide the opportunity parish and town councils to undertake their own Neighbourhood Development Plans or Orders, although these still have to have 'regard' to national legislation and guidance and be in 'general' conformity with strategic policies in local plans. (St Mary in the Marsh parish council has completed a Neighbourhood Plan for the parish which was recently approved by local voters at a referendum.) However, if the Town Council feel that there are planning issues they would like to take control of (such as design or other development sites) this could be an opportunity to do that. The District Council would be happy to advise. With regard to the proposed by-pass to the south of the town, this was identified in an early draft of the Places and Policies Local Plan. The scheme could not progress because a major landowner did not want to develop their land. In identifying sites, the District Council has involved infrastructure providers at all stages in drafting the Core Strategy Review (and the Places and Policies Local Plan), including Kent County Council (the education and transport authority and lead local flood authority), Highways England (which oversees the strategic road network), the Environment Agency, water companies, rail operators, the National Grid,</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD8	696	1165942	<p>Gladman support policy CSD8 and the prescribed direction for growth north of the town centre. New Romney is clearly a sustainable settlement with a range of shops, services and employment opportunities. Residential development in the town offers the potential to further strengthen these services and to allow the town to grow to meet future needs. Whilst not questioning, at this time, the need for the broad development location to provide for the requirements set out in criteria (a) (g) we would question the need for any planning application to be preceded by a single masterplan. Given that one proportion of the proposed allocation already has detailed reserved matters consent, and a further part has a planning application, which has been approved subject to the signing of a Section 106 agreement, and a separate revised application submitted to ensure quick delivery on the parcel controlled by Gladman, we do not consider that the last paragraph of policy CSD8 is required, and indeed the circumstance have already to some extent moved on. The criteria expressed in (a) (g) should give the Council comfort that development will meet the requirements of the policy.</p>	<p>As the broad location has now been granted planning permission (outline and partly full), and work has started on the eastern section of the site, it is agreed that the reference to the masterplan should be removed for the reasons given. However, there is still a need to ensure that the central road link through the site is provided when the remaining parcels of land come forward to ensure that existing local roads are not unduly burdened in the long term. New text will be added to reflect this.</p>	<p>Delete paragraph (after criterion 'G') of Policy CSD8: "Any planning application for the broad location should be preceded by, and consistent with, a single masterplan, addressing these objectives and produced in consultation with the local community, the district council and key stakeholders" Replace with: "The layout and design of any proposals for the remaining undeveloped two parcels of land under the broad location must take into account the potential development of the adjoining land parcel and the existing development around. In particular the internal road layout of the two parcels allocated to the south-east of Cockreed Lane shall not prejudice the future delivery of a link ' road (criterion C above) to provide a vehicular connection between the two parcels and the developed part of the broad location to the north-east".</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD8	685	1165852	<p>This site is within Southern Water's statutory wastewater service area. In accordance with paragraph 162 of the National Planning Policy Framework (NPPF), and National Planning Practice Guidance, Southern Water has undertaken a preliminary assessment of the impact of the proposed development on the existing public sewer network. This investigation indicates that network reinforcement will be required at the "practical point of connection" (as defined in the New Connections Services implemented from 1st April 2018). This reinforcement will be provided through the New Infrastructure charge but Southern Water will need to work with site promoters to understand the development program and to review if the delivery of network reinforcement aligns with the occupation of the development. This is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of sewerage infrastructure, in order to prevent an increased risk of flooding. We note supporting paragraph 5.120 includes a requirement for phasing of delivery with the necessary infrastructure, however inclusion of this requirement in relation to sewerage infrastructure within site policy will ensure the requisite planning conditions are implemented. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure. Our site investigation also revealed that Southern Water's sewerage infrastructure crosses the site, and this needs to be taken into account when designing the site layout. An easement would be required, which may affect the site layout or require diversion. This easement should be clear of all proposed buildings</p>	<p>Comment noted. Although Southern Water request additional criteria, it is considered that given that most of this allocation now has the benefit of planning permission, with the layout of the site already determined, and the majority of the site already occupied or close to completion, that the inclusion of these additional criteria will not be relevant or necessary in this instance.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.133	165	1161386	<p>Policy CSD9 Sellindge strategy, must also incorporate the A20 Barrow Hill, which is over one third of the village of Sellaindige. It incorporates the development proposed with in Barrow Hill (15 properties) and also the substantial proposed development either side of Barrow Hill residential communitiy as part of Otterpool park development plan. It is disrespectful and disingenuous to the residents of Sellindge Barrow Hill, to have a Sellindge strategy CSD9 without considering them, the impact of all these cumulative developments, which will have a significant detrimental impact on the Barrow Hill residents, due to traffic, noise, air and environmental pollution. Policy CSD9 must incorporate Barrow Hill Sellindge proposed development. The fact that it is not currently being considered, is causing Barrow Hill residents to perceived that this is evidence that the district council &amp; Core Strategy are being disingenuous by attempting to swallow up Barrow Hill as part of Otterpool Park development, taking them away from being part of our Sellindge community. To not incorporate Barrow Hill with in Sellindge strategy, will prove this to be the case. During the Open meeting in Sellindge Village hall, a representative from Folkestone &amp; Hythe council stated that the intention was to widen the A20 under Grove Bridge, Barrow Hill. The way this was going to be achieved was by removing the public footpaths, reverting to how it was before. This way it will relieve congestion at the current traffic lights. We strongly oppose this, as this would cause a significant health and safety risk to the residents of Barrow Hill who attempt to access the rest of our village by foot. This stretch of the A20 with out a foot path will divide our community and prevent children and adults accessing the School, shops, GP and post office on foot. If this development is causing too much traffic congestion, then do not have it. Further development</p>	<p>The focus of the policy is land to the south and north east of Ashford Road in Sellindge which forms a broad location for future development and growth. The policy is not all encompassing for the whole of Sellindge which consists of a series of neighbourhoods. The Barrowhill neighbourhood of Sellindge falls within the boundary for Policy SS6 New Garden Settlement and future plans for the area are addressed here.</p>	<p>Action: paragraph 5.149 should be amended to include the following: Sellindge is dispersed in character, consisting of a series of neighbourhoods located along, or just off, the busy Ashford road (A20). Historically there has been no central core or main cluster of facilities. Picture 5.8 will be amended to include the Barrow Hill neighbourhood of Sellindge.</p>
5.148	399	716056	<p>Sellindge is a Rural Centre, but it must be stressed that the Doctors Surgery does support Sellindge but also Stanford, Westenhanger, Newingreen, Monks Horton, Stowting, and also Brabourne, Smeeth, Aldington, Mersham and Hinxhill which are in Ashford Borough Council, these villages in Ashford Borough all have their own housing developments coming on. Sellindge Surgery is within Ashford CCG</p>	<p>Comments noted.</p>	<p>Paragraph 5.148 will be amended to state: "The village of Sellindge is a Rural Centre in the west of the district. It has a wide range of facilities and services, serving Sellindge and the wider rural area. These include including a GP surgery, primary school, village shop with integrated Post Office, village hall, residents ' association, sports and social club, farm shop and a public house."</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.149	403	716056	<p>Although Barrow Hill is severed from the rest of the Village by the motorway and rail bridges, it must be stressed THAT BARROW HILL IS A VERY VALUED PART OF SELLINDGE VILLAGE. In fact 3 of the 9 Parish Councillors on Sellindge Parish Council come from Barrow Hill. The word SEVERED as described in 5.149 from Barrow Hill, Sellindge community is inaccurate and disingenuous to these residents in Barrow Hill. Sellindge village is built along the A20 and Barrow Hill has the same access to the community as the rest of the properties along the A20, i.e., the A20 road and foot path. The fact that KCC and the District Council have permitted two further bridges to be built over the A20 in the last 40 years, has had no impact in reducing access of Barrow Hill residents to the rest of the village. Barrow Hill has some of the oldest properties in the Village and has been here longer than the bridges. I Live in Barrow Hill, and residents in this area do not feel we have a poor sense of place in the settlement. It is poor planning which causes this. Most of Barrow Hill residents are closer to the key amenities in the village than other homes West of Sellindge on the A20. By not treating Barrow Hill as part of the village, the Core strategy and District Council are causing this effect. Barrow Hill, must have the same traffic calming, speed restrictions as the rest of the village, keeping it part of the village, instead of segregating it due to poor planning and policy making. I'd also like to add that Barrow Hill has already been cut off from Newingreen as it's often impossible to access the pavement, and the disabled access point at which one can cross with a wheelchair at the Otterpool traffic lights. This is due to lorries parked in the layby and on the pavement.</p>	<p>The focus of the policy is land to the south and north east of Ashford Road in Sellindge which forms a broad location for future development and growth. The policy is not all encompassing for the whole of Sellindge which consists of a series of neighbourhoods. The Barrowhill neighbourhood of Sellindge falls within the boundary for Policy SS6 New Garden Settlement and future plans for the area are addressed here.</p>	<p>Amend paragraph 5.149 to include the following: "Sellindge is dispersed in character, consisting of a series of neighbourhoods located along, or just off, the busy Ashford road (A20). Historically there has been no central core or main cluster of facilities." Picture 5.8 will be amended to include the Barrow Hill neighbourhood of Sellindge.</p>
5.149	419	894636	<p>The absence of a central connecting feature in the village is exactly why the community responded against the then proposed development between Whitehall Way and the motorway, and proposed the 'village green' development, as a mechanism for bonding the three main linear components of the village. Barrow Hill is part of Sellindge, just as Stone Hill is. The planning consent that was the conclusion of that proposal is now being implemented.</p>	<p>The focus of the policy is land to the south and north east of Ashford Road in Sellindge which forms a broad location for future development and growth. The policy is not all encompassing for the whole of Sellindge which consists of a series of neighbourhoods. The Barrowhill neighbourhood of Sellindge falls within the boundary for Policy SS6 New Garden Settlement and future plans for the area are addressed here.</p>	<p>Amend paragraph 5.149 to include the following: "Sellindge is dispersed in character, consisting of a series of neighbourhoods located along, or just off, the busy Ashford road (A20). Historically there has been no central core or main cluster of facilities." Picture 5.8 will be amended to include the Barrow Hill neighbourhood of Sellindge.</p>



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5. 150	166	1161386	The word SEVERED as described in 5.149 from Barrow Hill, Sellindge community is inaccurate and disingenuous to these residents in Barrow Hill. Sellindge village is built along the A20 and Barrow Hill has the same access to the community as the rest of the properties along the A20, i.e., the A20 road and foot path. The fact that KCC and the district Council have permitted two further bridges to be built over the A20 in the last 40 years, has had no impact in reducing access of Barrow Hill residents to the rest of the village. Barrow Hill has some of the oldest properties in the Village and have been here longer than the bridges. I Live in Barrow Hill, and residents in this area do not feel we have a poor sense of place in the settlement. It is poor planning which causes this. Most of Barrow Hill residents are closer to the key amenities in the village than other homes West of Sellindge on the A20. By not treating Barrow Hill as part of the village, the Core strategy and district council are causing this effect. Barrow Hill, must have the same traffic calming, speed restrictions as the rest of the village, keeping it part of the village, instead of segregating it due to poor planning and policy making. There is a small strip of land at the bottom of Barrow Hill and Meadow Grove, which runs alongside the stream. This land is overgrown and unkept, making the area look untidy. This could be turned into a natural play and seating area for the community. This would improve the visual impact of the area, whilst having a positive impact on the health and wellbeing of local residents.	The focus of the policy is land to the south and north east of Ashford Road in Sellindge which forms a broad location for future development and growth. The policy is not all encompassing for the whole of Sellindge which consists of a series of neighbourhoods. The Barrowhill neighbourhood of Sellindge falls within the boundary for Policy SS6 New Garden Settlement and future plans for the area are addressed here.	Paragraph 5.149 should be amended to include the following: Sellindge is dispersed in character, consisting of a series of neighbourhoods located along, or just off, the busy Ashford road (A20). Historically there has been no central core or main cluster of facilities.
5. 150	405	716056	Agree.	Noted.	No change proposed.
5.15	397	1163118	I strongly disagree with the statement 'This creates a poor sense of place in the settlement with no central core, public open space or main cluster of facilities.'. As a resident of Barrow Hill, I would like to know where this assumption came from. I do not feel a poor sense of place and feel strongly that Barrow Hill is part of Sellindge. Where has this statement come from?	It is agreed that Barrowhill is a neighbourhood within Sellindge. Paragraph 5.149 will be amended.	Amend paragraph 5.149 as outlined.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.151	406	716056	<p>Agree and the development agreed is now under construction.</p> <p>The community engagement during this current development was very good and supported due to it. Future development in Sellindge must have the same amount of community engagement as this development had. Phase 2 does not appear to have this and due to this, many residents feel these developments are not required and being imposed on them.</p>	<p>Noted. Phase 1 had the benefit of National Rural Masterplanning Funding (£50,000) from the Homes and Communities Agency after the council made a successful bid. Therefore Independent consultants were able to be appointed who worked closely with the local community. The Sellindge's Future Masterplan Report also looked at alternative areas for possible supporting residential development which included the land now proposed for development in phase 2. The Core Strategy (2013) figure 5.8 shows these areas. The number of homes required in the district has increased since the Core Strategy was adopted in 2013, therefore the masterplan work has had to be revisited and additional studies carried out such as the Growth Options Study and High Level Landscape Appraisal to find more potential areas for residential development. Phase 2 has received the statutory level of consultation as set out in the Council's Statement of Community Involvement (SCI). The SCI sets out how the Council involves the local community in developing planning policy and making planning decisions, both outline and reserved matters, which is a requirement for all local planning authorities under the Town and Country Planning (Local Planning) (England) Regulations 2012 and Neighbourhood Planning Regulations 2012.</p>	No change proposed.
5.152	408	716056	<p>Agree though sadly little or no consultation regarding this has taken place within the community of Sellindge, many of who supported the 250 homes currently being built but feel that phase 2 is being imposed on them with little or no consultation the Bucknell Trust Ground should have been part of the Core strategy before outlining planning being given. Phase 1 was well consulted Phase 2 has not been well consulted, have half of phase 2 decided before going through the Core Strategy was a very poor dissection.</p>	<p>Noted. Phase 1 had the benefit of National Rural Masterplanning Funding (£50,000) from the Homes and Communities Agency after the council made a successful bid. Therefore Independent consultants were able to be appointed who worked closely with the local community. The Sellindge's Future Masterplan Report also looked at alternative areas for possible supporting residential development which included the land now proposed for development in phase 2. The Core Strategy (2013) figure 5.8 shows these areas. The number of homes required in the district has increased since the Core Strategy was adopted in 2013, therefore the masterplan work has had to be revisited and additional studies carried out such as the Growth Options Study and High Level Landscape Appraisal to find more potential areas for residential development. Phase 2 has received the statutory level of consultation as set out in the Council's Statement of Community Involvement (SCI). The SCI sets out how the Council involves the local community in developing planning policy and making planning decisions, both outline and reserved matters, which is a requirement for all local planning authorities under the Town and Country Planning (Local Planning) (England) Regulations 2012 and Neighbourhood Planning Regulations 2012. The Bucknell Trust land is within Phase 2 of the Core Strategy Review, however the applicant submitted an early planning application rather than waiting on the outcomes of the Local Plan process. The application was approved because it is considered that the site is within a sustainable location, adjacent to the settlement boundary of Sellindge with good transport links and within an identified area for planned growth in the future. It is also supported by the National Planning Policy Framework (NPPF).</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.153	411	716056	It is of the utmost importance that, if Sellindge is to have up to 600 extra dwellings, that facilities and infrastructure is expanded. If the infrastructure needed (Schools, medical facilities, cycle & footpaths) are not able to be provided with in Sellindge, then the number of dwellings built should be reduces to reflect this. To build these 600 dwellings without this would go against the aims of the Core strategy in reducing traffic congestion, air and environmental pollution. If these new proposed residents of the community have to drive to other facilities outside the village to access Schools or medical care, then clearly the District Core Strategy has failed at its planning stage.	Noted. We have worked closely with a wide range of organisations in producing the plan (including Kent County Council, Highways England, Network Rail, the Environment Agency, the NHS and water companies, among others). They have taken account of the growing population and the new homes we 're planning, and have let us know what we need to provide, such as new primary schools, doctors surgeries or water treatment works. In addition, these organisations are being contacted as part of the current consultation and they will give their comments on the draft plan and let us know if there is more that needs to be done. When requirements are firmed up, as planning applications come forward for the sites in the plan, then the provision of new facilities, such as primary schools, will be linked to phases of the development so that they will be there in time for the new residents to use.	No change proposed.
5.154	145	1161386	If residents from these further proposed dwellings are unable to access medical facilities or school places with thin the village, then clearly these dwellings are being proposed in the wrong place. Build then within the garden town development, where they will not need to drive to these facilities. The 106 developer then would have to find the funding for them as part of the Garden town. Ashford A&E has the worst waiting times in the whole of the UK and services are currently over stretched. With the substantial expansion of Ashford homes and the proposed Garden Town, medical facilities need to be urgently look at, not just at GP level, but at a trust & county level. Canterbury A&E has been closed and further cuts being considered. This Core Strategy must take these further developments and cuts into account before considering proposing substantial dwellings with in out community and district that is struggling now to provide these key services.	The council has worked closely with a wide range of organisations in producing the plan (including Kent County Council, Highways England, Network Rail, the Environment Agency, the NHS and water companies, among others). They have taken account of the growing population and the new homes that are being planned, and have identified what needs to be provided, such as new primary schools, doctors surgeries or water treatment works. In addition, these organisations are being contacted as part of the current consultation and they will give their comments on the draft plan and let us know if there is more that needs to be provided. When requirements are firmed up, as planning applications come forward for the sites in the plan, then the provision of new facilities, such as primary schools, will be linked to phases of the development so that they will be there in time for the new residents to use.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.154	412	716056	<p>The School does seem to be provided for. However the idea of Health Care being provided by a new facility in the proposed Otterpool Garden Town is very poor planning as KCC were unsuccessful in getting the infrastructure grant from Central Government, so therefore the development of Otterpool Park Garden Town will be somewhat slower than first planned. There is also the matter that Sellindge comes under Ashford NHS. If residents from these further proposed dwellings are unable to access medical facilities or school places within the village, then clearly these dwellings are being proposed in the wrong place. Build them within the garden town development, where they will not need to drive to these facilities. Ashford A&amp;E has the worst waiting times in the whole of the UK and services are currently over stretched. With the substantial expansion of Ashford homes and the proposed Garden Town, medical facilities need to be urgently looked at, not just at GP level, but at a Trust &amp; County level. Canterbury A&amp;E has been closed and further cuts being considered. This Core Strategy must take these further developments and cuts into account before considering proposing substantial dwellings within our Community and District that is struggling now to provide these key services.</p>	<p>We have worked closely with a wide range of organisations in producing the plan (including Kent County Council, Highways England, Network Rail, the Environment Agency, the NHS and water companies, among others). They have taken account of the growing population and the new homes we're planning, and have let us know what we need to provide, such as new primary schools, doctors surgeries or water treatment works. In addition, these organisations are being contacted as part of the current consultation and they will give their comments on the draft plan and let us know if there is more that needs to be done. When requirements are firmed up, as planning applications come forward for the sites in the plan, then the provision of new facilities, such as primary schools, will be linked to phases of the development so that they will be there in time for the new residents to use.</p>	No change proposed.
5.155	414	716056	<p>Must admit it would be an excellent opportunity to have a footpath / cycle way to Westenhanger Station, this would have to be proper tarmac, so it can be used in all weather conditions and used all year, also the footpath / cycle way would need lighting. This is a key time for the District to be bold and ambitious by providing a Sellindge bypass as part of the Garden Town development South West of Sellindge, linking the A20 at Otterpool lane, with the through road required to access these new substantial developments South of Sellindge. The through road can then be developed to Harringe Lane, and coming out West of Sellindge, behind the Church grounds. This would open Sellindge traffic movements to allow it to become a key hub for the West communities of the District and allow further development along other land opened as result of the bypass/through road. It would also open the A20 between junction 10 and 11 of the M20 to free traffic movement, not having congestion pinch point of having to come through Sellindge. This would improve the whole district traffic flow, allow the A20 to still be a relief road for the M20 and improve the International Gateway transport links. This would have a significant financial and environmental positive effect on the Local District and County.</p>	<p>The policy does require surfaced cycle access (criteria 3 b), however this criteria will be amended to incorporate a requirement for lighting. A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired (which is highly improbable), the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route.</p>	Amend Policy CSD9, criterion 3b: "Contribute to the provision of a safe, lit, surfaced cycle and pedestrian access to Westenhanger Station from Sellindge through the upgrade of existing bridleways and public rights of way (HE271A and HE274);"

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.156	146	1161386	<p>This is a key time for the district to be bold and ambitious by providing a Sellindge bypass as part of the Garden Town development South West of Sellindge, linking the A20 at Otterpool lane, with the through road required to access these new substantial developments South of Sellindge. The through road can then be developed to Harringe Lane, and coming out West of Sellindge, behind the Church grounds. This would open Sellindge traffic movements to allow it to become a key hub for the West communities of the district and allow further development along other land opened as result of the bypass/through road. It would also open the A20 between junction 10 and 11 of the M20 to free traffic movement, not having congestion pinch point of having to come through Sellindge. This would improve the whole district traffic flow, allow the A20 to still be a relief road for the M20 and improve the International Gateway transport links. This would have a significant financial and environmental positive effect on the local district and county.</p>	<p>A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired (which is highly improbable), the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route.</p>	No change proposed.
5.156	167	1161386	<p>The current development of houses round Barrow Hill Sellindge and Otterpool lane, are out on a limb which will cause commuter traffic heading West bound to Ashford and London to drive through the village of Sellindge and not use junction 11 of the M20. Once the new Junction 10A is completed, no traffic will double back along the A20 towards junction 11 to access the West bound motorway. This would then impede the accessibility of Sellindge village to the rest of the local district as being a community hub for its facilities. The Core strategy aims for Sellindge to become a Village community hub, which in its self will bring significant extra traffic. This will fail under the current strategy, as the A20 through the village of Sellindge is becoming a bottle neck. The traffic calming measures will may slow the traffic down, but the volume of traffic is the main issue, with future growth being unsustainable. Considerable housing construction in Sellindge is currently in progress and further is imminently planned, increasing the housing stoke by almost 500 new properties, with several new junctions from these developments onto the A20 through the village, which creates bottle necks, with traffic turning into and out of these junctions. There are regular M20 incidents between junction 10 and Junction 11, with all motorway traffic having to drive through the village. It is not uncommon for traffic congestion &amp; jams going back all the way to Ashford. When Op Stack was on for 34 days, 80% of GP appointments were not kept on time as patients could not access the village. The last two weeks, at night the M20 has been closed for essential maintenance, requiring all motorway traffic to drive via the A20 through the village. Today the traffic tailbacks were three miles long and the police had to attend (Police report:24/0003). Folkestone and Hythe District is in a recognised gateway location between the UK and the Europe and Sellindge village and the A20</p>	<p>A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired (which is highly improbable), the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route. There will be a key imperative to ensure that strategic transport movements to/from the site from locations west of Otterpool Park (for example Ashford, Maidstone) utilise the M20 with access via J11 and not to J10A via the A20 through Sellindge. The local road network (principally internal roads) will need to be configured so as to appropriately limit the attractiveness of undertaking westbound movements via the A20 in order to access destinations that are better served by the strategic road network. Inevitably there will be proportionate use of the A20 for certain localised journeys.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.156	415	716056	To help mitigate the visual appearance of any developments, good wooded landscaping must be used to the North boundary of the Bucknell Trust Land (land to the East). The location of the land to the West, being on the land between the A20 and M20, this actual location should help to mitigate the view from the North Downs AONB. Any further developments in the future should be constrained to this area (between A20 and M20) as this would maintain the views to the North Downs (AONB), which is a much valued aspect of Sellindge.	Agree. Policy CSD9, criterion (2)(f), requires appropriate landscaping, including woodland planting, to be provided on the rural edge of the development, particularly on the eastern development site (Bucknell Trust Land).	No change proposed.
5.157	416	716056	This is most important as covered in 5.156 The Land between the M20 and Fast rail link, East of Grove Bridge, Barrow Hill, which the local river stream meanders, also have a significant fauner, flora and wild habitat. This must be protected.	It is noted that the area is of local value however it is not currently proposed for any development other than a possible route for better connectivity to Westenhanger Station.	No change proposed.
5.158	417	716056	This is of utmost importance, having large delivery lorries accessing the site would not be safe.	Noted.	No change proposed.
5.158	402	1163118	This should extend to all residents affected by all proposals in the core document, not just Gibbons Brook.	Noted. It is important to integrate new development with the existing village and have connectivity between the different parts to ensure Sellindge remains as one village and community rather than have old and new parts of the village as two separate enteritis. However landscaping does play an important role in Policy CSD9 and is specifically mentioned for phase 1 in criterion (1)(c)(ii) and for phase 2 in criterion (2)(f).	No change proposed.
5.159	418	716056	Agree.	Noted.	No change proposed.
<b>Policy CSD9</b>	34	1162350	As consultants representing landowners in this area the policy is supported as the site is deliverable.	Noted. The provision set out in the policy has resulted from discussions with infrastructure providers and is considered to be necessary, proportionate and deliverable.	No change proposed.
<b>Policy CSD9</b>	25	314402	As landowners of the fields surrounding Grove House, the inclusion of the Sellindge Strategy within the Core Strategy is strongly supported. We are committed to the residential development of our landholding and are working with others to ensure this can be delivered in a timely fashion.	Support noted.	No change proposed.
<b>Policy CSD9</b>	39	1162396	As residents of Sellindge, I am shocked to see any plans to develop land surrounding Grove House. This was never part of the proposal nor any other discussions that were had with the local residents. We will strongly oppose any green site developments that will turn our village into a copy-paste suburban ugly settlement.	This is the first consultation on the new proposals. Having found that more homes are needed, the council has looked in detail at where the development could go. This has involved looking at constraints (places where development would not be suitable) and opportunities (places where there is suitable land and there are roads, railways and other facilities that could cope with growth or could be improved). The district has many constraints: large areas are at serious risk of flooding; some places are protected for their rare habitats or species; some areas are protected for their landscape (for example, a large part of the North Downs is protected under government planning policy as an Area of Outstanding Natural Beauty). Having taken all these things into account, we believe that we have identified the most appropriate places for new development. Development is focused on a new garden town at Westenhanger and more growth at Sellindge. There will be another stage of consultation on the Submission Draft (Regulation 19) Core Strategy Review.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	75	1032113	<p>This policy provides for expansion of the village of up to 600 dwellings. This represents a major expansion of the village and we object to this strategic scale of development proposed in the rural North Downs area, given the village 's sensitive setting within the Kent Downs AONB and in view of potential cumulative impacts with the proposed establishment of a new garden town at Otterpool. We note that planning permission has already been granted for part of the area proposed to be allocated, but the proposed allocation far exceeds that in the approved application and is on higher land than the approved site. It is contended that an LVIA should be carried out to fully test the landscape capacity of the site to accommodate the proposed development and establish appropriate development parameters, including amount, densities and locations of development. It is recognised at paragraph 5.156 that the site lies within the setting of the AONB, and that any development here may give rise to adverse impacts on the landscape and that this should be addressed through landscaping, siting, type and design of new buildings to help mitigate impact. This is not however carried through into the policy wording. In the event of the allocation coming forward it will be essential for robust criterion to be included within the policy to ensure that the issues set out in para 5.156 are appropriately addressed and that the small scale settlement character is maintained, with good connectivity between all parts of the village. This will be required for both phases of the proposed development. As a minimum, we consider the following requirements should be incorporated: The Masterplan must be informed by a LVIA to ensure development is designed to minimise as far as possible impacts on the AONB. Substantial structural planting will need to be incorporated, both on the AONB side of the development but also throughout; the</p>	<p>Noted. The number of homes required in the district has increased since the Core Strategy was adopted in 2013. Having found that more homes are needed, the council has looked in detail at where the development could go. An important part of the evidence base for this work is a Strategic Growth Options Study which identifies land suitable for strategic scale development. One of the criteria used in this study was Landscape (seeking to avoid visually prominent locations, including but not limited to minimising impact on the AONB, and seeking locations with the potential for landscape mitigation). The study highlighted the areas that would have the least visual impact on the AONB and its setting, helping to shape the additional land proposed for development in Policy CSD9. Sellindge is not within the AONB, however parts of the area are within the setting of the AONB. Looking at where the additional land is proposed the study concluded that land north and east of Sellindge benefits from fewer constraints in terms of potential landscape or visual effects on the AONB. This is as a result of the land 's proximity to existing development, its relatively contained zone of visual influence, and other localised detracting features. Whilst strategic scale development on these areas of land would be likely to give rise to some adverse landscape and visual effects, these effects are limited because they could be more readily mitigated through the siting, type and design of development in order to assimilate the potential development into the landscape. Land south of the A20 and north of the M20 benefits from no constraints in terms of landscape this is in part because of the loss of tranquility due to noise from the M20, the lack of intervisibility from viewpoints in the Kent Downs AONB due to intervening landforms, development and vegetation, a relatively contained zone of visual influence, and localised detracting features including the M20 and power lines. It is also important to note that approximately 70% of the development proposed in this policy now has planning permission, with the</p>	<p>Some changes to the text and Policy are proposed.</p>
Policy CSD9	207	333026	<p>My husband and I went to the exhibition of the plans for Sellindge yesterday afternoon. We have been to all of them but never encountered the yellow expanses of yellow going all round Grove house and Field head. There has never been an inkling. The developments were going to end at Bulls lane. If any houses are built they will look straight into our house as we are in a slight dip, so I object strongly. Sellindge is being ruined. My husband has been in Sellindge since before the ww2 . Sellindge is a very lovely place to live as we have all the shops etc to make life very comfortable especially in old age. . Please do not expand your plans from what was originally planned for 250 homes for people that have connections with the village to swamp it all out of recognition. Very upset</p>	<p>The Core Strategy Review proposes a second phase of development in Policy CSD9 Sellindge Strategy, with an additional 350 dwellings, this is the first public consultation on this document. Having found that more homes are needed, the council has looked in detail at where the development could go. This has involved looking at constraints (places where development would not be suitable) and opportunities (places where there is suitable land and there are roads, railways and other facilities that could cope with growth or could be improved). The district has many constraints: large areas are at serious risk of flooding; some places are protected for their rare habitats or species; some areas are protected for their landscape (for example, a large part of the North Downs is protected under government planning policy as an Area of Outstanding Natural Beauty). Having taken all these things into account, we believe that we have identified the most appropriate places for new development. Development is focused on a new garden town at Westenhanger and more growth at Sellindge.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	280	1162685	It is regrettable that after careful consideration and consultation with Sellindge residents which resulted in a Master Plan acceptable to all, this is now to be overridden with a substantial new development, which, if we recall correctly, was specifically rejected in the master planning process. Affordable housing proportion should remain at 30% as in the existing CS. (3)(b) HE227 might provide a better route from Sellindge to Westenhanger and integrate better with the garden settlement.	Noted. The number of homes required in the district has increased since the Core Strategy was adopted in 2013. Having found that more homes are needed, the council has looked in detail at where the development could go. This has involved looking at constraints (places where development would not be suitable) and opportunities (places where there is suitable land and there are roads, railways and other facilities that could cope with growth or could be improved). The district has many constraints: large areas are at serious risk of flooding; some places are protected for their rare habitats or species; some areas are protected for their landscape (for example, a large part of the North Downs is protected under government planning policy as an Area of Outstanding Natural Beauty). Having taken all these things into account, we believe that we have identified the most appropriate places for new development. Development is focused on a new garden town at Westenhanger and more growth at Sellindge. The revised figure for affordable housing provision comes from evidence in the council's updated Strategic Housing Market Assessment (SHMA). Part two of the SHMA assesses the need for affordable housing and finds that, taking demand and supply into account, there is a total annual need for an additional 139 affordable homes a year in the district (paragraph 5.29). This equates to around 22 per cent of all new housing. National planning policies require local planning authorities to take the viability of a development into account when preparing local plans and making decisions on applications (National Planning Policy Framework, paragraph 57); the council cannot ignore this requirement. The council will keep this requirement and the provision of affordable housing under review as part of the monitoring of the plan and review the policy if necessary. Noted, this will be looked into - (3)(b) HE227 might provide a better route from Sellindge to Westenhanger and integrate better with the garden settlement.	No change proposed.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	173	1162986	<p>As a resident of Sellindge I am concerned that the incorporation of the Sellindge Strategy into the Core Strategy is misguided. The present planned building work in Sellindge and the surrounding area is extensive. The building of 1300-1600 homes to the south, west and east of Sellindge as indicated by Sellindge D in the Sustainability Appraisal Report at page 225 is simply not sustainable in this village. Whilst promised, the ancillary works to accommodate the increase in population has not taken place as yet. As well as schooling, medical facilities, shops, recreational facilities and other amenities there are other difficulties that cannot be overcome these include transportation limitations including access to road, rail and public transport, traffic congestion problems with no available solution (confirmed by the local Council in the Sustainability Appraisal report at page 230, SA13) and the availability of suitable water and waste water facilities coupled with other utility and environmental factors including air pollution. The pressure on infrastructure will be unsustainable. Is the rural setting of the village to be completely lost to accommodate the desire for increased housing when there are other sites available? The quality of the arable land lost is high, the area extensive and also mineral deposits will be sterilised. The net loss of accessible green space around Sellindge is considered to be a significant negative impact. As the owner of Grove House I am particularly concerned that the proposed works set out to the West and South of the present building phase. This will remove the rural aspect as you enter the village, will destroy what remains of greenfield views on the doorsteps of an AONB, will build houses that will be far from the amenities in the village (if and when they are built) and will lead to isolated homes, with little access to the village and next to a busy motorway. The SHLAA at Option 122 Site 610</p>	<p>Policy CSD9 Sellindge Strategy is in the adopted Core Strategy (2013) and allocates approximately 250 dwellings. The Core Strategy Review is proposing a further 350 dwellings, therefore 600 dwellings in total. The sites which already have planning permission will provide the agreed infrastructure in a phased approach, as the dwellings start to be built so that they will be there in time for the new residents to use. We have worked closely with a wide range of organisations in producing the plan (including Kent County Council, Highways England, Network Rail, the Environment Agency, the NHS and water companies, among others). They have taken account of the growing population and the new homes that are being planned, and have let the council know what needs to be provided, such as new primary schools, doctors surgeries or water treatment works. In addition, these organisations have been contacted as part of this consultation and they have given their comments on the draft plan and let us know if there is more that needs to be provided. Having found that more homes are needed, the council has looked in detail at where the development could go. This has involved looking at constraints (places where development would not be suitable) and opportunities (places where there is suitable land and there are roads, railways and other facilities that could cope with growth or could be improved). The district has many constraints: large areas are at serious risk of flooding; some places are protected for their rare habitats or species; some areas are protected for their landscape (for example, a large part of the North Downs is protected under government planning policy as an Area of Outstanding Natural Beauty). Having taken these constraints into account, we believe that we have identified the most appropriate places for new development. The SHLAA is an evidence base document and has been used to inform the plan, but it does not itself allocate sites for development. However Policy CSD9 and Picture 5.8 set out and show the two phases for development in</p>	<p>Amend Picture 5.8: Sellindge Strategy. Amend Policy CSD9: Sellindge Strategy to include consideration of the setting of non-designated built and natural heritage assets such as Grove House and Potten Farm.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	178	1037873	<p>Adding so many new houses in Sellindge and at Otterpool, will put even more traffic onto the single track lanes of other local villages. I have seen no evidence that safe off-road riding routes will be provided, which will make riding in the area even more hazardous, with such a large increase in traffic. The doctors surgery has been trying to recruit a new Doctor for some time and as it is, there is a lengthy wait for an appointment! (How can you predict that you are going to be unwell/injured weeks in advance?!) There is no school car park on the school side of the A20, meaning many children will have to cross the A20. When the M20 is closed, the A20 is the alternative route and so ridiculously busy. The many potholes will no doubt increase in number along with the increase in traffic! I was shocked to see that some of the proposed houses are 3 storeys high! This is totally out of keeping with the surrounding buildings. The North Downs are very special and so much proposed development, so close to them, will surely have a detrimental impact.</p>	<p>We have worked closely with a wide range of organisations in producing the plan (including Kent County Council, Highways England, Network Rail, the Environment Agency, the NHS and water companies, among others). They have taken account of the growing population and the new homes we're planning, and have let us know what we need to provide, such as new primary schools, doctors surgeries or water treatment works. In addition, these organisations have been contacted as part of this consultation and they have give their comments on the draft plan and let us know if there is more that needs to be done. When requirements are firmed up, as planning applications come forward for the sites in the plan, then the provision of new facilities, such as primary schools, will be linked to phases of the development so that they will be there in time for the new residents to use. Although Sellindge is not in the Kent Downs AONB it is within its setting and paragraph 5.156 states that through the use of landscaping on the rural edge, and through the siting, type and design of new buildings, development should be able to be assimilated into the landscape and any detrimental effects on the setting of the AONB minimised. Regarding the size of any new buildings, there are design policies which any planning application will need to be in keeping with which require new development to respect existing buildings and land uses, particularly with regard to layout, scale, proportions, massing, form, density, materiality and mix of uses so as to ensure all proposals create places of character.</p>	<p>Additional text to the end of paragraph 5.156 and Policy CSD9.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	306	1163030	<p>Policy CSD9: The inclusion of a village green/common and pedestrian and cycle enhancements to Ashford Road as part of this development are supported. There should be a focus on improving cycle infrastructure within large developments and creating attractive routes between larger settlements in the region. This could be achieved by upgrading the status of existing PRow or creating new routes, though the schemes would require the co-operation of landowners and key stakeholders. The creation of new and improved routes could bring additional benefits to the local economy by providing green infrastructure for outdoor recreation and tourism e.g. promoted cycle routes. Policy CSD9 (2): The policy should require the provision of fibre-to-the premise broadband to the premise at the outset of development. This would be consistent with Policy SS9 (2) (a). This will prevent the need for the retrospective installation of fibre to the cabinet which has a significant cost implication and provides inferior connectivity when compared to the performance of new fibre networks. Such a policy approach is also supported by the proposed revisions to the National Planning Policy Framework (paragraph 112) subject to recent consultation by the Ministry of Housing, Communities and Local Government. Commercial deployment of 5G connectivity will take place over the next decade, requiring full-fibre cabling in the ground. The proposed policy will help facilitate the deployment of 5G and incorporate the latest advances in connectivity in each phase of development. In KCC 's experience, the majority of infrastructure providers do not charge of the installation of FTTP in schemes comprising 30 or more dwellings and consequently, there should be no adverse impact on viability and deliverability. Policy CSD9 (2) (d): Suggested amendments to second sentence: Total water use per dwelling shall not exceed 90 litres per person per day</p>	<p>CSD9 Support noted. CSD9 (2) Noted, however Policy E8 (Provision of Fibre to the Premises ) in the Places and Policies Local Plan states that all major developments within Shepway District will enable Fibre to the Premises (FTTP).Therefore the requirement does not need to be duplicated in this policy. CSD9 (2) d. Agree wording will be changed to: Total water use per dwelling shall not exceed 90 litres per person per day of potable water ' CSD9 (2) g. Support noted CSD9 (3) a. Support noted. Agree that a shared use pedestrian and cycle route should be considered. CSD9 (3) b. Support noted. Agree that the upgrade to cycle and pedestrian access to Westenhanger Station should be fully funded by development contributions.</p>	<p>Amend CSD9 (2) d. to: Total water use per dwelling shall not exceed 90 litres per person per day of potable water '</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	543	75029	<p>The Core Strategy for Folkestone and Hythe District Council was discussed at Stowting Parish Meeting's Annual General Meeting on 17 May 2018. Stowting Parish Meeting recognises that there is a need to provide additional housing in an area which has witnessed an increase in population in recent years and to comply with targets set by Government. Stowting Parish Meeting however has serious concerns that a large proportion of the proposed housing will be centred in a Garden Town with further development in the nearby village of Sellindge. The Garden Town is not situated in the AONB but its position adjoining the AONB means that the area requires special treatment. The size and spread of the proposed Town are such that no amount of landscaping will prevent what is a huge development being seen from the North Downs Ridge affecting the setting of this specially designated area. The Garden Town together with planned development at Sellindge will result in the loss of the rural landscape and atmosphere of that part of the district which will be detrimental to the area as a whole. Furthermore the rural village of Sellindge will become part of the urban sprawl with the loss of its distinct character. There are serious concerns regarding the infrastructure required:- Much of the traffic generated by the proposed development from both sites will use the A20 which will be inadequate to deal with a substantial increase of traffic particularly at peak times. Those wishing to travel to Canterbury will use the B2068 which has been an accident blackspot for many years. The situation will only worsen with increased traffic. Existing GP surgeries have found it difficult to recruit doctors so there is concern that it will be difficult to supply adequate health provision for the increased population. Nearby hospitals are already running at full capacity. The area's water supply struggles to meet existing demand. Without proper policies</p>	<p>The indicative strategy (Figure 4.5) shows that the proposed development would be smaller areas linked together as described by the Parish, with substantially and interlinked green spaces and planting, according to garden town principles. The garden town will consist of a number of neighbourhoods, sharing facilities and separated by green spaces and it will not be one urban mass.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	422	716056	<p>Sellindge Parish Council would like to make the following statement, in the most strongest way about Policy CSD9 The Sellindge Strategy !!! Policy CSD9 Sellindge strategy, must also incorporate Barrow Hill, which is over one third of the village of Sellindge. It must also incorporate the development proposed with in Barrow Hill (15 properties) part of policy ND5 the General Sellindge Policy of the Places and Policies Local Plan. The fact that it is not currently being considered, is causing Barrow Hill residents to perceive that this is evidence that the District Council &amp; Core Strategy are being disingenuous by attempting to swallow up Barrow Hill as part of Otterpool Park development, taking them away from being part of their Sellindge Community. To not incorporate Barrow Hill with in Policy CSD9 Sellindge strategy, will prove this to be the case !!! The intention was to widen the A20 under Grove Bridge, Barrow Hill. The way this was going to be achieved was by removing the public footpaths, reverting to how it was before. This way it will relieve congestion at the current traffic lights. We strongly oppose this, as this would cause a significant health and safety risk to the residents of Barrow Hill who attempt to access the rest of our village by foot. Having being a person who had to daily walk my children to school under this bridge with a footpath of under a metre wide, it is extremely dangerous, you have lorry wing mirrors passing inches over your head (and I 'm six feet tall) !!! We have a letter from Kent Highways / Shepway District Council dated 25 th July 2002, which states Access is particularly narrow under Grove Bridge where there is insufficient room for two lanes of traffic plus a standard footway '. The only way to relieve congestion is to have a SELLINDGE BY PASS, which would be of great benefit to Otterpool Park, by providing a spinal road with free flowing traffic. Policy CSD9 Sellindge Strategy,</p>	<p>Policy CSD9 focuses on land to the south and north east of Ashford Road in Sellindge which forms a broad location for future development. The policy is not all encompassing for the whole of Sellindge which consists of a series of neighbourhoods. The Barrowhill neighbourhood of Sellindge falls within the boundary for Policy SS6 New Garden Settlement and future plans for the wider area are addressed here. A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired (which is highly improbable), the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route. There will be a key imperative to ensure that strategic transport movements to/from the site from locations west of Otterpool Park (for example Ashford, Maidstone) utilise the M20 with access via J11 and not to J10A via the A20 through Sellindge. The local road network (principally internal roads) will need to be configured so as to appropriately limit the attractiveness of undertaking westbound movements via the A20 in order to access destinations that are better served by the</p>	Amend Picture 5.8.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	541	339689	<p>My husband and I have been through the documents separately and found the prospect overwhelming and daunting. Therefore we should like to make comments on the overall Strategy, dealing with issues we would wish to be resolved. Comments: What it will mean, the overall picture: Looking at the strategy for the coming decades it is clear the council is preparing for a new conurbation, absorbing the local villages and possibly encroaching on the boundaries of Hythe, Folkestone and Saltwood. The big increase in population along with the necessary facilities, housing, roads, transport can only lead to massively increased congestion, noise, pollution and increased consumption of natural resources at all these levels. Building on and eradicating good farmland only adds to the loss of natural resource. The area is regarded by many of those who live in London, the Medway towns, Maidstone and even Ashford as a place to get away to and enjoy, because its countryside. Effects on the locality: Those who have properties in Sellindge, on Barrowhill and at Newinggreen already suffer from the increased congestion - the amount of traffic, its speed and the weight of vehicles have become an increasing problem over the last decade. In spite of continual complaints to elected representatives about the constant damage to the environment nothing has been done to resolve any of these issues. Those not resolving the issues include the District Council, the County Council and national government. We have reached the stage where tiles are falling off the fronts of some cottages (due to vibration of heavy vehicles), cracks are appearing in walls, thick dust washes over front walls and paths and the road surface needs constant repair. There is already tremendous stress on the area which cannot cope. On the evening of the May Day Bank Holiday (2018) there was an accident on the M20 just beyond J10, blocking the westbound</p>	<p>Noted. The number of homes required in the district has increased since the Core Strategy was adopted in 2013. Having found that more homes are needed, the council has looked in detail at where the development could go. This has involved looking at constraints (places where development would not be suitable) and opportunities (places where there is suitable land and there are roads, railways and other facilities that could cope with growth or could be improved). The district has many constraints: large areas are at serious risk of flooding; some places are protected for their rare habitats or species; some areas are protected for their landscape (for example, a large part of the North Downs is protected under government planning policy as an Area of Outstanding Natural Beauty). Having taken all these things into account, we believe that we have identified the most appropriate places for new development. Development is focused on a new garden town at Westenhanger and more growth at Sellindge. We have worked closely with a wide range of organisations in producing the plan (including Kent County Council, Highways England, Network Rail, the Environment Agency, the NHS and water companies, among others). They have taken account of the growing population and the new homes we 're planning, and have let us know what we need to provide, such as new primary schools, doctors surgeries or water treatment works. In addition, these organisations are being contacted as part of the current consultation and they will give their comments on the draft plan and let us know if there is more that needs to be done. When requirements are firmed up, as planning applications come forward for the sites in the plan, then the provision of new facilities, such as primary schools, will be linked to phases of the development so that they will be there in time for the new residents to use.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	428	1158103	<p>My Company has been instructed to submit representations on behalf of the owners of land adjacent to Grove House, Sellindge, to your Core Strategy Review. These relate to the Sellindge Strategy and are as set out below. Policy CSD9: Sellindge Strategy My clients ' land is situated fronting the A20, south of the Duke 's Head PH, and west of land already committed for development as shown on Picture 5.8: Sellindge Strategy. This land was previously identified as an Area of Opportunity in April 2017 and has now been carried forward into your Regulation 18 Consultation Draft. This document explains that Sellindge is a Rural Centre and benefits from the existence of a wide range of services. Indeed, and because of this, the Council identified Sellindge for 250 dwellings, a new village green and other development in its 2013 Core Strategy Local Plan. It is now entirely logical for the Council to continue its strategy for further expansion of the village. The identification of my clients ' land that surrounds Grove House (as shown on the attached plan) and being within a more extensive area of Phase 2 housing is welcomed and strongly supported. Indeed, it forms a natural and logical extension to the development taking place to the east. Nevertheless, it is requested that that element of my clients ' land immediately west of the Phase 1 Housing and east of Grove House be also allocated for development. At the moment Picture 5.8 shows a gap between the Phase 1 and Phase 2 elements. However, it is considered that there is no need for this. Instead, housing should be allowed to extend westwards across my clients ' land, as shown on the attached plan. I also wish to inform you that my clients are in advanced discussions with a major housebuilding company that already has excellent experience of promoting and developing land in the District. Given the government 's emphasis on the delivery of housing, then this is a most important</p>	<p>Support noted. Regarding the additional land to the east of Grove House, the land has not been highlighted for development as it is felt that the land should remain as existing open space and mature trees because it plays an important role in preserving the setting of Grove House a building of local interest. In addition the gap in development with mature trees softens the built environment and helps to mitigate the impact on the wider views from the Kent Downs AONB. The Kent Downs AONB Unit has commented that 'large trees within built developments and across the site are vital to ameliorate the impact of built form in views from the higher elevations of the Kent Downs'. Therefore land to the east of Grove House will be marked as landscaping on Picture 5.8 Sellindge Strategy. Regarding the figure given for dwellings in phase two we propose to change this.</p>	<p>Amend Picture 5.8 Sellindge Strategy to show land east of Grove House as landscaping Amend wording for both phases to be consistent with the approach taken in other sections of the Plan.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	538	1163366	<p>We are writing as fairly new residents of Barrow Hill in Sellindge, Kent, having moved into our property June 2017. We have taken a keen interest in the plans for expansion in the area both within Sellindge and the surrounding area and would like voice our views regarding the future plans. We understand the need to increase housing capacity and welcome the proposal to keep a green buffer between the proposed new development and the existing properties in Barrow Hill, this will help keep our Sellindge identity and the history of Barrow Hill and Sellindge and allow new and existing properties to benefit from the green spaces we all desire. With the massive increase in housing, from the Otterpool town development (and the current large scale house building next to the Sellindge village hall) this does lead to difficulties along the existing route of the A20. This road is mainly used by through traffic accessing Ashford/Hythe but also the industrial units and businesses in the area. The existing A20 has a bottle neck where it passes under the motorway/railway and with the local school and shops also along this road it does present extra difficulties for local people parking to use these facilities (cars parking on the main road causes congestion) and frustration for those just wanting to get through the village. The extra traffic that the proposed town will generate is going to increase the traffic problems the best example we have is when the M20 is closed temporarily and the tailbacks that ensue through the village. There also exists a speeding problem through the village which increases during the night particularly with the recent overnight M20 closures where HGV's in particular, use the A20 at high speed, despite the restrictions in place on overnight HGV's through the village. The residents of Barrow Hill are also being hugely affected by the passing of HGV's, the surface of the A20 is in particularly poor condition (the</p>	<p>A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired (which is highly improbable), the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route. There will be a key imperative to ensure that strategic transport movements to/from the site from locations west of Otterpool Park (for example Ashford, Maidstone) utilise the M20 with access via J11 and not to J10A via the A20 through Sellindge. The local road network (principally internal roads) will need to be configured so as to appropriately limit the attractiveness of undertaking westbound movements via the A20 in order to access destinations that are better served by the strategic road network. Inevitably there will be proportionate use of the A20 for certain localised journeys.</p>	<p>No change proposed.</p>



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	552	1164105	<p>Secondly, whilst it is acknowledged that strategic scale sites can form a part of a districts spatial strategy, this must be balanced against housing delivery and providing choice for the development industry so that smaller housebuilders, as well as national operators, can work together. The Government has acknowledged this in the draft NPPF and the focus on two main sites Otterpool and Sellindge is considered a high risk approach given infrastructure delivery timeframes and these potential costs threatening viability. The LPAs confidence about the delivery of housing projections is crucial because, if not, the Housing Delivery Test ' will not be met in the future within the district which will lead to speculative applications being submitted to meet short term delivery targets. This scenario would be the opposite of the plan-led system that planning decision makers are collectively striving for. Because of the importance of overall delivery, it is important that smaller sites are selected alongside the strategic opportunities. We would therefore recommend that the Places and Policies Local Plan is advanced alongside the Core Strategy and rolled in to one document. Whilst the likely imminent adoption of the Places and Policies Local Plan can provide some direction up to 2031, the document is based upon an out of date Objectively Assessed Housing Need and is also out of step with the likely Government target for smaller sites to help diversify the number of potential delivery partners of housing and growth. The influence of the M20 strategic road corridor on the selection of the growth options is understood, but the level of landscape constraint (AONB) and need for these sites to be truly complemented with a choice to meet local needs distributed across the district and assist with short term delivery, must also be taken into account as part of a balanced assessment. As a practice, we expect this to be confirmed when the</p>	<p>The Places and Policies Local Plan is further along in the plan-making process and adopting this will ensure that small to medium sites can come forward earlier. The current development management policies are based on the 2006 Local Plan and are in need of updating. To ensure that the district's policies are in line with national policy it is important not to delay the plan's adoption.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	423	894636	This proposal exemplifies the deep suspicions that communities hold about the planning process. The northern part of this proposal has already been granted consent, without the grace to wait for this consultation to conclude. That decision was nothing short of disgraceful. It was wholly dismissive and undermined the purpose of consultation. It is confusing that the policy is framed to include work and development which is already committed, and led from community inspired proposals for a centrally located village green. This was and remains a development that gives more than just itself to the village. The new proposals should be segregated from the existing commitments; they are not evolutions of it and should be considered independently. Some parts of it were recently considered under the PPLP and were found wanting. What has changed?	Noted. Phase 1 had the benefit of National Rural Masterplanning Funding (£50,000) from the Homes and Communities Agency after the council made a successful bid. Therefore Independent consultants were able to be appointed who worked closely with the local community. The Sellindge's Future Masterplan Report also looked at alternative areas for possible supporting residential development which included the land now proposed for development in phase 2. The Core Strategy (2013) figure 5.8 shows these areas. The land remains as an allocation in the Core Strategy Review as it is not yet developed/ built out. The number of homes required in the district has increased since the Core Strategy was adopted in 2013, therefore the masterplan work has had to be revisited and additional studies carried out such as the Growth Options Study and High Level Landscape Appraisal to find more potential areas for residential development. Phase 2 has received the statutory level of consultation as set out in the Council's Statement of Community Involvement (SCI). The SCI sets out how the Council involves the local community in developing planning policy and making planning decisions, both outline and reserved matters, which is a requirement for all local planning authorities under the Town and Country Planning (Local Planning) (England) Regulations 2012 and Neighbourhood Planning Regulations 2012. The Bucknell Trust land is within Phase 2 of the Core Strategy Review, however the applicant submitted an early planning application rather than waiting on the outcomes of the Local Plan process. The application was approved because it is considered that the site is within a sustainable location, adjacent to the settlement boundary of Sellindge with good transport links and within an identified area for planned growth in the future. It is also supported by the National Planning Policy Framework (NPPF). The Places and Policies Local Plan looks at smaller sites for development, the examination of this Plan is due to take place in early 2019.	No change proposed.
Policy CSD9	525	1042876	Policy CSD9 Sellindge Strategy Natural England concurs with the findings drawn in the SA, of both minor positive and negative effects for landscape (SA3) and biodiversity (SA5), and minor/ major positive effects for GI (SA6), and the associated commentary.	Noted. Natural England's comments are welcomed.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
<b>Policy CSD9</b>	643	1057385	Policy CSD9 (2) [page 147] The policy should require the provision of fibre-to-the premise broadband to the premise at the outset of development. This would be consistent with Policy SS9 (2) (a). This will prevent the need for the retrospective installation of fibre to the cabinet which has a significant cost implication and provides inferior connectivity when compared to the performance of new fibre networks. Such a policy approach is also supported by the proposed revisions to the National Planning Policy Framework (paragraph 112) subject to recent consultation by the Ministry of Housing, Communities and Local Government. Commercial deployment of 5G connectivity will take place over the next decade, requiring full-fibre cabling in the ground. The proposed policy will help facilitate the deployment of 5G and incorporate the latest advances in connectivity in each phase of development. In KCC 's experience, the majority of infrastructure providers do not charge of the installation of FTTP in schemes comprising 30 or more dwellings and consequently, there should be no adverse impact on viability and deliverability.	Noted, however Policy E8 (Provision of Fibre to the Premises) in the Places and Policies Local Plan states that all major developments within Folkestone & Hythe District will enable Fibre to the Premises (FTTP). Therefore the requirement does not need to be duplicated in this policy. The Garden Settlement has a separate policy on infrastructure, delivery and management which is linked to the phases as it is a new town.	No change proposed.
<b>Policy CSD9</b>	645	1057385	Policy CSD9 (2) (g) Support.	The support is welcomed.	No change proposed.
<b>Policy CSD9</b>	647	1057385	Policy CSD9 (3) (b) [page 148] Support. KCC would expect the improvements to be fully funded by development contributions.	Noted. The support is welcomed.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	712	908770	<p>On behalf of Quinn Estates, we hereby submit representations in response to the Folkestone &amp; Hythe District Council Core Strategy Local Plan Review Consultation. These representations respond to the documents prepared by Folkestone &amp; Hythe District as part of the Council's Core Strategy Local Plan Review, which sets out the development strategy for the District to 2036/37. The consultation document is the first draft of the Core Strategy Review, prepared for public consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations. The document constitutes an update of the adopted 2013 Core Strategy Local Plan and whilst continuing to include policies and allocations for existing strategic and non-strategic development sites, also introduces proposed new policies and allocations for a new Garden Settlement at Otterpool Park and further expansion of Sellindge, together with additional sites to come forward for residential development across the District in response to new housing targets and a revised Growth Strategy for the District. These representations are submitted specifically relating to two landholdings at Sellindge, which Quinn Estates have a direct interest in. 1) Land to the rear of Rhodes House, Main Road, Sellindge, Kent (Site Location Plan enclosed as Appendix 1). This site has a resolution to grant outline planning permission for the development of a neighbourhood extension for the creation of up to 162 houses including affordable, self-build and retirement housing, up to 929m<sup>2</sup> Class B1 Business floorspace, allotments, recreational ground and multi-use games area, nature reserve and associated access, parking, amenity space and landscaping (LPA ref: Y16/1122/SH); and 2) Land at Elm Tree Farm to the rear of Sellindge Primary School (Site Location Plan enclosed as Appendix 2). This site is currently not designated by Folkestone &amp;</p>	<p>It is considered that the charging schedule, which is to be reviewed and updated alongside the Core Strategy Review, appropriately captures and reflects the fact that the expanded spatial area to which policy CSD9 applies will result in the expanded area being 'zero-rated' to reflect the fact that as a strategic allocation the implementation of necessary infrastructure is to be secured through the application of S106. The evidence base study, the Shepway Growth Options Study Phase Two Report (April 2017) considered the suitability areas around Sellindge for strategic sized development. This assessment considered the impact of such development on a number of issues, such as agricultural land, landscape (particularly in relation to the AONB), heritage, or the wider highway network. Land at Elm Tree Farm situated north of the A20, is in an area characterised by sparse tree cover with an open character within the visual setting of the Kent Downs AONB. In addition the land surrounds the Grade II listed Elm Tree Farm House and associated barn. Although fairly well screened by hedgerow, the farmhouse is visible from Ashford Road to the south and development between it and the road would be within its setting, making this location less suitable for development. The study also identifies the land as having highway capacity constraints. Therefore the land is considered to be unsuitable for strategic scale development.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	700	1044196	Please see the attached document for the full representation. As strategic allocations, we have no objection in principle in respect of the retention of policies (SS11 and CSD9) which continue to allocate Shorncliffe Garrison and Sellindge for residential development. However, Policies SS11 and CSD9 must be updated to reflect the consented developments and updated National guidance. The applications that have been submitted in respect of these Sites, have been positively determined against the most up to date planning guidance and subsequently considered acceptable in the form proposed. Additionally, both applications have been implemented. In these circumstances it would not be Justified or Effective of the CS to retain policies unchanged, where they no longer align with the consented and implemented development. Furthermore, elements of the policies are no longer Consistent with National Policy . Policies SS11 and CSD9 should therefore be amended accordingly in line with the comments below. The policy and supporting Figure 5.8, identify that there are two phases of development at Sellindge. The policy as currently worded requires a comprehensive masterplan to be drawn up to demonstrate that the two phases will not prejudice each other. This is clearly unrealistic since Phase 1 is already consented and part of Phase 2 (to the east of the A20 and north of the M20) has a resolution to grant outline consent for a mixed use development including 149 dwellings (ref 16/1122). It is therefore clear that each phase and in the case of phase 2, each sub-phase are capable of coming forward independently of each other. This requirement should therefore be removed for the policy to be Justified and Effective . Criterion b. should be amended to refer to 20% affordable housing, in line with the agreed viability assessment for Phase 1 (the Taylor Wimpey development). Criterion c (ii) should be similarly amended to	Agree that applications have been granted on parts of the area and it may not be possible now to masterplan as a whole; however the new allocated land to the south west will still need to be masterplanned and the policy will be amended accordingly. Although the application has been granted the policy exists to provide a basis for assessing and determining a planning application, therefore the criteria will be retained. The National Planning Policy Framework (paragraph 47) sets out that there may be material considerations at the point the planning application comes in which mean the planning permission departs in certain aspects from the adopted policy.	Amend policy to reflect the Council's Response.
Policy CSD9	642	1057385	Policy CSD9 [page 147] The inclusion of a village green/common and pedestrian and cycle enhancements to Ashford Road as part of this development are supported. There should be a focus on improving cycle infrastructure within large developments and creating attractive routes between larger settlements in the region. This could be achieved by upgrading the status of existing PRow or creating new routes, though the schemes would require the co-operation of landowners and key stakeholders. The creation of new and improved routes could bring additional benefits to the local economy by providing green infrastructure for outdoor recreation and tourism e.g. promoted cycle routes.	Noted. The support is welcomed.	No change proposed.
Policy CSD9	644	1057385	Policy CSD9 (2) (d) [page 147] Suggested amendments to second sentence: Total water use per dwelling shall not exceed 90 litres per person per day of potable water ' This would be consistent with Policy SS8 (1) (b).	Noted. Support suggested amendments to second sentence: Total water use per dwelling shall not exceed 90 litres per person per day of potable water ' This would be consistent with Policy SS8 (1) (b).	Amend second sentence of Policy CSD9(2)(d): Total water use per dwelling shall not exceed 90 litres per person per day of potable water '
Policy CSD9	646	1057385	Policy CSD9 (3) (a) [page 148] Support. KCC would expect further improvements to informal traffic calming features at key locations and suggests that an off shared use pedestrian and cycle route is considered to provide a realistic alternative to the car, encouraging active travel.	Support noted and this will be encouraged through the policy.	Add new wording in Policy CSD9 (3)(a) to encourage connectivity.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	719	1101438	<p>The references to meeting needs for education infrastructure in Policy CSD9 Sellindge Strategy are also welcomed and supported. The next version of the Local Plan should seek to provide further information on education infrastructure requirements within the site-specific policies, where possible, to clearly communicate expectations to developers and wider stakeholders. This should include seeking to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. For an example of the latter, see draft policy CC7 in Milton Keynes 's Plan: MK Preferred Option draft from March 2017. While it is important to provide clarity and certainty to developers, retaining a degree of flexibility about site-specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. The EFSA therefore recommend the Council consider highlighting in the next version of the Local Plan that: - specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that - requirements to deliver schools on some sites could change in future if it was demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use. The ESFA would like to be included in discussions on potential site allocations, as there may be pipeline school projects in Folkstone &amp; Hythe District which may be appropriate for specific designation. The local planning authority should note that there are</p>	<p>Support noted. CSD9 provides details on plans for the extension of an existing primary school; it is felt that the policy provides adequate clarity on the requirements for the delivery of the extensions. Kent County Council Education has been consulted on this plan and are supportive of this approach and there is no need for a separate education policy.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Policy CSD9	689	1165852	This site is within Southern Water's statutory wastewater service area. In accordance with paragraph 162 of the National Planning Policy Framework (NPPF), and National Planning Practice Guidance, Southern Water has undertaken a desk study of the impact of the proposed development on the existing public sewer network. This indicates that network reinforcement will be required at the "practical point of connection", as defined in the New Connections Services implemented from 1st April 2018. This reinforcement will be provided through the New Infrastructure charge but Southern Water will need to work with site promoters to understand the development program and to review if the delivery of network reinforcement aligns with the occupation of the development. This is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of sewerage infrastructure, in order to prevent the increased risk of flooding. We note supporting paragraph 5.147 includes a requirement for phasing of delivery with the necessary infrastructure, however, inclusion of this requirement within policy will ensure the requisite planning conditions can be implemented. Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure. In addition, our assessment also revealed that Southern Water's sewerage infrastructure crosses the site, and this needs to be taken into account when designing the site layout. An easement would be required, which may affect the site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.	Southern Water's suggested new criteria are accepted and will be incorporated into the policy.	Add additional criteria to Policy CSD9 (3)(f) and (g).
5. 160	26	314402	Comments on Picture 5.8 - Sellindge Strategy: As landowners of the fields surrounding Grove House, the inclusion of the Sellindge Strategy within the Core Strategy is strongly supported. We are committed to the residential development of our landholding and are working with others to ensure this can be delivered in a timely fashion.	Support noted.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.16	99	1161386	<p>Considerable housing construction in Sellindge is currently in progress and phase two of this plan increasing the housing stock by almost 600 new properties, with several new junctions from these developments onto the A20 through the village, which creates bottle necks, with traffic turning into and out of these junctions. There are regular M20 incidents between junction 10 and Junction 11, with all motorway traffic having to drive through the village. It is not uncommon for traffic congestion &amp; jams going back all the way to Ashford. When Op Stack was on for 34 days, 80% of GP appointments were not kept on time as patients could not access the village. The last two weeks, at night the M20 has been closed for essential maintenance, requiring all motorway traffic to drive via the A20 through the village. On the 24/04/18 the traffic tailbacks were three miles long and the police had to attend (Police report:24/0003).</p> <p>Folkestone and Hythe District is in a recognised gateway location between the UK and the Europe and Sellindge village and the A20 through it regularly has all its traffic having to travel through it. If Sellindge were not on the A20, the corridor between junction 10 and 11 along the A20 would have no obstructions and the speed would allow free flowing traffic at 60mph. This would be a substantial benefit to KCC, Highways and both Ashford and Folkestone district councils and communities. The development of Otterpool Town could achieve this, with slight alterations to the plans which will increase development opportunities, increase potential housing, whilst improving the transportation and environment for the new and current communities in the district. This proposed new town of 10,000 houses will produce an average of 5 car movements per household, i.e., 50,000 traffic movements. This will increase as shopping habits are moving to on line shopping with home deliveries. 65% of the</p>	<p>Phase 2 is proposed to increase the number of dwellings by 350. A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired (which is highly improbable), the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route. Barrowhill is shown in figure 4.5 as a neighbourhood with landscape mitigation.</p>	No change proposed.
5.160	101	1161386	<p>Policy CSD9 Sellindge strategy, must also incorporate the A20 Barrow Hill, which is over one third of the village of Sellindge. It must incorporate the development proposed with in Barrow Hill (60 properties) and also the substantial proposed development either side of Barrow Hill properties as part of Otterpool park. It is disrespectful to the residents of Sellindge Barrow Hill, to have a Sellindge strategy CSD9 with out considering the impact of all these cumulative developments, which will have a significant detrimental impact on the Barrow Hill residents, due to traffic, noise, air and environmental pollution. Policy CSD9 must incorporate Barrow Hill Sellindge proposed development. The fact that we have not been considered, is evidence of how the district council are being disingenuous by attempting to swallow up Barrow Hill as part of Otterpool Park development. They are using the Core strategy to brake off Barrow Hill from Sellindge. To not incorporate Barrow Hill with in Sellindge strategy, will prove this to be the case.</p>	<p>15 dwellings are proposed to be allocated in the Barrowhill area of Sellindge within the Places and Policies Local Plan (PPLP). The focus of the policy is land to the south and north east of Ashford Road in Sellindge which forms a broad location for future development and growth. The policy is not all encompassing for the whole of Sellindge which consists of a series of neighbourhoods. The Barrowhill neighbourhood of Sellindge falls within the boundary for Policy SS6 New Garden Settlement and future plans for the area are addressed here.</p>	Picture 5.8 will be amended.



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5. 160	424	716056	Agree but the improved connection to Swan Lane must not be a vehicular one, just a pedestrian / cycle way. Having a vehicular here would cause extreme gridlock to Swan Lane. At present in the morning peak time Swan Lane backs up around 75m, with cars joining the A20. The alternative, to go North up Swan Lane, once you leave the built area of the village the Lane narrows, and gets even narrower when the Lane becomes Blindhouse Lane, so is not suitable for a vast amount of traffic. Also at the end of Blindhouse Lane where it joins Stone Street, it is an extremely dangerous junction.	Agree, planning permission has been granted for this site and vehicle access is from the A20.	No change proposed.
5. 160	699	1044196	Please see attached document for the full representation. Phase 1 of the housing allocation, comprises the permitted Taylor Wimpey development. Figure 5.8 substantially reflects the consented development and is therefore not considered to require updating at this time. However, it is noted that the allocation of land at Silverspray ' which sits within the broadly grey square area Phase 1 wraps around (fronting the A20), is not identified as a Places and Policies Local Plan (PPLP) allocation (Policy ND5) unlike other allocated sites. The Site should be identified as such.	Agree, Silver Spray should be shown on picture 5.8 as an emerging Places and Policies Local Plan allocation.	Picture 5.8 will be amended to show the emerging Places and Policies Local Plan allocation.
5.161	2	1159868	I object to the "Rhodes House" development.	Noted. The black dotted line represents new cycle/pedestrian links to the station. The red dotted line shows areas where there will be improved connectivity and in this particular case it would most likely be a footpath.	No change proposed.
5.161	12	1160521	The use of grade 1/2 Agricultural land for house building should be as a last resort. Brownfield sites should always be used in the first instance, I fear this is not happening because of developers profit margins.	Noted. As well as producing the Core Strategy Review, the council is also finalising another plan, the Places and Policies Local Plan. This plan identifies a number of previously-developed (or 'brownfield') sites for redevelopment, such as the former gas works in Folkestone, St Saviour 's Hospital in Hythe, Former Sands Motel in St Mary 's Bay, the Former Officers ' Mess in Hawkinge and others in towns and villages across the district. The previous Core Strategy also identified some large brownfield sites that are now starting to come forward for development, including the former Nickolls Quarry at Hythe and the Folkestone Seafront site, which together will provide more than 2,000 new homes. However, despite this, we believe that there is still a need to plan for more homes and this means that some building on greenfield sites is unavoidable looking to the next 20 years and more.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.161	38	1162396	I strongly object to using green sites for Sellindge expansion. Appropriate consideration has to be given to brown sites as a priority. This is also the FIRST time I have seen that any development is proposed on fields around Grove House - strongly object.	As well as producing the Core Strategy Review, the council is also finalising another plan, the Places and Policies Local Plan. This plan identifies a number of previously-developed (or 'brownfield') sites for redevelopment, such as the former gas works in Folkestone, St Saviour's Hospital in Hythe, Former Sands Motel in St Mary's Bay, the Former Officers' Mess in Hawkinge and others in towns and villages across the district. The previous Core Strategy also identified some large brownfield sites that are now starting to come forward for development, including the former Nickolls Quarry at Hythe and the Folkestone Seafront site, which together will provide more than 2,000 new homes. However, despite this, we believe that there is still a need to plan for more homes and this means that some building on greenfield sites is unavoidable looking to the next 20 years and more. You are correct this is the first public consultation to feature the land around Grove House for development (Consultation Draft Core Strategy Review, consulted on March-May 2018). There will be another stage of consultation on the Submission Draft Core Strategy Review.	No change proposed.
5.161	42	1162409	The Trustee for the Trusts supporting my brothers Stuart and Christopher supports this plan since this will provide financial security for them. And, as my brothers Deputy for Financial Affairs, I confirm that I strongly support the Sellindge Strategy and the commitment to residential development. My brothers live in the Rotherwood Farm House which together with the land is held in a Trust for them. I will work with others to ensure timely progress in a manner which supports my brothers' needs.	Support noted. An additional criteria is proposed for Policy CSD9 in regard to connectivity.	New criteria for Policy CSD9 regarding connectivity.
5.161	43	1162505	The phase two houses behind Rhodes House should not have been passed, these I feel will negatively impact upon the village. Any houses built should reflect the surroundings and should not be any more than two storeys in height. Three storey town houses which developers seem to prefer will not be in keeping with the aesthetics and feel of this rural village location.	Noted. There are design policies which any planning application will need to be in keeping with which require new development to respect existing buildings and land uses, particularly with regard to layout, scale, proportions, massing, form, density, materiality and mix of uses so as to ensure all proposals create places of character.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.161	96	1161386	<p>Faze 1 (Wimpy Homes) was part of a substantial consultation with the community of Sellindge, who supported the development of 250 homes as a maximum within our village and who were informed at the time that by supporting these houses, no further large development would be necessary. Faze two appears to be going ahead with no consultation and does not represent any of the learning points and findings from the recent Sellindge parish plan and the communities wishes which have come out of this. The current Core strategy is not considering the Sellindge Parish Council Plan and the outcomes of the views of the local community. Policy CSD9 Sellindge Strategy, particularly Faze 2 and 3, is in no way required or supported by the outcomes of the recent community response from the Sellindge Parish plan. The Parish plan and Local plan must form part of the Folkestone and Hythe Core strategy and be fully considered. This must not be development for development sake. This village have clearly shown that they are willing to support development, though are now being over run by development. Policy CSD9 must take into account the Otterpool Park development, Development in Ashford and Junction 10A of the M20 and the overbearing impact this will all have on the A20 which traverses the whole of the Village of Sellindge. This cumulative impact of all these current and future plan developments must be considered as a whole as our community in Sellindge will be adversely impacted in every way, especially regards to the size, scale of the developments, traffic congestion, infrastructure needs, pollution and air quality, environment, amenities, and the issues with shortage of water in the area.</p>	<p>The council is aware of the Sellindge Parish Council Plan (2016/26) and where possible has taken account of the plan in the Core Strategy Review and the Places and Policies Local Plan. The Core Strategy Review proposes a second phase of development in Policy CSD9 Sellindge Strategy, with an additional 350 dwellings; the Consultation Draft Core Strategy Review was the first consultation on this new proposal, in March-May 2018. Having found that more homes are needed, the council has looked in detail at where the development could go. This has involved looking at constraints (places where development would not be suitable) and opportunities (places where there is suitable land and there are roads, railways and other facilities that could cope with growth or could be improved). The district has many constraints: large areas are at serious risk of flooding; some places are protected for their rare habitats or species; some areas are protected for their landscape (for example, a large part of the North Downs is protected under government planning policy as an Area of Outstanding Natural Beauty). Having taken all these things into account, we believe that we have identified the most appropriate places for new development. We have worked closely with a wide range of organisations in producing the plan (including Kent County Council, Highways England, Network Rail, the Environment Agency, the NHS and water companies, among others). They have taken account of the growing population and the new homes we're planning, and have let us know what we need to provide, such as new primary schools, doctors surgeries or water treatment works. In addition, these organisations are being contacted as part of the current consultation and they will give their comments on the draft plan and let us know if there is more that needs to be done. When requirements are firmed up, as planning applications come forward for the sites in the plan, then the provision of new facilities, such as primary schools, will be linked to phases of the development so that they</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.161	106	1161386	<p>Policy CSD9 Sellindge strategy, must also incorporate the A20 Barrow Hill, which is over one third of the village of Sellaindige. It incorporates the development proposed with in Barrow Hill (60 properties) and also the substantial proposed development either side of Barrow Hill residential communitiy as part of Otterpool park development plan. It is disrespectful and disingenuous to the residents of Sellindge Barrow Hill, to have a Sellindge strategy CSD9 with out considering them, the impact of all these cumulative developments, which will have a significant detrimental impact on the Barrow Hill residents, due to traffic, noise, air and environmental pollution. Policy CSD9 must incorporate Barrow Hill Sellindge proposed development. The fact that it is not currently being considered, is causing Barrow Hill residents to perceived that this is evidence that the district council &amp; Core Strategy are being disingenuous by attempting to swallow up Barrow Hill as part of Otterpool Park development, taking them away from being part of our Sellindge community. To not incorporate Barrow Hill with in Sellindge strategy, will prove this to be the case. During the Open meeting in Sellindge Village hall, a representative from Folkestone &amp; Hythe council stated that the intention was to widen the A20 under Grove Bridge, Barrow Hill. The way this was going to be achieved was by removing the public footpaths, reverting to how it was before. This way it will relieve congestion at the current traffic lights. We strongly oppose this, as this would cause a significant health and safety risk to the residents of Barrow Hill who attempt to access the rest of our village by foot. This stretch of the A20 with out a foot path will divide our community and prevent children and adults accessing the School, shops, GP and post office on foot. If this development is causing too much traffic congestion, then do not have it. Further development</p>	<p>15 dwellings are proposed to be allocated in the Barrow Hill area of Sellindge within the Places and Policies Local Plan (PPLP). The focus of the policy is land to the south and north east of Ashford Road in Sellindge which forms a broad location for future development and growth. The policy is not all encompassing for the whole of Sellindge which consists of a series of neighbourhoods. The Barrow Hill neighbourhood of Sellindge falls within the boundary for Policy SS6 New Garden Settlement and future plans for the area are addressed here. Discussions are ongoing and no decision has been reached regarding the A20 and Grove Bridge.</p>	<p>Picture 5.8 will be amended.</p>
5.161	102	1161386	<p>During the Open meeting in Sellindge Village hall, a representative from Folkestone &amp; Hythe council stated that the intention was to widen the A20 under Grove Bridge, Barrow Hill. The way this was going to be achieved was by removing the public footpaths, reverting to how it was before. This way it will relieve congestion at the current traffic lights. I strongly appose this, as this would cause a significant health and safety risk to the residents of Barrow Hill who attempt to access the rest of our village by foot. This stretch of the A20 with out a foot path will divide our community and prevent children and adults accessing the School, shops, GP and post office on foot. If this development is causing too much traffic congestion, then do not have it. Further development must not be to the detriment of the health and safety of existing residents and communities. There are over 100 houses in Barrow hill and this is another example of how the district council are attempting to break us away from being part of our Sellindge community. Both footpaths on either side of Barrow Hill, Grove Bridge must stay and the speed limit through the whole village, including Barrow Hill, must be reduced to 30mph. Traffic calming with in Barrow Hill must also be implemented as it is in the rest of the A20. Why are we being treated differently.</p>	<p>Noted, discussions are ongoing and no decision has been reached regarding the A20 and Grove Bridge.</p>	<p>No change proposed.</p>

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.161	425	716056	The significant road improvements as agreed in the Taylor Wimpey plans are now being constructed. A Sellindge By Pass MUST be considered, as without this the whole village would be gridlocked on a daily basis. Sellindge is the only village where the A20 runs through the centre between Ashford and Folkestone, so it is the only pinch point. A by-pass could be a valuable aspect for the Otterpool Garden Town, as it could be used as a spinal road, giving access to various parts of Otterpool Garden Town. It would also make a valuable contribution in reducing harm and preserving Sellindge as a village.	A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired (which is highly improbable), the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route.	No change proposed.
5.162	13	1160521	The Taylor Wimpey site appears to be an improvement to Sellindge as a village and hopefully will give Sellindge a "centre" point. I believe it has been well thought out and inclusive of the residents.	Noted. The comment is welcomed.	No change proposed.
5.162	98	1161386	The core strategy should not be agreed until the outcome of Brexit is known and the consequences from it. Sellindge A20 and M20 are key to the Gateway to and from Europe and the National economy. If Brexit leaves a hard boarder, then the A20 and M20 will be at grid lock with HGV traffic and no one will wish to live in homes they cannot get to or communities in traffic gridlock. Also, Brexit may require more land to be used for food production and most of the land being considered for development in this core strategy is farming land. Land owners and trustees are clearly keen from their responses to make a profit from this core strategy bonanza of development, but no one appears to be considering the actual needs and requirements of the local community and possible National requirement from the Brexit fall out. If Sellindge does not get an A20 bypass, then Folkestone and Hythe Council and developers may just be building white elephants. I am concerned that the district council are not impartial in this consultation, being land owners themselves who have obtained the land to develop for houses. They are the land owners/developers who are also running the planning department and consultation. How can any resident feel this will be a fair process, if the core strategy does not mirror the local Parish community consultation plan.	Every local authority producing a local plan uses projections and other forward-looking estimates (such as population, household projections and economic forecasts) in arriving at their assumptions about growth and how it should be accommodated. This is a part of looking forward and planning to meet anticipated needs. These needs may change as events (economic growth, technological change or government decisions) do not unfold as anticipated over the twenty or so years of the plan period. This is why the government requires authorities to review their plans regularly. National guidance states: Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes to national policy (National Planning Policy Framework, paragraph 33).	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.162	105	1161386	<p>Policy CSD9 Sellindge Strategy, must ensure that any further development in Sellindge or in the area along the A20, between Junction 10 and 11 of the M20, agrees with KCC Highways and Highways England to build along this stretch of the M20 a contraflow capability which can be used during Motorway incidents, maintenance and Op Stack, ensuring that the M20 can remain operational without having to divert motorway traffic along the A20, where our village communities and any further development will be affected. Highways England should put this into place before any development starts.</p> <p>The current development which is causing several A20 traffic lights to be implemented in the village, is causing significant disruption, pollution and traffic jams, not just to the village of Sellindge, but some have extended over three miles back onto the Motorway (Police incident report 24 April/0008 refers. The A20 must be downgraded to allow any further development and a 30 mph speed limit through the whole of Sellindge, including Barrow Hill, must have traffic calming in place before faze 2 of any development is started.</p>	<p>At the time of writing Highways England are in the process of completing on-site works to provide a contraflow system (if enacted) between M20 J9 and J8 on the London-bound carriageway. It is understood there are no such proposals afoot to introduce a contraflow system between M20 J10 and J11. Corridor improvement works are currently being carried out to downgrade the A20 to a 30 mph limit through Sellindge by narrowing the carriageway width as part of a comprehensive traffic calming scheme. The narrowing also facilitates the introduction of a 3 metre footway/cycleway to improve accessibility through the village. Whilst it is accepted that the period of construction works to implement the A20 corridor improvement works has caused a degree of local delay to users of the A20, the construction period is temporary. Lastly, it would be disproportionate for development at Sellindge to require associated off-site highway works to the A20 at Barrow Hill. The local road network to Barrow Hill is to be the subject of detailed appraisal as part of the proposed Garden Town scheme, for which additional information shall be released in due course.</p>	No change proposed.
5.162	426	716056	Agree and must be adhered too.	Noted.	Noted.
5.162	401	1163118	<p>A proposal is required that result in 'Significant improvements to the A20'. However this should not be focused on pedestrians or cyclists. Put simply, the narrow railway bridge at Barrow Hill creates a bottleneck that has ramifications for all of Sellindge. The proposal should focus on enabling traffic flow, not on foot/cyclist traffic as the majority of traffic is not of that nature. Ideally a bypass should be implemented to mitigate the effects of any Otterpool development and M20 closures. Sellindge does not have the capacity to cope with additional traffic with the current road layout.</p>	<p>A number of responses have called for the provision of a bypass to the west of Barrow Hill via internal roads to Otterpool Park and connecting through to Harringe Lane and onwards (north) to the A20 to provide a connection to the west of Sellindge as an alternative east/west movement corridor to the A20 that passes through Sellindge. The principal limitation to the proposal / implementation of a bypass road along this route is the fact that Harringe Lane falls outside of the Otterpool Park redline boundary and, therefore, ownership control of the site promoters. Aligned to this, the character of Harringe Lane is that of a rural lane of narrow width (often single-way working) of changing horizontal alignment with grass verges and tree/hedge planting on both sides of the carriageway, in particular the section to the north of the M20 overbridge. Even if land required to widen Harringe Lane could be acquired (which is highly improbable), the removal of a continuous belt of tree and hedge planting to facilitate a highway improvement would have a significantly detrimental impact upon character of the local area as a result of the removal of verdant features and through increasing traffic volumes that would utilise the route. There will be a key imperative to ensure that strategic transport movements to/from the site from locations west of Otterpool Park (for example Ashford, Maidstone) utilise the M20 with access via J11 and not to J10A via the A20 through Sellindge. The local road network (principally internal roads) will need to be configured so as to appropriately limit the attractiveness of undertaking westbound movements via the A20 in order to access destinations that are better served by the strategic road network. Inevitably there will be proportionate use of the A20 for certain localised journeys. Discussions are ongoing and no decision has been reached regarding the A20 and Grove Bridge.</p>	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
5.163	14	1160521	With the proposed Garden Town on the boundaries of Sellindge I feel that the Quinn Estates proposal for 162 houses + is an inappropriate proposal and should have been rejected. There is no need for this housing when we have the potential 12,000 on our doorstep.	Noted. The government has introduced a new national methodology for calculating how many homes local authorities should plan for. For Folkestone & Hythe district, this indicates that the council should be providing an average of 676 new homes a year. The allocations in the Core Strategy Review are designed to meet this requirement. The methodology behind the selection of sites is set out in Section 4.6 of the plan.	No change proposed.
5.163	427	716056	Agree and must be adhered too.	Noted.	Noted.
<b>5.3 IMPLEMENTATION</b>					
5.166	232	1029376	The major risk to the plan is budget constraints, how much has been allocated by the district and county council to implement any of this	The District Council is fully resourced to undertake and complete all activities associated with plan preparation. Necessary internal resource shall be assigned to process and determine a future planning application, once submitted. The resource inputs are reflected under a Planning Performance Agreement, which is a project management tool which the local planning authorities and applicants can use to agree timescales, actions and resources for handling particular applications.	No change proposed.
5. 180	666	1160683	The monitoring of retail provision and the health of existing centres is essential if development management decisions are to be well informed once the Core Strategy has been adopted. However, we would suggest it is equally important to monitor how changes in the retail sector and the economy may be affecting the demand side. The monitoring should therefore be extended to include the regular review of both quantitative and qualitative needs for the District.	Comments noted. The paragraph will be amended to reflect the need for regular monitoring of frontage mix of town centre uses and vacancies.	Amend paragraph to reflect the need to monitor frontage mix and vacancies in town centres.
Table 6.1	667	1160683	The use of vacancy rates within defined frontages as the sole measure to monitor the health and vitality and viability town centres is inadequate and potentially misleading. The increasing use of short-term or temporary lettings may obscure underlying problems of limited demand or miss important changes in the retail offer, such as the loss of a key anchor.	Noted. Table 6.1 will be amended to reflect the need to monitor vacancy rates, changes in occupancy, mix of uses and proportion of multiple stores.	Amend Table 6.1 to reflect the need to monitor vacancy rates in town centre frontages, changes in occupancy, mix of uses and proportion of multiple stores.
Table 6.1	613	1165505	It is suggested that Appendix 6 on Monitoring Risk and Performance should include reference to creative enterprise zones in the aim A11. In terms of the target for A11, this should be strengthened by adding Achieving national Creative Enterprise Zone status should the opportunity be provided in Government Policy '.	Noted. While new wording has been added to the Core Strategy Review to reflect these comments (new paragraph number 5.96) it is considered that the existing wording in Table 6.1 would allow all forms of development in the Creative Quarter to be monitored effectively.	No change proposed.

Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Table 6.6	340	1163106	<p>"The national economy seriously under-performs over the majority of the plan period (no net GDP rise)" "Confidence in the local housing market decreases and house sales remain limited in volume over an extended period" The two instances of risk quoted above are considered to be "Low". This is a specious assessment. The current government is presiding over a creeping stagnation throughout the economy and has no plan except managed decline. A hard Brexit and the trend of increasing interest rates will most certainly bring recession. Specifically, Otterpool Park is a high risk gamble based on wishful thinking; low interest rates and the hope that an influx of wealthy individuals will buy houses. Moreover the use of PWLB loans is not free money and the higher the amount the higher the percentage of council tax required just to pay interest. This represents a critical failure to protect public funds. To accept extensive contractual obligations with an offshore entity may be detrimental to the tax payer. SDC has provided no explanation of the financial liability incurred and ultimately underwritten by the taxpayer. Furthermore, there is a tidal wave of "New Town" and large and small housing developments across the whole country. There is no reason to assume that Otterpool will be more desirable than the competition. In fact there is a high probability of overbuilding. This coupled with a flat economy, or even outright recession will render the housing uneconomic and the expected council tax windfall non-existent. As a consequence I find that these two risk factors are HIGH.</p>	<p>The government has introduced a new national methodology to set out how many homes local authorities should plan for. For Folkestone &amp; Hythe district this indicates that the council should be planning for an average of 676 new homes a year. The allocations in the Core Strategy Review are designed to meet this requirement over the plan period 2018/19 to 2036/37. The government requires local authorities to review their plans at least every five years, or sooner if circumstances change. The monitoring indicators in Appendix 6 will be used to assess whether a plan review is needed if economic conditions change or development does not proceed as anticipated.</p>	<p>No change proposed.</p>
Table 6.9	339	1157838	<p>There are a worrying amount of documents in Table 6.9 listed as "In Preparation", "Ongoing" or "To be Prepared". How can you create this document, or any others such as the PPLP, if key reference documents are not final or are completely missing? How are we supposed to comment without these documents? Why are some of the documents that have not yet been created credited to Shepway District Council? This Council no longer exists. Whilst I appreciate that the consultation was opened exactly 72 hours before the Council changed its name, this forthcoming change should have been taken into consideration if the documents were not yet "In Preparation" at that time. The Local List of non-designated heritage assets is an important document that should be referenced. Why is it missing from the list? Whilst it has not yet been started, it should be included.</p>	<p>The National Planning Policy Framework states that local plans should be supported by evidence that is "adequate and proportionate". A wide range of studies are published on the council's website and more will be completed for the consultation on the Submission Draft (Regulation 19) Core Strategy Review.</p>	<p>No change proposed.</p>



Paragraph / policy	ID	Person ID	Detailed Comment	Council's Response	Council's Action
Table 6.9	281	1162685	<p>11 documents in this list are listed as 'in preparation'. There are more documents mentioned in the body of the text which seem to be unavailable. How can this draft Core Strategy have been properly prepared without a complete evidence base? In a number of places in this document, the wording suggests that the author had access to early drafts of the unpublished study reports. These details have been denied to the public or at best released late in the consultation period. This calls into question the transparency and validity of the consultation process. The impression that this consultation has been rushed through is reinforced by the many mistakes and inconsistencies throughout the document. Some of these are in the glossary above, which the system does not allow us to comment on. This consultation should be extended until all of the relevant supporting material, covering the complete plan period, has been published.</p>	<p>The National Planning Policy Framework states that local plans should be supported by evidence that is "adequate and proportionate". A wide range of studies are published on the council's website and more will be added for the next stage of consultation on the Submission Draft (Regulation 19) Core Strategy Review.</p>	<p>No change proposed.</p>

**Appendix 4:  
Summary of Representations Received to Core Strategy  
Review Submission Draft Document and Revised Housing  
Requirement**



---

# FOLKESTONE & HYTHE DISTRICT CORE STRATEGY REVIEW SUBMISSION DRAFT (REGULATION 19) AND SUPPLEMENTARY REVISED HOUSING NEED CONSULTATIONS

---

Summary of Main Issues

MARCH 6, 2020

## Contents

<b>1. Introduction</b>	<b>3</b>
<b>2. Summary of Main Issues</b>	<b>3</b>
<b>Comments on accompanying documents</b>	<b>4</b>
<b>3. Comments on the Core Strategy Review as a Whole</b>	<b>5</b>
<b>4. Foreword</b>	<b>6</b>
<b>5. Section 1.1: About the Core Strategy</b>	<b>6</b>
<b>6. Section 1.2: About Folkestone &amp; Hythe</b>	<b>6</b>
<b>7. Section 2.1: District Development Challenges and Potential</b>	<b>7</b>
<b>8. Section 2.2: Strategic Needs for Sustainable Development</b>	<b>7</b>
<b>9. Section 3.1: District Planning Aims</b>	<b>7</b>
<b>10. Section 3.2: Vision for Folkestone &amp; Hythe District</b>	<b>8</b>
<b>11. Section 4.1: District Spatial Strategy</b>	<b>8</b>
<b>Policy SS1: District Spatial Strategy</b>	<b>9</b>
<b>12. Section 4.2: Housing and the Economy Growth Strategy</b>	<b>10</b>
<b>Policy SS2: Housing and the Economy Growth Strategy</b>	<b>10</b>
<b>13. Section 4.3: Place Shaping and Sustainable Settlements Strategy</b>	<b>13</b>
<b>Policy SS3: Place-Shaping and Sustainable Settlements Strategy</b>	<b>13</b>
<b>14. Section 4.4: Priority Centres of Activity Strategy</b>	<b>13</b>
<b>15. Section 4.5: District Infrastructure Planning Strategy</b>	<b>14</b>
<b>Policy SS5: District Infrastructure Planning</b>	<b>15</b>
<b>16. Section 4.6: Strategic Allocations</b>	<b>15</b>
<b>Policy SS6: New Garden Settlement – Development Requirements</b>	<b>17</b>
<b>Policy SS7: New Garden Settlement – Place Shaping Principles</b>	<b>18</b>
<b>Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles</b>	<b>Error! Bookmark not defined.</b>
<b>Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management</b>	<b>Error! Bookmark not defined.</b>
<b>Policy SS10: Spatial Strategy for Folkestone Seafront</b>	<b>24</b>
<b>Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone</b>	<b>24</b>
<b>17. Section 5.1: Core Policies for Planning</b>	<b>26</b>
<b>Policy CSD1: Balanced Neighbourhoods</b>	<b>26</b>
<b>Policy CSD2: District Residential Needs</b>	<b>26</b>
<b>Policy CSD3: Rural and Tourism Development</b>	<b>27</b>

<b>Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation .....</b>	<b>27</b>
<b>Policy CSD5: Water and Coastal Environmental Management.....</b>	<b>28</b>
<b>18. Section 5.2: Areas of Strategic Change .....</b>	<b>30</b>
<b>Policy CSD6: Central Folkestone Strategy .....</b>	<b>30</b>
<b>Policy CSD7: Hythe Strategy .....</b>	<b>30</b>
<b>Policy CSD9: Sellindge Strategy .....</b>	<b>30</b>
<b>19. Section 5.3: Implementation .....</b>	<b>33</b>
<b>20. Appendix 1: Monitoring and Risk .....</b>	<b>34</b>
<b>21. Appendix 2: Glossary of Terms .....</b>	<b>34</b>
<b>22. Appendix 3: Indicative Housing Trajectory .....</b>	<b>34</b>
<b>23. Submission Draft Core Strategy Review – Sustainability Appraisal .....</b>	<b>35</b>
<b>24. Submission Draft Core Strategy Review – Historic Environment Assessment .....</b>	<b>36</b>
<b>25. Submission Draft Core Strategy Review – Habitats Regulations Assessment .....</b>	<b>36</b>

## 1. Introduction

- 1.1. The Core Strategy Review Submission Draft (Regulation 19) was published for consultation between 25 January and 11 March 2019.
- 1.2. Following Government changes to the standard method for calculating housing need, a supplementary consultation on a revised minimum housing need figure ran between 2 December 2019 and 20 January 2020.

## 2. Summary of Main Issues

- 2.1. The Town and Country Planning (Local Planning) (England) Regulations 2012 require local planning authorities to prepare ‘a summary of the main issues raised by the representations’. What constitutes a ‘main issue’ is not defined in legislation or guidance but it is generally accepted to mean an issue that goes to the heart of the soundness of the plan.

### Breakdown of comments by chapter

- 2.2. A total of 510 representations were received to the Draft Core Strategy Review from 117 respondents (different individuals and organisations). A further 33 representations from 24 respondents were received to the 2019-20 supplementary consultation on the revised minimum housing need.
- 2.3. The numbers of representations made against each section of the plan are shown in Table 1.

<b>Section</b>		<b>No. of representations (CSR)</b>	<b>No. of representations (CSR-H)</b>
	<b>Core Strategy Review as a whole</b>	<b>21</b>	
	<b>Foreword</b>	<b>0</b>	
<b>1</b>	<b>Introduction</b>	<b>23</b>	
1.1	About the Core Strategy	15	
1.2	About Folkestone and Hythe	8	
<b>2</b>	<b>Strategic Issues</b>	<b>9</b>	
2.1	District Development Challenges and Potential	7	
2.2	Strategic Needs for Sustainable Development	2	
<b>3</b>	<b>Aims and Vision for Folkestone &amp; Hythe</b>	<b>22</b>	
3.1	District Planning Aims	7	

<b>Section</b>		<b>No. of representations (CSR)</b>	<b>No. of representations (CSR-H)</b>
3.2	Vision for Folkestone & Hythe	15	
<b>4</b>	<b>The Spatial Strategy for Folkestone &amp; Hythe</b>	<b>303</b>	
4.1	District Spatial Strategy	25	1
4.2	Housing and the Economy Growth Strategy	29	26
4.3	Place Shaping and Sustainable Settlements Strategy	15	
4.4	Priority Centres of Activity Strategy	14	
4.5	District Infrastructure Planning Strategy	24	
4.6	Strategic Allocations	196	5
<b>5</b>	<b>Core Strategy Delivery</b>	<b>128</b>	
5.1	Core Policies for Planning	35	
5.2	Areas of Strategic Change	90	
5.3	Implementation	3	1
Appendices		<b>4</b>	
Appendix 1: Monitoring and Risk		2	
Appendix 2: Glossary of Terms and Technical Studies		1	
Appendix 3: Indicative Housing Trajectory		1	
<b>Total number of comments</b>		<b>510</b>	<b>33</b>

### Comments on accompanying documents

2.4. Numbers of comments to the accompanying documents are shown in Table 2.

<b>Title</b>	<b>No. of representations (CSR)</b>	<b>No. of representations (CSR-H)</b>
--------------	-------------------------------------	---------------------------------------

Submission Draft Core Strategy Review Sustainability Appraisal	13	5
Submission Draft Core Strategy Review Habitats Regulations Assessment	3	3
Submission Draft Core Strategy Review Historic Environment Assessment	1	
<b>Total number of comments</b>	<b>17</b>	<b>8</b>

- 2.5. The main issues raised by the representations are outlined section-by-section in this summary.
- 2.6. Where comments have been made against paragraphs of supporting text to a particular policy, they are summarised under the policies they relate to. Where comments do not directly relate to a specific policy, but make general points or relate to a named settlement, they are summarised separately against the most relevant part of the plan.
- 2.7. Comments to the 2019-20 supplementary consultation on the revised housing requirement are summarised with the other representations at the point in the plan against which the comments were made. The text highlights that that these were made to the supplementary consultation.

### 3. Comments on the Core Strategy Review as a Whole

- 3.1. 21 comments were received to the Core Strategy Review as a whole. These raised a number of issues, some general and others relating to specific areas or sites:
- CPRE query whether the set local housing need figure is achievable.
  - Cross-border issues with neighbouring authorities appear to have been addressed; but there is no evidence of any specific agreements.
  - Development proposals will have a huge impact on the residents of Smeeth/Sellindge
  - The district has experienced significant levels of development. Further development will result in over-stretching the local infrastructure (including water, roads, public transport, healthcare); and the loss of quality Grade 1 agricultural land.
  - The proposed garden settlement should be developed in an area that needs extra housing and has the appropriate supporting infrastructure;
  - Development will place huge strain on the roads around Barrow Hill and Sellindge. A by-pass needs to be created to alleviate this before any works commence.
  - The proposed strategy will encourage accommodation for London overspill;
  - There should be a greater focus on developing brownfield rather than greenfield sites.
  - Concerns raised that the Heritage Strategy has not been adopted.



- The impact on tourism through the loss of countryside has not been adequately considered;
- Will the aspirations to protect and enhance the landscape and natural environment reconcile with the desire for economic growth and prosperity;
- There has been a lack of local engagement in regards to the new development at Otterpool Park; in particular Sellindge residents who were told that no further development of their village would occur.

#### **4. Foreword**

- 4.1. No comments were received to the foreword.

### **Part 1 – Introduction**

#### **5. Section 1.1: About the Core Strategy**

- 5.1. 12 representations were received relating to Section 1.1. These raised the following key issues:
- The scale of the development required should have been dealt with through a new Core Strategy, not a review;
  - Building on the scale proposed will have unacceptable impacts on residents, landscape, wildlife, traffic and infrastructure;
  - The Home Builders' Federation states that under-delivery of housing in Rother District should be taken into account in Folkestone & Hythe District;
  - Highways England concurs generally with the CSR's approach and policies with regard to impacts on the strategic road network;
  - Concerns raised about heritage assets within the district; and the current status of the emerging Heritage Strategy; and
  - There has been insufficient publicity and time given to comment on the document. The consultation portal is difficult to navigate and use.

#### **6. Section 1.2: About Folkestone & Hythe**

- 6.1. 11 representations were received relating to Section 1.2. These raised the following issues:
- There is no capacity for a high-speed services at Westenhanger. An additional stop would increase journey times to London from Folkestone, Dover and Thanet;
  - High-speed services are more than adequate at Ashford, Folkestone, Dover and Canterbury;
  - The highways infrastructure is inadequate and high-speed trains cannot stop at Westenhanger because there is no disabled access;
  - Healthcare provision in the area is a weakness, not a strength, and additional facilities are needed before any development takes place.
  - The Heritage Strategy has not been given due consideration in preparing the document; and

- Cozumel Estates Ltd supports proposed amendments to exclude the garden settlement from the application of CIL; and would like confirmation of the boundary of the exemption area.

## **Part 2 – Strategic Issues**

### **7. Section 2.1: District Development Challenges and Potential**

7.1. 7 representations were received relating to Section 2.1. These raised the following issues:

- The CSR is not being prepared to address local housing needs.
- There are no platform facilities for high-speed services at Westernhanger;
- The provision of a high-speed rail service at Westernhanger would not benefit local employment;
- Older residents moving into the district may need greater health and social care, placing more pressure on existing services;
- Kent County Council supports reference to enhancing leisure opportunities encouraging healthy lifestyles and the provision of open spaces, sports pitches and recreational facilities; and
- The water aquifer is not able to support continuing development and water rationing will be needed.

### **8. Section 2.2: Strategic Needs for Sustainable Development**

8.1. 2 representations were received relating to Section 2.2. These comments raised the following issues:

- The housing needs of the district can be met without the need for a garden settlement; and
- There is little evidence that younger people will be attracted and developers will provide the necessary leisure and entertainment facilities required.

## **Part 3 – Aims and Vision for Folkestone & Hythe District**

### **9. Section 3.1: District Planning Aims**

9.1. 6 representations were received relating to Section 3.1. These raised the following issues:

- The creation of a garden settlement would have a detrimental impact on air quality in the area;
- The garden settlement will not meet local needs but will become a dormitory town. There are enough brownfield sites to meet development needs;
- The plan needs to be set within the context of the Paris Climate Change Agreement and United Nations' Sustainable Development Goals;
- Natural England supports revised wording that emphasises the enhancement rather than just protection, of the natural environment;

- Historic England broadly supports the Aims & Vision for Folkestone & Hythe, especially the challenge to enhance management and maintenance of natural and historic assets; and
- Kent County Council states that it is essential that the advice of the Heritage Strategy is accepted, and the priorities it identifies are followed.

## **10. Section 3.2: Vision for Folkestone & Hythe District**

10.1. 15 representations were received relating to Section 3.2. These raised the following issues:

- A new settlement is unnecessary to meet local needs. Furthermore, public-sector investment in the garden settlement, to serve commuters and benefit a limited number of people, is morally indefensible;
- The creation of a garden settlement will draw resources away from Folkestone Town Centre;
- CCPIII Shopping Folkestone SARL states that it is essential that the Core Strategy Review has a commitment to preparing a masterplan for Folkestone Town Centre to ensure support for the Priority Centres of Activity (Policy SS4);
- Lyminge should be protected due to its location in the Kent Downs Area of Outstanding Natural Beauty and any further enlargements of settlements in the parish should be resisted;
- Water capacity, highways and health infrastructure are inadequate.
- An additional stop for high-speed rail at Westenhanger will affect all other stops on the line and there is limited capacity at St Pancras. There is already a link at Westenhanger to high-speed services departing from Ashford. Adding a transport link for commuters will not create local jobs;
- It is not clear how Westenhanger station will be improved, nor how road access to the station and car parking will be provided; and
- Any large-scale development will generate traffic on the A20 to the north of Sellindge and also on minor roads, such as the B2067 which connects to the A2070 south of Ashford, a much quicker route to Ashford International Station than the M20 from J11 to J10/10A.

## **Part 4 – The Spatial Strategy for Folkestone & Hythe District**

### **11. Section 4.1: District Spatial Strategy**

11.1. 14 representations were received relating to the supporting text in Section 4.1. These comments raised the following issues:

- CPRE states that setting ever higher numbers will not increase the rate of delivery of new homes. The rate is determined by the capacity of housebuilders to build houses and their need to provide a return to their shareholders;
- The Home Builders' Federation states that it has reservations about the reliance on the new settlement to meet housing needs and the rates of delivery that have been assumed;

- Taylor Wimpey states that changes to national policy regarding housing provision mean that the district's housing requirements have increased to 14,345 dwellings for the plan period, or 755 homes a year;
- The plan fails to recognise the role that new homes can play in revitalising town centres. As demand for office accommodation is falling and the focus on leisure is at the harbour and seafront, residential uses can be introduced into Folkestone town centre to support shops and services;
- Any new homes should be spread across the region, in small sustainable developments. A new town of this size will obliterate a large part of the countryside and destroy local communities;
- The site is unsuitable and will put massive strain on resources.
- It is unwise to commit to a new town in the context of Brexit, when other regions may become the focus for growth.
- Brexit will make it impossible to live or work in the area. It will be detrimental to air quality, landscape, water supply, policing, traffic, healthcare and other infrastructure;
- This area could be at the forefront of food production after Brexit, preserving its 'garden of England' status;
- The garden town will create houses, not jobs, and will divert investment from deprived parts of Folkestone;
- It has yet to be established whether water companies will be able to meet the demands of the new town;
- There is unprecedented pressure on green spaces between Ashford and Folkestone; the towns need to have a boundary that prevents expansion;
- The plan should have clear reference to marine planning.

11.2. A further representation was received to the 2019-20 supplementary consultation on the revised housing requirement. This raised concerns about decisions being taken in haste, the accuracy of reports compiled on behalf of the council and the potential to meet targets.

### **Policy SS1: District Spatial Strategy**

11.3. 11 representations were received relating to Policy SS1. These raised the following issues:

- Contrary to the Government's criteria for garden towns; there is no local support for the proposal; it is not on brownfield land; it is not away from existing settlements; nor is it a 'transformational' development.
- Taylor Wimpey states that it supports the identification of Sellindge as one of the more sustainable settlements within the district capable of accommodating new development;
- The Kent Downs AONB Unit states that it is unjustified to promote this level of development in the rural North Downs area, as the proposals would have a significant impact on the setting of the AONB and they are not capable of being mitigated satisfactorily;
- The Crown Estate states that Policy SS1 needs to give sufficient weight to rural housing needs; it supports the identification of Brookland as a Primary Village within the District Settlement Hierarchy with the potential to grow;

- The CSR must provide a clearer framework for the distribution of development within the AONB and Romney Marsh. Developers will target other areas and, if delivery is not keeping pace, applications will be approved in sensitive areas around towns and villages. Romney Marsh in particular cannot be regarded as the default pool of housing;
- There is a failure to recognise the role that new homes can play in revitalising town centres. As demand for office accommodation is falling and the focus on leisure is now at the harbour and seafront, residential uses can be introduced into Folkestone town centre to support shops and services;
- Further reference should be made to supporting mixed-use developments at existing employment sites which widen the definition of alternative acceptable commercial uses. This will ensure sites remain viable and avoid prolonged periods of vacancy;
- Natural England states that reference to further expansion at Lydd Airport needs to be strengthened to state that it will only be permitted where direct and indirect impacts can be avoided or fully mitigated; and
- Lydd Airport Action Group states that reference to the airport in Policy SS1 is inappropriate and that the council has succumbed to pressure from the Airport.

## **12. Section 4.2: Housing and the Economy Growth Strategy**

12.1. 16 representations were received relating to the supporting text in Section 4.2. These comments raised the following issues:

- CPRE consider that the housing delivery targets are not justified and unachievable;
- Housing figures have been deliberately skewed to favour the building of a new town. A strategy of mixed use urban extensions should be tested before any consideration of a new town;
- Cozumel Estates Ltd states that more flexibility is needed in employment floorspace requirements. The employment market may be subject to change over the plan period, which could have an implication on the floorspace requirements;
- There is a disproportionate focus on providing houses rather than jobs. A strategy of continuing at the current jobs density, will maintain the existing pattern of net out-commuting, contrary to the aims of new garden settlement;
- It is considered that commercial and industrial floorspace need to be delivered in advance of more houses; and
- CCP III Shopping Folkestone SARL is concerned that the updated retail assessment significantly overstates retail capacity in the Folkestone and Hythe area;

### **Policy SS2: Housing and the Economy Growth Strategy**

12.2. 13 representations were received relating to Policy SS2. These comments raised the following issues:

- Ashford Borough Council and Rother District Council support the overall strategy of meeting the district's housing need within the district;

- Gladman Developments Ltd states that the council is required to use the 2014 projections to calculate its housing need, using the most up-to-date information on affordability;
- Quinn Estates states that the government identifies a local housing requirement of 751 dwellings a year. A 5 per cent uplift should be applied in order to negate the likelihood of sites not coming forward, and the role of Sellindge should be strengthened;
- The Home Builders' Federation states that the minimum number of homes the council needs to plan for is 751 homes a year, a total of 14,269 homes over the plan period;
- Taylor Wimpey states that the council needs to plan for 755 homes a year, and that the current plan would result in a shortfall of 1,185 dwellings;
- Housing numbers should be expressed as 'maximums' rather than 'minimums';
- The council is compromised by being landowner in relation to the garden settlement. The council should explore meeting unmet need with Ashford Borough Council. The development is opposed by the majority of people in the district;
- Cozumel Estates Ltd states that it supports the Otterpool garden settlement as an important part of how the council will meet its housing needs;
- The Crown Estate states raises concerns regarding the ability of the garden town to deliver new homes at pace and scale. To save placing reliance on one large option, the plan should allocate a mix of sites, including sites in settlements such as Brookland;
- The Kent Downs AONB Unit consider that, given the significant harmful impacts on the AONB that would result from the proposed strategic allocations at Otterpool and Sellindge, should other less environmentally-sensitive land not be available, then a legitimate case can be made for not meeting the district's housing need;
- CCP III Shopping Folkestone SARL states that there may not be sufficient capacity at specified times during the plan period to support retail and food and beverage development in all locations. The plan needs to consider the phasing and location of provision, not just the quantum of space; and
- It will not be possible to meet the need for retail floorspace within existing centres or the new settlement. There should be flexibility for the provision of appropriate trade counter retail floorspace within industrial estates across the district.

12.3. A further 26 representations were received to Policy SS2 during the 2019-20 supplementary consultation on the revised housing requirement. These comments raised the following issues:

- The increase to the minimum housing needs requirement should be subject to a statutory consultation of 12 weeks;
- The Home Builders' Federation (HBF) raised concerns regarding the decision to reduce the plan period by a year. The NPPG suggests that under-delivery 'may need to be considered' where a plan is being prepared part way through a plan period. The council is part way through its proposed plan period but has not accounted for under-delivery – therefore a minimum of 14,022 homes is required;

- HBF suggest that the point at which the garden settlement starts delivering new homes is pushed back beyond the first five years and that additional smaller sites are allocated. There is a minimal supply buffer of 230 homes. This does not take account that development is unlikely to be delivered as expected, nor the requirement to prepare flexible plans - a 20 per cent buffer should be added;
- Gladman support the proposed revision to the housing requirement. A robust evidential basis is needed for a windfall allowance of 95; an over-reliance should not be placed on windfall delivery. Developments of five to nine houses should be allocated and not included as windfalls;
- East Kent College (EKC) are supportive of the revised housing need figure as housing is critical to ensuring retain talent and potential within the district;
- Rother District Council considers that there is flexibility in the housing supply as the council has stated its ability to over-deliver against the identified need of 13,284 units assessed through the standard methodology;
- The number houses profiled exceeds by a difference of 231 units. This increases the risk of under-delivery;
- Camland Hythe Ltd also raise concern that the decision to reduce the plan period by a year has resulted in an uplift of 439 houses, rather than 1,116 houses to be delivered up to 2036/37. By choosing not to allocate additional sites for development or increasing densities of existing allocations, jeopardises the CSR's deliverability and flexibility.
- It is also unknown what quantum of housing has been delivered against the Standard Method requirements for the 2018/19 financial year.
- Camland Hythe Ltd requests that the Council demonstrate deliverability through the publication of its housing trajectory.
- London Ashford Airport object to the lack of consideration to the infrastructure requirements associated with the increased housing need over the Plan period. LAA provides much needed employment opportunities and should be given significant weight via a standalone policy in the CSR.
- SGN consider that the revised housing figures raise no areas of significant concern, which would result in the requirement of network reinforcement.
- The Policy has been amended to include both C2 and C3 uses as part of the growth strategy; however, associated policies elsewhere i.e. [Policy CSD2] have not been reviewed or updated to reflect the proposed changes.
- The district already exceeds the amount of housing required and thus these adjustments are not warranted
- The rate of development on Romney Marsh must be slowed down and stronger policies introduced to restrict development.
  - There has been no attempt to argue a lower housing requirement using policies available in the NPPF.
  - The reduction of housing to be delivered by the garden settlement over the plan period will result in an increase in housing (windfalls) in the contested locations.
  - The CSR resets the and increases the base line for housing without taking into account historic, under and over, performance from the respective character areas. Consequently, the Romney Marsh, which delivers housing more rapidly, locks in a higher level of housing development than prescribed relative to other areas.

### **13. Section 4.3: Place Shaping and Sustainable Settlements Strategy**

13.1. 5 representations were received relating to the supporting text of Section 4.3. Comments raised the following issues:

- It is suggested that the council should challenge national policy in regards to its housing requirement;
- The creation of Otterpool Park will increase levels of traffic and air, noise and light pollution. Public transport is minimal and so private cars will be essential;
- Quinn Estates states that the settlement hierarchy is unsound. Sellindge should be re-designated as a Service Centre;
- As demand for office accommodation is falling and the focus on leisure is now at the harbour and seafront, residential uses can be introduced into Folkestone town centre to support the shops and services which remain; and
- The Environment Agency states that, while tidal flood risk is highlighted, the plan should make it clear that the sequential approach should take into account all forms of flooding.

#### **Policy SS3: Place-Shaping and Sustainable Settlements Strategy**

13.2. 10 representations were received relating to Policy SS3. These raised the following issues:

- The Theatres Trust supports the policy for retained valuable facilities where a need for them remains;
- The Diocese of Canterbury is keen to work with the council as it has connections and facilities within the area offering close links to worshippers, schools, landowners and housing communities;
- The Crown Estate has raised concern over flood risk being taken into consideration when looking at sites. A FRA has been raised with regard to land on Romney Marsh with no objection from The Environment Agency with this being included as the site benefits from coastal defences;
- Quinn Estates raised settlement hierarchy not sound as Sellindge has been designated a Rural Centre – should be elevated to a Service Centre;
- Taylor Wimpey requests clarification respecting historic features and sustainable construction measures and cites conflict with the national and local plan policies;
- Kent County Council requests an amendment to wording on flood risks to ‘a site-specific flood risk assessment may be required for other sources of flood risk as identified within EA surface water flood mapping’;
- CCPIII Shopping Folkestone S.A.R.L. welcome the recognition that town centres have critical role to play in establishing the character and economy of settlements but would like the word “potential” removed from paragraph 4.97.

### **14. Section 4.4: Priority Centres of Activity Strategy**

14.1. 10 representations were received relating to Section 4.4 in general and stated that:



- Cozumel Estates Ltd supports the new garden settlement to include a major employment site to provide further industrial premises, town centres to accommodate the needs for retail, office and leisure uses and local centres to protect crucial services and accommodation development that maintains their viability for residents and visitors;
- Concerns have been raised on the infrastructure to support the development including fresh water supply, health and capacity on the M20;
- Concerns expressed over the need for a new garden settlement and the need for regeneration of Folkestone Town;
- CCPIII Shopping Folkestone S.A.R.L. have concerns over the retail offer being pulled away from Folkestone Town Centre to the new settlement and the impact on floorspace;
- Concerns raised over the viability of developing Westenhanger Station in terms of capacity and infrastructure;
- Quinn Estates request clarification on the proposed amendments to the CIL exemption areas at Strategic and Key Development Sites.

#### **Policy SS4: Priority Centres of Activity Strategy**

14.2. 4 representations were received relating to Policy SS4. These raised the following issues:

- Cozumel Estates Ltd considers that the map should be amended to show where the Priority Centre of Activity should be located within the garden town;
- Clarification is needed on the use of mixed-use employment sites within the plan, such as Park Farm Industrial Site;
- CCPIII Shopping Folkestone S.A.R.L considers that Policy SS4 conflates employment and town centre policies – these should be dealt with separately to avoid main town centre uses being treated as employment-generating uses.
- Cozumel Estates Ltd considers that the Policies Map should be amended to show where the Priority Centre of Activity should be located within the garden town.

### **15. Section 4.5: District Infrastructure Planning Strategy**

15.1. 12 representations were received relating to Section 4.5.

15.2. Four representations related to the section in general and raised the following issues:

- Consideration should be given to the Government's Clean Growth Strategy 2018 and Clean Air Strategy 2019 for cleaner energy and fuel sources and on-site generation of low emission energy supplies;
- There are no plans to upgrade the A20 near the new garden town and no improvements to health to support the population, including GPs' surgeries and primary and secondary healthcare; and
- Concern over the ability to support the number of new residents in terms of clean portable water and transport, particularly bus services and the development of Westenhanger, turning the new town into a dormitory town for London overspill community;

15.3. Eight other representations related to specific policies and are summarised below:

- Highways England would like to see more information on encouraging a modal shift from using cars, upgrades to highways and motorways;);
- Certain identified infrastructure upgrades appears to be missing from Figure 4.4 such as schools and flood protection; and
- Kent County Council consider the approach to broadband and fibre to be suitable for the future fibre to the premises (FTTP).

#### **Policy SS5: District Infrastructure Planning**

15.4. 12 representations were received relating to Policy SS5. These raised the following issues:

- Concern at the impact of the new settlement on road infrastructure near Canterbury, especially in line with the development of the new hospital;
- Infrastructure concerns including water, flooding, transport, including comments from CPRE;
- Stanford Parish Council raise concern regarding impact on and understanding of lorry park development;
- –Clarification is sought on what CIL Reg123 infrastructure for services – what will it be paying for including waste disposal?
- Kent County Council are concerned at the need for land for education facilities to ensure delivery at point of impact and support sustainable travel patterns
- Highways England question the infrastructure upgrades, and the need for more emphasis on sustainable travel ;
- The Diocese of Canterbury supports the development and would like to be involved in supporting the ‘social infrastructure’; and
- KCC requests the use of developer contributions/CIL to ensure that any archeologically/heritage assets/findings are archived locally due to the lack of museum space within the region.

### **16. Section 4.6: Strategic Allocations**

16.1. 196 representations were received relating to Section 4.6.

16.2. 11 representations related to the section in general. These raised the following issues:

- Kent County Council recognises that the development will make a significant contribution to the housing requirements
- Object to the proposals for a new garden settlement because of concerns with water supply, health infrastructure, employment, transport, over-population, location and environmental issues
- Camland Hythe Ltd states the garden settlement strategic allocations does not fall within previously developed land and the CSR should include sites at Nickolls Quarry;

- The Environment Agency supports the high standards set for water efficiency in the new developments;
- Historic England seeks assurance that heritage assets are protected, integrated and enhanced where possible;
- Kent County Council states that reference should be made to the need for mineral and waste safeguarding for all sites;
- Natural England states that detailed assessments will be needed to assess the potential effects and options for mitigation which will have implications for location, density and height of built development; and
- Southern & Regional Developments seek to promote land adjacent to the Martello Lakes development and state that the identified flood risk can be mitigated through the raising of ground levels.

16.3. 10 other representations related to specific policies and are summarised below:

### **New Garden Settlement**

- There is concern that Folkestone & Hythe District Council's land interests at Otterpool Park creates a perceived conflict of interests.
- The Kent Downs AONB Unit disagree with the Growth Options Report regarding landscape impacts of the proposed garden town at Otterpool on the setting of the Kent Downs AONB.;
- Objections were raised to the proposed garden settlement because of the potential impacts on transport infrastructure, health and social care, waste management, water supplies; not being able to support the increase in local population;
- The statement that 'the creation of a new town can provide substantial new infrastructure and facilities' ignore current national trends. There is no evidence to show how shortages of doctors, dentists, nurses, carers and teachers will be reversed;
- Concerns raised as to how the rural road network will be affected in neighbouring areas, such as Aldington, and what mitigation will be provided;
- Historic England supports amended text that places greater emphasis on heritage assets making a contribution to creation of a strong sense of place; and
- Unhappy with engagement with adjoining villages; and those in Ashford Borough;

### **Figure 4.5 Garden Settlement North Down – Indicative Strategy**

4 representations were received relating to Figure 4.5, the Indicative Strategy for the Garden Settlement:

- CPRE identify differences between the areas of land deemed 'suitable' for development in the Phase 2 Growth Options Report; and the areas shown in Figure 4.5, especially around Lympne Airfield. The council need to justify this departure from their consultants' recommendations;
- CPRE also have concerns about the depiction of the proposed town centre within the garden settlement, including the height of some of the buildings;
- Historic England is concerned about the entrance to Westenhanger Castle and that other heritage assets are not shown.

## **Policy SS6: New Garden Settlement – Development Requirements**

16.4. 53 representations were received relating to Policy SS6. These raised the following issues:

- Infrastructure concerns raised including roads, traffic, sewage, water, schools, waste disposal, pollution, health services (including GP surgeries and primary care services) and transport services, including buses.
- Concerns raised about perceived lack of time to comment, lack of local consultation and engagement. Lack of co-operation with FHDC, Ashford BC and other local parish councils;
- Concerns raised about the lack of protection of existing villages and the amount of civil works causing disruption for local residents. Concern that development will join three existing parishes and effectively urbanise the entire area;
- The 'requirement' is for 6,375 homes yet the planning application is for 8,500-10,000. There is no justification for the figures contained within the planning application and this illustrates that Otterpool Park is not being driven by local needs;
- Concern raised for the loss of farmland;
- Concerns raised relating to the commitment to achieving 22% percent of affordable homes;
- Ashford Borough Council consider that the policies do not contain enough details to ensure cross border matters can be addressed appropriately i.e. provision of secondary schools and their phasing and locations within the new development;
- Environment Agency requests that the aspiration for “carbon and water neutrality” is amended to “low carbon and high water efficiency”.
- Homes England in general supports Otterpool Park although there maybe inconsistencies between the PPLP and the Core Strategy with the land adjacent to the west of Lympne;
- Concern raised for the protection of archaeological sites, particularly in Newingreen and the site of the Roman Villa at Upper Otterpool;
- Kent County Council supports aspirations to encourage modal shift from the outset of the development and to encourage sustainable development and the intention for the settlement to be a beacon of best practice environmentally;
- Kent Wildlife Trust supports the sentiment that “Otterpool Park will be a beacon for best practice” however to meet the aspirations the proposal should be enhancing and integrating biodiversity into the development in accordance with the NPPF.
- Home Builders Federation do not consider the requirements in each of the allocations policies for each dwelling not to exceed 90 litres per day to be consistent with the national policy. There is sufficient evidence that standards of 110 litres per person per day can be achieved;
- Natural England supports wording referring to the mitigation of impacts on the Kent Downs AONB; although suggest reinstating the aspiration for water and carbon neutrality;
- The Canterbury Diocese supports the CSR and the incorporation of a requirement to make stakeholders central to master planning; and

- The Kent Downs AONB wraps around 3 sides of the proposed Garden Settlement. Otterpool Park will be visible from the AONB.
  - The scale and extent of the development proposed would wholly and fundamentally alter existing views out from AONB to the north from a largely undeveloped rural site to a high density built form;
  - To be determined will be the impact of lighting resulting in a loss of dark night skies, noise movement and increased activity, use of roads and added recreational pressure on the adjacent AONB.
  - Business and Town Centre uses on land between Stone Street and the A20 to the east of Westenhanger are likely to necessitate larger buildings, both in terms of height and footprint which makes their effects harder to mitigate. This would be wholly inappropriate and does not represent a 'Landscape-led development' as is being suggested, nor does it comply with proposed policy wording for the allocation.

A further 5 representations were received relating to Policy SS6 as part of the revised minimum housing needs requirement consultation. These comments raise the following issues.

- F&HDC & Cozumel Estates supports the vision of the CSR that the new garden settlement shall provide for a minimum of 5,925 new homes in a phased manner within this plan period (2019/20 to 2036/37). F&HDC & Cozumel Estates are also confident that, subject to the grant of outline planning consent, the overall the delivery rates envisaged could be achieved.
- Homes England believe there is an opportunity to accelerate delivery of the garden settlement to allow a greater number of neighbourhoods to come forward in parallel.
- EKC are supportive of the revised housing need figure as housing is critical to ensuring retain talent and potential within the district.
- Concerns raised about the potential impacts on an Area of Outstanding Natural Beauty and on local wildlife, infrastructure; and council financial borrowing.

### **Policy SS7: New Garden Settlement – Place Shaping Principles**

16.5. 37 representations were received relating to Policy SS7. These raised the following issues:

#### *General*

- Infrastructure concerns including water supply, healthcare services (especially over stretching GP services in Sellindge), transport links, loss of valuable farmland, environmental impact, air quality, road networks (especially when M20 is closed) and schools;
- Concern over the extent of more building on top of the current developments in Sellindge and the creation of a dormitory town;

- Ashford Borough Council consider that the CSR does not contain enough detail and is not precise enough to ensure that the cross border matters will be addressed appropriately (suggested amendments below).
- Concern that development would obliterate views of the AONB, destroy any natural beauty and have a detrimental impact on surrounding area, especially small villages within the Saxon Shore.

### *(1) Landscape-led approach*

- KCC appreciates that a landscape led approach has been utilised when planning for the development area & welcomes the access strategy that seeks to protect and enhance public rights of way;
- Ashford Borough Council requires amendments to the integrated water management to avoid increased flood risk downstream.
- Kent Wildlife Trust support broad statements for the ecology but are concerned that little thought has been given to how this will be achieved in practice, the impacts to the wider habitat networks or how to engage the local community to support it as an on-going process. Given scale of development greater consideration is required prior to initial masterplanning;
- Natural England - welcomes the amended wording which reflects the need for proposals to mitigate impacts on views from the Kent Downs AONB and suggested minor working amends to strengthen the engagement of the GI strategy within the plan.
- Kent Downs AONB Unit – Request that for provision of structured areas of landscaping integrated into the proposed development with space for the trees to mature and densities which allow for the planting of trees that can establish large crown between buildings. Supporting the high quality palette of materials but is imperative that building materials are chosen to mitigate impact in views from the North Downs scarp. There also concerns that there is no mention of densities for buildings other than town centre or height and scale of the buildings;

### *(2) A vibrant town centre*

- Ashford BC - Concern over cross border consultation in relation to comparison retail in terms of format, scale and location. The policy should be more explicit about the role and function of the town centre and retail provision and impact on other centres;
- Support in principle the development but requires clarity on the quantitative needs for size of units, their location and phasing.

### *(3) Village neighbourhoods*

- KCC LHA – support for the statement “neighbourhoods and town centre shall be connected by a legible network of active streets, footways, cycle ways and open space”;
- Suggested amendments by Cozumel Estates Ltd including the removal of the word “village” when describing neighbourhoods.

- Diocese of Canterbury - Community formation could be given a good more prominence and would like to be involved in working with communities to deliver this;

#### *(4) A high townscape*

- KCC supports the ambition to design a high-quality townscape and encourages early involvement of KCC and other partners of Design Codes to deliver high quality design for long term;
- CPRE support limit on light pollution but concerns raised that development will intensify this;
- Diocese of Canterbury - recognises that high quality place making will be very important and that sustainable development principles must be adopted throughout. Community formation could be given a good more prominence and they would like to be involved in working with communities to deliver this;

#### *(5) Enhancing heritage assets*

- Historic England – support for strategic open space that embraces historic landscape setting of Westenhanger Castle and the commitment to a Heritage Strategy and the changes in paragraph ‘e’ but would like to see more information on the “master plan”.
- KCC – Suggested new text to ensure both masterplan and planning application for the Garden Settlement should respect the existing heritage of the area (including Westenhanger Castle) in line with the NPPF;
- CPRE question why only the coalescence of Lympne is to be avoided.

#### *(6) Sustainable access and movement*

- KCC LHA – Part c should be amended to include Newingreen Junction as this is detailed as a key highway improvement Fig 4.4;
- KCC – Part d & h – suggest addition of improvements to offsite public rights of way to link with the new onsite network and improve the frequency of the service to upgrade to bus services, funded through developer contributions
- Dover District Council - concerns on the impact of Westenhanger Station development, should be phased to come into service at an appropriate time and not before demand is sufficient. The service will not be to the detriment of the journey times of the High Speed Service from Dover.
- Concerns raised over timings, access and viability of the development of a high speed service at Westenhanger and capacity at Ashford;
- Ashford BC - More explanation is required on key junction improvements especially to M20 Junction 9 and the impact on traffic levels;
- More clarification on Junction 11, M20 works and where the funding will come from.
- Regarding bus service needs to be detailed in line with existing services and extra links to what areas.

9 other representations related to specific policies and are summarised below:

- Historic England welcome the additional references in Paragraphs 4.177 and Paragraph 4.176.;
- Music Events at Port Lympne and Lympne Industrial Estate can have an impact on the views (from Fiddling Lane, Monks Horton and other places) from the AONB so a complete new town will not be disguised ;
- Concerns over the development of the station at Westenhanger including;
  - Not objectively addressed and will make Otterpool Park a dormitory town for London commuters;
  - Questionability of financial return and viability of completing this upgrade with questions on involvement of Network Rail;
  - HS1 timetable already running at capacity with added journey time and no capacity at London Terminals;
  - Who are being engaged to deliver the upgraded station and how will the local roads manage the increased traffic flow;
  - Aldington & Bonnington Parish Council suggest wording change from “railway station upgrade and hub will potentially deliver” to “could potentially deliver” and concern relating to the timings for the work to be completed. Have discussions take place with cross border partners on a joint working strategy; and
- Concern raised in relation to equestrian safety with a new town’s worth of traffic using the local lanes, especially when the M20 is closed.;

Other representations related to specific policies and are summarised below:

### **Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles**

16.6. 26 representations were received relating to Policy SS8. The representations raised the following issues:

- General concerns raised in relation to water supply, healthcare provision, air pollution, transport infrastructure, and archaeology to support the level of development along with the development destroying an area of outstanding beauty;
- Concern raised for the need to review the sustainability principles to cover economic, social and environmental as well as water and energy;
- Concerns raised over the ability of Affinity Water to be able to support the fresh water supply to the new development and a possible desalination plant being introduced. Question whether the potable water target can be achieved;
- Concern raised in relation to the Otterpool development encroaching onto Sellindge with no strong justification for the delivery in the chosen area with little consultation;
- Ashford Borough Council would like an amendment to show explicit requirements for waste water including phasing in relation to the proposed development to avoid harm to water quality within the surrounding area.
- Ashford Borough Council considers that amendments are required to the policies which make it clear that the use of SuDS should be designed and



- implemented to reduce flood risk downstream, especially in line with requirements of SS7;
- Southern Water amendment suggested to Policy CSD8 to ensure network reinforcement will be required at the site's "practical point of connection";
  - Dover District Council - would like to discuss in more detail the cross border water supply and quality issues in line with a Water Cycle Strategy;
  - Environment Agency are happy with the inclusion of the high standards set for water efficiency in the New Garden Settlement;
  - Cozumel Estates Ltd would like to remove reference to the 'outstanding' in the BREEAM rating as this is a particularly challenging rating and have suggested new wording;
  - KCC would like a reference to energy efficiency included in the strategy, especially with the Governments possible phased withdrawal of solid state fuels for heating and a move towards electric heating systems such as heat pumps;
  - Natural England - welcome *principle 1 a)* which includes strengthened wording for the energy strategy, which will include potential heat, power and energy networks, to take into account the AONB and its setting;
  - KCC the development of a site waste strategy will need to secure land for waste disposal and this should be at nil cost to the County;
  - KCC welcomes the inclusion of the proposals to be accompanied by a Minerals Assessment but would like the wording strengthened to include an Infrastructure Assessment;
  - Historic England state the definition of sustainable development should also include the historic environment;
  - Kent County Council is pleased to see the inclusion of section 2(iv), in which it is stated that '*sustainable access and transport shall be promoted in accordance with Policy SS7 (6)*'; and
  - Kent Wildlife Trust recommend greater and more detailed attention be given to identifying, mapping and safeguarding priority ecological networks, habitats and species in accordance with paragraph 174 of the NPPF. Need to work with relevant partners from the onset to maximise benefits to wider ecological networks that an explicit commitment to improving connectivity between designated sites and meeting BOA (Biodiversity Opportunity Area) targets for habitat creation.

7 other representation related to supporting text are summarised below:

- Concern raised over the effects of the new development on surrounding villages including road networks and dark skies policy;
- Concern raised as to how new GP's are recruited to support new surgeries and whether there will be NHS provision to support the numbers of potential residents as the development is built;
- Historic England - the definition of sustainable development should include historic environment (NPPF para. 8c); and
- KCC - welcomes considerations (4.188) to assess new development against the County Council mineral safeguarding policies as set out in the KMWLP but suggest an amendment to clarify that Policy DM8 relates to KMWLP regarding waste management policy.

## **Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management**

16.7. 19 representations were received relating to Policy SS9. These raised the following issues:

- General infrastructure concerns raised include roads, traffic, fresh water supplies, transport links, schools, environmental issues, air quality, loss of quality agricultural land, loss of views with outstanding beauty and the lack of time available for local communities to respond to the plan;
- Policy totally ignores National trends concerning the availability of healthcare and education staff and gives no evidence of how these trends are to be reversed. The plan does not offer a solution to how the fresh water supply will be managed to the new development;
- Policy fails to address in enough detail, the infrastructure support that this development is prepared to give areas outside FHDC;
- The Plan does not set out what the housing requirement is, by when, where it should be, and how many homes go to each allocation;
- Otterpool Park was never mentioned in previous plans for Sellindge;
- Ashford Borough Council - more detail should be added to the policy regarding the requirements for wastewater infrastructure and its delivery to ensure that cross boundary matters are addressed;
- Ashford Borough Council – concern raised over secondary school provision. Policy SS9 (1) is very generic, and there are no specific requirements regarding the amount, timing or location of secondary education provision within the development;
- Ashford Borough Council – The current requirements for phasing and delivery of infrastructure set out in the policy is vague, and does not include any specific requirements or parameters around the details of what infrastructure will be required and when.
- Aldington & Bonnington Parish Council – request to be included in the infrastructure developments;
- Historic England - Welcomes the inclusion of a requirement for the Community Trust or elected body responsible for the future management of the new settlement to make specific provision for a heritage facility such as museum/archive storage;
- KCC state the education need is likely to consist of up to 13FE of secondary provision and 2FE of primary provision provided on site. With the scale of developer contributions for KCC-delivered services, KCC fully expects to be included as a S106 signatory (as set out in Section 13.6 of the Otterpool Park Planning Performance Agreement);
- KCC state working collaboratively to ensure an understanding of what waste provision will look like. Pleased to note the inclusion of informal pedestrian and cycle pathways in the plan and that the proposed approach to broadband provision is suitable and adequate to deal with the necessary provision of fibre in the future; and
- Kent Wildlife Trust do not object in principle to the development of a new garden settlement at Otterpool Park but concerned that aspects of the Core

Strategy Review specific to Otterpool Park do not sufficiently take account of biodiversity to meet the requirements of paragraph 174 of the National Planning Policy Framework (NPPF).

5 Other representation relating to the supporting text are summarised below:

- Given the uncertainties that the UK faces currently, and the fact that this Plan depends entirely on private investment, the assumption that it is deliverable is extremely questionable;
- The Council's Community Infrastructure Levy (CIL) Charging Schedule will shortly be updated and the amendments will confirm that the garden settlement will be excluded from the application of the CIL. The parties would welcome further discussion regarding the boundaries of the exemption area;
- Concerns raised about the loss of valuable and beautiful countryside and farmland needed for local food supplies; and
- Aldington should be added to the opportunity for the "Smart Town" infrastructure along with the other villages listed. Other villages local to the area but in Ashford Borough should be able to benefit from the new technology and should be considered in line with cross border districts.

### **Policy SS10: Spatial Strategy for Folkestone Seafront**

16.8. 4 representations were received relating to Policy SS10. These raised the following issues:

- Kent County Council suggest revision of the working to ensure the heritage policy ensures that both the key archaeological features and their settings are preserved ; and
- The Environment Agency supports that the "Special Water Scarcity Status" in paragraph 5.57 has been clarified; and the high standards set for water efficiency in the New Garden Settlement, the Seafront, Shorncliffe and Sellindge developments, and more widely across the district. .

Other representations (2) related to specific policies are summarised below:

- Folkestone Harbour Limited would like Figure 4.6 amended to show the Sea Sports Facility already provided within the red line of the application within the immediate vicinity of The Stade to be retained; and
- A review of the planned green cycle route is required due to the topography.

### **Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone**

16.9. 5 representations were received relating to Policy SS11. These raised the following issues:

- It is suggested that the design and layout of the development should draw upon the military character of the place, and not just the scale and pattern of surrounding development. This would ensure that the new development

- makes a positive contribution to local character and distinctiveness in line with the objectives of the NPPF;
- There is concern locally that the heritage features of the site are not being preserved and that proper archaeological investigation is not being carried out;
  - The Environment Agency supports that the "Special Water Scarcity Status" in paragraph 5.57 has been clarified; and the high standards set for water efficiency in the New Garden Settlement, the Seafront, Shorncliffe and Sellindge developments, and more widely across the district; and
  - Taylor Wimpey would like paragraph i) to be amended to refer to provision of 18% affordable housing in line with outcomes of the agreed viability assessment. Reference to 30% affordable, further fails to accord with CS Policy CSD1 which amended it to 22%. .

Other representations (4) related to specific policies are summarised below:

- Taylor Wimpey seek to amend Figure 4.7 to reflect the consented planning application Reference to the provision of allotments should also be removed and the area of green space at The Stadium should also be adjusted to reflect the consented scheme;
- Taylor Wimpey also question the additional statements covering the possibility of further heritage assets following the work carried out previously by Historic England for the Hybrid planning application (Y/14/0300/SH) where relevant sites were identified; and the need to provide a "significant proportion" of homes to be flexible to the needs of residents as they age. The Council has not produced an appropriate evidence base to justify the imposition of additional requirements; and there is no requirement within the Hybrid planning permission for the delivery of any such units.

## **Part 5 – Core Strategy Delivery**

### **17. Section 5.1: Core Policies for Planning**

17.1. 128 representations were received relating to Section 5.1.

17.2. 3 representations related to the section in general. These raised the following issues:

- CPRE agree that that the assessed requirement for affordable housing translates to about 22% of the housing target over the plan period, in order to achieve 139 homes per year, however they suggest this target should be raised to 30% over the first five years of the plan;
- The stated percentage of affordable housing should be increased to meet the needs of the population from East Folkestone; and

### **Policy CSD1: Balanced Neighbourhoods**

17.3. 9 representations were received relating to Policy CSD1. These raised the following issues:

- Cozumel Estates and Quinn Estates does not object to Policy CSD1 in its current form. The policy seeks a minimum of 22% affordable housing on sites over 0.5Ha or 15 dwellings.
- Alternatively, it is widely considered that the percentage of affordable housing should remain at 30% and not reduced to 22%;
- The Kent Downs AONB Unit supports the proposed lower threshold for affordable housing provision on sites proposing 5 to 10 dwellings within the Kent Downs AONB;
- Home Builders Federation has concerns over the minimum requirements for affordable housing as this would be difficult for developers to cost their schemes easily. .
- Taylor Wimpey note that CSD1 has been updated to reflect the range of affordable housing products. They support reference to the portfolio of affordable products which would aid in the delivery of mixed and balanced communities to meet the needs of a broad range of residents. However they have concerns should the target rise it will create uncertainty for developers; and
- The policy should include 'rent to buy' as part of the range of affordable housing tenures that the Council supports;

### **Policy CSD2: District Residential Needs**

17.4. 6 representations were received relating to Policy CSD2. These raised the following issues:

- Taylor Wimpey would like wording to be amended on the mix of housing to have the ability to deliver lower proportions of 1-bed and 4+ bed houses based on working with Registered Providers should it be found they are in less demand. The Home Builders Federation supports aspirations to provide

a range and choice of homes to meet the needs of the district. However, the findings of the SHMA should not be translated into policy, rather the mix of houses should be left to the developer depending on the needs of the local area. The threshold for consideration should be increased from 15 to 50 dwellings;

- Any requirement for M4(2) compliance should be supported by sufficient evidence to justify each of the standards, with adequate flexibility to take account of site specific circumstances, such as viability. Object to the implication that all dwellings would be required to be built to M4(2) standards as it would constitute an unreasonable and inflexible approach;
- Kent County Council consider that the policy should take into account the Kent Social Care Accommodation Strategy (2014); and
- Cozumel Estates Ltd acknowledges that the policy sets aspirational targets for a range of dwelling sizes but these need to reflect the latest housing requirements for the Otterpool development. It is also requested that the provision of older person accommodation is widened to include specialist units (Class C2 and C3 (b) for the garden settlement.
- Specialist units for older people, particularly in Sellindge, will exacerbate the pressure on a GP practice that is already struggling to meet demand. It seems to be contradictory to the aim at sub-para (a);

### **Policy CSD3: Rural and Tourism Development**

17.5. 2 representations were received relating to Policy CSD3. These raised the following issues:

- CPRE consider that the wording in relation to the conversion of existing buildings that contribute to the character of their location, to be ambiguous and that further clarification is required; and
- The policy fails to comply with NPPF (para 83) in respect of the conversion of existing buildings. Acceptability should not only be dependent on the character of their location but also take account of the diversification of agricultural businesses; and the creation of rural tourism and leisure development.

One representation related to the section in general. This raised the following issue:

- The indication that Westenhanger and Lympne Castles are tourist facilities is not correct as they are for hire businesses and are not open to the public; therefore development will not increase tourism in the area.

### **Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation**

17.6. 4 representations were received relating to Policy CSD4. These raised the following issues:

- The policy needs to be more specific in its wording of features which contribute to 'diverse local landscapes' i.e. coppiced woodland, hedgerows, ponds, walkways and ancient meadows (especially where these support the AONB) and must reflect the need for attractive and high quality open spaces throughout the district;
- Kent County Council requests adding more specific information regarding no net loss of biodiversity and would like to see ecological surveys to be carried out and submitted with any planning application.
- Kent Wildlife Trust feel that more of the biodiversity principles set out in the policy need to be integrated into policies SS6-9. Some of the aspects of the CSR in respect to Otterpool Park do not take into account sufficiently biodiversity to meet requirements of Para. 174 of the NPPF.
- KWT also widely supports that Otterpool Park will be a beacon for best practice for enhancing and integrating biodiversity into the development, however comparable priority should be given to landscape quality of life and sustainability. It is recommended that attention is given to identifying, mapping and safeguarding priority ecological networks, habitats and species in accordance with the NPPF and working with partners and conservation professionals from the outset to address a number of issues; and
- Natural England strongly support the policy's commitment to incorporate and improve GI throughout the district in a long-term and meaningful way. It is suggested further information of GI and biodiversity net gain could be provided through development of a Supplementary Planning Document (SPD) in collaboration with other Kent local authorities

### **Policy CSD5: Water and Coastal Environmental Management**

17.7. 5 representations were received relating to Policy CSD5. These raised the following issues:

- CPRE questions how the policy will address existing drainage problems, especially on the Marsh, such as the foul drains around Brenzett;
- The policy ignores the reality of the actual situation in the South East where the natural aquifer has been identified as being able to only support limited development. Since the publication of the Geological Survey Report this has continued to be drawn on – how will the proposed other technologies be implemented;
- The Environment Agency supports that the "Special Water Scarcity Status" in paragraph 5.57 has been clarified;
- Concerns raised on the potable water supply for the new development;
- The "Water Cycle Study" for Otterpool Park has not been completed.
- Kent County Council are supportive of the policy for the management of surface water, referencing inclusion of Sustainable Drainage Systems ensuring that flood risk must not be increased including reference to integration of water management.

5 other representations related to the section in general. This raised the following issues:

- Concern raised over the amount of water needed to supply all the new homes planned ;
- The Environment Agency welcomes the additional information on the district falling within a “designated Water Scarcity Status Area” which will result in efforts to reduce average domestic consumption;
- What specific measures does FHDC intend to implement to reduce the per person water usage by, an average of, 34% per person from the usage experienced by Southern Water and 18% below that defined in the Building Regulations for a Water Scarcity Status Area?; and
- The Environment Agency request paragraph 5.72 is amended to "Most of the district's water supply comes from groundwater sources". Water resources must be maintained and proposed developments must not have a negative impact to public water supplies or their associated Source Protection Zones. Pollution prevention measures are required in areas of high groundwater levels and/or vulnerability.



## 18. Section 5.2: Areas of Strategic Change

18.1. 90 representations were received relating to Section 5.2.

18.2. 1 representations related to the section in general. This raised the following issue:

- CPRE raise that they couldn't find the Transport Strategy referred to in para 5.81 and requests that there needs to be an over-arching summary of the various studies and other reports presented as the evidence base in order to resolve any ambiguities between them.

18.3. Other representations related to specific policies and are summarised below.

### Policy CSD6: Central Folkestone Strategy

18.4. 3 representations were received relating to Policy CSD6. These raised the following issues:

- Theatres Trust support the promotion of cultural venues articulated throughout the policy;
- The CSR fails to recognise that residential development plays an important role in the vitality of town centres in accordance with NPPF para 85(f). The emphasis is on the harbour and sea front area, and, whilst welcomed does not provided a clear lead for the town centre itself.
- Support the guidance set out in the policy but would like a commitment to prepare a vision and masterplan for Folkestone Town Centre to co-ordinate its long-term development and ensure maximum integration with, and the complementary development of the Seafront area.

### Policy CSD7: Hythe Strategy

No representations were received relating to Policy CSD7.

### Policy CSD8: New Romney Strategy

18.5. 2 representations were received relating to Policy CSD8. These raised the following issues:

- Pentland Homes consider that the regeneration of Romney Marsh could be enhanced through sustainable development and infrastructure improvements at New Romney, over and above the objectives set out in Policies. Suggest a comprehensive residential led, mixed use development, which would facilitate significant infrastructure improvements, including a new 'By-pass' around the Eastern and Southern edge of the town; and
- Gladman Developments support growth north of the town centre, but question the need for a single masterplan given the recent planning history of the allocation.

3 other representations related to supporting text and figures are summarised below:

- Nuclear Decommissioning Authority support the Core Strategy's position on Dungeness 'A' but suggests that a clearer reference is made to support both the decommissioning and remediation of the Dungeness 'A' site, together with employment (B1/ B2/ B8) uses and development associated with energy generation.
- Natural England suggest additional wording to strengthen text relating to Lydd Airport expansion (5.121) to ensure that there are no detrimental impacts to the Dungeness designated sites; and
- Figure 5.6 Pentland Homes fully support the identification of New Romney as a "Town Centre" and feel that a comprehensive residential led development could facilitate significant infrastructure improvements including a proposed "by-pass" around the Eastern and Southern edge of the town.

### **Policy CSD9: Sellindge Strategy**

18.6. 31 representations were received relating to Policy CSD9. These raised the following issues:

- Infrastructure concerns, including roads, water, healthcare services especially the GP surgery, local school capacity, cycle, pedestrian and bridle ways potential loss of areas of historic interest, green belt and landscaping, traffic, air quality and loss of valuable farmland;
- Quinn Estates believe that 600 dwellings should be the minimum housing figure and that Elm Tree Farm should come forward before other sites in Sellindge ;
- Taylor Wimpey suggest that the policy should split the allocation of Site A and Site B to provide separate requirements for each one. There is no supporting evidence to justify C2 uses on the site. Other considerations are on the lower target on water uses, sewage requirements, energy efficiency standards, landscaping and the AONB, the upgrading of the primary school, upgraded sports facilities within the village;
- Taylor Wimpey believe the percentage of affordable housing should be amended to 20%; that the provision of allotments be removed, and that the criteria for improvements to the doctor's surgery be amended;
- Concerns raised over the impact on the countryside and urbanisation on rural areas;
- There is not adequate information of the phasing and numbers of dwellings that will be built in the development of Otterpool Park.
- The requirement for 22% affordable housing is not enough;
- Some land in Phase 2 is not available for development. There are concerns over the achievement of Phase 2 with the Section 106 agreement showing no provision for a new village hall, cycle/pedestrian access and traffic calming;

- Kent County Council request that consideration is given to requirements needed for school places and expansion to Sellindge Primary School, developer contribution and the planning permission on any land used;
- Kent County Council would like focus to be put on increasing cycle pathways, and improvements to informal traffic calming and a pedestrian and cycle routes to access Westenhanger Station;
- Concerns about the overdevelopment of Sellindge which will jeopardise the habitat it supports;
- Kent Downs AONB Unit suggest that a further criterion be included in Policy CSD9 to address the issues raised in paragraph 5.158, in addition to criterion h in Policy CSD9 which only relates to design;
- Environment Agency endorse the wording used in the policy to highlight Special Water Scarcity Status;

38 other representations related to specific policies and are summarised below:

There were a number of similar representations on Sellindge in paragraphs 5.150 and 5.162:

- Concern over the amount of traffic using the A20 through Sellindge as a result of Otterpool Park being developed in terms of air pollution, noise, mix of vehicles, especially HGV's where the road narrows within the centre of the town. Need to reconsider diverting the traffic away from Sellindge via a through road for the A20 west of Otterpool Park. The road plan for CDS9 is now incorrect;
- Linear villages are widespread within the UK and the absence of a central core is not detrimental;
- Sellindge Parish Council concerned over the delay in seeing plans for the school extension even though the land has been cleared;
- Industrial units need to be placed closer to the M20 Junction 11 and not in the village. Green space required to keep Sellindge/Barrow Hill separate from the Otterpool Park development;
- Aldington & Bonnington Parish Council questions the expanded new facilities and infrastructure to support the increase in the number of new houses in Sellindge, but there has been no consultation with neighbouring parishes and planning authorities on what impact this will have on them;
- Phase 1 of development agreed that the GP surgery would be extended and no further development would commence until this was completed. New residents will have to use other local surgeries and the possibility of new medical centres being developed for Otterpool Park will mean that the local one in Sellindge may close;
- Any 106 development funds coming from housing development must be invested in the village of Sellindge. If Newingreen are having a diversion of the A20 around them, why not Sellindge? The village is the community most impacted negatively through traffic as a result of the plans from the Core Strategy;
- Concern over the need to meet the provision of staff for an expanded surgery and primary school when the National trend is the reverse;

- Aldington & Bonnington District Council has concerns over the Growth Options Study regarding local traffic hot spots and M20 incidents;
- Sellindge is not in the Kent North Downs AONB but it lies on three sides of the village so any development must follow the AONB guidelines;
- The land close to SSSI Gibbins Brook has proposed development plans in CSD9 and is an area of special scientific interest. The expansion of Sellindge will impact the dark skies around the area;
- The listed buildings (Rhodes House, Little Rhodes) mentioned and building of local interest (Grove House, Potten Farm) should be protected and mature trees should be given Tree Preservation Orders;
- Why develop the land for employment within Sellindge when Lympe Industrial Estate is just over a mile away, which will cause an excess of HGV and van movements; and
- There is no evidence to show that technologies will be able to negate the carbon footprint produced from the CSD9 development including traffic movements and water consumption.

12 further representations were received relating to Paragraphs 5.163 – 5.166, & Figure 5.7:

- The connectivity between Phase 1 and site A is only presumed;
- The new developments at Sellindge and Otterpool Park will not benefit the local population; and
- Phase 2 will not be able to meet the criteria of meeting community needs so the development should not be supported

### **19. Section 5.3: Implementation**

19.1. 3 representations were received relating to Section 5.3. These raised the following issues:

- The Authority Monitoring Report (AMR) is not sufficiently robust as it does not show the distribution of housing across the three character areas. This is vital information for all stakeholders to make informed responses to development proposals and policy consultations The North Downs Character Area should be split into the AONB vs the Rest of the Area; and
- CCPIII Shopping Folkestone S.À.R.L would like to suggest an amendment to Para. 5.189 “The retail needs of an area should be updated on a regular basis to reflect changes in local provision and wider changes in the retail sector and economy”. This applies especially to Folkestone Town Centre.
- Historic England consider that the reference to a garden town with “its very own heritage” needs to build on the existing history of the place

A further 1 representation was received as part of the revised minimum housing needs requirement consultation. The comments raise the following issue.

- Windfall sites account for 10.5% of all dwellings. It is questionable whether this represents a cautious estimate or is deliverable?

## **Part 6 – Appendices**

### **20. Appendix 1: Monitoring and Risk**

20.1. 2 representations were received relating to Appendix 1. These raised the following issues:

- Table 6.1 does not show affordable home defined by area. The focus on Otterpool is taking attention away from the needs of Folkestone and Romney Marsh); and
- Table 6.6 – the possibility of the event (Place Competition) should be increased from ‘low’ to ‘high’. Ebbsfleet is at a more advanced stage of delivery and is a more attractive place for London Commuters to live, than Otterpool.

### **21. Appendix 2: Glossary of Terms**

21.1. 1 representations were received relating to Appendix 2. Representations raised the following issues:

- Concern over the change of the title from “Glossary of Terms and Technical Studies” to Glossary of Terms - this should be reinstated and what has happened to the table of Technical Studies?

### **22. Appendix 3: Indicative Housing Trajectory**

22.1. 1 representations were received relating to Appendix 3. Representations raised the following issues:

- It is considered that the targets presented in the bar graph are unrealistic. It is questioned whether the demand for properties will meet the anticipated schedule of delivery over the plan period.

## 23. Submission Draft Core Strategy Review – Sustainability Appraisal

23.1. 13 representations were received relating to the Sustainability Appraisal. Representations raised the following issues:

- Natural England concurs with the wording for the garden settlement policies in particular to mitigate views from the AONB, and the conclusions drawn in the Sustainability Appraisal;
- Concerns raised that the Growth Options Study is flawed in terms of transport infrastructure and capacity i.e. it fails to consider commuting patterns and travel to work areas. There is emphasis on the A20 towards Folkestone and Hythe and the B2068 to Canterbury. There is no evidence that any Growth Study Option was carried out on the A20 towards Ashford or the B2067 which links Lympe to the A2070 south of Ashford;
- The Sustainability Appraisal does not reference the neighbouring parishes adjoining Sellindge and the impact on them by the proposed developments;
- Concerns that the traffic modelling has not taken into account the parishes that border with Ashford and the impact on them with respect to traffic congestion and air quality. Aldington is not mentioned in the document. A full appraisal is required to look at the impact on all adjoining neighbourhoods;
- Paragraph 6.48 suggest that access to existing strategic road infrastructure is expected to have a positive effect on SA2 - creation of high quality and diverse employment opportunities. While it is accepted that SRN access can reduce congestion on lower-order roads which are less able to accommodate heavy traffic, Highways England aims to encourage development in locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives. As such, while limiting congestion is important, this should not be achieved in a way that could encourage an increase in overall car use, even if the road network could accommodate such traffic in that location.
- Highways England is supportive of Paragraphs 6.65 and 6.66 which attribute a positive effect on SA Objective 13 - access to sustainable modes;
- The Kent Downs AONB disagrees with many of the scores assigned in relation to the North Downs Character Area and the impacts of strategic scale development on SA Objective 3.
- The Kent Downs AONB disagrees with the SA score for Table 6.2, sub-area B of Character Area in respect of SA Objective 3 (Landscape), where proximity to and visibility from the AONB means that much of this sub area would be highly visible from the nationally protected landscape of the Kent Downs AONB. As such, it is considered that a significant negative effect would be more appropriate than the minor negative effect that has been assigned to Area B;
- The Kent Downs AONB disagrees with the SA scores for Table 7.1, Otterpool Spatial Options A & B in respect of SA Objective 3. It is considered that both Otterpool Spatial Options A & B would have negative effects in view of the visibility of the site from the highly sensitive Kent Downs landscape;
- The Kent Downs AONB disagrees with the SA scores for Table 8.2 - summary of effects following reappraisal, Policies SS1-SS4, in respect of

SA Objective 3. Allocation large scale development on land in the setting of the Kent AONB is likely to result in detrimental effects to the landscape;

- Kent County Council welcomes reference in Appendix 2, to the Energy White Paper<sup>1</sup> which aims to reduce carbon emissions. However, it is advised the target has changed to 80% by 2050 and may yet drop to 0% by 2050; and
- Sellindge Parish Council comments that Sellindge B (Appendix 4, Sellindge Spatial Options) should not be considered until after 2050. Furthermore, Sellindge Spatial Options C & D are totally unacceptable as it includes the nature reserve provided by Site B in Policy CSD9.

#### **24. Submission Draft Core Strategy Review – Historic Environment Assessment**

24.1. 1 representations were received relating to the Historic Environment Assessment accompanying the Sustainability Appraisal. These raised the following issues:

- Concern that the Roman Villa unearthed at the Otterpool Park development site will not be conserved and separated from the development.

#### **25. Submission Draft Core Strategy Review – Habitats Regulations Assessment**

25.1. 3 representations were received relating to the Habitats Regulations Assessment. These raised the following issues:

- Natural England (NE) would like minor amendments to the reference of Regulations<sup>2</sup>. The CSR and HRA should emphasise that future planning applications for the garden settlement will need a project-level HRA. The CSR HRA should make clear that the PPLP has been assessed in combination for all impact pathways (air quality and recreation pressure on European sites);
- Natural England concurs with the findings of the HRA of no likely significant effect in relation to air quality and recreational impact on the named European sites in Table 2.2. Regarding Dungeness protected sites, as the garden settlement is some distance away and will provide onsite greenspace; it will have little impact on the Dungeness protected sites. NE suggest funding for SARMS should be addressed through a tourism growth plan; and
- Natural England concurs that there are no adverse effects on the Folkestone to Etchingill Escarpment SAC for the CSR alone and in combination with air quality. NE support the commitment by the Council to undertake monitoring of air quality along the A20 close to the SAC and to review this in conjunction with Natural England.

---

<sup>1</sup> Our Energy Future 2003

<sup>2</sup> Conservation of Habitats & Species Regulation 2010 (para 2.6) should be amended to 2017