

**Preferred Options Policy**

**General Comments**

**Infrastructure**

**Otterpool & Core Strategy Review**

**Structure Of Plan**

**Neighbourhood Plans**

**Evidence Base**

**SA & HRA**

**Duty to Cooperate**



**Comments received**

Residential building should not be allowed on any green fields or agricultural land. There should not be housing development where there is no prospect of local employment.

There are too many places that you want to build on and spoil, which will in turn be a suburb of London and not be for first time buyers. Please lets keep some beautiful countryside for future generations.

Grossly over crowded

We have a principle concern that reference to LAA throughout the document, has been removed from the Local Plan. There is a significant decrease in the level of support that the Local Plan gives to LAA in principle, and in the acknowledgement of its benefits to the District in comparison to the issues and options document.

Given the high level of concern among local people about the fact that many of the new homes proposed may end up as second homes I think there should at least be a debate as to whether Shepway should follow St Ives's lead and include a condition that all new homes should be principal residences not second home

There are several references in the introductory sections (e.g. pares 3.3 (2) and 3.6) to the requirement to 'maintain' the historic environment. Although the sentiment and purpose is undoubtedly correct, this could appear to downplay the requirement of the National Planning Policy Framework

The target of 8,000 dwellings should now be a minimum as Office of National Statistics figures published since the adoption of the Core Strategy show that the need for new housing in Shepway has increased.

For a Preferred Options document one would expect a clear indication of the Councils intentions, but the document refers to further work being needed.

Southern Water supports the statement that the Local Plan will help to provide certainty about the future pattern of development in the District

No mention is made anywhere about traffic mitigation, affordable/social housing, secondary school places, nor ensuring adequate health/medical specialists, social services/services and waste management.

The draft Local Plan envisages a very substantial increase in the number of homes in and around New Romney

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

The mention of self build etc is interesting but how achievable?

Although there is support for infrastructure in a general sense within the text of the Local Plan Preferred Options document, Southern Water notes that there is no overt policy support for new or additional waste water infrastructure within policy text. Accordingly, we propose the following additional policy: New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community, subject to other policies in the development plan.

Otterpool:

Target should be revised downwards significantly to take into account the very large number of new homes that Otterpool will provide.

When can we comment the Otterpool madness?

Infrastructure would not be able to cope with both 8,000 and 12,000 homes

Shepway DC should clarify how they propose to take account of this major project and the impacts it may have on this draft plan.

This plan does not meet the infrastructure needs of new homes increasing from 8,000 to 20,000.

Oppose Otterpool although not part of this Plan

With regards to any planning in Stanford area, Highways England have proposed a 3,600 lorry holding area! Sellindge 12,000 houses! Princes Parade development in Hythe, and the outskirts of Canterbury's huge development. We say no more!

It is surprising that the plan does not, in its introductory chapter, explain the relationship of the document to the Core Strategy Review. Local people in the district will be concerned about the relationship of this plan to a potential new settlement at Otterpool (and any other strategic allocations). Strategic allocations in a Core Strategy Review will obviously have infrastructure and environmental capacity implications, which may have relevance to the proposed sites in this plan

An index having 3 introductions section 3,4 and 8 does not make an easy read.

Policy Index This should include page numbers to further aid navigation of the document.

This plan, as proposed, is not fit for purpose. As a Local Plan within the Planning process this plan should support and sit within both National policy and the Local authorities Core Strategy Local Plan. It should provide for the communities needs whilst both protecting community assets and ensuring that community infrastructure increases in capacity as development takes place. This proposed plan fails to do so.

The Places and Policies Plan, Preferred Options Policy Drafted is well planned and based on careful Consideration. The Preferred Options are Evenly and Fairly Distributed across the District, the features based upon which all of those chosen warrant Inclusion in the Policy on merit.

Pleased to see that the Local Plan Preferred Options document, is written in a greatly improved style to the Core Strategy, which immediately makes it more accessible and understandable to the public but there is concern that the published document is not in as clear, accessible or people friendly form as it could be. It is extremely lengthy, which means it is difficult to read and comprehend as a whole and there is still too much 'planning speak' which is unclear, and planning terms which are not explained.

The AONB Unit supports Shepway's commitment to actively engage with town and parish council wishing to prepare a Neighbourhood Development Plan or Order

It is disappointing that Neighbourhood Planning did not help shape the Preferred Options document.

Agree that these are an excellent way for local people to influence development and land use in accordance with local wishes

The heritage strategy is described at para 16.4 but not its relevance to decision taking. At para 6.95 with reference to Dungeness the heritage strategy is listed as an important source of advice for planning applicants but this is I think the only place where it is so referenced.

Historic England has not been consulted on a SA/SEA for the draft local plan at this stage. However, the earlier issues and Options draft Plan was accompanied by a SA/SEA which the Council, may consider is adequate for the purpose of the current draft plan.

Duty to cooperate The draft Plan does not refer to the duty to cooperate and how any strategic matters may influence the contents of the Plan

Rother District Council (RDC) acknowledges and appreciates the ongoing engagement in the preparation of SDC's Local Plan and has only relatively minor comments, primarily relating to developing effective and, where appropriate, comparable policies through continuing dialogue as our respective Local Plan progress.

KCC recognises the role of this plan in delivering the growth set out in the Shepway Core Strategy 2013 (CS), which identifies the need for a total of 8,000 homes, 20 ha business use and 35,000 sq. m retail in the 2006-2026 plan period. KCC acknowledges the other work that is concurrently being undertaken by Shepway District Council (SDC), including the Housing Market Needs Assessment; a joint study with Dover District Council, and is aware that this is work likely to result in a higher OAN figure compared to the existing CS housing figure. KCC understands that a CS partial review will be undertaken in light of this new data and will welcome the opportunity for involvement in that process.



**Response from the Council**

There are not enough previously developed sites to meet the forecasted population needs of the district, so previously undeveloped sites will need to be considered. These have been assessed in terms of the Settlement Hierarchy set out in the Core Strategy.

The amount of development being sought is to meet the requirement of the adopted Core Strategy, minus Strategic Allocations and sites with planning permission. Adopted policy in the Core Strategy seeks a distribution of development across the district.

Whilst the airport is supported by the District Council, the London Ashford Airport expansion has planning permission, so it is not considered necessary for a new policy in this Plan. References to LAA are to be added to the supporting text.

Noted. Such a policy would only be applicable to new build developments and there is no evidence to identify that there is a major problem in the district. If local neighbourhoods considered it to be a problem in their areas, they could try to address it through the Neighbourhood Plan process as was done at St Ives.

Noted, the text in this section will be updated.

The target is set out in the adopted Core Strategy. Any additional need will be considered through the Review of the Core Strategy , which is currently progressing.

The evidence base work is still ongoing as it is not possible to do all of it at once. There have been a couple of areas where the Preferred Options will be relying upon new Evidence Base (for example Open Space) but this will inform the Submission Draft, which will also be subject to consultation and then examination.

The support is noted.

The District Council has been working with Kent County Council (in terms of Education, Social Care and Highways) and the NHS and Clinical Commissioning Groups.

It is agreed that additional text should be added with regard to infrastructure and reference to the Infrastructure Delivery Plan should be added.

There are changes proposed to the policies for New Romney, including land safeguarded for a new medical hub (Submission Policy RM5: Land adjoining The Marsh Academy, Station Road, New Romney) and deletion of the allocation for Land to the South of New Romney.

A new policy is not considered necessary. Site allocations include additional criteria to meet Southern Water's requirements where specified. Core Strategy Policy XX deals with general infrastructure provision.

The Core Strategy Review will consider the options for future development based on the new Objectively Assessed Need (as required by Government guidance) for new homes in the district until 2037.

These homes will be in addition to those identified in the Places and Policies Local Plan. The District Council has to demonstrate a five year housing land supply. If this cannot be demonstrated, then this will allow ad hoc development throughout the district. There is a need for both short term smaller sites and long term developments to ensure a five year supply can be demonstrated now and can continue to be delivered in the future.

The first draft of Core Strategy Review will be published for consultation in early 2018.

It is agreed that text should be included to explain the relationship of the different plans.

Noted, but by splitting up the document it is intended to make it easier to navigate and understand. The PDF document allows the reader to navigate directly to the policies by clicking on the relevant highlighted sections.

The Plan sets out to meet the requirement in the adopted Core Strategy, which sets out the strategic requirements of the District to 2031. The Plan has also been drafted to meet the requirements of Government guidance set out in the National Planning Policy Framework and Planning Practice Guidance.

Support noted

Noted, but the plan covers a number of issues and it is not possible to reduce the size. In drafting the Plan, effort has been made to make it easier to navigate through the various sections.

It is also a document which will need to stand up to scrutiny at examination, so the wording needs to reflect the requirements of national policy.

Noted

Noted

Noted

An additional reference explaining the importance of the emerging Heritage Strategy has been included in the Heritage chapter.

The Sustainability Appraisal was out for consultation at the same time as the Local Plan. It will also be updated and published with the next draft of the Plan. It carries over the methodology which was agreed from the initial scoping exercise.

There is a paragraph in the introduction that explains the duty to cooperate. The District Council has consulted with neighbouring authorities in fulfilling its duty. Strategic issues have also been considered as part of the Core Strategy, which sets out the strategic sites and which identifies the amount of development for the district that the Places and Policies Local Plan will help to deliver.

Noted

Noted

**Action by the Council**

No changes required

Updates to supporting text.

No changes required

Updates to supporting text.

No changes required

No changes required

No changes required

A new section will be added to the Plan which will consider monitoring.

Add text to chapter explaining the relationship of the different plans.

No changes proposed.

No changes proposed.

No changes proposed.

Additional paragraphs are to be added to the Heritage chapter in the Local Plan.

No changes proposed.

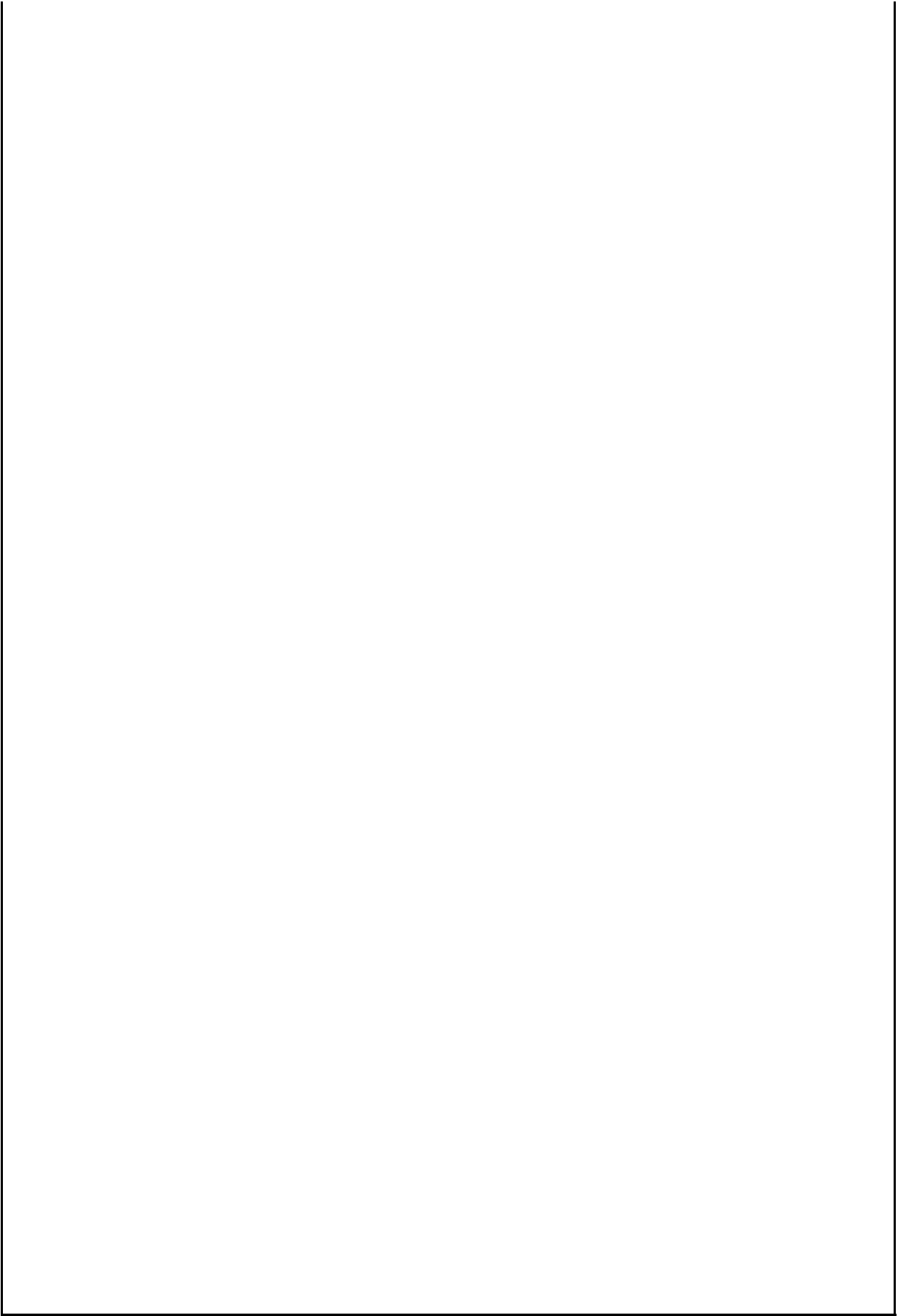
Existing paragraph to be updated.

No changes proposed

No changes propsoed







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Additional text to be inserted to
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Replace existing text with new text:  'While producing the plan, the Council has complied with the statutory Duty to Co-operate established by Section 110 of the Localism Act 2011. The Act requires local planning authorities "to engage constructively, actively and on an ongoing basis" on planning matters that impact on more than one area and to have regard to the requirements of neighbouring authorities and the approach they are taking to develop policies and allocations'.
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Preferred Options Policy	Comments received	Response from the Council	Action by the Council	Revised Submission Draft Policy
<p><b>UA1 Folkestone Town Centre</b></p> <p>Within the designated town centre area (as identified on the Policies Map), planning permission will be granted for development that provides for a range of town centre uses that adds to the vitality and viability of the town centre, particularly where it can be demonstrated that the proposal would enhance the evening economy.</p> <p>Within the Primary Shopping Frontage (as identified on the Policies Map) within the town centre, development on the ground floor will be permitted for A1 and A3 uses. Other uses will be permitted in the Primary Frontages provided that:</p> <ol style="list-style-type: none"> <li>1. They fall within the NPPF definition of 'town centre uses'; or</li> <li>2. They fall under D1 or C1 uses and provide a complimentary function to the town centre; and</li> <li>3. They would not create a continuous frontage of two or more non A1 uses.</li> </ol> <p>Within the Secondary Shopping Frontages (as defined on the Policies Map) proposals for development, redevelopment or change of use for Class A1, A2 and A3 (A4, A5) uses will be permitted, provided that:</p> <ol style="list-style-type: none"> <li>1. They fall within the NPPF definition of 'town centre uses'; or</li> <li>2. They fall under B1, C1, D1 or D2 uses, retain an active shop frontage and provide a complimentary function to the town centre:</li> </ol> <p>Proposals for larger retail developments will be permitted at:</p> <ol style="list-style-type: none"> <li>1. The area around and including the bus station, providing that a suitable alternative location for the bus station can be provided; and</li> <li>2. Through the consolidation of smaller retail properties in Guildhall Street, or the redevelopment of land to the north of St Eanswythe Way (including the car park).</li> </ol> <p>For development proposals that fall within the town centre uses definition that cannot be located within the designated town centre area, permission will be permitted provided that:</p> <ol style="list-style-type: none"> <li>1. The sequential approach set out in the NPPF and the NPPG has been followed;</li> <li>2. A full impact assessment is provided of the impact that the proposal would have on the retail health of Folkestone Town Centre and other town centres, relating to the scale and the type of development proposed in compliance with the requirements of the NPPF and NPPG;</li> <li>3. It can be demonstrated that the site is in an accessible location and well connected to the town centre enabling easy access on foot, by bicycle and public transport.</li> <li>4. The overall design, including parking and landscaping, complies with Policy HB1 of this Plan and reflects the character of the streetscene in which it is located together with the wider built context;</li> <li>5. Acceptable vehicular access and, if required, service yard, can be provided without harm to the living conditions of local residents.</li> </ol>	<p>Policy focus on larger retail developments risks being outdated. Retail industry is changing; equal or greater weight should be given to other town centre uses such as offices and leisure development.</p>	<p>The Shepway Town Centre Survey (2016) identifies that the majority of Folkestone's retail stock (72%) consists of small and constrained units (generally under 200m<sup>2</sup>). Small and inflexible retail premises are of limited attractiveness to national retailers, who prefer larger-floorplate stores with maximum street frontage. Whilst evidence shows that the current demand for Folkestone is limited; demand is linked to quality provision.</p> <p>Furthermore, draft Policy UA1: Folkestone Town Centre proposes that other town centre uses that do not fall within the A1 (shops) and A3 (food and drink) use classes (including business and leisure uses) will be permitted in the Primary Shopping Frontage provided that they would not create a continuous frontage of two of more non-A1 uses.</p>	<p>No action proposed.</p>	<p>Officers considered that the Places and Policies Local Plan would read more fluidly if the Policies relating to town centres and retail and leisure development were grouped together. Therefore the decision was taken to move Policies UA1 Folkestone Town Centre, UA2 Cheriton District Centre, UA3 Sandgate Local Centre, UA20 Hythe Town Centre, RM1: New Romney Town Centre; and site policies UA4 and UA5 into a new Retail and Leisure Chapter.</p> <p><b>RL2 Folkestone Town Centre</b></p> <p>Within the designated town centre area (as identified on the Policies Map), planning permission will be granted for development that provides for a range of town centre uses that adds to the vitality and viability of the town centre, particularly where it can be demonstrated that the proposal would enhance the evening economy. Residential development will also be permitted on upper floors where it would enhance the vitality and viability of the centre and not lead to the loss of town centre uses or active frontages at street level.</p>
	<p>Folkestone not large enough for 3 commercial areas (Town Centre, Harbour and Park Farm); Park Farm and Folkestone Harbour should complement the town centre and not weaken it.</p>	<p>The ShepwayTown Centre Survey (2016) identifies a requirement for 12,800m<sup>2</sup> net additional comparison goods floorspace by 2031.</p> <p>The National Planning Policy Framework (23) states that the LPA should 'allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres'. At present, the Town Centre boundary consists mostly of small and constrained premises with limited deliverable opportunities to develop the larger modern footplate stores required by national retailers. Where suitable and viable town centre sites are not available, the National Planning Policy Framework guides LPA's to 'allocate appropriate edge of centre', ... 'or other accessible locations that are well connected to the town centre' having regards to the sequential test.</p> <p>The sequentially preferable sites that could accommodate the identified retail need would be Folkestone Harbour which currently benefits from planning consent for 500m<sup>2</sup> of A1 comparison retail floorspace; and the former Silver Spring site.</p>	<p>No action proposed.</p>	<ol style="list-style-type: none"> <li>1. Within the Primary Shopping Frontage (as identified on the Policies Map) development on the ground floor will be permitted for A1 (shops) and A3 (restaurants and cafes) uses. Other uses will be permitted in the Primary Frontages where: <ul style="list-style-type: none"> <li>•They fall within the National Planning Policy Framework definition of town centre uses; or</li> <li>•They fall under D1 (non-residential institutions) or C1 (hotel) uses and provide a complementary function to the town centre; and</li> <li>•They would not create a continuous frontage of two or more non-A1 (shops) uses; and</li> <li>•In the case of appropriate sui generis uses they would create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area.</li> </ul> </li> <li>2. Within the Secondary Shopping Frontages (as defined on the Policies Map) proposals for development, redevelopment or change of use for Class A1 (shops), A2 (financial and professional services) and A3 (restaurants and cafes), A4 (drinking establishments) and A5 (hot food takeaways) uses will be permitted, provided that: <ul style="list-style-type: none"> <li>•They fall within the National Planning Policy Framework definition of town centre uses; or</li> <li>•They fall under B1 (business), C1 (hotels), D1 (non-residential institutions) or D2 (assembly and leisure) uses, retain an active shop frontage and provide a complementary function to the town centre; and</li> <li>•They would not create a continuous frontage of three or more A5 (hot food takeaway) units.</li> </ul> </li> </ol>
	<p>Internal discussion that the policy as drafted would have precluded certain uses in the town centre that would create an active frontage and positively contribute towards enhancing the vitality and viability of the centre.</p>	<p>The current policy should be amended to be more flexible to allow 'appropriate sui generis uses' in the Town Centre.</p>	<p>Amend Policy UA1 (reassigned Policy RL2) to include the following text as further clarification on the 'other uses permitted in the primary frontage'</p> <p>•In the case of appropriate sui generis uses they would create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area.</p>	<ol style="list-style-type: none"> <li>3. Proposals for retail development and other town centre uses will be permitted at: <ul style="list-style-type: none"> <li>•The area around and including the bus station, providing that a suitable alternative location for the bus station can be provided; and</li> <li>•Through the consolidation of smaller retail properties in Guildhall Street, or the redevelopment of land to the north of St Eanswythe Way (including the car park).</li> </ul> </li> </ol> <p>Development proposals within the town centre uses definition that cannot be located within Folkestone Town Centre will be judged against Policy RL8.</p> <p><b>RL8 Development Outside Town, District and Local Centres</b></p> <p>Planning permission for town centre uses outside the Major Town Centre, Town Centre, District Centres and Local Centres will be permitted provided that:</p> <ol style="list-style-type: none"> <li>1. The sequential approach set out in the National Planning Policy Framework and Planning Practice Guidance has been followed;</li> <li>2. A full assessment is provided of the impact that the proposal would have on the retail health of all centres that are likely to be affected, relating to the scale and the type of development proposed in accordance with the requirements of the National Planning Policy Framework and Planning Practice Guidance. In addition, the assessment should demonstrate: <ul style="list-style-type: none"> <li>- The extent to which the market profile of the development proposed will compete with existing facilities in town centres;</li> <li>- The potential for relocation of businesses currently trading in town centre to out-of-centre locations;</li> <li>- The impact on linked trip spending between different town centre uses or businesses;</li> <li>- The cumulative effect of more than one development coming forward at the same time; and</li> <li>- The impact through trade diversion on the role and function of a centre or centres.</li> </ul> </li> </ol>
	<p>The quantitative retail capacity figures in Table S.1 need to be updated to include recent permissions. The retail floorspace requirements need to be phased across the plan period as specified by the findings of the Town Centre Study and the draft allocations do not set out the likely quantum of floorspace to be delivered against the phased capacity.</p>	<p>The table sets out and phases the cumulative quantitative retail floorspace requirements for the District over the Plan period to 2031. A paragraph will be inserted into the supporting text to set out the recent permission at Folkestone Harbour. A quantum of floorspace will also be set out in allocations where retail is proposed (former Silver Spring). Any outstanding retail need not identified within the the PPLP will be reviewed as part of the Core Strategy Review.</p>	<p>Insert the following text at paragraph 11.23</p> <p>The district's retail needs are still able to be met in the early stages of the plan period through the planning permission at Folkestone Harbour (Y12/0897/SH), which includes 500sqm of A1 comparison floorspace, in addition to a further 3,100sqm which is proposed as part of the mixed-use allocation at the former Silver Spring site (Policy RL11). The outstanding 9,200sqm retail requirements will be identified through a future plan review.</p>	<ol style="list-style-type: none"> <li>2. A full assessment is provided of the impact that the proposal would have on the retail health of all centres that are likely to be affected, relating to the scale and the type of development proposed in accordance with the requirements of the National Planning Policy Framework and Planning Practice Guidance. In addition, the assessment should demonstrate: <ul style="list-style-type: none"> <li>- The extent to which the market profile of the development proposed will compete with existing facilities in town centres;</li> <li>- The potential for relocation of businesses currently trading in town centre to out-of-centre locations;</li> <li>- The impact on linked trip spending between different town centre uses or businesses;</li> <li>- The cumulative effect of more than one development coming forward at the same time; and</li> <li>- The impact through trade diversion on the role and function of a centre or centres.</li> </ul> </li> </ol>
	<p>Supportive of development that provides for a range of town centre uses that adds to the vitality and viability of the town centre; flexible approach to the types of uses that would be permitted within the Primary Shopping Frontage; and larger retail development opportunities for the Bus Station and Guildhall St. However, caution should be exercised not to create a significant number of non-retail uses adjacent to one another.</p>	<p>Support noted. Draft Policy UA1: Folkestone Town Centre proposes that other town centre uses that do not fall within the A1 (shops) and A3 (food and drink) use classes (including business and leisure uses) will be permitted in the Primary Shopping Frontage provided that they would not create a continuous frontage of two of more non-A1 uses.</p>	<p>No action proposed.</p>	<ol style="list-style-type: none"> <li>3. It can be demonstrated that the site is in an accessible location and well connected to the centre enabling easy access on foot, by bicycle and public transport;</li> <li>4. The proposed development does not have a significant detrimental impact on the highway network in terms of congestion, road safety and pollution;</li> <li>5. Acceptable vehicular access and, if required, service space, can be provided without harm to the living conditions of local residents; and</li> <li>6. The design, including parking and landscaping, complies with Policy HB1 and reflects the character of the local street scene and wider built context.</li> </ol> <p>For the purposes of this policy, the following impact thresholds will be applied:</p> <p>Outside the Major Town Centre, Town Centre and District Centres - 500sqm gross; and Outside Local Centres - 200sqm gross.</p> <p>The threshold will be based on the nearest centre to the proposal.</p> <p>To avoid cumulative developments that exceed these thresholds, an impact assessment will be required if the threshold is breached in one year by more than one planning application.</p>
	<p>Unable to identify any potential 'alternative location for the bus station' to enable the existing site to be redeveloped for larger retail uses.</p>	<p>It would be helpful if going forward Stagecoach could provide some additional context in respect of the current operational requirements for existing (and future) bus services that utilise Bouverie Square. Specifically, it is queried whether there is scope to introduce layover periods on the network at locations away from Bouverie Square, whilst working to the same timetable arrangements</p> <p>It is also noted that the existing stop at the northern extent of the site accessed from Middleburg Square exclusively serves National Express services comprising only 4 departures a day. Accordingly, there could be an opportunity to revised network arrangements to better utilise this stop.</p>	<p>No action proposed.</p>	<p>No action proposed.</p>

Consideration should be given to introducing a locally set threshold for requiring retail impact assessment. In the region of 300-500sqm	<p>The Shepway Town Centre Survey (2016) concluded that developments of less than 2,500m<sup>2</sup> could potentially cause significant adverse affects on some of Shepway's retail centres, depending on the occupier and location. It is agreed that without a locally set threshold such developments would not be required under the National Planning Policy Framework to undertake an impact assessment as part of any planning application.</p> <p>The Town Centre Survey recommends the inclusion of a locally set threshold for requiring a retail impact assessment as follows:</p> <ul style="list-style-type: none"> <li>• Development outside Town or District Centres: Over 500m<sup>2</sup> Gross; and</li> <li>• Development outside Local Centres: Over 200m<sup>2</sup> Gross</li> </ul> <p>In assessing the likely impact of a proposed retail development as required in paragraph 26 of the National Planning Policy Framework, local authorities have to judge 'the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area'.</p>	Draft new Policy RL8: Development outside Town, District and Local Centres, in a new Retail and Leisure Chapter that sets out the policy position regarding larger retail development proposals that cannot be located within the designated town centre area (previously included in Policy UA1); and sets a locally set threshold for requiring retail impact assessment to be undertaken.
A more integrated approach and improved connectivity for Guildhall Street. Possible measures inc. reducing the number of shops; de-pedestrianisation, allow wider range of uses provided non-retail stretches not too extensive.	The Shepway Town Centre Survey (2016) identified two potential areas for future investment within Folkestone Town Centre - the Bus Station, adjacent to Bouverie Place, and Guildhall / Shellons Street, which have both been promoted through draft Policy UA1. Although it is not possible to allocate these specific sites at this stage, it is hoped that Policy UA1 will draw the attention of possible investors and/or provide the basis for any future masterplanning work that stimulates the regeneration of these areas.	No action proposed.
Policy should reflect positive contribution that residential development can make to enhance the vitality and viability of Folkestone Town Centre	The National Planning Policy Framework (paragraph 23) recognises that residential development can play an important role in ensuring the vitality of centres and sets out policies to encourage residential development on appropriate sites.	Amend Policy UA1 (reassigned Policy RL2) to include the following text:  'Residential development will also be permitted on upper floors where it would enhance the vitality and viability of the centre and not lead to the loss of town centre uses or active frontages at street level'.
An up to date character appraisal and management plan for the Old Town Conservation Area would help to guide development proposals.	Kent County Council is in the process of preparing a Heritage Strategy for Shepway District Council. The Heritage Strategy work to date has fed into the development of the draft Places and Policies Local Plan and the Heritage Strategy will itself be subject to consultation.	No action proposed.
The policy should include mention of the historic character of the town centre so that this is properly taken account of. Within the Conservation Area consideration might be given to the development of specific guidance for Shop Fronts and Signage.	Kent County Council is in the process of preparing a Heritage Strategy for Shepway District Council. The Heritage Strategy work to date has fed into the development of the draft Places and Policies Local Plan and the Heritage Strategy will itself be subject to consultation.	No action proposed.
Folkestone's Town Centre Heritage is in need of widespread protection: The Bayle, The Leas, the Creative Quarter etc. include buildings such as Debenhams and the Post Office.	Kent County Council is in the process of preparing a Heritage Strategy for Shepway District Council. The Heritage Strategy work to date has fed into the development of the draft Places and Policies Local Plan and the Heritage Strategy will itself be subject to consultation.	No action proposed.
The semi-ring road layout around the Town Centre dates back to serving the Ferry terminal – could this be improved / phased out to provide a more attractive approach.	<p>Recent improvements to the historic one-way system have been implemented to provide improved public transport penetration between the town centre and Folkestone Seafront via Tontine Street, alongside making The Tram Road two-way working to improve route choice. These improvements have maximised the benefit derived for users of the local highway network (all modes) and involved minimal physical alterations.</p> <p>The request made to phase out what is referred to as 'the semi ring-road layout' is rather more challenging owing to the demand for on-street parking on typically Victorian residential streets that lack off-street car parking. Furthermore, the orientation/interaction of the road network and junction connections, coupled with changes in topographic height, present further difficulties to remodel the network and actually derive a net benefit in terms of network performance.</p> <p>The District Council will investigate the feasibility/benefit of altering elements of the one-way network, and any identified interventions are expected to be captured as part of the Infrastructure Delivery Plan update currently underway.</p>	No action proposed.
Connections between Town, Station and Seafront (Harbour) need urgent reappraisal.	In 2015, Kent Country Council, in partnership with Shepway District Council, embarked on delivering a network of pedestrian signage in Folkestone to help visitors navigate around the town and explore new areas. The signage focused on getting people from Folkestone Central Station to the town centre, the Harbour and the Leas. The signage has been well recieved.	No action proposed.
Folkestone needs to develop / promote the night-time economy in secondary areas like Rendezvous St.	<p>The Shepway Town Centre Study (2016) identified the absence of an evening economy as one of the key areas which needs to be addressed in order to ensure the long term vitality and viability of the town. It also identifies scope for approximately 4,200 sq.m (gross) of A3-A5 floorspace across the District, with an acute qualitative need for an improved evening economy within Folkestone town centre, particularly in respect of 'family dining' restaurants and multiplex cinema.</p> <p>The Study also identified two potential areas for future investment - The Bus Station and Guildhall / Shellons Street, which in turn have been promoted through draft Policy UA1. Although it is not possible to allocate specific sites at this stage, the policy will hopefully draw the attention of possible investors and/or provide the basis for any future masterplanning work.</p>	No action proposed.

	The town centre outlined does not take into account the retail businesses in Bouverie Road West, Langhorne/Clifton Gardens, The leas Cliff Hall and Channel Suite/ The Leas Pavillion, St Mary's & St Eanswythe Church and Church Street?	The Shepway Town Centre Survey (2016) identified that for the most part, the Secondary Shopping Frontages were struggling with increased levels of vacancy.  To address the issue, officers decided to consolidate the Town Centre boundary. This would require businesses looking to set up in areas such as Bouverie Road West to demonstrate that there are no other sequentially preferable sites available in the recognised Primary and Secondary Frontages in the first instance, so as to support and strengthen the existng shopping areas.	No action proposed.	
<b>UA2 Cheriton Local Centre</b>  Within the Local Centre of Cheriton, as defined on the Policies Map, proposals for the development, redevelopment or change of use for Class A uses (1 to 5) will be permitted. Other uses will be permitted provided that they would not create a continuous frontage of three or more A3 units and meet the requirements in Policy HW1 Promoting healthier food environments.	Internal discussion it was considered that Policy UA2 as drafted would have precluded certain uses in the town centre that would create an active frontage and positively contribute towards enhancing the vitality and viability of the centre.	The current policy should be amended to be more flexible to allow 'appropriate sui generis uses' in the District Centre.	Amend Policy UA2 (reassigned Policy RL5) to include the following text:  'Appropriate sui generis uses they would create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area'.	<b>RL5 Cheriton District Centre</b>  Within the District Centre of Cheriton, as defined on the Policies Map, proposals for the development, redevelopment or change of use to Class A uses (1 to 5) (shops, financial and professional services, restaurants and cafes, drinking establishments and hot food takeaways) will be permitted.  Appropriate sui generis uses will be permitted providing they create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area. Other town centre uses will be permitted provided that they would not create a continuous frontage of three or more A5 units and meet the requirements in Policy HW1: Promoting Healthier Food Environments.  Planning permission will be granted for change from a town centre use where:  1.The proposed use is not detrimental to residential amenity; 2.There is evidence to demonstrate that there is no demand for the continued use of the premises for retail or community uses; 3.The existing use is no longer viable and the property has been actively marketed at a reasonable rate for a period of at least 12 months and no reasonable offers have been made; and 4.The proposed use does not threaten the vitality and viability of the district centre and retains an active frontage at street level.  Development proposals within the town centre uses definition that cannot be located within Cheriton District Centre will be judged against Policy RL8.
	Internal discussion regarding concerns that an increasing number of retail units in Cheriton and Sandgate are being lost to residential dwellings	The current policy should be strenthered to resist the conversion of retail units in the District and Local Centres to residential. New criteria to be added to Policy UA2	Amend Policy UA2 (reassigned Policy RL5) to included the following text  Planning permission will be granted for change from a town centre use where:  1.The proposed use is not detrimental to residential amenity; 2.There is evidence to demonstrate that there is no demand for the continued use of the premises for retail or community uses; 3.The existing use is no longer viable and the property has been actively marketed at a reasonable rate for a period of at least 12 months and no reasonable offers have been made; and 4.The proposed use does not threaten the vitality and viability of the district centre and retains an active frontage at street level.	
<b>UA3 Sandgate Local Centre</b>  Within the Local Centre of Sandgate, as defined on the Policies Map, proposals for the development, redevelopment or change of use to Class A1 and A3 uses will be permitted. Other non-residential town centre uses will be permitted provided that: 1. They fall under D1 or C1 uses and provide a complimentary function to the village centre: and 2. They would not create a continuous frontage of two or more non A1 uses.	Supportive of the policy to protect the commercial hub of the Sandgate Local Centre Internal discussion it was considered that Policy UA3 as drafted would have precluded certain uses in the town centre that would create an active frontage and positively contribute towards enhancing the vitality and viability of the centre.	Comment noted. The current policy should be amended to be more flexible to allow 'appropriate sui generis uses' in the Local Centre.	No action proposed. Amend Policy UA3 (reassigned Policy RL6) to include the following text:  'Appropriate sui generis uses they would create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area'.	<b>RL6 Sandgate Local Centre</b>  1.Within the Local Centre of Sandgate, as defined on the Policies Map, proposals for the development, redevelopment or change of use to Class A1 (shops) and A3 (restaurants and cafes) uses will be permitted; 2.Appropriate sui-generis uses will be permitted providing they create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area. Other town centre uses will be permitted provided that they would not create a continuous frontage of three or more A5 units and meet the requirements in Policy HW1: Promoting Healthier Food Environments; 3.Other non-residential town centre uses will be permitted provided that: •They fall under D1 (non-residential institutions) or C1 (hotels) uses and provide a complementary function to the local centre; •They would not create a continuous frontage of two or more non-A1 (shops) uses; and 4.Planning permission will be granted for a change from a town centre use where: •The proposed use is not detrimental to residential amenity; •There is evidence to demonstrate that there is no demand for the continued use of the premises for retail or community uses; •The existing use is no longer viable and the property has been actively marketed at a reasonable rate for a period of at least 12 months and no reasonable offers have been made; and •The proposed use does not threaten the vitality and viability of the local centre and retains an active frontage at street level.  Development proposals within the town centre uses definition that cannot be located within Sandgate Local Centre will be judged against Policy RL8.
	Internal discussion regarding concerns that an increasing number of retail units in Cheriton and Sandgate are being lost to residential dwellings	The current policy should be strenthered to resist the conversion of retail units in the District and Local Centres to residential. New criteria to be added to Policy UA3	Amend Policy UA3 (reassigned Policy RL6) to included the following text  Planning permission will be granted for change from a town centre use where:  1.The proposed use is not detrimental to residential amenity; 2.There is evidence to demonstrate that there is no demand for the continued use of the premises for retail or community uses; 3.The existing use is no longer viable and the property has been actively marketed at a reasonable rate for a period of at least 12 months and no reasonable offers have been made; and 4.The proposed use does not threaten the vitality and viability of the district centre and retains an active frontage at street level.	
<b>UA4 Silverspring Site Park Farm</b>  The former Silver Spring site, Park Farm, as defined on the Policies Map, has been allocated for mixed use development consisting of business uses (B1), leisure (D) retail (A1) and hotel (C1). Proposals for mixed use development will be permitted provided that: 1. There is a comprehensive approach to development of the whole site so that any individual elements would not prejudice the implementation of the whole site 2. A suitable access or accesses can be established onto the wider highway network 3. Transport improvements are made to encourage cycling and walking and to provide a bus stop 4. Any potential contamination from earlier uses is investigated and mitigated 5. A full assessment is provided outlining what the impact of any proposed town centre uses would have on the vitality and viability of Folkestone Town Centre and other town centres, relating to the scale and the type of development proposed in compliance with the requirements of the NPPF and NPPG	The policy description should read 'The Former Silver Spring Site'.	Comment noted.	Policy description will be amended to read 'The Former Silver Spring Site'	<b>RL11 Former Silver Spring Site, Park Farm</b>  The former Silver Spring site, Park Farm, as defined on the Policies Map, is allocated for mixed-use development comprising up to 10,000sqm of office space (B1), 3,100sqm of non-food retail (A1) with supporting leisure (D2), restaurants and café (A3) uses and a hotel (C1).  Mixed-use (non-residential) development proposals will be supported where: 1. There is a comprehensive approach to the development of the site so that any individual elements would not prejudice the development of the whole site; 2. The existing access, or any new suitable accesses can be established, onto Park Farm Road is to the satisfaction and approval of the Local Highway Authority; 3. Any required off-site highway improvements are delivered to the satisfaction and approval of the Local Highway Authority; 4. It promotes and encourages the use of sustainable transport, including improvements to
	No guidance is given as to the quantum of floorspace that could be provided on site and therefore the acceptable split of the proposed uses.	Since the publication of the Places and Policies Local Plan (Preferred Options) the site promoter for the former Silver Springs site has suggested that the mix of uses (in particular the A1 element) promoted in Policy UA4 is unviable. An alternative scheme is currently being prepared for consideration. Once the detail of a new scheme emerges the quantum of floorspace to be provided on site and the split between the Use Classes will be set out in the site policy.	Amend Policy UA4 (reassigned Policy RL11) to include the maximum quantum of floorspace for prosoed B1 and A1 Use Classes.  A scheme for the regeneration of the former Silver Spring site is currently evolving. Precise floorspaces for uses classes are not yet known, although it is envisaged that it will be predominately employment-led with a mixed of complementary uses. (see Policy RL11: Former Silver Spring Site, Park Farm).	

6. The site is investigated and evaluated to establish if it is of archaeological interest and if so an appropriate mitigation strategy is prepared and implemented.	The Council's resistance to any residential development counters the NPPF and Government aspirations for permission in principle on brownfield land.	Local planning authorities are required to publish a 'Brownfield Register' of sites by the end of 2017; Shepway District Council's Brownfield Register is available to view on the Council's website. The Town and Country Planning (Permission in Principle) Order 2017 allows sites entered on part 2 of the registers to be granted permission in principle, a new form of upfront consent. However, Councils will be required to "have regard to" the Local Plan and the National Planning Policy Framework (National Planning Policy Framework) when deciding which sites are suitable for housing and whether to include them on their registers.	No action proposed.	<p>footpaths, cycle facilities and routes in accordance with the Shepway Cycle Strategy, and provides a bus stop(s);</p> <p>5. Appropriate and proportionate contributions, through a Section 106 agreement, are made towards providing improved bus services;</p> <p>6. There is a high quality of design that responds to the site's location within the setting of the AONB, paying particular regards to materiality, massing and roofscape;</p> <p>7. Any potential contamination from former uses is investigated, assessed and if appropriate, mitigated as part of the development;</p> <p>8. An impact assessment is provided, outlining what impact any proposed retail and leisure use would have on the vitality and viability of Folkestone Town Centre and other centres, in accordance with Policy RL8 and the NPPF; and</p> <p>9. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>
Park Farm has increased its market share of retail and leisure uses in recent years, which is having a direct impact on the vitality and viability of Folkestone Town Centre	It is acknowledged that Park Farm has increased its market share of retail and leisure uses in recent years.	Folkestone Town Centre consists mostly of small and constrained premises with limited deliverable opportunities to develop the larger modern footplate stores required by national retailers. Where suitable and viable town centre sites are not available, the National Planning Policy Framework (paragraph 23) guides local planning authorities to 'allocate appropriate edge of centre sites for main town centre uses', ... 'or other accessible locations that are well connected to the town centre' having regards to the sequential and impact tests.	No action proposed.	
Park Farm is not a suitable location for a hotel - catering and hospitality sector is over represented.	Folkestone Town Centre has limited deliverable opportunities to develop main town centre uses including hotels.	The former Silver Spring site is allocated for mixed-use development a significant element of which is likely to be offices. A hotel can be a complementary use to capture the transient business traffic generated by office/conferences.	No action proposed.	
Park Farm is not a suitable location for significant quantum of good quality office development.	Shepway has many assets upon which to build and to attract further investment. We need 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 Shepway in the future. There is unsatisfied demand across many sectors with many commercial buildings that are available are too old and of poor quality to meet occupier needs. The Shepway Economic Development Strategy 2015-2020 indicates that existing employment land allocations (Local Plan 2013 Review) are in the wrong locations to meet current business demand in the sectors that have been identified as having growth potential. Therefore, the Plan needs to explore opportunities for identifying new employment sites in and around the three M20 junctions. (See Policy RL11: Former Silver Spring Site, Park Farm).	The National Planning Policy Framework (paragraph 23) guides local planning authorities to 'allocate appropriate edge of centre site for main town centre uses', ... 'or other accessible locations that are well connected to the town centre' having regards to the sequential and impact tests. (see Policy RL11: Former Silver Spring Site, Park Farm).	No action proposed.	
Criterion 1 adds an unnecessary and unreasonable layer of restriction and uncertainty to the policy. Limited interest has been shown in the site, therefore vital to capture credible occupier interest to kick-start the redevelopment of the site.	Officers consider that it is important to promote a comprehensive Masterplan approach to the redevelopment of the former Silver Spring site to ensure that if part of the site were to be developed that it would not compromise the remaining parts; and that the new mix of uses can operate alongside one another in a properly planned development that ultimately does not create problems for the end occupants. (See Policy RL11: Former Silver Spring Site, Park Farm).	No action proposed.	No action proposed.	
In criterion 2, the reference to the wider highway network is ill defined and unreasonably related to the site. There is no reference to the existing (established) access to the site. It should refer to the need for any new access proposals onto Park Farm Road to meet the policy requirements and standards of the County Highway Authority .	Given the extent of site's roadside frontage with Park Farm Road and the provision of an existing highway access, it is considered that a highway layout could be promoted to the satisfaction of the local highway authority, subject to further discussion that would occur as/when the site is promoted as a planning application.	Amend Policy UA4 criteria 2 (reassigned Policy RL11) to read:	'The existing access, or any new suitable accesses can be established, onto Park Farm Road is to the satisfaction and approval of the Local Highway Authority.'	
The policy should specify that the cycle improvements should provide facilities and routes in accordance with the Shepway Cycle Strategy. It should enable the completion of the Park Farm Road and Kingsmead segregated cycle paths.	Comment noted.	Amend Policy UA4 criteria 4 (reassigned Policy RL11) to read:	'It promotes and encourages the use of sustainable transport, including improvements footpaths, cycle facilities and routes in accordance with the Shepway Cycle Strategy, and provides a bus stop(s).'	
Add new criterion, that requires a high level of design to respond to the sites location within the setting of the AONB.	Comment noted.	Amend Policy UA4 (reassigned Policy RL11) to read:	'There is a high quality of design that responds to the site's location within the setting of the AONB, paying particular regards to materiality, massing and roofscape.'	
Development proposals should contribute necessary funds to extend service hours of the No.73 bus (Stagecoach).	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	Amend Policy UA4 (reassigned Policy RL11) to read:	'Appropriate and proportionate contributions, through a Section 106 agreement, are made towards improved bus services.'	
UA5 Former Harbour Railway Line	Supportive of the protection of the former railway line as a linear park promoting sustainable means of transportation.	Support for Policy UA5 noted.	No action proposed.	RL12 Former Harbour Railway Line



<p>The former Harbour Railway Line, as defined on the Policies Map, has been allocated for a linear park, promoting active travel by providing a cycle and pedestrian route to the harbour area, together with visitor car parking.</p>	<p>The Tram Road Link Walkway and Cycleway is a future scheme in the Local Transport Plan 4 (LTP4). The Local Plan aims to safeguard this to protect it from any incremental development.</p>	<p>Support for Policy UA5 noted. Policy wording to be strengthened further to protect it from any incremental development.</p>	<p>Amend Policy UA5 (reassigned Policy RL12) to include the following text:  'Planning permission will be refused for inappropriate development that would compromise its reuse as an alternative transport link.'</p>	<p>The former Harbour Railway line, as defined on the Policies Map, 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.</p>
	<p>The option to exploit the existing rail infrastructure as part of an integrated tramway system should not be ignored. Can the Council advise of any evidence that may negate further consideration of such an aspiration through the Plan?</p>	<p>The harbour line was formally closed in May 2014 following a period of consultation by the Department for Transport (DfT). It was concluded that ferry services were no more viable now or in the future than when they ceased to operate in 2001. Consequently, it was maintained that there was little point in re-introducing the train service; and uncertainty about the railways future was inhibiting the regeneration of the seafront.</p>	<p>No action proposed.</p>	<p>Planning permission will be refused for inappropriate development that would compromise its reuse as an alternative transport link.</p>
<p><b>UA6 East Station Goods Yard, Folkestone</b></p> <p>The site is allocated for residential led mixed-use development with an estimated capacity of 40 dwellings and 1000 sqm complimentary Class B1/B8 commercial floorspace. Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. Approximately 1000 sqm B1/B8 commercial floorspace is provided in a way that would be compatible with new housing without having an adverse impact on the ongoing viability of the commercial uses or the amenities of future residential occupants</li> <li>2. There is a comprehensive approach to development of the whole site so that if the employment and residential elements were developed separately each element would not prejudice the implementation of the whole development</li> <li>3. Access is maintained from Southern Way</li> <li>4. Any potential contamination from earlier uses is investigated and mitigated</li> <li>5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</li> <li>6. An Acoustic Survey is provided as part of any application to ensure that the noise and vibration from the adjacent railway lines can be satisfactorily mitigated against.</li> <li>7. Securement of a financial contribution towards the upkeep or improvement of the existing play facilities on Folly Road.</li> </ol>	<p>Consideration should be given to reinstating Folkestone East Station for commuting and/or access to the harbour development.</p>	<p>Folkestone East originally closed as a result on declining passenger traffic due to the opening of other more convenient stations in the town (Folkestone Central and Folkestone West). This in addition to the decline of the harbour means that there is little in the way of demand for the Station to be reinstated and would result in an increase in journey times along the Thanet - London line.</p>	<p>No action proposed.</p>	<p><b>UA1 East Station Good Yard</b></p> <p>The site is allocated for residential led mixed-use development with an estimated capacity of 40 dwellings and 1,000sqm complementary Class B1 (office) / B8 (storage and distribution) commercial floorspace.</p> <p>Development proposals will be supported where:</p>
	<p>The Tram Road Link Walkway and Cycleway is a future scheme in the Local Transport Plan (LTP4).</p>	<p>Comment noted.</p>	<p>No action proposed.</p>	<p>1. There is a comprehensive masterplan for the site to ensure that neither the employment nor the residential elements if developed separately would prejudice the implementation of the whole development;</p>
	<p>The proposals will place additional strain on the junction of Tram Road with Southern Way and Warren Road. The policy should give consideration to contributions or measures to improve pedestrian and highway safety at this junction.</p>	<p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.</p>	<p>No action proposed.</p>	<p>2. Approximately 1,000sqm B1/B8 commercial floorspace is provided in a way that would be compatible with new housing without having an adverse impact on the ongoing operation of the commercial uses or the amenities of future residential occupants;</p> <p>3. Vehicular access to the site is from Southern Way;</p> <p>4. Appropriate and proportionate contributions are made towards the upkeep and/or improvement of the existing play facilities on Folly Road;</p> <p>5. Any potential contamination from former use is investigated, assessed and if appropriate, mitigated as part of any development;</p> <p>6. Masterplanning of the site takes account of the nearby Southern Way Waste Water Treatment Works to minimise land-use conflict;</p> <p>7. An acoustic survey is provided as part of any application to ensure that the noise and vibration from the adjacent railway lines can be satisfactorily mitigated;</p> <p>8. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and</p> <p>9. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>
	<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA6 , criterion 9 (reassigned Policy UA1) to read:  'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
	<p>Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.</p>	<p>Comment noted.</p>	<p>Amend Policy UA6 ,criterion 8 (reassigned Policy UA1) to read:  'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes;'</p>	
	<p>The site is in close proximity to Folkestone Wastewater Pumping Station. The following additional criterion should be included within the policy for soundness. "The Masterplanning of the site should take account of nearby wastewater pumping stations to minimise land use conflict" (Southern Water).</p>	<p>Comment noted</p>	<p>Amend Policy UA6 ,criterion 6 (reassigned Policy UA1) to read:  'Masterplanning of the site takes account of the nearby Southern Way Waste Water Treatment Works to minimise land-use conflict;'</p>	
	<p>The access from Southern Way is ideal for a Park and Ride with space for upto 500 vehicles to serve the Remembrance Line vision.</p>	<p>The harbour line was formally closed in May 2014 following a period of consultation by the DfT. It was concluded that ferry services were no more viable now or in the future than when they ceased to operate in 2001. Consequently, it was maintained that there was little point in re-introducing the train service; and uncertainty about the railway's future was inhibiting the regeneration of the seafront.</p>	<p>No action proposed.</p>	
<p><b>UA7 Rotunda and Marine Parade Car Parks, Lower Sandgate Road</b></p> <p>The Rotunda Car Park is allocated for residential development with an estimated capacity of 100 dwellings and the Marine Car and Coach Park is allocated for residential development with an estimated capacity of 65 dwellings. Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. The layout enhances the links between the town and the seafront by providing appropriate contributions to fund upgrades to the cliff paths (upgrading the slope access from the seafront site to Road of Remembrance to be step-free and provision of new or upgrades to existing pavement from Leas Cliff Hall to the Site)</li> <li>2. The existing accesses are retained with new emergency access provided via Lower Sandgate Road</li> <li>3. The scheme preserves or enhances the character and setting of nearby Heritage Assets, including the Folkestone Conservation Area, the Area of Archaeological Interest and nearby Listed Buildings</li> <li>4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</li> <li>5. A Flood Risk assessment is provided to establish any potential risk associated from the proximity to the Pent Stream</li> <li>6. Any potential contamination from earlier car parking uses is investigated and mitigated as part of the development proposal</li> <li>7. Contributions are made towards improvements in connectivity between the seafront and town centre, as required by policy CSD6</li> <li>8. Any net loss of open space should be provided in the immediate vicinity of the site.</li> </ol>	<p>Supportive of policy, which brings forward PDL that contributes to the regeneration of Folkestone, improves connectivity between town and seafront, provides opportunities to enhance the setting of heritage assets; and providing housing of a mixed type and tenure.</p>	<p>Support noted.</p>	<p>No action proposed.</p>	<p><b>UA2 Rotunda and Marine Parade Car Parks, Lower Sandgate Road, Folkestone</b></p> <p>The Rotunda Car Park is allocated for residential development with an estimated capacity of 50 dwellings and the Marine Car and Coach Park is allocated for residential development with an estimated capacity of 65 dwellings.</p>
	<p>Why do the Rotunda and Marine Parade Car Parks not form part of the comprehensive redevelopment of the Harbour?</p>	<p>The Rotunda and Marine Parade Car Parks are not within the ownership/control of the Folkestone Harbour Company; therefore they are unable to form part of the overall Masterplan vision for the regeneration of Folkestone Harbour.</p>	<p>No action proposed.</p>	<p>Development proposals will be supported where:</p>
	<p>The sites should be developed as a mixed use scheme that could include an entertainment venue etc.</p>	<p>At present, Policy UA1 is promoting two potential areas for investment within Folkestone Town Centre for a mixed-use retail/commercial leisure development - the Bus Station and Guildhall Street. These sites are the Council's preferred location(s) in order to help stimulate the evening economy within the town centre and supports its future viability and vitality.</p>	<p>No action proposed</p>	<p>1.The design and layout of any new buildings improves and enhances connectivity between the seafront and Folkestone Town Centre;</p> <p>2.Appropriate and proportionate contributions are made in relation to improvements to connectivity between the seafront and Folkestone Town Centre; a portion of which should be set aside as a payment towards the restoration and/or upgrade of the Leas Lift, or sinking fund for its ongoing maintenance, if required, through a Section 106 agreement;</p> <p>3.The existing accesses are retained with new emergency access provided through Lower Sandgate Road;</p>
	<p>Criterion 1, when considered in conjunction with criterion 7, may prohibit alternative and/or alternative means of connectivity improvements between the seafront and the town centre. These should be combined to read: "The layout enhances the links between the town and the seafront by providing contributions towards improvements in connectivity between the seafront and town centre, as required by policy CSD6".</p>	<p>Comment noted.</p>	<p>Amend Policy UA7 (reassigned Policy UA2) by splitting criteria 1 into two separate criteria as follows:  'The design and layout of any new buildings improves and enhances connectivity between the seafront and Folkestone Town Centre;'  'Appropriate and proportionate contributions are made in relation to improvements to connectivity between the seafront and Folkestone Town Centre; a portion of which should be set aside as a payment towards the restoration and/or upgrade of the Leas Lift, or sinking fund for its ongoing maintenance, if required, through a Section 106 agreement';  Criteria (7) to be deleted from the policy.</p>	<p>4.The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the Folkestone Leas and Bayle Conservation Area and nearby Listed Buildings;</p> <p>5.Mitigation and enhancement measures are incorporated into the design to minimise effects on the local Biodiversity Action Plan Priority Habitat;</p> <p>6.Any potential contamination from former uses is investigated, assessed and if appropriate, mitigated as part of the development;</p> <p>7.Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and</p> <p>8.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>

<p>In Criterion 1 and/or 3, consideration should be given to the adjacent Grade II* Leas Lift and its role in enhancing connections with the town centre and the need to secure a sustainable future for the heritage asset</p>	<p>Since publication of the Places and Policies Local Plan the Leas Lift's breaking mechanism has been deemed unsafe and shut down. A functioning Leas Lift can still play a key role in providing a sustainable and enhanced connection between the town and seafront in particular those with mobility problems who would be unable to negotiate the slope footpaths, whilst securing the future of a local heritage asset.</p>	<p>Amend Policy UA7 (reassigned Policy UA2) by splitting criteria 1 into two separate criteria as follows:</p> <p>'The design and layout of any new buildings improves and enhances connectivity between the seafront and Folkestone Town Centre;'</p> <p>'Appropriate and proportionate contributions are made in relation to improvements to connectivity between the seafront and Folkestone Town Centre; a portion of which should be set aside as a payment towards the restoration and/or upgrade of the Leas Lift, or sinking fund for its ongoing maintenance, if required, through a Section 106 agreement;'</p>	
<p>A standard archaeological requirement has been applied to the majority of allocation sites. There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA7, criterion 8 (reassigned Policy UA2) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
<p>The Rotunda Car Park may contain priority habitat, deciduous woodland. These potential environmental constraints were not highlighted in the final SHLAA.</p>	<p>A review showed that the Rotunda Car Park site is partly within a Biodiversity Action Plan Priority Habitat (deciduous woodland). Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.</p>	<p>Amend Policy UA7 (reassigned Policy UA2) to include the following additional criterion:</p> <p>'Mitigation and enhancement measures are incorporated into the design to minimise effects on the local Biodiversity Action Plan Priority Habitat;'</p>	
<p>Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes</p>	<p>Comment noted.</p>	<p>Amend Policy UA7 (reassigned Policy UA2) to include the following additional criteria:</p> <p>'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes;'</p>	
<p>Concerns about the availability of car parking spaces once the harbour development is completed.</p>	<p>The detailed design of parking arrangements for the outline planning consent for the harbour development will be subject to approval at reserved matters stage, in accordance with the requirements of the mandatory Design Guidelines and overarching strategy set out within the Transport Assessment and controlled by conditions and the Section 106 agreement.</p>	<p>No action proposed.</p>	
	<p>Following an internal discussion concerning the density of the site, the decision was taken to reduce the number of units proposed for the Rotunda Car Park.</p>	<p>Capacity reduced from 100 to 50 dwellings</p>	
<p><b>UA8 The Royal Victoria Hospital, Radnor Park Avenue</b></p> <p>The site is allocated for residential development with an estimated capacity of 42 dwellings. Development will be permitted for 16 new homes through residential conversion of the original Victorian building. The rear aspect of the site should be cleared to provide approximately 26 new dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. The converted and new build elements are properly masterplanned to ensure a coherent approach to the redevelopment of this site</li> <li>2. A high quality conversion is sought that preserves the character and setting of the Victorian element of the building</li> <li>3. The rear aspect of the site is redeveloped in a manner that would enhance the wider setting of the area</li> <li>4. Clear regard is demonstrated as to how parking and the flow of traffic will be managed to ensure that the development does not put undue pressure on the local highway network. If required, mitigation measures or parking permit restrictions should be applied to ensure the free flow of traffic</li> <li>5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</li> <li>6. Contributions are to be provided to enhance play and open space at Radnor Park.</li> <li>7. Contaminated land onsite should be fully remediated prior to construction works.</li> </ol>	<p>Loss of employment and medical services as well as the opportunity to re-provide the jobs and services previously lost at St Saviours in Hythe.</p> <p>Social care and residential homes had been overlooked in the Plan. The Royal Victoria would be an ideal residential care home adjacent to medical facilities.</p> <p>A portion of the site should still be retained for some future limited expansion of the medical facilities.</p> <p>Options should be kept open for a private health company to operate services in the locality.</p> <p>The site would be better allocated for business (office) uses given its proximity to Folkestone Central Station.</p> <p>A standard archaeological requirement has been applied to the majority of allocation sites. There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p> <p>Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes</p> <p>Preserve the cycle/footpath at the rear of the site for access to Radnor Park.</p>	<p>The medical services provided at the Royal Victoria Hospital are now provided in more suitable and up-to-date accommodation. The existing buildings are not appropriate for modern healthcare and are currently a liability for the Trust.</p> <p>The existing buildings are not appropriate for modern healthcare or residential care and are currently a liability for the Trust.</p> <p>The existing buildings are not appropriate for modern healthcare and are currently a liability for the Trust.</p> <p>The existing buildings are not appropriate for modern healthcare and are currently a liability for the Trust.</p> <p>Officers consider that the existing building is not of a design that would be suitable for conversion into modern contemporary office accommodation that is required by employers. Furthermore, it is unlikely that such a scheme would be viable, as office yields would be low and the spaces would be difficult to let.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>The site boundary has been incorrectly digitised. The site boundary will be redrawn to exclude the footpath between Park Farm Road and Beech Close.</p>	<p><b>UA3 The Royal Victoria Hospital, Radnor Park Avenue, Folkestone</b></p> <p>The site is allocated for residential development with an estimated capacity of 42 dwellings.</p> <p>Development will be permitted for 16 new homes through residential conversion of the original Victorian building. The rear part of the site should be cleared to provide approximately 26 new build dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. There is a comprehensive masterplan that ensures a coherent approach to both the conversion of the original Victorian building and the redevelopment of the rear aspect of the site;</li> <li>2. A high quality conversion preserves or enhances the character and setting of the Victorian elements of the original hospital building;</li> <li>3. The design and scale of proposals to the rear aspect of the site are of a manner that would enhance the wider setting of the area;</li> <li>4. Traffic flow and parking provision is assessed to ensure that the development does not put undue pressure on the local highway network and that adequate parking provision is provided so that there are no detrimental parking impacts on Radnor Park Avenue. If required, mitigation measures or parking permit restrictions should be applied to ensure the free flow of traffic;</li> <li>5. Appropriate and proportionate contributions are made towards the upkeep and/or improvement of open space and existing play facilities at Radnor Park;</li> <li>6. Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat;</li> <li>7. Any potential contamination from former use is investigated, assessed and if appropriate, mitigated as part of the development;</li> <li>8. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and</li> <li>9. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ol>

	<p>The combination of residential and clinic car parking in the area, will exacerbate congestion in the area.</p>	<p>Any proposal that comes forward for the site should be designed in accordance with Local Parking Standards.</p> <p>Furthermore, Policy UA3 criterion (4) as amended also states that:</p> <p>'Traffic flow and parking provision is assessed to ensure that the development does not put undue pressure on the local highway network and that adequate parking provision is provided so that there are no detrimental parking impacts on Radnor Park Avenue. If required, mitigation measures or parking permit restrictions should be applied to ensure the free flow of traffic.'</p>	<p>No action proposed.</p>	
	<p>A review showed that the Royal Victoria Hospital site is partly within a Biodiversity Action Plan Priority Habitat. Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.</p>	<p>Comment noted.</p>	<p>Amend Policy UA8 (reassigned Policy UA3) to include the following additional criterion:</p> <p>'Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat.'</p>	
<p><b>UA9 3 to 5 Shorncliffe Road, Folkestone</b></p> <p>The site is allocated for residential development with an estimated capacity of 20 residential apartments.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. The scale and design of the proposal would be compatible with the character of the surrounding area and would preserve or enhance the setting of the nearby Folkestone Leas and Bayle Conservation Area.</li> <li>2. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.</li> </ol>	<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA8, criterion 2 (reassigned Policy UA3) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	<p><b>UA4 3-5 Shorncliffe Road, Folkestone</b></p> <p>The site is allocated for residential development with an estimated capacity of 20 residential apartments.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the Folkestone Leas and Bayle Conservation Area; and</li> <li>2. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ol>
<p><b>UA10 Ingles Manor, Castle Hill Avenue</b></p> <p>Ingles Manor is allocated for mixed development with an estimated capacity of 46 dwellings and 1400sqm of complimentary Class B1a commercial floorspace</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. The proposed design adequately takes account of the sites setting within a conservation area and tree constraints</li> <li>2. An assessment is carried out of the impact on the setting of the listed buildings within the site and appropriate measures put in place to preserve or enhance the buildings and their settings</li> <li>3. Approximately 1400 sqm B1a of new commercial floorspace is provided in a way that would be compatible with new housing without having an adverse impact upon the ongoing viability of the commercial uses or the amenities of future residential occupants</li> <li>4. B1a Office accommodation will be delivered on the site</li> <li>5. Retention and conversion of existing barns</li> <li>6. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.</li> </ol>	<p>Supportive of the policy, which would constitute an effective use of previously developed land within the urban confines of Folkestone, in a highly sustainable location.</p>	<p>Support noted.</p>	<p>No action proposed.</p>	<p><b>UA5 Ingles Manor, Castle Hill Avenue, Folkestone</b></p> <p>Ingles Manor is allocated for mixed-use development with an estimated capacity of 46 dwellings and 1,600sqm of complementary Class B1a (office) commercial floorspace.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. A comprehensive masterplan is prepared for the redevelopment of the site in accordance with the total requirements of this and other local plan policies;</li> <li>2. They are accompanied by a landscape strategy that retains a substantial amount of the existing tree cover including those protected by Tree Preservation Orders or individual or groupings considered to be important to the appearance of the site and which should be integral to the overall design and layout of the scheme;</li> <li>3. An assessment is carried out of the impact on any heritage assets within the site and appropriate measures put in place to preserve or enhance the buildings and their settings;</li> <li>4. The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets, including the Folkestone Leas and Bayle Conservation Area;</li> <li>5. Approximately 1,600sqm B1a additional commercial floorspace is provided in a way that would be compatible with new housing without having an adverse impact on the ongoing viability of the commercial uses or the amenities of future residential occupants; and</li> <li>6. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ol>
	<p>Propose that the parcels within the site as defined in extant Local Plan policies FTC3 and HO2(C) should be retained. This identifies between that land for residential and that for employment; and allow them to come forward independently.</p>	<p>It is considered that removing the parcels of land previously defined by Policies FTC3 and HO2(C) of the Local Plan (2006) allows for a more comprehensive Masterplan approach to be adopted for the redevelopment of the site and increases the likelihood of the new commercial floorspace being delivered on site.</p>	<p>Amend Policy UA10 (reassigned Policy UA5) to include the following additional criterion:</p> <p>'A comprehensive masterplan is prepared for the redevelopment of the site in accordance with the total requirements of this and other local plan policies.'</p>	
	<p>Criterion 4 is not necessary given the protection afforded to the employment aspirations of the site elsewhere in the policy. The statement that B1(a) office will be delivered does not meet with NPPF paragraphs 21 and 154 and the potential, albeit not a desired one, that there may be a future need to address the spatial implications of economic and social change.</p>	<p>Comment noted.</p>	<p>Criteria (4) to be deleted from Policy UA10 (reassigned UA5).</p>	
	<p>Criterion 5 is understood to refer to the 'barns' located in and around Ingles Manor and comprising curtilage listed structures. There are also at least two barns within the grounds of the current garden centre. It is unnecessary given the protection afforded to heritage assets in criterion 2; and is potentially damaging to the policy's objective of bringing forward the desired commercial aspect of the mixed use.</p>	<p>Comment noted.</p>	<p>Criteria (5) to be deleted from Policy UA10 (reassigned UA5).</p>	
	<p>This site has an exceptional, heavily treed character and this should be stated more strongly and safeguarded. A tree schedule should be issued to prevent undesirable removals.</p>	<p>Comment noted.</p>	<p>Amend Policy UA10, criteria 2 (reassigned Policy UA5) to read:</p> <p>'They are accompanied by a landscape strategy which retains a substantial amount of the existing tree cover including those protected by Tree Preservation Orders or individual or groupings considered to be important to the appearance of the site and which should be integral to the overall design and layout of the scheme.'</p>	
	<p>The land take for housing should be minimised in view of the open and attractive character of those areas and its popular existing use. It should have a low density of development in line with Jointon Road and the south side of Shorncliffe Road.</p>	<p>Comment noted.</p>	<p>Amend Policy UA10 (reassigned Policy UA5) to include the following additional criterion:</p> <p>The scale, layout and design of any new buildings preserve or enhance the character and setting of nearby heritage assets, including the Folkestone Leas and Bayle Conservation Area.'</p>	
	<p>Ingles Manor and, particularly its subsidiary garden cottage and barns must be safeguarded and given a proper setting.</p>	<p>Policy UA5 (criterion 3) states:</p> <p>'An assessment is carried out of the impact on any heritage assets within the site and appropriate measures put in place to preserve or enhance the buildings and their settings.'</p>	<p>No action proposed.</p>	
	<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place." (Kent Heritage).</p>	<p>Comment noted.</p>	<p>Amend Policy UA10, criteria 6 (reassigned Policy UA5) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
	<p>Poor drainage on corner of Castle Hill Avenue and Shorncliffe Road should be remedied.</p>	<p>All proposals will need to comply with Policy CC3: Sustainable Drainage Systems (SuDs), whereby surface water is managed close to the source. The council has also consulted with Southern Water and Kent County Council, the lead local flood authority, as part of the Places and Policies Local Plan</p>	<p>No action proposed.</p>	
<p><b>UA11 Shepway Close, Folkestone</b></p> <p>The site is allocated for residential development with an estimated capacity of 24 dwellings and 0.3ha of public open space.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. An area of 0.3ha is provided as landscaped open space including an area for natural play, which should be linked to the street layout and the landscape scheme for the site.</li> </ol>	<p>Require clarification as to the type, form and extent of open space that should be provided on the site and the policy wording should be amended accordingly.</p>	<p>A meeting was held with the Agent to discuss open space requirements. It was agreed that given the proximity to existing open space on Archer Road it wasn't necessary to allocate a substantial part of the site for further open space provision. It was also considered that a smaller open space for natural play would improve the overall design and ensure a better quality scheme.</p>	<p>Reduce open space requirement to 0.15ha and increase residential capacity of the site to 35 dwellings.</p>	<p><b>UA6 Shepway Close, Folkestone</b></p> <p>The site is allocated for residential development with an estimated capacity of 35 dwellings and 0.15ha of public open space.</p> <p>Development proposals will be supported where:</p>

<p>snouia de integral to the overall layout to avoid the long-term pressure for it to be lost to development. A management company should be established for its long term maintenance</p> <p>2. Any planning application should include a full ecological survey with the proposals incorporating biodiversity mitigation measures where necessary</p> <p>3. A strategy for the management of surface water is included within the development proposals</p> <p>4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.</p>	<p>Supportive of policy in principle. Further clarification is needed as to the type, form and extent of Open Space that should be provided on the site. Alternatively, requiring a financial contribution to the improvement of existing Open Space nearby may enable more strategic improvements to play and Open Space provision by pooling contributions.</p>	<p>Whilst the site is fenced off and overgrown, it was previously a playing field and it is designated as Open Space Value or Potential within the Local Plan 2006. Officers are therefore of the opinion that an element of open space should be retained as part of any development proposals rather than a financial contribution to improving the existing open space on Archer Road. However, it is accepted that the 0.3ha suggested is overly generous in the context of the site and therefore this is reduced to 0.15 ha.</p> <p>In regards to the type, form and extent of open space, the Policy requires an area of natural play. These are spaces made of natural components such as boulders, tree trunks, mounds, plants to improve how a playground looks, as well as increasing the scope for imaginative games. This is set out in the supporting text (paragraph 5.49).</p>	<p>No action proposed.</p>	<ol style="list-style-type: none"> <li>1. An area of 0.15ha is provided as landscaped open space including a natural play area, which should be integral to the overall layout. A management company or other solution should be established for its long term maintenance;</li> <li>2. They are accompanied by a full ecological survey and adequate biodiversity mitigation measures implemented where necessary;</li> <li>3. A strategy for the management of surface water is included within the development proposals;</li> <li>4. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and</li> <li>5. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ol>
	<p>Shepway Close is an area of protected open space and should be open to the public.</p>	<p>Although the site is designated as Open Space Value or Potential within the Local Plan (2006), in real terms, it is neither accessible to, nor usable by, the public. Officers are of the opinion that it is necessary to pursue an active approach to developing the site which can provide a meaningful and usable open space alongside new family housing.</p>	<p>No action proposed.</p>	
	<p>Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.</p>	<p>Comment noted.</p>	<p>Amend Policy UA11 (reassigned Policy UA6) to include the following additional criterion:</p> <p>'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes;'</p>	
	<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA11, criterion 5 (reassigned Policy UA6) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
	<p>The site is bordered by Public Footpath HBX16. Request to change criteria 1 to prescribe open space being accessible from the public footpath and along the Western edge of any development.</p>	<p>The open space that is to form part of any future development proposals for the site would be accessible via the public highway. Officers are of the opinion that it would be unreasonable to include an additional criteria to Policy UA6 which would ultimately prescribe the detailed design and layout of any scheme for this site.</p>	<p>No action proposed.</p>	
<p><b>UA12 Former Gas Works, Ship Street</b></p> <p>The site is allocated for residential development with an estimated capacity of 100 dwellings and public open space.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. Full ecological and arboricultural investigations are undertaken and adequate mitigation or protection measures identified where necessary</li> <li>2. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</li> <li>3. Contributions will be required to the offsite enhancements of the public open space and play at Radnor Park</li> <li>4. Appropriate and proportionate contributions are made to Doctors Surgery in Folkestone through a site specific S106 agreement</li> <li>5. The scale, design and layout of the development should seek to sustain and enhance the setting of the nearby Grade II Listed Railway Viaduct</li> <li>6. Any potential contamination from earlier uses is investigated and fully mitigated as part of the development</li> <li>7. The design approach utilises the special characteristics of the site to deliver a high quality and innovative urban development</li> <li>8. The development demonstrates how each property will benefit from acceptable private amenity space to meet the needs of occupants via innovative design and layout.</li> <li>9. The development has at least 5 self / custom build plots on site</li> <li>10. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.</li> </ol>	<p>Supportive of policy allocation for residential development.</p> <p>This could be a pivotal site for further economic generation in the town, with the emphasis on nurturing new businesses and growing established ones, supported by Local Growth Fund and encouraging training and apprenticeships.</p> <p>Archaeology is repeated in criterion 2 and 10. Criterion 2 should be deleted.</p> <p>Criterion 4 is unnecessary as it is considered that any requirement for a new doctor's surgeries should be met through CIL.</p> <p>Criterion 8 needs to better reflect the supporting text and be clear that Policy HB5 will not be applied. This should be reworded to read: "The development does not have to provide 10m rear gardens as otherwise required by Policy HB5 of this Plan. However, it will need to demonstrate that inter and over looking will not result and that acceptable levels of amenity can be provided for occupants via an innovative design and layout."</p> <p>This site has ongoing monitoring to address historic contamination issues. We reiterate point 6 of Policy UA12 .</p> <p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p> <p>In regards to brownfield sites, assumptions about land values should clearly reflect the levels of mitigation and investment required to bring sites back into use.</p> <p>Given the site's former use as a gas works, preparation of the site for redevelopment has been a costly exercise. Existing structures have had to be removed and the site decontaminated. B Use Classes are unlikely to generate the land value required to make the project viable.</p> <p>Comment noted.</p> <p>The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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. The NHS Clinical Commissioning Group have currently only identified the Romney Marsh as an area where there is a deficiency of Doctor's and health facilities.</p> <p>The Places and Policies Local Plan should be read as a whole. The supporting text (paragraph 5.55) sets out that Policy UA7: Former Gas Works, Ship Street, Folkestone may not be able to provide garden space as required by Policy HB3: Internal and External Space Standards. HB3 also makes provision that the Council will consider a variation to the external space standards if it can be demonstrated through the Design and Access Statement.</p> <p>Comment noted.</p> <p>Comment noted.</p>	<p>No action proposed.</p> <p>No action proposed.</p> <p>Criterion 2 to be deleted from Policy UA12 (reassigned Policy UA7).</p> <p>Criterion 4, to be deleted from Policy UA12 (reassigned Policy UA7).</p> <p>No action proposed.</p> <p>No action proposed.</p> <p>Amend Policy UA12, criterion 7 (reassigned UA7) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	<p><b>UA7 Former Gas Works, Ship Street, Folkestone</b></p> <p>The site is allocated for residential development with an estimated capacity of 100 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. The design approach utilises the special characteristics of the site to deliver a high quality and innovative urban development;</li> <li>2. The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the nearby Grade II listed Railway Viaduct;</li> <li>3. Any potential contamination from former use is investigated, assessed and if appropriate, mitigated as part of the development;</li> <li>4. A full ecological and arboricultural survey is undertaken and adequate biodiversity mitigation measures implemented where necessary;</li> <li>5. It can be demonstrated that each property will benefit from an acceptable level of private amenity space to meet the needs of occupants through an innovative design and layout;</li> <li>6. Appropriate and proportionate contributions are made towards the upkeep and/or improvement of open space and existing play facilities at Radnor Park to mitigate any on-site under-provision;</li> <li>7. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; and</li> <li>8. At least 5 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development.</li> </ol>
<p><b>UA13 Highview School, Moat Farm Road</b></p> <p>The site is allocated for residential development with an estimated capacity of 27 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. An appropriate mix of housing is provided at a density consistent and compatible with its surroundings</li> <li>2. The design includes appropriate links to the local footpath network</li> <li>3. Adequate parking provision is provided to ensure no undue parking stress is caused on Moat Farm Road</li> <li>4. Appropriate and proportionate contributions are made to schools in Folkestone through a site specific S106 agreement</li> <li>5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.</li> </ol>	<p>Supportive of policy to allocate for residential as it forms previously developed land in a sustainable location with good access to services and community facilities.</p> <p>The proposed housing will increase the foot traffic using an alleyway between two properties on Mead Road. The alleyway already attracts anti-social behaviour. The alley way should be permanently shut to public.</p>	<p>Comment noted.</p> <p>The alleyway between properties on Mead Road is a Public Right of Way; closing the route is not an option. It is considered that the redevelopment of Highview School may actually result in a reduced number of trips and instances of anti-social behaviour.</p> <p>Notwithstanding this, an additional criterion could be included as part of Policy UA8: Highview School, Moat Farm Road, Folkestone that requires the design of any future proposal to minimise the opportunities for anti-social behaviour along the Public Right of Way to Mead Road. Policy HB2: Cohesive Design includes a requirement that development clearly defines public and private spaces and ensures they are attractive, can well managed and are safe.</p>	<p>No action proposed.</p> <p>Amend Policy UA13 (reassigned UA8) to include the following additional criterion:</p> <p>'The design includes appropriate links to the local footpath network that connects Park Farm and Black Bull Road and incorporates measures to minimise opportunities for anti-social behaviour;'</p>	<p><b>UA8 Highview School, Moat Farm Road, Folkestone</b></p> <p>The site is allocated for residential development with an estimated capacity of 27 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. The design includes appropriate links to the local footpath network that connects Park Farm and Black Bull Road and incorporates measures to minimise opportunities for anti-social behaviour;</li> <li>2. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes;</li> <li>3. Traffic flow and parking provision is assessed to ensure that adequate parking provision is provided so that there are no detrimental parking impacts on Moat Farm Road; and</li> <li>4. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ol>

	The proximity of any new houses to the back of existing properties could interfere with privacy.	At this stage in the Local Plan process, the detailed layout and design of any of the draft site allocations are unknown. Issues concerning over-looking and loss of privacy of existing properties are 'material considerations' that will be considered during the determination of the planning application.	No action proposed.	
	Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.	Comment noted.	Amend Policy UA13 (reassigned UA8) to include the following additional criterion:  'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'	
	There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."	Comment noted.	Amend Policy UA8, criterion 4 (reassigned UA8) to read:  'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'	
	Criterion 4 is unnecessary as it is considered that any requirement for new schools should be met through CIL (Shepway District Council).	The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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.	Criterion 4 to be deleted from Policy UA13 (reassigned Policy UA8).	
<b>UA14 Brockman Family Centre, Cheriton</b>	Given the potential traffic generation from 100 units, plus commercial traffic from Saga and future developments at Cheriton Parc; thought should be made to the possibility of s.106 contributions being pooled to create an extension to the road past Tesco and filtering out traffic to M20 or Hythe	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	No action proposed.	<b>UA9 Brockman Family Centre, Cheriton</b>
The site is allocated for residential development with an estimated capacity of 26 houses or 50 apartments. Development proposals will be supported where: 1. Full ecological investigations of the potential of the existing building and surrounding land is undertaken as part of any development submission and adequate biodiversity mitigation measures implemented if necessary 2. Existing trees and hedgerows around perimeter of site are retained and enhanced 3. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.	There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."	Comment noted.	Amend Policy UA14, criteria 4 (reassigned Policy UA9) to read:  'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'	The site is allocated for residential development with an estimated capacity of 26 houses or 50 apartments.  Development proposals will be supported where:  1. A full ecological and arboricultural survey is undertaken and adequate biodiversity mitigation measures implemented where necessary; 2. Existing trees and hedgerows around the perimeter of the site are retained and enhanced; 3. There is on-site provision of open and play space to meet the needs of the development, for which a management company or other solution should also be established for its long term maintenance; and 4. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.
	Following an internal discussion it was agreed that the site should provide an element of open and play space to reflect the findings of the Open Space and Play Space Strategies	Comment noted.	Amend Policy UA14 (reassigned UA9) to include the following additional criteria:  'There is on-site provision of open and play space to meet the needs of the development, for which a management company or other solution should also be established for its long term maintenance.'	
<b>UA15 The Cherry Pickers Public House, Cheriton</b>	Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.	Comment noted.	Amend Policy UA15 (reassigned Policy UA10) to include the following additional criterion:  'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'	<b>UA10 The Cherry Pickers Public House, Cheriton</b>
The site is allocated for residential development with an estimated capacity of 10 houses or 20 apartments. Development proposals will be supported where: 1. Necessary highway mitigation measures are incorporated to ensure safe visibility and access 2. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.	There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."	Comment noted.	Amend Policy UA15, criterion 4 (reassigned Policy UA10) to read:  'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'	The site is allocated for residential development with an estimated capacity of 10 houses or 20 apartments.  Development proposals will be supported where:  1. Primary vehicular access is achieved from Ashley Avenue with the necessary highway mitigation measures incorporated to ensure safe visibility and access; 2. Appropriate and proportionate contributions, through a Section 106 agreement, are made towards the upkeep and/or improvement of open space and existing play facilities at Cheriton Recreation Ground; 3. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and 4. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.
	At present, no buses cater for this area. Suggested that every other No.71 bus becomes a 71A and is re-routed along Tile Kiln Lane, Cherry Garden Ave into Folkestone.	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	No action proposed.	

	The current parking situation in Ashley Avenue is severe and displaced onto the adjoining streets. Any new houses should have sufficient parking provision.	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.		
	Following an internal discussion it was agreed that the site should make an off site contribution towards improvements to the Cheriton Recreation Ground to reflect the findings of the Open Space and Play Space Strategies	Comment noted.	Amend Policy UA15 (reassigned Policy UA10) to include the following additional criterion:  'Appropriate and proportionate contributions, through a Section 106 agreement, are made towards the upkeep and/or improvement of open space and existing play facilities at Cheriton Recreation Ground.'	
<b>UA16 Affinity Water, Shearway Road, Cheriton</b>  The site is allocated for residential development with an estimated capacity of 70 dwellings and an area of public open space approximately 1 ha in size. Development proposals will be supported where: 1. The proposal forms part of a wider strategy showing how the existing facilities will be reprovided within the area north of Shearway Road 2. A masterplan of the whole site is provided that demonstrates a comprehensive approach to development 3. A new footway is provided along the southern edge of Shearway Road 4. The line of trees along the southern boundary and the tree with the TPO are retained and protected for its amenity value 5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest 6. The public open space includes publicly accessible on site play equipment and appropriate planting 7. The development has at least 4 self / custom build plots on site.	The policy should be amended as follows: "The site is allocated for residential development with an estimated capacity of 120 dwellings and an area of public open space" .	Officers are unconvinced that the Masterplan proposal that illustrates an increased capacity of 120 dwellings fully takes into consideration the physical constraints of the site as specified in the draft policy (particularly the retention and protection of trees along the southern boundary and the requirement for publically accessible open space). Moreover, additional concerns have been raised during the Places and Policies Local Plan consultation that would need to be addressed as part of any future masterplanning exercise such as flooding from the Pent Stream, the need to retain public rights of way and the electricity pylon and electricity lines that transverse the northern boundary of the site.	No action proposed.	<b>UA11 Affinity Water, Shearway Road, Cheriton</b>  The site is allocated for residential development with an estimated capacity of 70 dwellings, 3,500sqm of complementary Class B1a (office) commercial floorspace and an area of public open space.  Development proposals will be supported where:  1. A comprehensive masterplan is prepared for the redevelopment of the site, which also demonstrates how the existing facilities will be re-provided within the area north of Shearway Road; 2. Approximately 3,500sqm B1a of new commercial floorspace is provided at the western end of the site in a way that is compatible with the neighbouring commercial uses and new housing, without having an adverse impact on the continuing viability of the commercial uses or the amenities of future residential occupants; 3. The proposals acknowledge the surrounding urban grain by creating a strong residential frontage onto Cherry Garden Lane and ensuring that the design complements the existing development in the locality; 4. Proposals are accompanied by a landscape strategy that retains a substantial amount of the existing tree cover including those protected by Tree Preservation Orders within an area(s) of landscaped open and play space, which should be integral to the overall design and layout of the scheme; 5. Accompanied by a Site-specific Flood Risk Assessment and demonstrate that any potential risks associated with the Pent Stream can be mitigated and/or safely managed; 6. A footpath and appropriate lighting is provided on southern edge of Shearway Road to connect with Cherry Garden Lane; 7. Public footpaths HF19A and HF20 that link Shearway Road and Tile Kiln Lane are reinstated and enhanced; 8. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; 9. There will be no contamination of groundwater sources; 10. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; and 11. At least 4 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development.
	The requirement for 1 ha of open space should be reduced to 0.5 ha (village green). Council's OSS places emphasis should be placed on upgrade existing parks and the area is already well served by parks and formal sports provision (Affinity Water).	The significant proportion of the site is currently made up of a mix of amenity greenspace, natural and semi-natural urban greenspace and outdoor sports facilities. It had previously been considered that 1 ha of open space was necessary to retain the open character of the site.  However, in response to the fact that Morehall Recreation Ground is a short distance away, and that a number of trees have recently had Tree Preservation Orders (TPOs) applied to them, the requirement for 1 ha of open space has been removed from the policy in favour of landscaped open space that retains the trees covered by TPOs (that is the avenue of cherry trees on the southern boundary).	Amend Policy UA16, criterion 4 (reassigned Policy UA11) to read:  'Proposals are accompanied by a landscape strategy that retains a substantial amount of the existing tree cover including those protected by Tree Preservation Orders within an area(s) of landscaped open and play space, which should be integral to the overall design and layout of the scheme.'	
	Alternative uses for the site should also be considered such as hotel, business or residential. The policy should be amended to include development opportunity for either B1 Business development or a mixed use development comprising B1(a), Hotel/Leisure and Housing.	The Affinity Water site is designated in the Local Plan (2006) as an Employment Opportunity Site. In the Employment Land Review (2016) Shearway Business Park ranks highly amongst employment sites in Shepway. The Business Park benefits from strong occupation rates and in conjunction with a number of high quality Grade A floorspace units suggests that the site is highly attractive to the market; and opportunities should be considered for a mixed use development.  The Shepway Economic Development Strategy 2015-2020 indicates that employment land allocations in the Local Plan 2013 Review are not of a standard to meet current business demand in the sectors that have been identified as having growth potential. Therefore, the Plan needs to explore opportunities for identifying new employment sites with good access to the strategic road network via the three M20 junctions.  Officers consider that the site offers the opportunity to enable the delivery of high quality office accommodation in a strategic location as part of a mixed use development.	Amend Policy UA16 (reassigned Policy UA11) to include the following criteria:  Approximately 3,500sqm B1a of new commercial floorspace is provided at the western end of the site in a way that is compatible with the neighbouring commercial uses and new housing, without having an adverse impact on the continuing viability of the commercial uses or the amenities of future residential occupants;	
	Southern Water requires access to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.	Comment noted.	Amend Policy UA16 (reassigned Policy UA11) to include the following additional criteria:  'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'	
	Sewage capacity is over-loaded. The Shearway Business Park and Premier in have been connected to the local network since it was put in.	The Council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including water and utilities companies. Comments from these providers have been taken into account when drafting the plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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 action proposed.	

<p>The flood risk problems associated with North Folkestone have been under-estimated. There is a prevalence of springs; and increased surface run-off in addition to existing drainage issues associated with the Pent Stream could be an issue.</p>	<p>The Council has involved statutory consultees, including the Environment Agency, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. The Environment Agency were consulted for this site allocation and raised no objection other than development proposals are to ensure that there is no contamination of groundwater sources.</p> <p>However, given the concerns raised about the flood risk associated with the Pent Stream by an additional criterion has been added in response.</p>	<p>Amend Policy UA16 (reassigned Policy UA11) to include the following additional criterion:</p> <p>'Accompanied by a Site-specific Flood Risk Assessment and demonstrate that any potential risks associated with the Pent Stream can be mitigated and/or safely managed.'</p>	
<p>The stream should be retained as a wildlife sanctuary, given plenty of space and landscaping as at Broadmead village.</p>	<p>The Pent Stream will be untouched. Moreover, Criteria 4 of Policy UA11 also states that the trees along the southern boundary are to be retained and protected for their amenity value as part of any development proposals. This would also provide a green corridor/ habitat for wildlife associated with the stream.</p>	<p>No action proposed.</p>	
<p>The site lies within Source Protection Zone 1 - groundwater source for drinking water. Any development must ensure that there is no contamination of groundwater (Environment Agency).</p>	<p>Comment noted.</p>	<p>Amend Policy UA16 (reassigned Policy UA11) to include the following additional criterion:</p> <p>'There will be no contamination of groundwater sources.'</p>	
<p>Local primary and secondary schools and doctors surgeries are at capacity; additional development could exacerbate the problem.</p>	<p>The Council has involved statutory consultees, including Kent County Council Education and NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education and NHS support the Council that there is capacity available in existing schools and doctors to cater for the planned additional growth within the Urban Character Area. Where improvements to school and health facilities are necessary to cater for the additional growth, comments from KCC and NHS have been taken into account when drafting the plan.</p>	<p>No action proposed.</p>	
<p>At present, no buses cater for this area. Suggested that every other No.71 bus becomes a 71A and is re-routed along Tile Kiln Lane, Cherry Garden Ave into Folkestone.</p>	<p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.</p>	<p>No action proposed.</p>	
<p>There are a number of mature trees on the proposed site. These should be retained as part of any planning permission.</p>	<p>A tree survey will be undertaken by the Council's tree officer and any trees of note will be afforded additional protection and will become an additional consideration at the planning application stage.</p>	<p>Criterion 4 and 6 to be deleted from Policy UA16 (reassigned Policy UA11) and incorporated into new criterion:</p> <p>'Proposals are accompanied by a landscape strategy that retains a substantial amount of the existing tree cover including those protected by Tree Preservation Orders within an area(s) of landscaped open and play space which should be integral to the overall design and layout of the scheme.'</p>	
<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA16 (reassigned Policy UA11) to include the following additional criterion:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
<p>Compensation should be considered for the bungalows in Cherry Garden Lane – effect on property values, disruption, noise etc.</p>	<p>Problems arising from construction (e.g. noise, dust, construction vehicles, hours of working (covered by Control of Pollution Act) and loss of property value) are not material considerations and therefore not relevant to any decision.</p>	<p>No action proposed.</p>	
<p>Public Footpath's HF20 and HF19A would be directly affected by this development. It is important that these links are retained. Any policy wording that ensures this development contributes to wider pedestrian and cycling network development would be useful.</p>	<p>The Public Footpaths HF20 and HF19A appear to be closed. There is no means to cross the Pent Stream to the south of the site and no visible signs of being able to access and walk through the allotments to Tile Kiln Lane.</p>	<p>Amend Policy UA16 (reassigned Policy UA11) to include the following additional criterion:</p> <p>'Public footpaths HF19A and HF20 that link Shearway Road and Tile Kiln Lane are reinstated and enhanced.'</p>	
<p><b>UA17 The Shepway Resource Centre, Military Road</b></p> <p>The site is allocated for residential development with an estimated capacity of 41 dwellings. Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. A high quality design and mix of dwelling types is advanced that would protect the amenities of future occupants without prejudicing the long term viability of the surrounding commercial uses;</li> <li>2. The design of the development should ensure that the setting of the nearby Roman Catholic Church Grade II Listed Building is enhanced</li> <li>3. Existing trees and hedgerows around the eastern boundary of site are retained and enhanced</li> <li>4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.</li> </ol> <p><b>UA18 Land East of Coolinge Lane, Sandgate</b> - The site is allocated for residential development with an estimated capacity of up to 60 dwellings and approximately 1.2 ha of retained publicly accessible open space. Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. An area of publicly accessible open space to incorporate natural play, planting, including edible planting and high quality landscaping is provided</li> <li>2. Access is provided from both Coolinge Lane and either Bathurst or Hardwick Road, with improved cycle and pedestrian connectivity provided from the site to the surrounding area</li> </ol>	<p>Supportive of the policy to allocate for residential.</p> <p>The site would be ideal for social housing of which there is a severe lack of locally.</p> <p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p> <p>Despite there being 2 schools and a lot of new development nearby – further development should be arrested here, and open green spaces should be preserved .</p> <p>Traffic is a major problem here already.</p> <p>No sites including playing fields should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field .</p> <p>It was stated publicly on more than one occasion by KCC when Pent Valley School closed there was no intention of selling any of the school's land. This policy runs counter to that commitment.</p> <p>Support proposals for the retention of, and public access to, a playing pitch that was previously closed off. An alternative pitch such as a hard surface court could be considered.</p>	<p>In 2016, the site was granted planning permission for twenty-three dwellings and eighteen flats Ref: Y16/0463/SH; thirty-five will become Council houses. The site is currently under construction.</p> <p>Sport England raised concern that the existing Playing Pitch Strategy dates back from 2011. Since the publication of the existing Playing Pitch Strategy, Sport England has produced new guidance on the development of Playing Pitch Strategies and recommends that this part of the evidence base is now reviewed in order to ensure that it is both up-to-date and robust.</p> <p>It is therefore considered that there is currently insufficient evidence at this stage of the planning process to continue to allocate the site for development; consequently Policy UA18: Land East of Coolinge Lane, Sandgate is to be deleted from draft Places and Policies Local Plan.</p>	<p>Policy UA17: Shepway Resource Centre, Military Road to be deleted from draft Places and Policies Local Plan</p> <p>Policy UA18: Land East of Coolinge Lane, Sandgate to be deleted from draft Places and Policies Local Plan</p> <p>Policy UA17: Shepway Resource Centre, Military Road to be deleted from the Places and Policies Local Plan.</p> <p>Policy UA18: Land East of Coolinge Lane, Sandgate to be deleted from Places and Policies Local Plan.</p>

<p>5. The design of the development ensures that the setting of the nearby Pentoid House Folkestone School for Girls Grade II Listed Building is sustained and enhanced</p> <p>4. The development has at least 2 self / custom build plots on site</p> <p>5. The mature tree belt across the site is retained and enhanced</p> <p>6. Existing trees and hedgerows around perimeter of site are retained and enhanced</p> <p>7. The ecological potential of the site is fully investigated and mitigated (where necessary) as part of the application proposal</p> <p>8. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</p> <p>9. Proposals include either:</p> <p>a. A strategy to mitigate the loss of playing pitch provision either as a like for like replacement elsewhere, on site provision or via the upgrade of existing off site facilities; or</p> <p>9. Proposals include either:</p> <p>a. A strategy to mitigate the loss of playing pitch provision either as a like for like replacement elsewhere, on site provision or via the upgrade of existing off site facilities; or</p> <p>b. It adequately demonstrated that there is an over provision of playing pitches in the local area and that there would not be a detrimental impact on pitch provision because of the loss of these pitches.</p>	<p>The roads in this area are very busy at school pick up and dropping off times. Additional houses in this location will put more pressure on the local highways network.</p> <p>Support the requirement to enhance pedestrian and cycle routes through to Cooling Lane; development would create opportunities for safer access to schools and lessen the problems of schooltime car traffic in the area.</p> <p>The school should walk to a more suitable collection point or the make off-road provision on school premises. Cooling Lane is too narrow to cope.</p> <p>Local primary and secondary schools and doctors surgeries are at capacity; additional development could exacerbate the problem.</p> <p>The new development will destroy the few remaining larger wildlife habitats left along the road.</p> <p>The proposed housing density is out of keeping with the local area. The land take for housing should be minimised in view of the open and attractive character of those areas and its popular existing use.</p> <p>Cooling Lane used to have a special landscape safeguard and has some listed Georgian buildings from the former hamlet of Cooling. It should still be treated sensitively.</p> <p>Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.</p> <p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place." (Kent Heritage).</p> <p>This site has a mix of TPO's and mature trees; this should be stated more strongly and safeguarded. A tree schedule should be issued to prevent undesirable removals.</p> <p>The local sewer network is at capacity.</p> <p>Local water pressure is falling with each added development in the area.</p>	<p>deleted from the Places and Policies Local Plan.</p> <p>The Playing Pitch Strategy is currently being updated to inform the Core Strategy Review.</p>		
<p><b>UA19 Encombe House, Sandgate</b></p> <p>The site is allocated for residential development with an estimated capacity of approximately 36 residential apartments.</p> <p>Development proposals will be supported where:</p> <p>1. The ecological and arboricultural potential of the site is fully investigated and mitigated (where necessary) prior to the commencement of any development here to ensure that the biodiversity of this site is enhanced and TPOs protected</p> <p>2. Proposals would enhance the setting of the nearby Scheduled Ancient Monument and the Sandgate High Street Conservation Area</p> <p>3. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</p> <p>4. The development complies with Policy NE6 Land Stability.</p>	<p>Sandgate has land instability issues. Concern that the proposal will impact negatively on the area and threaten the stability of neighbouring properties.</p> <p>The site Tree Preservation Order's (TPO's) should be retained. They also stabilise the land and prevent flooding.</p> <p>Development of this site would inevitably affect the setting of the scheduled Martello Tower No.7. Any design and layout should seek to minimise impact.</p> <p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p> <p>A review showed that Encombe is partly within a Biodiversity Action Plan Priority Habitat. Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.</p>	<p>The Places and Policies Local Plan should be read as a whole. Any planning application would need to satisfy Policy NE6: Land Stability.</p> <p>Policy UA12 (Criteria 2) states that development proposals will be supported where trees protected by Tree Preservation Orders are retained.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p>	<p>Criteria 4 to be deleted from Policy UA19 (reassigned UA12).</p> <p>No action proposed.</p> <p>Amend Policy UA19, criterion 3 (reassigned Policy UA12) to read:</p> <p>'The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the nearby Scheduled Ancient Monument and the Sandgate High Street Conservation Area.'</p> <p>Amend Policy UA19 (reassigned Policy UA12) to include the following additional criterion:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p> <p>Amend Policy UA19 (reassigned Policy UA12) to include the following additional criteria:</p> <p>'Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat.'</p>	<p><b>UA12 Encombe House, Sandgate</b></p> <p>The site is allocated for residential development with an estimated capacity of approximately 36 residential apartments.</p> <p>Development proposals will be supported where:</p> <p>1. Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat;</p> <p>2. There is a landscaping scheme which retains a substantial amount of the existing tree cover including those trees protected by Tree Preservation Orders and any groups or individual trees important to the appearance of the site;</p> <p>3. The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the nearby Scheduled Ancient Monument and the Sandgate High Street Conservation Area; and</p> <p>4. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>
<p><b>UA20 Hythe Town Centre</b></p> <p>Within the designated town centre area (identified on the Policies Map), planning permission will be granted for development that provides for a range of town centre uses that adds to the vitality and viability of the town centre.</p> <p>Within the Primary Shopping Frontage (as identified on the Policies Map) within the town centre, development on the ground floor will be permitted for A1 and A3 uses. Other uses will be permitted in the Primary Shopping Frontage provided that:</p> <p>1. They fall within the definition of 'town centre uses' as defined in the NPPF; or</p> <p>2. They fall under D1 uses and provide a complimentary function to the town centre; and</p> <p>3. They would not create a continuous frontage of two or more non A1 uses.</p> <p>For development proposals that fall within the town centre uses definition that cannot be located within the designated town centre area, permission will be permitted provided that:</p> <p>1. the sequential approach set out in the National Planning Policy Framework and the Planning Practice Guidance has been followed;</p> <p>2. A full assessment is provided of the impact the proposal would have on Hythe Town Centre and any other town centres, relating to the scale and the type of development proposed in compliance with the National Planning Policy Framework and Planning Practice Guidance;</p> <p>3. It can be demonstrated that the site is in an accessible location and well connected to the town centre that would encourage people to walk, cycle and use public transport;</p> <p>4. The overall design reflects the local character in which it is located and the impact of any car parking is reduced by location and appropriate landscaping; and</p> <p>5. A suitable access and, if required, service yard, can be provided without detrimental impacts to any local residential amenity.</p>	<p>Supportive of the policy which seeks to protect and enhance Hythe Town Centre, as this is a central function and the heart of the town, and needs to remain viable and have continued vitality.</p> <p>Supportive of the policy but would like to see a further criteria protecting the character of the High Street. In particular restricting new or redevelopment to small scale, and restricting the amalgamation of small units.</p> <p>This policy should specify a percentage of A1 retail per frontage so the viability of the retail element in the Town is not undermined by too many A3 uses. Policy SS4 refers to predominantly A1 use but this is not sufficiently specific.</p> <p>The Policy should include mention of the special historic character of Hythe town centre so that this is properly taken account of. Permission for new shopfronts and alterations to existing shopfronts will only be given if the proposals preserve or enhance the character of the High Street. It is also suggested that the Council should consider the development of specific guidance for Shop Fronts and Signage in the Conservation Area.</p> <p>Hythe should include developments including housing and flats to cater for the ageing population</p>	<p>Comment noted.</p> <p>Support noted. The Places and Policies Local Plan should be read as a whole. Any Planning application would need to satisfy Policy HB2: Cohesive Design. A new Policy on Shopfronts will also be drafted as part of the new Retail and Leisure chapter to protect the design and traditional character of shopfronts within the district's Town and Local Centres.</p> <p>The Local Plan (2006) previously set maximum percentage thresholds for non-A1 uses in the street frontage for each of the town centres. However, this created problems when determining planning applications, as it led to instances where town centre uses as defined by the National Planning Policy Framework were being refused in the town centres because it exceeded the percentage threshold for which there was no evidence to justify the level set.</p> <p>Kent County Council is in the process of preparing a Heritage Strategy for Shepway District Council. Heritage Strategy work to date has fed into the development of the draft Places and Policies Local Plan.</p> <p>Policy UA15 allocates land at Saltwood Care Centre for C2/C3 housing and is designed to meet the needs of the ageing population and is restricted to occupation for the over 65 with appropriate communal facilities to meet the needs of an elderly population.</p>	<p>No action proposed</p> <p>Amend Places and Policies Local Plan to include new Policy RL10 on Shopfronts, Blinds and Security Shutters in Chapter 11: Retail and Leisure.</p> <p>No action proposed</p> <p>No action proposed.</p> <p>No action proposed.</p>	<p><b>UA3 Hythe Town Centre</b></p> <p>Within the designated town centre area (identified on the Policies Map), planning permission will be granted for development that provides for a range of town centre uses that adds to the vitality and viability of the town centre.</p> <p>Within the Primary Shopping Frontage (as identified on the Policies Map) development on the ground floor will be permitted for A1 (shops) and A3 (restaurants and cafes) uses. Other uses will be permitted in the Primary Shopping Frontage provided that:</p> <p>1. They fall within the definition of town centre uses in the National Planning Policy Framework; or</p> <p>2. They fall under D1 uses and provide a complementary function to the town centre; and</p> <p>3. They would not create a continuous frontage of two or more non-A1 (shops) uses; and</p> <p>4. In the case of appropriate sui generis uses they would create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area.</p> <p>Development proposals within the town centre uses definition that cannot be located within Hythe Town Centre will be judged against Policy RL8.</p> <p><b>RL10 Shop Fronts, Blinds and Security Shutters</b></p> <p>Proposals for new shop fronts, or alterations to shop fronts, will be permitted where:</p> <p>1. The design, materials and proportions of any new, or altered, shop front relates to the character of the building and its locality;</p> <p>2. Proposals that reflect the traditional character of shop fronts must include historically appropriate detailing;</p> <p>3. Any existing features of historic or architectural interest are retained; and</p> <p>4. Proposals affecting Listed Buildings, Conservation Areas or other heritage assets will preserve or</p>



	Improvements to infrastructure are needed	The Council is preparing an Infrastructure Delivery Plan (IDP) for Shepway which will identify all types of infrastructure needed to support new homes and businesses over the course of the Places and Policies Local Plan to 2031.  The Planning Act 2008 provides a wide definition of the infrastructure which can be funded by the Community Infrastructure Levy. It can include schools, sports facilities, transport, culture, green infrastructure, community, health and social care facilities. Detail of the CIL in operation in the district is set out on the Council's website.	No action proposed.	enhance the character or appearance of the asset and its setting  Proposals for blinds, canopies or awnings which respect the architectural character and features of the building on which they are to be installed will be permitted.  Proposals for the use of security measures will be permitted only if they do not involve the introduction of obtrusive features or detract from the character of the street scene.
	The policy should include a specific reference to archaeology potential and assessment as part of development proposals. The following additional criterion should be included: "The effect of the development upon the significance of any archaeological remains is properly considered and measures to either safeguard these or, if appropriate, to record and understand them are agreed".	Comment noted. The Plan should be read as a whole; Policy HE2: Archaeology would also apply to any relevant proposals.	No action proposed.	
	Planning consents given, particularly for residential development, must have sufficient parking within the proposed development so that the existing public car parking spaces are kept open for visitors to the town centre.	The Places and Policies Local Plan should be read as a whole. Any Planning application would need to satisfy Policy T2: Parking Standards.	No action proposed.	
<b>UA21 Smiths Medical Campus, Hythe</b>  The site is allocated for mixed residential development with an estimated capacity of approximately 80 dwellings and Commercial use B1/B8. Development proposals will be supported where: 1. The design and layout of the whole site should provide vehicular access for residential and business development from Fort Road with an additional new relief road connection to Range Road. No vehicular access should be from Boundary Road 2. Retention of the established factory unit and car park located at the southern end of the site. 3. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest 4. Any potential contamination from former use is investigated and appropriately mitigated as part of the development 5. Ecological investigations are undertaken adequate mitigation measures identified (if necessary) to ensure development does not have an adverse impact upon the Hythe Ranges Local Wildlife Site 6. The development has at least 4 self / custom build plots on site	A full Transport Assessment should be undertaken to demonstrate the expected vehicle movements on Fort Road and other roads in the vicinity.	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	No action proposed.	<b>UA13 Smiths Medical Campus, Hythe</b>  The site is allocated for mixed-use development with an estimated capacity of approximately 80 dwellings and 2,000sqm of B1 (business) / B8 (storage and distribution).  Development proposals will be supported where: 1.Primary vehicular access for residential and business is achieved from Fort Road with a secondary vehicular access connection to Range Road. There should be no vehicular access from Boundary Road; 2.Highway improvements at the junction of St Nicholas Road at Dymchurch Road are provided to the satisfaction of the Local Highways Authority; 3.The established factory unit and car park located at the southern extent of the site are retained or replaced; 4.Appropriate and proportionate contributions are made to the expansion of Oaklands Health Centre through a Section 106 agreement; 5.Appropriate and proportionate contributions, through a Section 106 agreement, are made towards the upkeep and/or improvement of open space and existing play facilities in the vicinity; 6.Ecological investigations are undertaken and adequate mitigation and enhancement measures are incorporated into the design to minimise effects on the Hythe Ranges Local Wildlife Site; 7.Proposals are accompanied by a Site-specific Flood Risk Assessment and demonstrate that any risks can be mitigated and/or safely managed; 8.Extra flood resistant and resilient construction measures are incorporated into the design of the development to reduce the risk of life to occupants in an extreme flood event and improve flood risk management; 9.The masterplanning of the site is informed by an odour assessment to take account of nearby wastewater treatment works in order to minimise land use conflict; 10.Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; 11.Any potential contamination from the former use is investigated, assessed and if appropriate, mitigated as part of the development; 12.The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest; and 13.At least 4 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development.
	There should be a higher proportion of appropriate commercial use on the site with around 50% reduction in the number of proposed dwellings given the large amounts of housing proposed elsewhere across Shepway.	The Employment Land Review (2016) concluded that there is sufficient employment land allocated to meet both industrial and office requirements for the remaining plan period. However, the Shepway Economic Development Strategy (2015-2020) suggests that these allocation are in the wrong locations to meet the current business demands for future growth the focus should be around the M20 junctions will strong access to the strategic network. Consequently, officers are of the opinion that the Smith's Medical site is not an appropriate location to be allocating significant new commercial space. The factory unit is being retain as the ELR identified that Shepway contains the second smallest stock of factories in the sub-region.  Since publication of the Preferred Options the site promoter has met with the Council to explain that the factory units were designed and built specifically to their operational needs and are therefore unlikely to be of practical use to another company. Therefore, the policy is to be made more flexible to specify a mixed-use development with an estimated capacity of 80 dwellings and 2,000sqm of B1 (business) / B8 (storage and distribution) uses.	Amend Policy UA21, criterion 3 (reassigned Policy UA13) to read:  'The established factory unit and car park located at the southern extent of the site are retained or replaced;'	
	The Council needs to wait and evaluate the impact of the Martello Lakes development before further land is allocated in this area. Taking account of school and doctors places, increased air and noise pollution.	The effects of the Martello Lakes development was fully assessed as part of the planning application and the necessary mitigation measures to address these formed part of the planning consent. The Council has involved statutory consultees, including Kent County Council Education and NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education and NHS support the Council that there is capacity available in existing schools and doctors to cater for the planned additional growth within the Urban Character Area. Where improvements to school and health facilities are necessary to cater for the additional growth, comments from KCC and NHS have been taken into account when preparing the plan.  Since the publication of the Preferred Options Local Plan, the Clinical Commissioning Group have identified the Oaklands Health Centre in Hythe for expansion in order to meet the needs of the growing population. A number of site allocations are required to make a financial contribution through a Section 106 agreement in order to facilitate the growth of services.	Amend Policy UA21 (reassigned Policy UA13) to include the following additional criteria:  'Appropriate and proportionate contributions are made to the expansion of Oaklands Health Centre through a Section 106 agreement;'	
	Where the site boundary meets Hythe Green, appropriate measures must be taken to protect the tree line and established habitats.	The established tree line on the eastern boundary with Hythe Green falls outside of the Smith's Medical site boundary.	No action proposed.	
	Development should not take place against the eastern boundary, but should be set back away from it. Development that creates an inward looking estate should be resisted.	The Places and Policies Local Plan should be read as a whole. Any planning application would need to satisfy Policy HB1: Quality Places Through Design and Policy HB2: Cohesive Design.  Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations.	No action proposed.	

	Fort Road should be extended to provide residents with direct access to the seafront. Any such design would need to ensure that this did not create a bypass for the A259.	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	No action proposed.	
	No housing should be constructed prior to the completion of the link road.	A quantum of housing will need to be built in advance in order to finance the construction of the Fort Road - Range Road link. These trigger points for the delivery of infrastructure will be specified in a Section 106 legal agreement attached to the planning permission.	No action proposed.	
	Following an internal discussion and with Kent Highway it was suggested that some minor highway improvement at the St Nicholas Road junction with Dymchurch Road should form part of the site development proposals.	Comment noted.	Amend Policy UA21 (reassigned Policy UA13) to include the following additional criterion:  'Highway improvements at the junction of St Nicholas Road at Dymchurch Road are provided to the satisfaction of the Local Highways Authority.'	
	This site should be considered as a possible site for the proposed new Hythe leisure centre. More central to Hythe and Romney Marsh. There is no reason why SDC should limit itself to sites within its ownship.	The construction of a new leisure centre for Hythe would be funded by Shepway District Council using the Section 106 financial contributions from the Nickolls Quarry development, and capital land receipts from the sale of the existing swimming pool site on South Road and Princes Parade. The project would be unaffordable if the Council had to factor in the additional cost of purchasing a prime site that is not in its ownship.	No action proposed.	
	The development should include a high proportion of affordable housing.	Any planning application will need to comply with the adopted Policy CSD1 in the Core Strategy (2013) with regard to affordable housing provision.	No action proposed.	
	Given the generous existing employment land allocations in Hythe at Nickolls Quarry and existing sites at Range Road, and Pennypot, and the close proximity of Link Park. We suggest there is potential to increase housing (and/or density?) on this site.	A general calculation of 35 dwellings per hectare was used to inform the number of dwellings proposed on the site based on the site area. Although, the draft Local Plan allocates sufficient land to meet the employment needs of the District, the factory unit is still to be retained as the Employment Land Review identified a shortage in the factory stock for the district in comparison to the sub-region.  The number of dwellings is a general guide to inform future planning applications which once tested at the planning application stage may increase or decrease subject to design, layout and siting. However, the level of development proposed is considered appropriate for this site	No action proposed.	
	A review showed that the Smiths Medical site is partly within a Biodiversity Action Plan Priority Habitat. Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.	Comment noted.	Amend Policy UA21 (reassigned Policy UA13) to include the following additional criterion:  'Ecological investigations are undertaken and adequate mitigation and enhancement measures are incorporated into the design to minimise effects on the Hythe Ranges Local Wildlife Site.'	
	Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.	Comment noted.	Amend Policy UA21 (reassigned Policy UA13) to include the following additional criterion:  'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'	
	The site is in close proximity to Hythe Wastewater Treatment Works. The following additional criterion should be included within the policy for soundness. "The Masterplanning of the site should take account of nearby wastewater pumping stations to minimise land use conflict".	Comment noted.	Amend Policy UA21 (reassigned Policy UA13) to include the following additional criterion:  'The masterplanning of the site is informed by an odour assessment to take account of nearby wastewater treatment works in order to minimise land use conflict.'	
	Elements of Hythe Ranges once included this site, Archaeological potential is low but the following additional criterion should be included: "The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest".	Comment noted.	Amend Policy UA21, criterion 12 (reassigned Policy UA13) to read:  'The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.'	
<b>UA22 Land at Station Road, Hythe</b>	The proximity to the AONB means that development could impact on the setting of the Kent Downs AONB, especially in view of the fact that the landscape here is of high quality and shares similar characteristics to the adjacent AONB. Support the inclusion of criterions 1 and 3.	Support noted.	No action proposed.	<b>UA14 Land at Station Road, Hythe</b>
The site is allocated for residential development with an estimated capacity of approximately 40 family sized dwellings. Development proposals will be supported where: 1. Development is designed to a high quality standard that would not have a harmful impact upon the character and setting of the nearby Kent Downs Area of Outstanding Natural Beauty 2. Ecological and arboricultural investigations are undertaken and adequate mitigation measures identified to ensure development does not have an adverse impact upon protected trees or protected species 3. Existing trees and hedgerows within/around perimeter of site are retained and enhanced	Development of this site together with that at Saltwood Care Centre (UA23) will require very careful management of surface water runoff to avoid the flooding found elsewhere in Hythe. The drainage infrastructure and Mill Stream seems unable to cope as flooding is a regular occurrence in the lower half of Station Road all the way down to the junction with the A259 and into Mill Road.	The Places and Policies Local Plan should be read as a whole. Any planning application will need to comply with Policy CC3: Sustainable Drainage Systems (SuDs). The council has also consulted with Southern Water and Kent County Council, the lead local flood authority, as part of the preparation of the Places and Policies Local Plan.	No action proposed.	Development proposals will be supported where:  1. The development is designed to a high standard and would not have a harmful impact on the character and setting of the nearby Kent Downs Area of Outstanding Natural Beauty; 2. An appropriate pedestrian crossing point, in the form of dropped kerbs and tactile paving, is provided;

<p>4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</p> <p>5. Development directs land to sequentially preferential locations within the site in terms of flood risk.</p>	<p>Station Road is an extremely busy road and safe access for this number of homes will prove challenging. Concerned about sight lines and proximity of the blind bend.</p>	<p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.</p>	<p>No action proposed.</p>	<p>3. Existing trees and hedgerows within and around the perimeter of the site are retained and enhanced;</p> <p>4. Ecological and arboricultural investigations are undertaken and adequate mitigation measures identified to ensure development does not have an adverse impact on protected trees or protected species;</p> <p>5. Appropriate and proportionate contributions are made to the expansion of Oaklands Health Centre through a Section 106 agreement;</p> <p>6. They are accompanied by a Site-specific Flood Risk Assessment with development directed to sequentially preferential locations within the site in terms of flood risk; and</p> <p>7. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>
	<p>An appropriate pedestrian crossing point in the form of dropped kerbs and tactile paving will be required as there is no footpath on the northern side of Station Road.</p>	<p>Comment noted.</p>	<p>Amend Policy UA22 (reassigned Policy UA14) to include the following additional criterion:</p> <p>'An appropriate pedestrian crossing point, in the form of dropped kerbs and tactile paving, is provided.'</p>	
	<p>Blackhouse Hill / Station Road has become unfortunately a preferred route for traffic between Hythe and the Romney Marsh up to The A20/M20 access, the West End of Folkestone and beyond</p>	<p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.</p>	<p>No action proposed.</p>	
	<p>Since the publication of the preferred Options Local Plan, the Clinical Commissioning Group have identified the Oaklands Health Centre in Hythe for expansion in order to meet the needs of the growing population. A number of site allocations are required to make a financial contribution through a s.106 agreement in order to facilitate the growth of services.</p>	<p>Comment noted.</p>	<p>Amend Policy UA22 (reassigned Policy UA14) to include the following additional criterion:</p> <p>'Appropriate and proportionate contributions are made to the expansion of Oaklands Health Centre through a Section 106 agreement.'</p>	
	<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA22, criterion 7 (reassigned Policy UA14) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
	<p>The site is an attractive open green space and wildlife corridor. Land adjacent to Mill Stream should be set aside for open space.</p>	<p>The Council has involved statutory consultees including Natural England, together with specialist consultees including Kent Wildlife Trust and Kent County Council Biodiversity team at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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.</p> <p>Policy UA14: Land at Station Road, Hythe (criterion 4) states that development proposals will be supported where ecological and arboricultural investigations are undertaken and adequate mitigation measures identified to ensure development does not have an adverse impact on protected trees or species.</p>	<p>No action proposed.</p>	
	<p>Public Right of Way to Saltwood Castle should be maintained as part of any proposed development.</p>	<p>The Public Right of Way falls outside the site boundary and therefore will not be affected by site proposals</p>	<p>No action proposed.</p>	
	<p>Following an internal discussion it was agreed that the site capacity was too high.</p>	<p>Given the site topography, flood risk and landscaping considerations, and the density of the existing adjacent urban form, it was considered appropriate to reduce the proposed site capacity from 40 to 30 dwellings.</p>	<p>Site capacity reduced from 40 to 30 dwellings.</p>	
<p><b>UA23 Land at the Saltwood Care Centre</b></p> <p>The site is allocated for an appropriate quantum of Extra Care (C2/C3) housing. Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>All properties are designed to wheelchair accessible homes standards (M4(3)3 of the building regulations</li> <li>On site care provision is made via an appropriate contract that requires a minimum of 2 hours of care, to be provided by a CSCI registered provider</li> <li>The development meets the needs of the ageing population and is restricted to occupation for those over 65</li> <li>Appropriate communal facilities are provided to meet the needs of an elderly population</li> <li>Proposals are landscape led and demonstrate that landscape character is protected</li> <li>Access is provided to meet the needs of residents and to provide connectivity to the surrounding area</li> <li>The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.</li> </ol>	<p>The proximity to the AONB means that development could impact on the setting of the Kent Downs AONB, especially in view of the fact that the landscape here is of high quality and shares similar characteristics to the adjacent AONB. Support the inclusion of criterions 1 and 3.</p> <p>In regards criterion 6, contributions should be sought towards improving pedestrian safety at the North Road / Tanners Hill junction.</p>	<p>Comment noted.</p> <p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.</p>	<p>No action proposed.</p>	<p><b>UA15 Land at the Saltwood Care Centre, Hythe</b></p> <p>The site is allocated for 84 Class C2 or C3 Extra Care Units. Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>The development meets the needs of the ageing population and is restricted to occupation for those over 65 years of age;</li> <li>On-site care provision is made through an appropriate contract that requires a minimum of 2 hours of care, to be provided by a Care Quality Commission registered provider;</li> <li>All of the Extra Care Units are designed to wheelchair accessible homes standards (M4(3): Category 3) of the Building Regulations;</li> <li>Appropriate communal facilities are provided to meet the needs of the residents;</li> <li>Access is provided to meet the needs of residents and to provide connectivity to the existing care centre site and the surrounding area;</li> <li>Proposals are accompanied by a landscape strategy that retains a substantial amount of the existing tree cover and demonstrates that the landscape character is protected;</li> <li>Appropriate and proportionate contributions, through a Section 106 agreement, are made to the expansion of Oaklands Health Centre;</li> <li>Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat;</li> <li>A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider; and</li> <li>The archaeological potential of the land is properly considered and appropriate archaeological</li> </ol>

<p>Since the publication of the preferred Options Local Plan, the Clinical Commissioning Group have identified the Oaklands Health Centre in Hythe for expansion in order to meet the needs of the growing population. A number of site allocations are required to make a financial contribution through a s.106 agreement in order to facilitate the growth of services.</p>	<p>Comment noted.</p>	<p>Amend Policy UA23 (reassigned Policy UA15) to include the following additional criterion:  'Appropriate and proportionate contributions, through a S106 agreement, are made to the expansion of Oaklands Health Centre.'</p>	<p>20. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>
<p>My comments at Picture 5.25 (Station Road) also apply to this site. In fact, the view up the valley from the West side towards the Listed Saltwood Castle is of particular note - part of Hythe's 'Green Belt'! (SA Objective 7 concerning consideration of longer distances to heritage assets being relevant).</p>	<p>The Council has involved statutory consultees including Historic England and Kent Heritage at all stages in drafting both the Core Strategy and Places and Policies Local Plans.  Where concerns have been raised in regards to the possible impact on heritage assets, the necessary mitigation measures can be provided as part of the allocated sites; these are identified in specific policies. General policies in Chapter 17: Historic Environment will also apply to relevant proposals, as will national policy set out in the National Planning Policy Framework and Planning Practice Guidance.</p>	<p>No action proposed.</p>	
<p>A review showed that the Land at Saltwood Care Centre is partly within a Biodiversity Action Plan Priority Habitat. Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.</p>	<p>Comment noted.</p>	<p>Amend Policy UA23 (reassigned Policy UA15) to include the following additional criterion:  'Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat.'</p>	
<p>When assessing the type of care to be provided, consideration should be given to the proximity of local services to ensure that residents are not isolated.</p>	<p>Under the Planning and Compulsory Purchase Act 2004, a Sustainability Appraisal (SA) is mandatory for Local Plans.  The SA Framework is formed of 14 SA Objectives, which are applied to the potential site allocations and policies. SA Objective (3) aims to promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access.  When the appraisal questions for this particular objective were assessed against Policy UA23: Land at Saltwood Care Centre (now renumbered) the site received a positive score.</p>	<p>No action proposed.</p>	
<p>Extra Care (C2/C3) should read "Extra Care C2 or C3".  We are concerned that this is outside the Hythe settlement area (contrary to policy CSD3), in a designated local landscape area and where there is a blanket TPO. It is not clear why expansion of the care home is acceptable when market housing wouldn't be acceptable – surely both will damage the countryside/landscape. The policy should state a definite number of new dwellings – "an appropriate quantum" is too vague. Note that the SHLAA assessment refers to "latchgate" i.e. there is a potential landslip risk so the policy should refer to this.</p>	<p>Comment noted.  There is currently an outline application for 84 extra care homes (ref 15/0720/SH) with a resolution to grant planning consent subject to finalisation of legal agreements.  The perceived impact on the Local Landscape Area, setting of the Area of Outstanding Natural Beauty and blanket Tree Preservation Order trees would not be acceptable for market housing. The current allocation for Extra Care facilities is judged to be a special case given the need to address Hythe's ageing population and that the site adjoins the existing Saltwood Care Centre.  The Places and Policies Local Plan should be read as a whole. Where necessary, a planning application would need to satisfy Policy NE6: Land Stability.</p>	<p>No action proposed.  No action proposed.</p>	
<p>The following additional criterion should be included within the policy for soundness. "A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider".</p>	<p>Comment noted.</p>	<p>Amend Policy UA23 (reassigned Policy UA15) to include the following additional criterion:  'A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.'</p>	
<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA23, criteria 10 (reassigned Policy UA15) to read:  'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
<p>Land not appropriate for general non-care related residential housing.</p>	<p>There is currently an outline planning application for 84 extra care homes (ref 15/0720/SH).</p>	<p>No action proposed.</p>	
<p><b>UA24 Foxwood School and St Saviours Hospital, Seabrook Road, Hythe -</b>  Foxwood School is allocated for a landscape led residential development with an estimated capacity of approximately 150 dwellings. St Saviours Hospital is allocated for a landscape led residential development with an estimated capacity of approximately 35 dwellings. Development proposals will be supported where: 1. The design proposals are genuinely landscape led to take account of the environmental and topographical features of the sites and to ensure important long and short distance views are retained and the proposal preserves the character and setting of the Kent Downs Area of Outstanding Natural Beauty, the Area of Special Character and the Local Wildlife Site 2. The design of the development should seek to enhance the setting of the nearby Grade II Listed Building The Black Cottage and Scheduled Monument the Royal Military Canal 3. An appropriate mix of housing and/or apartments is provided that respects the constraints of the sites 4. The archaeological potential of the land is properly considered and measures are agreed to monitor and respond to any finds of interest 5. Access is derived from Seabrook Road with no vehicular access via Cliff Road 6. Ecological and arboricultural investigations are undertaken and adequate mitigation measures identified to ensure development does not have an adverse impact upon protected trees or wider established habitats 7. The provision of open space and children's play space being provided and a management company is established for its long term maintenance 8. The Foxwood School site has at least 6-8 self / custom build plots on site 9. The Dutch House (71 Seabrook Road) must be retained and incorporated in to any design.</p>	<p>The access and egress onto Seabrook Road is a concern.  The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.  The Policy should impose a maximum number of homes. The loose wording "approximately" should be replaced by "no more than". This would avoid the prospect of the over-intensity of development which characterised the recent application.  The statement that there would be no vehicular access to either the St Saviour's site or the Foxwood site from Cliff Road is welcomed.</p>	<p>No action proposed.  No action proposed.  No action proposed.</p>	<p>Following the publication of the Preferred Options Local Plan it was decided that the joint site allocation policies for St. Saviours and Foxwood would be clearer if split into two separate policies.  <b>UA16 St Saviour's Hospital, Seabrook Road, Hythe</b>  St. Saviour's Hospital is allocated for a landscape-led residential development with an estimated capacity of approximately 50 dwellings.  Development proposals will be supported where:  1. The design is landscape-led to take account of the environmental and topographical features of the site and to ensure important long and short distance views are maintained; 2. The character and setting of the Kent Downs Area of Outstanding Natural Beauty, the Seabrook Road area; and the Royal Military Canal Local Wildlife Site are preserved; 3. The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the Grade II Listed Building, The Black Cottage; and Scheduled Monument, the Royal Military Canal; 4. The Dutch House (71 Seabrook Road) is retained and incorporated into the design; 5. Access is derived from Seabrook Road with no vehicular access from Cliff Road; 6. Appropriate and proportionate contributions, through a S106 agreement, are made to the expansion of Oaklands Health Centre; 7. Appropriate and proportionate contributions are made towards the provision of a controlled crossing on Seabrook Road to improve access to Princes Parade and the seafront; 8. The public highway known as College Bridge that links the A259 with the Royal Military Canal is upgraded to the satisfaction of the Local Highways Authority;</p>

<p>An emergency access is required as the proposal provides for more than 50 dwellings. A controlled crossing should also be provided across Seabrook Road in that residents living at the site can cross Seabrook Road to access Princes Parade and the beach. The policy should require the upgrading of the public highway known as College Bridge, which links the A259 with the Royal Military Canal and will link this site with the Canal and the PROW to the north of the canal.</p>	<p>Comment noted.</p>	<p>Amend Policy UA24 (reassigned Policy 16 St Saviours and 17 Foxwood) to include the following additional criteria:</p> <p>'Appropriate and proportionate contributions are made towards the provision of a controlled crossing on Seabrook Road to improve access Princes Parade and the seafront;'</p> <p>'The public highway known as College Bridge that links the A259 with the Royal Military Canal is upgraded to the satisfaction of the Local Highways Authority;'</p>	<p>9. Appropriate and proportionate contributions, through a S106 agreement, are made towards the upkeep and/or improvement of open space and existing play facilities at Princes Parade;</p> <p>10. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; and</p> <p>11. An appropriate mix of housing and/or apartments is provided that respects the constraints of the site.</p> <p><b>UA17 Foxwood School, Seabrook Road, Hythe</b></p> <p>Foxwood School is allocated for a landscape-led residential development with an estimated capacity of approximately 150 dwellings.</p> <p>Development proposals will be supported where:</p>
<p>It should be a requirement for any new development to introduce an effective drainage system that is not only sufficient for the new scheme but also rectifies the existing surface water drainage deficiencies.</p>	<p>All proposals will need to comply with Policy CC3: Sustainable Drainage Systems (SuDs), whereby surface water is managed close to the source. The council has also consulted with Southern Water and Kent County Council, as lead local flood authority, as part of the preparing Places and Policies Local Plan.</p>	<p>No action proposed.</p>	<p>1. The design is genuinely landscape-led to take account of the environmental and topographical features of the site and to ensure important long and short distance views are maintained and the playing pitches are retained and enhanced as part of the landscape scheme;</p> <p>2. The character and setting of the Kent Downs Area of Outstanding Natural Beauty, the Seabrook Road area and the Royal Military Canal Local Wildlife Site are preserved;</p> <p>3. The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the Grade II Listed Building, The Black Cottage; and Scheduled Monument, the Royal Military Canal;</p>
<p>The existing line of trees play an important role in giving some stability to the steep bank. Importantly they also provide a screen to the residences below. Under no circumstances should those trees be removed.</p>	<p>The site falls within the latchgate area (land instability) therefore any development should comply with Policy NE6: Land Stability. The trees to the south of the site are also covered by Tree Preservation Orders; Policy UA17 (criteria 8) requires arboricultural investigations to be undertaken and mitigation and enhancement measures to be incorporated into the design to minimise effects on habitat.</p>	<p>No action proposed.</p>	<p>4. Access is derived from Seabrook Road with no vehicular access from Cliff Road;</p> <p>5. Appropriate and proportionate contributions are made towards the provision of a controlled crossing on Seabrook Road to improve access to Princes Parade and the seafront;</p> <p>6. The public highway known as College Bridge that links the A259 with the Royal Military Canal is upgraded to the satisfaction of the Local Highways Authority;</p> <p>7. There is on site provision of play space to meet the needs of the development for which a management company or other solution should also be established for its long term maintenance;</p>
<p>Consideration must be given to the surrounding residential character. The massing should be consistent with the surrounding residential character and not that of the existing main building which dominates the area</p>	<p>The Places and Policies Local Plan should be read as a whole. Any planning application would need to satisfy Policy HB1: Quality Places Through Design criterion 1 which states:</p> <p>'Planning permission will be granted where the proposal: Makes a positive contribution to its location and surroundings, enhancing integration, while also respecting existing buildings and land uses, particularly with regard to layout, scale, form, density, materiality and mix of uses so as to ensure all proposals create places of character;'</p>	<p>No action proposed.</p>	<p>8. Ecological and arboricultural investigations are undertaken and adequate mitigation and enhancement measures are incorporated into the design of the Foxwood School development to minimise effects on the local Biodiversity Action Plan Priority Habitat;</p> <p>9. A connection from the site is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider;</p> <p>10. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place;</p> <p>11. An appropriate mix of housing and/or apartments is provided that respects the constraints of the sites; and</p> <p>12. At least 6-8 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development.</p>
<p>The Foxwood Site may contain priority habitat, deciduous woodland. These potential environmental constraints were not highlighted in the final SHLAA.</p>	<p>A review showed that the former Foxwood School site is partly within a Biodiversity Action Plan Priority Habitat (deciduous woodland and additional habitats). Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.</p>	<p>Amend Policy 24 (reassigned Policy UA17) to include the following additional criterion:</p> <p>'Ecological and arboricultural investigations are undertaken and adequate mitigation and enhancement measures are incorporated into the design of the Foxwood School development to minimise effects on the local Biodiversity Action Plan Priority Habitat;'</p>	
<p>The old "Seabrook Lodge School House" at Foxwood and St Saviours Hospital should be considered of architectural value are preserved given their distinctiveness on the Hythe scarp.</p>	<p>The buildings, especially St Saviours Hospital, were assessed (at pre-application) for their architectural value; however it was considered by officers that behind the facade the main building was modern in its design and construction and of little heritage value or architectural merit and therefore was not worth retaining as part of any future proposals.</p>	<p>No action proposed.</p>	
<p>Since the publication of the preferred Options Local Plan, the Clinical Commissioning Group have identified the Oaklands Health Centre in Hythe for expansion in order to meet the needs of the growing population. A number of site allocations are required to make a financial contribution through a s.106 agreement in order to facilitate the growth of services.</p>	<p>Comment noted.</p>	<p>Amend Policy UA24 (reassigned Policy UA16) to include the following additional criterion:</p> <p>'Appropriate and proportionate contributions, through a Section 106 agreement, are made to the expansion of Oaklands Health Centre;'</p>	
<p>Following an internal discussion it was agreed that the site should make an off site contribution towards improvements of open space and existing play facilities at Princes Parade to reflect the findings of the Open Space and Play Space Strategies</p>	<p>Comment noted.</p>	<p>Amend Policy UA24 (reassigned Policy UA16) to include the following additional criterion:</p> <p>'Appropriate and proportionate contributions, through a Section 106 agreement, are made towards the upkeep and/or improvement of open space and existing play facilities at Princes Parade;'</p>	
<p>No sites including playing fields should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field.</p>	<p>Foxwood is part of a Federation with Highview School. In September 2016 the schools merged into one new school and moved to new premises on Park Farm Road, Folkestone and is now rebranded as The Beacon, Folkestone. School facilities including playing field facilities were have been reprovided on the new site.</p> <p>It is agreed that the site should provide an element of open and play space to reflect the findings of the Open Space and Play Space Strategies</p>	<p>Amend Policy UA24 (reassigned Policy UA17) to include the following additional criterion:</p> <p>'There is on site provision of play space to meet the needs of the development for which a management company or other solution should also be established for its long term maintenance;'</p>	
<p>The following additional criterion should be included within the policy for soundness. "A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider".</p>	<p>Comment noted.</p>	<p>Amend Policy UA24 (reassigned Policy UA17) to include the following additional criterion:</p> <p>'A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider;'</p>	
<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA24, criterion 10 (reassigned Policy UA17) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place;'</p>	

<p><b>UA25 Princes Parade, Hythe</b></p> <p>The site is allocated for mixed use redevelopment to include public open space, leisure, small scale commercial uses and up to 150 residential dwellings.</p> <p>Development proposals will be supported where:</p> <p>1. They form a single comprehensive masterplan of the entire site which meets with the policy requirements of this plan and the Core Strategy (2013). The mix of uses shall include :</p> <p>- A substantial community recreation and leisure offer including an appropriate replacement for Hythe Swimming Pool, with further investigation of the inclusion of other facilities</p> <p>- High quality public open spaces incorporating the enhancement of and linking between the canal and beach front and accessibility east to west along the canal and coast</p> <p>- An appropriate mix of well designed homes within a landscape led setting, including appropriate accommodation for the elderly, affordable housing and self/custom build</p> <p>2. They are accompanied by appropriate heritage assessment to demonstrate that key features of the Royal Military Canal and its setting, which contribute to its significance as a Scheduled Monument would be preserved and enhanced and that the overall scheme would not result in substantial harm to the heritage asset</p> <p>3. Any less than substantial harm is clearly and convincingly demonstrated to be outweighed by the public benefits of the proposal, which should include heritage benefits</p> <p>4. Any potential contamination from former use is investigated and appropriately mitigated as part of the development</p> <p>5. Appropriate protection, preservation and integration of the Royal Military Canal Local Wildlife Site is provided.</p>	<p>The Core Strategy Housing requirement and 5-year housing land supply can be satisfied without relying on Princes Parade;</p>	<p>Princes Parade contributes to providing the housing land supply for the Urban Character Area over the local plan period as set out in the Places and Policy Local Plan (Submission Draft) Table 4.3)</p>	<p>No action proposed.</p>	<p><b>UA18 Princes Parade, Hythe</b></p> <p>The site is allocated for mixed-use redevelopment to include up to 150 residential dwellings, a 2,961sqm leisure centre; approximately 1,500sqm of commercial uses including hotel use (Use Class C1 / A1 / A3); and public open space.</p> <p>Development proposals will be supported where:</p> <p>1.They form a single comprehensive masterplan of the entire site which meets with the policy requirements of this plan and the Core Strategy. The mix of uses shall include:•A substantial community recreation and leisure facility including an appropriate replacement for Hythe Swimming Pool, with further investigation of the inclusion of other facilities;</p> <p>•High quality public open and play space of at least 45 per cent of the site area (including the promenade); incorporating the enhancement of, and linking between, the canal and beach front and accessibility east to west along the canal and coast; and</p> <p>•An appropriate mix of well designed homes within a landscape-led setting, including appropriate accommodation for the elderly, affordable housing and self-build and custom build plots in accordance with Policy HB4: Self-build and Custom Housebuilding Development;</p> <p>2.They are accompanied by an appropriate heritage assessment to demonstrate that the harm to key features of the Royal Military Canal and its historic setting, which contribute to its significance as a Scheduled Ancient Monument, would be minimised and that the overall scheme would not result in substantial harm to the heritage asset;</p> <p>3.Any less than substantial harm is clearly demonstrated to be outweighed by the public benefits of the proposal, which should include heritage benefits;</p> <p>4.The design creates a sense of place by taking account of opportunities to draw on the heritage of the Royal Military Canal and its setting, including the retention of key vistas and physical links with the coast;</p> <p>5.A new accessible Destination Play Space is created to replace the existing Royal Military Canal Play Area;</p> <p>6.Any potential contamination from its former use is investigated, assessed and if appropriate, mitigated as part of the development;</p> <p>7.Highway and junction improvements are provided as required to the satisfaction of the Local Highways Authority;</p> <p>8.Traffic flow and parking provision is assessed to ensure that the development does not put undue pressure on the local highway network and that adequate parking provision is provided so that there are no detrimental parking impacts on Princes Parade;</p> <p>9.Improvements are delivered to the public bridleway along the north side of the canal to enhance its amenity value;</p> <p>10.At least two links between the canal crossings and Princes Parade are provided as dedicated public footpaths or bridleways;</p> <p>11.A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider;</p> <p>12.The masterplanning of the site takes account of the nearby pumping station to allow for odour dispersal and help prevent unnecessary unacceptable impact from vibration;</p> <p>13.Access is maintained to the existing or reconfigured underground sewerage infrastructure for maintenance and up-sizing purposes;</p> <p>14.Ecological and arboricultural investigations are undertaken and adequate mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat; and</p> <p>15.Appropriate protection, preservation and integration of the Royal Military Canal Local Wildlife Site is provided and there is a demonstrable net gain in the protection of wildlife.</p>
	<p>Housing development rejected previously by Local Plan Inspectors.</p>	<p>The policy as drafted seeks to address the concerns raised by previous Planning Inspectors by seeking to mitigate and/or minimise the perceived adverse impacts of developing the site to the point whereby a scheme could be considered acceptable. The Council has also been working closely with Historic England to address specific concerns in regards to the Hythe Royal Military Canal.</p>	<p>No action proposed.</p>	
	<p>Conflicts with current National and Local Plan Policies LR9, TM8 &amp; BE13.</p>	<p>The Places and Policies Local Plan is looking to the future. The current saved policies in the Local Plan Review (2006) are out-of-date and not National Planning Policy Framework compliant; as a consequence these will be superseded by the Places and Policies Local Plan when adopted. Regardless, officers consider that the objectives of the existing saved Policies TM8, LR8 and BE13 are still covered by the draft Policy UA18: Princes Parade of the Places and Policies Local Plan.</p>	<p>No action proposed.</p>	
	<p>The Sustainability Appraisal scored the site a significant negative effect due to loss of designated green open space, failing to meet local needs, and in regard to flood risk issues.</p>	<p>The Sustainability Appraisal (SA) is a tool used at the plan-making stage to assess the likely effects of potential allocations in the Places and Policies Local Plan against the 'reasonable alternatives'. It is also a means of identifying any significant negative effects that site allocations might have and provides an opportunity to mitigate and/or minimise these through the drafting of the site-specific policies.</p>	<p>No action proposed.</p>	
	<p>An accurate description and assessment of the current state and value of the site is not included in the guidelines.</p>	<p>Comment noted.</p>	<p>No action proposed.</p>	
	<p>Urbanisation by amalgamating Hythe with Sandgate and may set a precedence for future development of the Imperial Golf Course.</p>	<p>The Hythe Imperial Golf Course has previously been submitted as part of the Strategic Housing Land Availability Assessment (SHLAA). It was assessed for its suitability for housing and was considered to be 'more sensitive' to development than the adjacent site on Princes Parade in regard to the setting of the Hythe Royal Military Canal.</p>	<p>No action proposed.</p>	
	<p>Proposed gaps within development and end vistas will be not be sufficient to overcome concerns about the impact on the character of the area and loss of important open views.</p>	<p>Comment noted.</p>	<p>No action proposed.</p>	
	<p>The site is visible in longer views and enhances the ambience of the canal setting which would be destroyed by buildings.</p>	<p>The Places and Policies Local Plan should be read as a whole. Any planning application would need to satisfy Policies HB1: Quality Places Through Design and HB2: Cohesive Design. The Council has also been working closely with Historic England in ensure that the policy and any future development minimises the harm to the Royal Military Canal and its setting.</p>	<p>No action proposed.</p>	
	<p>Development should deliver improvements to the Public Bridleway along the southside the canal to enhance its amenity value. It is also advised that the policy specifies at least two links between the canal crossings and princes parade as dedicated Public Footpaths or Bridleways</p>	<p>Comment noted.</p>	<p>Amend Policy UA25 (reassigned Policy UA18) to include the following additional criteria:</p> <p>'Improvements are delivered to the public bridleway along the north side of the canal to enhance its amenity value;'</p> <p>'At least two links between the canal crossings and Princes Parade are provided as dedicated public footpaths or bridleways;'</p>	
	<p>A review showed that the Princes Parade site is partly within a Biodiversity Action Plan Priority Habitat. Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.</p>	<p>Comment noted.</p>	<p>Amend Policy UA25 (reassigned Policy UA18) to include the following additional criteria:</p> <p>'Ecological and arboricultural investigations are undertaken and adequate mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat;'</p>	
<p>Kent Wildlife Trust requires policy to demonstrate net gain in protection of wildlife (Bullet 5).</p>	<p>Comment noted.</p>	<p>Amend Policy UA25 (reassigned Policy UA18) to read:</p> <p>'Appropriate protection, preservation and integration of the Royal Military Canal Local Wildlife Site is provided and there is demonstratable net gain in the protection of wildlife.'</p>		
<p>This land at Prince's Parade is naturalised now and is teeming with flora and fauna.</p>	<p>Former Policy UA25 (criterion 5) stated that appropriate protection, preservation and integration of Royal Military Canal Local Wildlife Site (LWS) is provided. See additional change to the policy to demonstrate a net gain in protection of wildlife in response to comments made by the Kent Wildlife Trust (KWT).</p>	<p>Amend Policy UA25 (reassigned Policy UA18) to read:</p> <p>'Appropriate protection, preservation and integration of the Royal Military Canal Local Wildlife Site is provided and there is demonstratable net gain in the protection of wildlife.'</p>		
<p>Building construction on the scale proposed will affect all wildlife adversely.</p>	<p>Former Policy UA25 (criterion 5) stated that appropriate protection, preservation and integration of Royal Military Canal Local Wildlife Site (LWS) is provided. See additional change to the policy to demonstrate a net gain in protection of wildlife in response to comments made by the Kent Wildlife Trust (KWT).</p>	<p>Amend Policy UA25 (reassigned Policy UA18) to read:</p> <p>'Appropriate protection, preservation and integration of the Royal Military Canal Local Wildlife Site is provided and there is demonstratable net gain in the protection of wildlife.'</p>		
<p>This green open space is an important stopping off and departing site for migrating birds, holds a range of nesting species and is also an important feeding site for breeding and wintering birds.</p>	<p>The Council has consulted with statutory consultees including Natural England, together with specialist consultees including Kent Wildlife Trust and Kent County Council Biodiversity team at all stages in drafting both the Core Strategy and Places and Policies Local Plans.</p>	<p>No action proposed.</p>		

<p>This is not a sustainable location for major new buildings due to likely effect on Royal Military Canal which is a Scheduled Ancient Monument. The Policy should objectively provide a framework and guidance about how a sustainable future for the Princes Parade site might be possible taking into account the advice of the NPPF.</p>	<p>Since the Preferred Options Local Plan, Historic England now consider that proposals for Princes Parade would equate to less than substantial harm to the significance of the designated heritage asset.</p> <p>The Princes Parade site has been tested through the Sustainability Appraisal. The Council acknowledges that the historic environment forms part of one of the three key strands of sustainable development. In regards to protecting and enhancing the historic environment, Policy UA18: Princes Parade, Hythe and its supporting text has been redrafted to reflect comments made by Historic England. The supporting text includes a more detailed acknowledgement and understanding of the importance setting of the Scheduled Ancient Monument and the public benefit resultant from the proposed development. The policy also sets out a more objective framework for achieving a sustainable future for Princes Parade.</p>	<p>The supporting text for Princes Parade will be expanded further to provide a better understanding/acknowledgement of the contribution that the site makes to the significance of the setting of the Scheduled Monument as well as the public benefits that would be associated with the redevelopment of the site.</p> <p>Amend Policy UA18: Princes Parade, Hythe (criterion 2) to read:</p> <p>'They are accompanied by an appropriate heritage assessment to demonstrate that the harm to key features of the Royal Military Canal and its historic setting, which contribute to its significance as a Scheduled Ancient Monument, would be minimised and that the overall scheme would not result in substantial harm to the heritage asset.'</p> <p>Amend Policy UA18: Princes Parade to include the following new criterion:</p> <p>'The design creates a sense of place by taking account of opportunities to draw on the heritage of the Royal Military Canal and its setting including the retention of key vistas and physical links with the coast.'</p>
<p>The policy as worded needs to express a better understanding of the contribution that the site makes to the significance of the Scheduled Monument. A mixed-use development here of the type described in Policy UA25 could cause very great harm to the significance of the Scheduled Royal Military Canal by change in its setting. The openness between the canal and the coast is especially important in telling the story of the canal, its purpose and its specific design</p>	<p>The supporting text for Princes Parade will be expanded further to provide a better understanding/acknowledgement of the contribution that the site makes to the significance of the setting of the Scheduled Monument.</p> <p>However, officers consider that the setting of the Canal to be already significantly altered at the eastern extent of Princes Parade as a result of a combination of developments over the past century, including the creation of a new sealed road and sea wall and the use of the site as a refuse tip in the 1960s have reduced people's ability to appreciate the defensive logic of this part of the canal and have had a negative impact on its significance as a historically important site. It is considered that any development proposal for the site should seek to identify specific opportunities within the area for the conservation and enhancement of the Royal Military Canal to better reveal its significance.</p>	<p>The supporting text for Princes Parade will be expanded further to provide a better understanding/acknowledgement of the contribution that the site makes to the significance of the setting of the Scheduled Monument.</p>
<p>Criterion 2 requires that "key features of the Royal Military Canal and its setting, which contribute to its significance as a Scheduled Monument would be preserved and enhanced". Development within the setting of the canal, even if the harmful effects of such development are minimized, cannot preserve the setting of the canal, which we feel is a key feature that makes an important contribution to the monument's significance.</p>	<p>Since the Preferred Options Local Plan, Historic England now consider that proposals for Princes Parade would equate to less than substantial harm to the significance of the designated heritage asset.</p> <p>Officers consider that the setting of the Canal to be already significantly altered at the eastern extent of Princes Parade as a result of a combination of developments over the past century, in particular the creation of a new sealed road and sea wall and the use of the site as a refuse tip in the 1960s have reduced people's ability to appreciate the defensive logic of this part of the canal and have had a negative impact on its significance as a historically important site.</p> <p>It is accepted that development cannot 'preserve the setting of the Canal'. Criterion 2 of the policy will be amended to reflect this.</p>	<p>Amend Policy UA25, criterion 2 (reassigned Policy UA18) to read:</p> <p>'They are accompanied by an appropriate heritage assessment to demonstrate that the harm to key features of the Royal Military Canal and its historic setting, which contribute to its significance as a Scheduled Ancient Monument, would be minimised and that the overall scheme would not result in substantial harm to the heritage asset.'</p>
<p>Criterion 3 requires that "any less than substantial harm is clearly and convincingly demonstrated to be outweighed by the public benefits of the proposal, which should include heritage benefits". We would see such public benefits as being ones that fulfill one or more of the objectives of sustainable development as set out in the NPPF. The NPPF requires both that the harm is necessary to achieve the public benefits and that these outweigh the harm or loss. In this instance we feel that the potential for harm to the significance of the Royal Military Canal would be very great and remain unconvinced that sufficient benefits could be delivered or have yet been identified to outweigh this very great harm .</p>	<p>Since the publication of the Places and Policies Local Plan, Historic England consider that the effect of development on the setting of the Royal Military Canal would not be 'Substantial' but 'Less than Significant'.</p> <p>Policy UA18: Princes Parade, Hythe proposes a mix of uses that includes a substantial community recreation and leisure facility including an appropriate replacement for Hythe Swimming Pool.</p> <p>Inspection work of Hythe Pool showed that the pool require extensive maintenance and repairs to comply with health and safety standards and to ensure that it can stay open in the short to medium term. The Council has accepted the need to replace Hythe Swimming Pool.</p> <p>Lee Evans were appointed in 2015 to prepare the Options Appraisal and Site Analysis, for the provision of a Leisure Centre for Hythe (2015). The study concluded that of the available sites within Hythe, Hythe Green was the preferred site followed by Princes Parade.</p> <p>Given this and the lack of deliverable alternative sites, Princes Parade is allocated for a replacement leisure facility to provide a sustainable and efficient facility to meet the needs of the present and future population.</p>	<p>The supporting text for Princes Parade will be expanded further to provide a better understanding/acknowledgement of the public benefits that would be associated with the redevelopment of the site.</p>

The site is located in a flood risk area. Unsuitable site for development due to coastal exposure, including high winds and wave over-topping.	The Princes Parade site is located within Flood Risk Zones 2 and 3 as well as being in an area at risk of wave overtopping. Consequently, it will need to be demonstrated that the site meets the sequential and exceptions test set out in the National Planning Policy Framework.  With a significant proportion of the district in Flood Risk Zone 3, the Shepway Strategic Flood Risk Assessment sub-divides this area into varying levels of hazard so that the sequential test can be applied more easily and development within FR23 can be steered towards the areas of least risk. Policy S53 of the Shepway Core Strategy (2013) is explicit that new dwellings (other than replacements) will not be allowed within areas of 'severe or extreme risk' on the SFRA 2115 climate change map.  The SFRA 2115 hazard mapping shows the Princes Parade site as being at Nil value.	No action proposed.
The Seabrook/Hythe section of the Royal Military Canal has been awarded Green Flag Status in recognition of its 'value to local people as a recreational resource'.	The canal walks and bridleway between Hythe and Seabrook will be maintained and enhanced; it is considered that there will be no loss of recreational value to local people.	No action proposed.
With increasing development the residents of Sandgate, Seabrook and Hythe won't have sufficient public open green space for informal recreation.	The open space at Princes Parade has not been publically accessible for a number of years. The Open Space and Play Space Strategies identify Princes Parade as an opportunity to create a 'destination play space'. Therefore, the policy seeks to ensure that a high quality and usable public open space(s) linking the canal and the coast is delivered as part of a comprehensive redevelopment scheme for the site.	No action proposed.
Site was used extensively by public for recreational purposes over many years prior to silt dumping in 2002.	The open space at Princes Parade has not been publically accessible for a number of years. The Open Space and Play Space Strategies identify Princes Parade as an opportunity to create a 'destination play space'. Therefore, the policy seeks to ensure that a high quality and usable public open space(s) linking the canal and the coast is delivered as part of a comprehensive redevelopment scheme for the site.	No action proposed.
Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.	Comment noted.	Amend Policy UA25 (reassigned Policy UA18) to include the following additional criterion:  'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'
Southern Water requires a connection is provided to the local sewerage system at the nearest point of adequate capacity	Comment noted.	Amend Policy UA25 (reassigned Policy UA18) to include the following additional criterion:  'A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.'
Southern Water requires that the masterplanning of the site takes account of the nearby pumping station to allow for odour dispersal and help prevent unnecessary unacceptable impact from vibration;	Comment noted.	Amend Policy UA25 (reassigned Policy UA18) to include the following additional criterion:  'The masterplanning of the site takes account of the nearby pumping station to allow for odour dispersal and help prevent unnecessary unacceptable impact from vibration.'
Additional houses in this location will put increased pressure on the local highways network - A259, Horn Street, Princes Parade etc.	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.  Following an internal discussion and with Kent Highway it was suggested that some traffic flow and parking assessment and some minor highway improvements should form part of the site development proposals.	Amend Policy UA25 (reassigned Policy UA18) to include the following criteria in response to ongoing discussions with the Local Highways Authority:  'Highway and junction improvements are provided as required to the satisfaction of the Local Highways Authority.'  'Traffic flow and parking provision is assessed to ensure that the development does not put undue pressure on the local highway network and that adequate parking provision is provided so that there are no detrimental parking impacts on Princes Parade.'
There is lack of infrastructure such as schools and doctors surgeries in Hythe to cope with 150 new dwellings.	The Council has involved statutory consultees, including Kent County Council Education and NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education and NHS support the Council that there is capacity available in existing schools and doctors to cater for the planned additional growth within the Urban Character Area. Where improvements to school and health facilities are necessary to cater for the additional growth, comments from KCC and NHS have been taken into account when preparing the plan.	No action proposed.
There are alternative locations where the swimming pool could be built i.e. Martello Lakes, Smiths Medical; and which could better serve Romney Marsh Residents.	Lee Evans were appointed in 2015 to prepare the Options Appraisal and Site Analysis, for the provision of a Leisure Centre for Hythe (2015). The study concluded that of the available sites within Hythe, Hythe Green was the preferred site followed by Princes Parade.  Alternative sites considered included Nickolls Quarry (Martello Lakes). Whilst the Council had an option for a leisure centre on the site there were concerns regarding deliverability as the timings are not within Shepway District Council control. The Smith's Medical site was not available for redevelopment for a new leisure centre.	No action proposed.



	Princes Parade could be used for other more appropriate uses such as a visitor centre, nature reserve, coastal park and leisure centre - not housing.	The financial cost of remediating and bringing contaminated sites such as the former landfill site at Princes Parade back into use is high. Only a residential use on a portion of the site will generate a land value high enough that will make the decontamination process and redevelopment of the site viable.	No action proposed.	
	Unstable land conditions given its former use as a landfill site.	There are a number of engineering techniques available for redeveloping former landfill sites. Depending on the type of facility being built, it may be necessary to extend pilings through the landfill and into the underlying base material or it may be possible to employ special foundations or footings to support the load(s) being placed on the former landfill.	No action proposed.	
	Health hazard and risk to residents and wildlife due to disturbance of contaminated land.	Policy UA18: Princes Parade, Hythe (criterion 4) states that:  'Development proposals will be supported where: Any potential contamination from former use is investigated, assessed and if appropriate mitigated as part of the development.'	No action proposed.	
	Two, three or four storey buildings would visually impact the landscape.	The Places and Policies Local Plan should be read as a whole. Therefore, any application would need to satisfy Policy HB1: Quality Places Through Design criterion 1 which states:  'Planning permission will be granted where proposals: Make a positive contribution to its location and surroundings, enhancing integration, while also respecting existing buildings and land uses, particularly with regards to layout, scale, form, density, materiality and mix of uses so as to ensure all proposals create places of character.'	No action proposed.	
	There is a lack of SDC evidence in support of this policy to show it is viable.	A Viability Appraisal of Sites Proposed for Shepway Local Plan has been prepared to support the allocations included within the Places and Policies Local Plan.  However, sites that are currently being actively promoted by the landowner/developer (such as Princes Parade) have not been included as part of this work as a site specific viability appraisal will form part of the planning application.	No action proposed.	
	The proposed housing will not be affordable	Any planning application will need to comply with the adopted Policy CSD1 in the Core Strategy (2013) and/or the most recent government guidance position in the Planning Practice Guidance.	No action proposed.	
<b>UA26 Hythe Swimming Pool, Hythe</b>  The site is allocated for residential development with an estimated capacity of approximately 50 dwellings. Development proposals will be supported where: 1. Contributions are made, through S106, for off site play and open space at the South Road Recreation ground 2. It can be demonstrated that a replacement facility is to be provided or is to be delivered 3. The café, public toilets and beach huts are retained 4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.	The most sensible and economic option is for the swimming pool to be retained and improved on the current site - expanding to include the beach huts and existing cafe.	To make the construction of a new leisure centre viable, the proposal would be funded by Shepway District Council including the use of a receipt from the sale of the existing swimming pool site, part of the Princes Parade site and Section 106 planning agreement monies available from the Nickolls Quarry development.	No action proposed.	<b>UA19 Hythe Swimming Pool, Hythe</b>  The site is allocated for residential development with an estimated capacity of approximately 50 dwellings. Development proposals will be supported where:  1. Appropriate and proportionate contributions, through a S106 agreement, are made towards the upkeep and/or improvement of open space and existing play facilities at Hythe Recreation Ground; 2. It can be demonstrated that a replacement facility is to be delivered locally; 3. The café, public toilets and beach huts are retained or replaced; 4. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and 5. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.
	There are alternative locations where the swimming pool could be built i.e. Martello Lakes, Smiths Medical; and could better serve Romney Marsh Residents.	Lee Evans were appointed in 2015 to prepare the Options Appraisal and Site Analysis, for the provision of a Leisure Centre for Hythe (2015). The study concluded that of the available sites within Hythe, Hythe Green was the preferred site, followed by Princes Parade.  Alternative sites considered included Nickolls Quarry (Martello Lakes). Whilst the Council had an option for a leisure centre on the site there were concerns regarding deliverability as the timings are not within Shepway District Council control. The Smith's Medical site was not available for redevelopment for a new leisure centre.	No action proposed.	
	The public toilets should be refurbished as part of any development proposal.	Comment noted.	Amend Policy UA26, criterion 3 (reassigned Policy UA19) to read:  'The cafe, public toilets and beach huts are to be retained or replaced.'	
	The current, recently refurbished pool is in a highly sustainable location within walking or cycling distance of many Hythe residents including children and young people.	The construction of a new leisure centre for Hythe would be funded by Shepway District Council using Section 106 financial contributions from the Nickolls Quarry development and capital land receipts from the sale of the existing swimming pool site on South Road and Princes Parade. Therefore, it is unviable to redevelop the existing site for a new facility - there is also not sufficient land to provided the number of parking spaces requirement to serve the facility.  Lee Evans were appointed in 2015 to prepare the Options Appraisal and Site Analysis, for the provision of a Leisure Centre for Hythe (2015). The study considered the Hythe Recreation Ground, but was ruled out because of the impact on the adjacent Conservation Area and amenity of residents.	No action proposed.	
	It should be referenced in the supporting text and/or policy that funds from the sale of the site will be used to develop a new leisure centre elsewhere.	Comment noted.	Amend the supporting text to include details about how the new leisure centre will be financed. The proposal would be funded by Shepway District Council including the use of a receipt from the sale of the existing swimming pool site, part of the Princes Parade site and use of Section 106 planning agreement monies available from the Nickolls Quarry development.	
	Criterion 2 should be amended to read: "A replacement facility will be provided" and a timescale given for delivery.	Policy UA19: Hythe Swimming Pool, Hythe is unable to ensure that a leisure centre 'will' be provided; as the only way this could be guaranteed is by the construction of the facility itself. The policy states that 'It can be demonstrated that a replacement swimming pool is to be delivered locally'.	No action proposed.	
	Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.	Comment noted	Amend Policy UA26 (reassigned Policy UA19) to include the following additional criterion:  'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'	



Preferred Options Policy	Comments received	Response from the Council	Action by the Council	Revised Submission Draft Policy/Text
General Romney Marsh comments	The road infrastructure cannot take the increase in traffic from new development	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the 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), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.	
	The water table is high across the Marsh and not suitable for so much housing	Site specific policies contain a criterion which ensures that a surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority. The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including water and utilities companies. Comments from these providers have been taken into account when drafting the plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.	
	Junior schools are full	The Council has involved statutory consultees, including Kent County Council Education, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education support the Council that there is capacity available in existing schools to cater for the planned additional growth. Where improvements to school facilities are necessary to cater for the additional growth, comments from KCC will be taken into account when finalising the plan.	No change.	
	Doctors surgeries are full and cannot get doctors to move into the area	The Council has involved statutory consultees, including NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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. The NHS Clinical Commissioning Group are aware that there is a deficiency of Doctor's and health facilities in the Romney Marsh area and options and opportunities are being actively sought to address this.	Work has been undertaken and a site has now been safeguarded for future use as a new medical hub at the Marsh Academy on Station Road (Policy RM5).	
	There is little employment in the area	An Employment Land Review has been completed and forms part of the evidence base for the Places and Policies Local Plan to identify employment need in the District. See Chapter 10: Economy.	No change.	
	There are no leisure facilities in the area such as a swimming pool, bowling alley or cinema	Investment in new development in the locality helps to encourage economic, leisure and recreational growth and attract businesses and new facilities.	No change.	
	New Romney cannot sustain more traffic on existing transport infrastructure without very severely disrupting the quality of life of residents	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the 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), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.	

An appropriate hierarchy of land has been allocated for housing across the area which will maintain the character and significance of Romney Marsh and prevent urban sprawl	Support noted. The level of new development in the Core Strategy was informed by evidence studies that were undertaken in drafting the plan, particularly the Strategic Housing Market Assessment which identified the number of new homes that the council should plan for. The plan was found 'sound' through this process and was adopted by the council in 2013 to set the overall strategy, including housing, for the district.	No change.
The number of homes being allocated in New Romney area exceeds the amount agreed in the Core Strategy for the area, equaling 30% contribution instead of the agreed 10%	The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). This amount of development has already been accounted for - proposals for a new garden town will be dealt with through the Core Strategy Review. The Core Strategy establishes the general level and distribution of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031). The Core Strategy focuses most of the development in the district to the Urban Area (comprising Folkestone and Hythe); 75% of the district's new housing development is planned for this area (to the nearest 5%). 10% of the district's new housing is planned for the Romney Marsh Area (to the nearest 5%), which includes the settlements of New Romney, Lydd and St Mary's Bay. The remaining 15% of new housing development (to the nearest 5%) is planned for the North Downs Area, which includes the settlements of Hawkinge, Lyminge and Sellindge). This distribution has taken account of available sites, constraints including infrastructure, the highway network, flood risk and landscape character, as well as access to services, such as shops, public transport, schools and employment opportunities.	No change.
More effort is needed to achieve a higher standard of architectural development and design so that it will enhance rather than detract from a town	The Places and Policies Local Plan includes new development management policies which ensure that developments are designed to a high standard and respect the existing character of the area.	No change.
It is essential that traffic management and road infrastructure is put in place before any further construction is agreed	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the 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), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.
Upgrades to Hammonds Corner are essential before more development	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the 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), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.
There is little in the plan to resolve parking problems in the town of New Romney	The purpose of the Places and Policies Local Plan is to allocate sites that are considered acceptable in principle for residential use that can be delivered within the Plan period. There are Development Management policies relating to parking, including Policies T1 and T2, to ensure that future planning applications provide appropriate parking spaces.	No change.
New Romney High Street struggles to cater for the existing population	The National Planning Policy Framework ensures that town centre uses are directed to the high streets in order to protect their vitality and viability. New Romney High Street has 95.7% occupancy rate with a range of shops, facilities and services, together with a supermarket, which all cater for the existing population. See also Chapter 11: Retail and Leisure.	No change.

Existing sewers are not large enough to cope with additional demand	The Council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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.
The character of the Marsh is unique and should be retained, whilst adapting to modern requirements	The Places and Policies Local Plan includes new development management policies which ensure that developments are designed to a high standard and respect the existing character of the area.	No change.
There is a lack of bungalows being built for the elderly population	The Places and Policies Local Plan includes new development management policies which ensure that developments are designed to a high standard and respect the existing character of the area.	No change.
Dungeness needs protecting and modern housing should be discouraged to protect its World Heritage status	Paragraphs 6.91 to 6.95 of the Places and Policies Local Plan Preferred Options document relate to the protection of the Dungeness landscape. As well as its World Heritage Status, Dungeness is located within the Conservation Area which is a designated heritage asset. Dungeness is afforded additional policy protection by the Special Protection Area, Special Area of Conservation, Site of Special Scientific Interest and Special Landscape Area designations. Dungeness is also covered by an Article 4 Direction to remove permitted development rights so all development is controlled by planning permission.	No change.
The road down to Dungeness needs improvements to warrant large scale developments	There are no large scale developments planned for Dungeness and therefore improvements to Dungeness road network, other than those already planned for, will not be necessary as a result of this Plan.	No change.
Recent new building housing is not inkeeping with the character of the local area	The Places and Policies Local Plan includes new development management policies which ensure that developments are designed to a high standard and respect the existing character of the area.	No change.
There is an issue with no employment in the area with more job losses once the power station closes	An Employment Land Review has been completed and forms part of the evidence base for the Places and Policies Local Plan to demonstrate employment need in the District. See Chapter 10: Employment.	No change.
With the proposed new housing developments it will take longer to reach the countryside from the town and its facilities as urbanisation creeps ever outwards	Improvements to accessible green infrastructure and connectivity to the countryside are supported in Development Management policies in the Places and Policies Local Plan . Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.
Prime agricultural land will also be lost alongside the mental and physical well-being of a community with easy access to 'breathing space' within existing residential areas	Whilst the site is currently in agricultural use, it is a natural expansion of the existing built form and the policy criteria ensures that open space will be provided within any future development scheme	No change.
There is no housing need to build in New Romney with the announcement of Otterpool Park	The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). The Core Strategy establishes the general level of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031). The Core Strategy has been subject to a number of stages of consultation and has been tested and examined by an independent Inspector appointed by central government. The level of new development in the Core Strategy was informed by evidence studies that were undertaken in drafting the plan, particularly the Strategic Housing Market Assessment which identified the number of new homes that the council should plan for. The plan was found 'sound' through this process and was adopted by the council in 2013 to set the overall strategy for the district.	No change.
There is no indication how the new by-pass will return to the A259. If it joins the Mountfield Road/ Station Road junction, then substantial improvements will be required because the railway bridge obscures the view of traffic approaching from the right on Station Road / Littlestone Road	The site allocation to the south of New Romney is undeliverable, due to ownership constraints, and is no longer being taken forward for allocation in the Places and Policies Local Plan, therefore the link road is unlikely to come forward.	No change.

<p>The 'consideration' of extra care housing and C2 residential care home facilities should be a 'firm' inclusion in the plan due to the existing demographics and increasing number of retired residents moving to the area from other parts of Kent and the wider area.</p>	<p>The population of Shepway District has been used as the basis for future housing projections, including an ageing demographic, which is identified in the Council's Strategic Housing Market Assessment. The Local Plan includes an allocation for a large care home complex, together with supporting Development Management Policy HB11 - Loss of Residential Care Homes and Institutions. This policy identifies that there will be an increased need over this plan period for the relocation and reconfiguration of existing residential care homes and institutions (C2 or sui generis use class) in the district. Where this cannot be achieved with the existing building, there will be a need for the building's conversion to other uses, or else an impetus for the demolition and reconstruction. Planning permission will be supported subject to certain criteria being met. The Local Plan also includes Policy HB12 - Development of New or Extended Residential Institutions (C2 use) which supports new residential institutions in sustainable locations with access to local services, leisure and community facilities.</p>	<p>Work has been undertaken and a site has now been identified for safeguarding for a new medical hub at the Marsh Academy on Station Road. The policy supports the provision of C2 residential use on the site.</p>		
<p>Evidence on infrastructure capacity is essential so that cumulative development impacts are understood.</p>	<p>The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.</p>	<p>No change.</p>		
<p>The Plan does not adequately support delivery of the local sewerage infrastructure necessary to serve individual allocated sites in parallel with development.</p>	<p>The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.</p>	<p>No change.</p>		
<p>Appropriate development in Romney Marsh is welcomed, but any impact from the London Ashford airport must be taken into account in the determination of planning applications and needs to be reflected in Local Plan policies.</p>	<p>Residential amenity, including noise pollution, is a consideration that is supported in policies in the Places and Policies Local Plan and will be assessed as part of any planning application.</p>	<p>No change.</p>		
<p>The Plan does not adequately address employment needs for the proposed new dwellings</p>	<p>An Employment Land Review has been completed and forms part of the evidence base for the Places and Policies Local Plan to demonstrate employment need in the District. See Chapter 10: Economy.</p>	<p>No change.</p>		
<p>The proposed main road would not counteract traffic coming east from the A259 into the town.</p>	<p>The site allocation to the south of New Romney is undeliverable, due to ownership constraints, and is no longer being taken forward for allocation in the Places and Policies Local Plan, therefore the link road is unlikely to come forward.</p>	<p>No change.</p>		
<p>The architecture of a historic cinque port should be promoted in policies</p>	<p>The Places and Policies Local Plan includes new development management policies which ensure that developments are designed to a high standard and respect the existing character of the area.</p>	<p>No change.</p>		
<p>The plan should specify the open space to be provided by developments including place space, sports pitches and allotments to enhance the wellbeing of the community</p>	<p>An Open Space Strategy has been completed and forms part of the evidence base for the Places and Policies Local Plan to demonstrate open space requirements and need in the District. A playing pitch strategy is being carried out and will form part of the evidence base of the Core Strategy Review.</p>	<p>No change.</p>		
<p>RM1 New Romney Town Centre - Within the designated town centre area (identified on the Policies Map), planning permission will be granted for development that provides for a range of town centres uses that adds to the vitality and viability of the town centre. Within the Primary Shopping Frontage (as identified on the Policies Map) within the town centre, development on the ground floor will be permitted for A1 and A3 uses. Other uses will be permitted in the Primary Shopping Frontage provided that:</p> <ol style="list-style-type: none"> <li>1. They fall within the definition of 'town centre uses'; or</li> <li>2. They fall under D1 uses and provide a complimentary function to the town centre; and</li> <li>3. They would not create a continuous frontage of two or more non-A1 uses</li> </ol>	<p>Part of St Martins Field in New Romney is within the town centre boundary which can be developed according to planning policy. This area should be excluded from the town centre boundary and retained for leisure use by residents</p> <p>Remove green space town centre boundary RM1 - it is a green space not a development site</p>	<p>The New Romey town centre boundary will be amended to exclude the field from the boundary which was erroneously included.</p> <p>The New Romey town centre boundary will be amended to exclude the field from the boundary which was erroneously included.</p>	<p>Amend the Town Centre Boundary.</p> <p>Amend the Town Centre Boundary.</p>	<p><b>RL4 New Romney Town Centre</b> (new policy in new Retail and Leisure Chapter)</p> <p>Within the designated town centre area (identified on the Policies Map), planning permission will be granted for development that provides for a range of town centres uses that adds to the vitality and viability of the town centre.</p> <p>Within the Primary Shopping Frontage (as identified on the Policies Map) development on the ground floor will be permitted for A1 (shops) and A3 (restaurants and cafes) uses. Other uses will be permitted in the Primary Shopping Frontage provided that:</p> <ol style="list-style-type: none"> <li>1. They fall within the definition of town centre uses; or</li> </ol>

<p>5. They would not create a continuous frontage of two or more non-A1 uses. For development proposals that fall within the town centre uses definition that cannot be located within the designated town centre area, permission will be permitted provided that:</p> <p>1. The sequential approach set out in the National Planning Policy Framework and the Planning Practice Guidance has been followed;</p> <p>2. A full assessment is provided of the impact the proposal would have on New Romney Town Centre and any other town centres, relating to the scale and the type of development proposed in compliance with the National Planning Policy Framework and Planning Practice Guidance;</p>	<p>Criterion 4 should also refer to any relevant Town Design Statement</p>	<p>The policy relates to primary shopping frontages and town centre uses rather than design. Whilst design is mentioned within the policy criteria, this relates to development proposals that fall within town centre uses that cannot be located within the designated town centre area. Therefore, reference to Town Design Statements within this policy criteria is not considered necessary in this instance, as any development proposal would need to comply with the development management design policies set out within this Plan.</p>	<p>Move Policy RM1 to the new retail and leisure chapter within the Development Management Policy section of the Plan to create Policy RL4.</p>	<p>1.They fall within the definition of town centre uses, or</p> <p>2.They fall under D1 (non-residential institutions) uses and provide a complementary function to the town centre; and</p> <p>3.They would not create a continuous frontage of two or more non-A1 (shops) uses;</p> <p>4.In the case of appropriate sui generis uses they would create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area; and</p> <p>5.For change from a town centre use:</p> <ul style="list-style-type: none"> <li>•The proposed use is not detrimental to residential amenity;</li> <li>•There is evidence to demonstrate that there is no demand for the continued use of the premises for retail or community uses;</li> <li>•The existing use is no longer viable and the property has been actively marketed at a reasonable rate for a period of at least 12 months and no reasonable offers have been made; and</li> <li>•The proposed use does not threaten the vitality and viability of the town centre and retains an active frontage at street level.</li> </ul> <p>Development proposals within the town centre uses definition that cannot be located within New Romney Town Centre will be judged against Policy RL8.</p>
	<p>Remove all of St Martins Field from Town Centre Policy. St Martins Field and Fairfield Road Recreation Ground to be designated Green Open Spaces</p>	<p>The New Romey town centre boundary will be amended to exclude the field from the boundary which was erroneously included.</p>	<p>Amend the Town Centre Boundary.</p>	
	<p>The town centre area falls almost wholly within the conservation area which includes a number of Listed Buildings; therefore the policy should take account of the special historic character of the High Street. Shopfront alterations should only be permitted if they preserve or enhance the character of the High Street. Specific guidance for Shop Fronts and Signage in the Conservation Area should be considered (<b>KCC Heritage</b>)</p>	<p>The policy relates to primary shopping frontages and town centre uses rather than design. Whilst design is mentioned in the policy criteria, this relates to development proposals that fall within town centre uses that cannot be located within the designated town centre area. Therefore, reference to the historic character and shopfront alterations within this policy criteria is not considered necessary in this instance, as any development proposal would need to comply with the design policies set out within the Plan. However, new criteria including reference to the preservation or enhancement of historic character of the High Street and shopfront alterations, including advertisements, will be included in Policies RL9 and RL10 in the Retail and Leisure chapter of the Plan.</p>	<ul style="list-style-type: none"> <li>• Include additional criteria in HB1 design policy wording.</li> <li>• Move Policy RM1 to the new retail and leisure chapter within the Development Management Policy section of the Plan to create Policy RL4.</li> </ul>	
<p>RM2 Land off Victoria Road West, Littlestone - Land off Victoria Road West, Littlestone is allocated for residential development with an estimated capacity of 70 dwellings.</p> <p>Development proposals will be supported where:</p> <p>1. Vehicular access to the site is from Victoria Road West, and solutions to parking issues along this road are forthcoming</p> <p>2. The development has at least 4 self / custom build plots</p> <p>3. Existing watercourses on site are integrated into the development</p> <p>4. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority</p> <p>5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</p> <p>6. Provision is made for open and play space on site or nearby, and reinforces the integration and connectivity of green infrastructure as per Core Strategy Policy CSD5</p> <p>7. Mitigation measures should be employed to prevent adverse effects on the nearby Ramsar, SAC and SSSI, and where possible provide biodiversity enhancements</p> <p>8. Appropriate and proportionate contributions are made to medical facilities in New Romney through a site specific S106 agreement or CIL.</p>	<p>Access to the site is poor and a transport study should be carried out</p>	<p>Kent County Council Highways have been consulted on the site allocations and overall support the Council that the existing road network can accommodate the planned additional growth. For this site, KCC Highways are now satisfied that a revised road layout would satisfy emergency access requirements and as a result have withdrawn their objections to the number of dwellings that can be provided on the site.</p>	<p>The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.</p> <p>Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.</p> <p>The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.</p>	<p><b>RM2 Land off Victoria Road West, Littlestone</b> (includes changes as a result of Habitats Regulations Assessment)</p> <p>Land off Victoria Road West, Littlestone is allocated for residential development with an estimated capacity of 70 dwellings.</p> <p>Development proposals will be supported where:</p> <p>1.Vehicular access to the site is from Victoria Road West, and a suitable layout is provided to enable an emergency access along the southern boundary of the site to the satisfaction of the local highway authority. Adequate parking to serve the new development should be provided;</p> <p>2.At least 4 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development;</p> <p>3.Extra flood resistant and resilient construction measures are incorporated into the design of the development to reduce the risk of life to occupants in an extreme flood event and improve flood risk management;</p> <p>4.A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority;</p> <p>5.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place;</p> <p>6.Provision is made for open and play space on site or at an appropriate locality within walking distance, and reinforces the integration and connectivity of green infrastructure in accordance with Core Strategy Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation;</p> <p>7.Mitigation measures are employed to prevent adverse effects on the nearby Ramsar, Special Area of Conservation and Site of Special Scientific Interest, and where possible provide biodiversity enhancements;</p> <p>8.Appropriate and proportionate contributions are made to healthcare facilities in New Romney through a site-specific Section 106 agreement; and</p> <p>9.The masterplanning of the site takes account of the nearby pumping station to allow for odour dispersal and prevent unacceptable impact from vibration</p>
	<p>The site is in a flooding area and needs a flood risk study</p>	<p>The Strategic Flood Risk Assessment (2115) confirms that the site is not in an extreme flooding area, with only a small portion to the south within a significant flooding area. The Council has involved statutory consultees, including the Environment Agency, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. The Environment Agency were consulted on for this site allocation and raised no objection. Criterion 4 of the policy ensures that a surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority prior to development.</p>	<p>No change.</p>	
	<p>The water table is at or just below the land surface</p>	<p>Criterion 4 of Policy RM2 ensures that a surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority. The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including water and utilities companies. Comments from these providers have been taken into account when drafting the plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.</p>	<p>No change.</p>	
	<p>Drainage is poor and soakaways become inoperative after heavy rain</p>	<p>Criterion 4 of Policy RM2 ensures that a surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority. The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including water and utilities companies. Comments from these providers have been taken into account when drafting the plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.</p>	<p>No change.</p>	

The development would impact upon local wildlife on the site	The Council has involved statutory consultees including Natural England, together with specialist consultees including Kent Wildlife Trust and Kent County Council Biodiversity team at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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.
Considerable infrastructure modifications are required before this site is developed	The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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. Where improvements to school facilities are necessary to cater for the additional growth, comments from KCC Education will be taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the 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). The NHS Clinical Commissioning Group are aware that there is a deficiency of health facilities in the Romney Marsh area and options and opportunities are being actively sought to address this (see Policy RM5).	No change.
The site is currently a field and is essential as is the biodiversity and habitat for wild animals and floral species	The Council has involved statutory consultees including Natural England, together with specialist consultees including Kent Wildlife Trust and Kent County Council Biodiversity team at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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.	
The trees on the site are essential to preserve the rural scene and backdrop	There are limited trees on this site that have significant amenity value. Where there are trees present on an allocated site that are identified as having significant current or future amenity value, there is an additional criterion within the site specific policy which ensures that existing trees and hedgerows within / around perimeter of the site are retained and enhanced within any development proposal.	No change.
The site is not within an area with doctors, safe crossings or with enough school places. Infrastructure must be in place first.	The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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. Where improvements to school facilities are necessary to cater for the additional growth, comments from KCC Education will be taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL). The NHS Clinical Commissioning Group are aware that there is a deficiency of health facilities in the Romney Marsh area and options and opportunities are being actively sought to address this; see Policy RM5.	Work has been undertaken and a site has now been safeguarded for a new medical hub at the Marsh Academy on Station Road (see Policy RM5).



This development will over stretch the utilities services in the New Romney area	The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.	
Local schools are already full	The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.
New Romney town is already congested with traffic and cannot cope with any more	Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to five in total) are 'pooled' to fund an identified improvement.	<p>The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.</p> <p>Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.</p> <p>The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.</p>
Doctors surgeries are full and there are not enough doctors	The Council has involved statutory consultees, including NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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. The NHS Clinical Commissioning Group are aware that there is a deficiency of health facilities in the Romney Marsh area and options and opportunities are being actively sought to address this; see Policy RM5.	Work has been undertaken and a site has now been safeguarded for a new medical hub at the Marsh Academy on Station Road (see Policy RM5).
The field provides natural waterways for drainage	Criterion 4 of Policy RM2 ensures that a surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority. The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including water and utilities companies. Comments from these providers have been taken into account when drafting the plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.

A relief road is needed before any building starts	Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to five in total) are 'pooled' to fund an identified improvement.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.
Schools and doctors surgeries need to be enlarged to cater for additional housing	The Council has involved statutory consultees, including KCC Education and NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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. The NHS Clinical Commissioning Group are aware that there is a deficiency of health facilities in the Romney Marsh area and options and opportunities are being actively sought to address this; see Policy RM5.	Work has been undertaken and a site has now been safeguarded for a new medical hub at the Marsh Academy on Station Road (see Policy RM5).
Speeding traffic on Queens Road makes the development of this site dangerous	The site will be accessed from Victoria Road West and will include provisions for an emergency access within the road layout design to ensure that the new development is served by an adequate road system. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. With reference to this site, 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), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.
There needs to be an alternative route out to the north if this site is developed	The site will be accessed from Victoria Road West and will include provisions for an emergency access within the road layout design to ensure that the new development is served by an adequate road system. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. With reference to this site, 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), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.
There would need to be better pedestrian routes if this site is developed to make the 'walking distance' statement true	Improvements to accessible green infrastructure and connectivity to the countryside is supported in emerging Development Management policies in the Places and Policies Local Plan . Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.

<p>There is no transport assessment to assess impact on existing roads</p>	<p>Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to five in total) are 'pooled' to fund an identified improvement.</p>	<p>The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.</p> <p>Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.</p> <p>The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.</p>
<p>There is an issue with no employment in the area with more job losses once the power station closes</p>	<p>An Employment Land Review has been completed and forms part of the evidence base for the Places and Policies Local Plan to demonstrate employment need in the District. See Chapter 10: Economy.</p>	<p>No change.</p>
<p>Significant housing developments should be located closer to major road infrastructure such as the M20</p>	<p>The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). This amount of development has already been accounted for regardless of proposals for a new garden town which will be dealt with through the Core Strategy Review. The Core Strategy establishes the general level and distribution of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031). The Core Strategy focuses most of the development in the district to the Urban Area (comprising Folkestone and Hythe); 75% of the district's new housing development is planned for this area (to the nearest 5%). 10% of the district's new housing is planned for the Romney Marsh Area (to the nearest 5%), which includes the settlements of New Romney, Lydd and St Mary's Bay. The remaining 15% of new housing development (to the nearest 5%) is planned for the North Downs Area, which includes the settlements of Hawkinge, Lyminge and Sellindge). This distribution has taken account of available sites, constraints including infrastructure, the highway network, flood risk and landscape character, as well as access to services, such as shops, public transport, schools and employment opportunities.</p>	<p>No change.</p>
<p>The land is open countryside in agricultural use. The Council has not demonstrated that this land is needed for meeting the housing requirement. <b>(CPRE Shepway)</b></p>	<p>The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). This amount of development has already been accounted for regardless of proposals for a new garden town, which will be dealt with through the Core Strategy Review. The Core Strategy establishes the general level and distribution of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031). The Core Strategy focuses most of the development in the district to the Urban Area (comprising Folkestone and Hythe); 75% of the district's new housing development is planned for this area (to the nearest 5%). 10% of the district's new housing is planned for the Romney Marsh Area (to the nearest 5%), which includes the settlements of New Romney, Lydd and St Mary's Bay. The remaining 15% of new housing development (to the nearest 5%) is planned for the North Downs Area, which includes the settlements of Hawkinge, Lyminge and Sellindge). This distribution has taken account of available sites, constraints including infrastructure, the highway network, flood risk and landscape character, as well as access to services, such as shops, public transport, schools and employment opportunities.</p>	<p>No change.</p>
<p>The inclusion of this site within the Places &amp; Policies Preferred Option Local Plan is supported. The representation site will contribute to the sustainable growth of the strategic town of New Romney and that, in principle, an allocation would be fully in accordance with the aims and objectives of the Core Strategy. The development of the site would comprise a rounding off of the existing settlement. It is requested that there are some revisions to the wording of Proposed Policy RM2 and the SHLAA and Sustainability Appraisal to more closely reflect the proposed development area and its specific constraints and opportunities.</p>	<p>Support noted. The policy criteria will be amended to reflect the specific constraints and opportunities of the proposed development area to ensure that the site is deliverable.</p>	<p>Amend policy as noted.</p>

	Additional criteria for this policy to include the requirement for an odour and vibration assessment to be undertaken to inform the masterplanning of the site ( <b>Southern Water</b> )	Suggestion noted. Criterion including the requirement for an odour and vibration assessment to be undertaken to inform the masterplanning of the site will be added to Policy RM2.	Include additional criterion in the policy wording relating to odour and vibration (criterion 9).	
	The site is in a sustainable location to allow for the growth of New Romney	Support noted.	No change.	
	The site is in close proximity to the SSSI, SAC, SPA and Ramsar. ( <b>Natural England</b> )	Comment noted.	No change.	
	An emergency access would be required as the proposals currently provide for more than 50 dwellings ( <b>KCC Highways</b> )	An amended road layout was submitted to Kent County Council Highways following their objection. Kent County Council Highways agreed that subject to new road layout being provided together with a 3 metre wide type 1 surface for emergency vehicles then the provision of 70 dwellings on this site is acceptable.	No change.	
	Criteria 5 relating to archaeology is welcomed but suggest re-wording as follows: The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place ( <b>KCC Heritage</b> )	Suggestion noted. This criterion will be re-worded to reflect the wording suggested by Kent County Council Heritage to ensure that all policies are consistent and worded correctly.	Amend archaeology wording within Policy RM2 (criterion 5).	
RM3 Land rear of the Old School House, Church Lane, New Romney - Land rear of the Old School House, Church lane is allocated for residential development with an estimated capacity of 20 dwellings. Development proposals will be supported where: 1. Vehicular access to the site is from Church Lane 2. Both sites are integrated in a unified masterplan, and come forward for development together as per the masterplan 3. Pedestrian permeability is ensured within and beyond the site 4. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority 5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest 6. The design of the development should seek to minimise the effects on the setting of the nearby Listed Buildings and Scheduled Monument 7. A Phase 1 Habitat Survey should be undertaken by a licenced ecologist to assess the presence of Protected Species on or near the site 8. Existing trees and hedgerows around perimeter of site are retained and enhanced	Loss of peaceful open space for recreation and impact upon the special setting of the Church	Whilst the site is allocated for residential development, any new development should include accessible open space provision, together with improved links and connectivity to green infrastructure to improve access to the wider countryside for existing and future residents. An additional criterion within the policy could be explored; however there is an overarching policy within the Adopted Core Strategy, Policy CSD4, which is concerned with protecting, managing and enhancing Shepway's varied and extensive green and open spaces. In addition, Policy NE1 within the Places and Policies Local Plan seeks to target opportunities for improvements on routes and links from urban areas where access is currently poor and to improve access to key open spaces from all areas.	No change.	<b>RM3 Land rear of the Old School House, Church Lane, New Romney</b>  Land rear of the Old School House, Church Lane is allocated for residential development with an estimated capacity of 20 dwellings.  Development proposals will be supported where:  1. Vehicular access to the site is provided from Church Lane; 2. Both sites are integrated in a unified masterplan, and come forward for development together in accordance with the masterplan; 3. Pedestrian permeability is ensured within and beyond the site to the public rights of way network; 4. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority; 5. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; 6. The design of the development preserves or enhances the character and setting of nearby heritage assets, including the Grade I Listed Church of St Nicholas, New Romney High Street Conservation Area and other nearby Listed Buildings; 7. A Phase 1 Habitat Survey is undertaken by a licenced ecologist to assess the presence of Protected Species on or near the site; 8. Existing trees and hedgerows around the perimeter of the site are retained and enhanced; and 9. The design of the development takes account of the setting of the cemetery directly adjacent, softening the south and western edge of the development with a strong focus on landscaping.
	There is a lack of alternative open space areas that are peaceful in New Romney	Whilst the site is allocated for residential development, any new development should include accessible open space provision, together with improved links and connectivity to green infrastructure to improve access to the wider countryside for existing and future residents. An additional criterion within the policy could be explored; however there is an overarching policy within the Adopted Core Strategy, Policy CSD4, which is concerned with protecting, managing and enhancing Shepway's varied and extensive green and open spaces. In addition, Policy NE1 within the Places and Policies Local Plan seeks to target opportunities for improvements on routes and links from urban areas where access is currently poor and to improve access to key open spaces from all areas.	No change.	
	There should be some car parking spaces retained for users of The Old School to park their cars, some of which are disabled	The land is not within the ownership of the Old School and is not currently a formal car park, therefore there is no protection of the car park use. There is also not enough room on the site to provide a car park as well as the residential use.	No change.	
	This development will over stretch the utilities services in the New Romney area	The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.	
	Local schools are already full	The Council has involved statutory consultees, including Kent County Council Education, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education support the Council that there is capacity available in existing schools to cater for the planned additional growth. Where improvements to school facilities are necessary to cater for the additional growth, comments from KCC will be taken into account when drafting the plan.	No change.	
	20 dwellings is overdevelopment on this site	A general calculation of 25 dwellings per hectare was used to inform the amount of dwellings proposed on this site based on the site area and surrounding characteristics. Although this would amount to 21 dwellings, the figure was rounded down to 20 dwellings. The number of dwellings is a general guide to inform future planning applications which once tested at the planning application stage may increase or decrease subject to design, layout and siting. However, the level of development proposed is considered appropriate for this site given the built up, residential area.	No change.	

<p>Access is narrow and inadequate via Church Lane which is busy due to the location near to the Doctors surgery which could cause problems</p>	<p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to five in total) are 'pooled' to fund an identified improvement.</p>	<p>No change.</p>
<p>The site should be used to extend the Doctors surgery and create a modern medical centre able to cope with extra patients</p>	<p>Suggestion noted. The Council has involved statutory consultees, including NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Comments from these organisations 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; 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. The NHS Clinical Commissioning Group are aware that there is a deficiency of health facilities in the Romney Marsh area and options and opportunities are being actively sought to address this; see Policy RM5.</p>	<p>Work has been undertaken and a site has now been safeguarded for a new medical hub at the Marsh Academy on Station Road; see Policy RM5.</p>
<p>The population of New Romney is getting older and there is a lack of smaller properties with easy access to the High Street, Church and Doctors Surgery. There is no allowance for the elderly in the Local Plan and this site is an ideal location for apartments for the elderly</p>	<p>The population of Shepway District has been used as the basis for future housing projections, including an ageing demographic, which is identified in the Council's Strategic Housing Market Assessment. The Local Plan includes an allocation for a large care home complex, together with supporting Development Management Policy HB11 - Loss of Residential Care Homes and Institutions. This policy identifies that there will be an increased need over this plan period for the relocation and reconfiguration of existing residential care homes and institutions (C2 or sui generis use class) in the district. Where this cannot be achieved with the existing building, there will be a need for the building's conversion to other uses, or else an impetus for the demolition and reconstruction. Planning permission will be supported subject to certain criteria being met. The Local Plan also includes Policy HB12 - Development of New or Extended Residential Institutions (C2 use) which supports new residential institutions in sustainable locations with access to local services, leisure and community facilities.</p>	<p>Work has been undertaken and a site has now been safeguarded for a new medical hub at the Marsh Academy on Station Road; see Policy RM5. The policy supports the provision of C2 residential use on the site.</p>
<p>Part of the site next to the cemetery could be purchased and used for extra burial spaces for the growing population</p>	<p>The Council is undertaking more detailed work to update its Infrastructure Delivery Plan (IDP) to identify where and when improvements to cemeteries and crematoria provision will be required and how the improvements will be delivered. The Council's Cemeteries team have identified that there is a critical need for additional provision across the Romney Marsh area. As a result, options and opportunities are being actively sought to address this.</p>	<p>No change.</p>
<p>An ideal site for multiple smaller units, preferably not requiring vehicular parking for residents due to the proximity to the High Street.</p>	<p>Support noted.</p>	<p>No change.</p>

<p>The existing infrastructure cannot cope with additional development and infrastructure improvements should be carried out before development takes place</p>	<p>The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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. Where improvements to school facilities are necessary to cater for the additional growth, comments from KCC Education will be taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL). The NHS Clinical Commissioning Group are aware that there is a deficiency of health facilities in the Romney Marsh area and options and opportunities are being actively sought to address this; see Policy RM5.</p>	<p>No change.</p>
<p>The existing road and access is not capable of supporting additional development on Church Lane</p>	<p>Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to five in total) are 'pooled' to fund an identified improvement.</p>	<p>The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.</p> <p>Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.</p> <p>The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.</p>
<p>It is perhaps a site that community will want to propose as a Local Green Space</p>	<p>The local community are able to propose this site as a Local Green Space during the next consultation period following the publication of the Places and Policies Local Plan Submission Draft, however the site is currently being put forward for residential development by the land owner.</p>	<p>No change.</p>
<p>Policy RM3 does not include adequate safeguards to ensure that biodiversity is protected.</p>	<p>The Kent County Council Ecological Advice Service were consulted on for this site allocation and raised no objection. Criterion 7 of the policy ensures that a Phase 1 Habitat Survey is carried out prior to development to ensure that protected species are safeguarded.</p>	<p>No change.</p>
<p>There is a lack of lighting and footpaths on Church Lane so there is a concern for safety</p>	<p>The purpose of the Places and Policies Local Plan is to allocate sites that are considered acceptable in principle for residential use that can be delivered within the Plan period. The detailed design and layout will be considered at the planning application stage where there will be a consultation period for any concerns regarding the impact of the design of the scheme on the character of the area, together with any concerns regarding neighbouring residential amenity or lighting. Consultation comments can inform the final design and layout of the development site to overcome any concerns.</p>	<p>No change.</p>
<p>Criteria 5 relating to archaeology is welcomed but suggest re-wording as follows: The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place. Criteria 6 relating to listed building and scheduled monuments is welcomed but suggest re-wording as follows: The design of the development should seek to preserve and enhance the character and setting of nearby heritage assets, including the Grade I Listed Church of St Nicholas, New Romney – High Street Conservation Area and other nearby Listed Buildings. <b>(KCC Heritage)</b></p>	<p>Suggestion noted. This criterion will be re-worded to reflect the wording suggested by Kent County Council Heritage to ensure that all policies are consistent and worded correctly.</p>	<p>Amend archaeology wording within Policy RM3 (criterion 5).</p>

<p>RM4 Land west of Ashford Road, New Romney - Land west of Ashford Road, New Romney is allocated for residential development with an estimated capacity of 60 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. A footpath and appropriate lighting is provided along the road frontage with Ashford Road</li> <li>2. Access is through the existing site access on Ashford Road, with an additional emergency access provided at the north of the site</li> <li>3. A pedestrian crossing point, to the satisfaction of the local highway authority, is provided across Ashford Road, to include dropped kerbs and tactile paving</li> <li>4. A Traffic Assessment is required to take account of the cumulative impact of development on the local road network, and contributions will be sought for any required improvements to mitigate the impact of this development</li> <li>5. The development has at least 3 self / custom build plots</li> <li>6. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority</li> <li>7. Existing trees and hedgerows within / around perimeter of site are retained and enhanced</li> <li>8. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</li> <li>9. The design of the development should seek to minimise the effects on the setting of the nearby Listed Buildings and Scheduled Monument</li> </ol>	<p>The site is currently a field and is essential as is the biodiversity and habitat for wild animals and floral species</p>	<p>The Council has involved statutory consultees including Natural England, together with specialist consultees including Kent Wildlife Trust and Kent County Council Biodiversity team at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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.</p>	<p>No change.</p>	<p><b>RM4 Land west of Ashford Road, New Romney</b> (includes changes as a result of Habitats Regulations Assessment)</p> <p>Land west of Ashford Road, New Romney is allocated for residential development with an estimated capacity of 60 dwellings.</p> <p>Development proposals will be supported where:</p>
	<p>The trees on the site are essential to preserve the rural scene and backdrop</p>	<p>Criterion 8 of Policy RM4 ensures that existing trees and hedgerows within/around perimeter of the site are retained and enhanced within any development proposal.</p>	<p>No change.</p>	<ol style="list-style-type: none"> <li>1. A single comprehensive masterplan is formed for the site;</li> <li>2. A footpath and appropriate lighting is provided along the road frontage with Ashford Road;</li> <li>3. Access is provided through the existing site access on Ashford Road, with an additional emergency access provided at the north of the site;</li> </ol>
	<p>The area is prone to flooding</p>	<p>The Strategic Flood Risk Assessment (2115) confirms that the site is not in a flooding area. The Council has involved statutory consultees, including the Environment Agency, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. The Environment Agency were consulted on for this site allocation and raised no objection. Criterion 7 of the policy ensures that a surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority prior to development.</p>	<p>No change.</p>	<ol style="list-style-type: none"> <li>4. A pedestrian crossing point is provided to the satisfaction of the local highway authority across Ashford Road, to include dropped kerbs and tactile paving;</li> <li>5. A Traffic Assessment is undertaken to take account of the cumulative impact of development on the local road network, and contributions or provision via s278 agreement will be sought for any required improvements to mitigate the impact of the development;</li> <li>6. At least 3 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development;</li> </ol>
	<p>There is a lack of suitable road access</p>	<p>The local highway network is to be enhanced in accordance with off-site highway improvements linked to the schemes of residential development at the New Romney 'Broad Location' under planning references Y14/1411/SH and Y15/0164/SH. Specifically, the schemes of development shall facilitate the change of priority at the junction of St Mary's Road/Cockreed Lane, a junction enhancement scheme at the junction of High Street/Station Road/Church Road, a build-out to the High Street at the junction with Ashford Road and the provision of a footway extension on the northern/north-eastern side of Ashford Road.</p> <p>Irrespective of the highway/accessibility improvements that have been secured in relation to the 'Broad Location', the promoters of the site subject to Policy RM4 will need to undertake a detailed highways and transport assessment to the satisfaction of the local highway authority, and propose appropriate mitigation should the assessment identify that mitigation is required.</p>	<p>The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.</p> <p>Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.</p> <p>The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.</p>	<ol style="list-style-type: none"> <li>7. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority;</li> <li>8. Existing trees and hedgerows within and around the perimeter of the site are retained and enhanced;</li> <li>9. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place;</li> <li>10. The design of the development responds to the town's historic character and seeks to preserve or enhance the character and setting of the New Romney High Street Conservation Area;</li> <li>11. Provision is made for open and play space on site or nearby, and reinforces the integration and connectivity of green infrastructure in accordance with Core Strategy Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation;</li> <li>12. The rural western edge of the development is fragmented and softened with a strong focus on landscaping to form a buffer;</li> <li>13. A Phase 1 Habitat Survey is undertaken by a licenced ecologist to assess the presence of Protected Species on or near the site. The pond on this site should be assessed for ecological importance and, if appropriate, compensation for its loss (if it occurs) will be required;</li> <li>14. The masterplan should deliver enhancements to public access within greenspaces on the site, connecting and improving the existing public rights of way;</li> </ol>
	<p>There is a lack of employment in the New Romney, particularly when Dungeness is decommissioned so new residents would need to commute</p>	<p>An Employment Land Review has been completed and forms part of the evidence base for the Places and Policies Local Plan to demonstrate employment need in the District; see Chapter 10: Economy.</p>	<p>No change.</p>	<ol style="list-style-type: none"> <li>15. Appropriate and proportionate contributions are made to healthcare facilities in New Romney through a site-specific Section 106 agreement;</li> <li>16. The masterplanning of the site should take account of the nearby pumping station to allow for odour dispersal and help prevent unacceptable impact from vibration; and</li> </ol>
	<p>Lack of health facilities in the area with very few doctors</p>	<p>The Council has involved statutory consultees, including NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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. The NHS Clinical Commissioning Group are aware that there is a deficiency of health facilities in the Romney Marsh area and options and opportunities are being actively sought to address this; see Policy RM5.</p>	<p>Work has been undertaken and a site has now been safeguarded for a new medical hub at the Marsh Academy on Station Road; see Policy RM5.</p>	<ol style="list-style-type: none"> <li>17. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.</li> </ol>
	<p>Investment in the area is poor due to lack of infrastructure and poor public transport links</p>	<p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to five in total) are 'pooled' to fund an identified improvement.</p>	<p>No change.</p>	

The area is used for recreation for dog walkers and hikers etc	Whilst the site is allocated for residential development, any new development should include accessible open space provision, together with improved links and connectivity to green infrastructure to improve access to the wider countryside for existing and future residents. An additional criterion within the policy could be explored; however there is an overarching policy within the Adopted Core Strategy, Policy CSD4, which is concerned with protecting, managing and enhancing Shepway's varied and extensive green and open spaces. In addition, Policy NE1 within the Places and Policies Local Plan seeks to target opportunities for improvements on routes and links from urban areas where access is currently poor and to improve access to key open spaces from all areas.	No change.
Empty and derelict properties should be renovated first before building new houses	The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). The Core Strategy establishes the general level and distribution of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond 2031). The Core Strategy focuses most of the development in the district to the Urban Area (comprising Folkestone and Hythe); 75% of the district's new housing development is planned for this area (to the nearest 5%). 10% of the district's new housing is planned for the Romney Marsh Area (to the nearest 5%), which includes the settlements of New Romney, Lydd and St Mary's Bay. The remaining 15% of new housing development (to the nearest 5%) is planned for the North Downs Area, which includes the settlements of Hawkinge, Lyminge and Sellindge). This distribution has taken account of available sites, constraints including infrastructure, the highway network, flood risk and landscape character, as well as access to services, such as shops, public transport, schools and employment opportunities.	No change.
This development will over stretch the utilities services in the New Romney area	The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.
Local schools are already full	The Council has involved statutory consultees, including Kent County Council Education, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education support the Council that there is capacity available in existing schools to cater for the planned additional growth. Where improvements to school facilities are necessary to cater for the additional growth, comments from KCC will be taken into account when finalising the plan.	No change.
This land is lower than the surrounding roads and gardens and has flooded in the past	The Council has involved statutory consultees, including the Environment Agency, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. The Environment Agency were consulted on for this site allocation and raised no objection. Criterion 7 of the policy ensures that a surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority prior to development.	No change.
There will be a need for considerable pumping stations and a pipeline to lower the water table	The Council has involved statutory consultees, including the Environment Agency, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. The Environment Agency were consulted on for this site allocation and raised no objection. Criterion 7 of the policy ensures that a surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority prior to development.	No change.



Improvements to the road network are needed such as traffic lights at the junction of Ashford Road to the High Street and major widening of Cockreed Lane	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to five in total) are 'pooled' to fund an identified improvement.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.
With all the development, existing and proposed, this site should be considered as a car park for the Church Lane Health centre.	Suggestion noted. The outline planning application Y14/1411/SH is at an advanced stage, having received a resolution to approve, with the issuing of the decision pending the resolution of negotiations associated with the legal agreement. The approved masterplan for the New Romney Broad Location does not cover securing access from the application site to the New Romney Day Centre and it would be unreasonable to introduce such a requirement at this very late stage.	No change.
The land has always been used for horse grazing and building on the land would create a claustrophobic environment and would impact upon existing properties on the other side of Ashford Road and Stonebridge Terrace	The Places and Policies Local Plan allocates sites that are considered acceptable in principle for residential use that can be delivered within the Plan period. The detailed design and layout will be considered at the planning application stage where there will be a consultation period for any concerns regarding the impact of the design of the scheme on the character of the area, together with any concerns regarding neighbouring residential amenity. Consultation comments can inform the final design and layout of the development site to overcome any concerns.	No change.
The cumulative impact of developing this site together with other nearby sites with planning permission will add to the problems with the existing infrastructure	The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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.
The site is currently open and housing would destroy this ambience as you travel out of New Romney	The Places and Policies Local Plan allocates sites that are considered acceptable in principle for residential use that can be delivered within the Plan period. The detailed design and layout will be considered at the planning application stage where there will be a consultation period for any concerns regarding the impact of the design of the scheme on the character of the area, together with any concerns regarding neighbouring residential amenity. Consultation comments can inform the final design and layout of the development site to overcome any concerns.	No change.
Access from this site onto the High Street is very busy and additional housing will exacerbate this problem	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to five in total) are 'pooled' to fund an identified improvement.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.
The new housing needs to be affordable for local people	The site will be subject to the Council's affordable homes policy which ensures that 30% of the housing is affordable.	No change.

The land at the other side of Cockreed Lane, siding onto St. Mary's Road, would be more appropriate for development than this site	Suggestion noted. In order for sites to be considered deliverable and achievable within the development plan period, land owners must submit their sites to the Council for consideration during the Council's Call for Sites consultation. If a site is not put forward to the Council to consider then it is unlikely to be deliverable for housing development and therefore cannot be allocated in the Plan.	No change.
Additional criteria for this policy to include the requirement for an odour and vibration assessment to be undertaken to inform the masterplanning of the site ( <b>Southern Water</b> )	Criteria including the requirement for an odour and vibration assessment to be undertaken to inform the masterplanning of the site will be added to Policy RM4.	Include additional criterion in the pollicy wording (criterion 16).
The site lies within Flood Zones 2 & 3, whereas the LPA's own SFRA confirms that the land is not liable to flooding even under 'worst- case scenario' 2 115 Climate Change conditions	Support noted.	No change.
The policy criteria 9 makes it optional to design the development to reduce effects on the setting of the nearby Listed Buildings and Scheduled Monument by using the word 'should'; this needs to be a mandatory requirement	Comment noted.	Amend policy wording.
Criteria 8 relating to archaeology is welcomed but suggest re-wording as follows: The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place ( <b>KCC Heritage</b> )	Suggestion noted. This criterion will be re-worded to reflect the wording suggested by KCC Heritage to ensure that all policies are consistent and worded correctly.	Amend archaeology wording within Policy RM4 (criterion 9).
Criteria 9 relating to listed building and scheduled monuments is welcomed but suggest re-wording as follows: The design of the development responds to the town's historic character and seeks to preserve and enhance the character and setting of the New Romney – High Street Conservation Area. ( <b>KCC Heritage</b> )	Comment noted.	Amend policy wording.
Public Footpaths HR3 and HR4 would be directly affected by this site allocation. Support the policy with amendments: The Masterplan should deliver enhancements to public access within greenspace connecting and improving the existing Public Rights of Way. ( <b>KCC PROW</b> )	Suggestion noted. This criterion will be re-worded to reflect the wording suggested by KCC PROW to ensure that all policies are consistent and worded correctly.	Amend Public Rights of Way wording within Policy RM4.

RM5 Land to the south of New Romney - Land to the south of New Romney is allocated for residential led, mixed use development to provide up to 400 dwellings, improved access to Mountfield Road Industrial Estate, health care and other community facilities, high quality open space and appropriate on and off site transport infrastructures improvements.  
Development proposals for this site shall:  
1. Form a single comprehensive masterplan  
2. Provide for an appropriate distributor road, connecting between Mountfield Road Industrial Estate and Lydd Road so as to reduce congestion through the High Street and open up Mountfield Road as an enhanced employment location  
3. Have an integrated approach that takes note of the nearby Mountfield Road Industrial Estate and its future growth proposals  
4. Provide an appropriate design response to the Romney Marsh Local Landscape Area, utilising Landscape and Visual Impact Assessment to inform master planning  
5. Provide for on site medical facilities that provide for an appropriate healthcare hub to serve the town of New Romney and the wider rural area  
6. Include consideration of extra care housing and C2 residential carehome facilities  
7. Sustainable Urban Drainage and surface-water management should be integral to the good urban design principles adopted for the development of the site

Adjoining neighbours were not informed of the site allocation suggesting that the people who will be affected are being ignored and not considered early on in the consultation process

The site is currently a field and is essential as is the biodiversity and habitat for wild animals and floral species

The trees on the site are essential to preserve the rural scene and backdrop

The infrastructure of New Romney is not capable of supporting a further 450 plus houses due to lack of employment and shortage of medical facilities

The rural identity of the town will be spoilt

Local schools are full

Affordable homes are needed with more 1 bedroom flats for young people rather than 4 bedroom detached houses

The recognition that an access road is an essential prerequisite for any such development is welcome and should be installed before any houses

The area is prone to flooding

There is a lack of suitable road access

There is a lack of employment in the New Romney, particularly when Dungeness is decommissioned

Lack of health facilities in the area with very few doctors

Investment in the area is poor due to lack of infrastructure and poor public transport links

The area is used for recreation for dog walkers and hikers etc

Empty and derelict propoerties should be renovated first before building new houses

## POLICY RM5 DELETED

This site should be considered for the plan period 2027 - 2046 rather than the 2006 - 2026 plan period
There is no evidence that Mountfield Industrial Estate is being held back by access issues
Existing medical facilities are located on the South side of New Romney; new facilities are required in the North of the town
This development will over stretch the utilities services in the New Romney area
While it is acknowledged that a new medical centre is proposed, there are problems with getting GP's to move to the area
If the link road is constructed as shown then it will create another blackspot and cause accidents as with Hammonds Corner
An Environmental Impact Assessment should be carried out as there are many wildlife creatures in the fields in the marsh
The water table is too high for any development
The development would be out of character with New Romney
A designated access to serve the development should be put in place rather than using the existing roads which are inadequate and dangerous
There is a proviso on the land preventing the land being built on for housing
Part of Mountfield road is unmade and unadopted and cannot cope with additional traffic
The development on this site for housing would restrict the expansion of the Mountfield Road Industrial Estate so the link road would be unnecessary
The industrial estate contains empty units and currently lacks success
Businesses choose to locate in larger towns such as Folkestone and Ashford rather than New Romney
The new road should be to the North of New Romney to bypass the High Street and ease traffic
There is an issue with no employment in the area with more job losses once the power station closes
There is no evidence or justification to suggest the expansion of the industrial park is needed or viable and no detail is provided in the Plan
The claimed 6.1ha undeveloped area earmarked for future expansion of Mountfield road industrial estate for business needs is undefined and unnecessarily ambiguous
Development in New Romney should be concentrated within the settlement boundary or to the north where flood risk is lower and more acceptable
The development of the marshes at the south of New Romney is inconsistent with every element of the Core strategy policy SS1 'protecting and enhancing the many special habitats and landscapes of the Romney Marsh area'
The area includes four main ponds containing Great Crested Newts and other amphibians
Ecological assessments of the site are required as the area is rich in biodiversity and wildlife
Archaeology studies should be carried out prior to development
The number of dwellings is based on the number needed to fund the link road rather than the housing need in New Romney

RM5 contains the Romney Marsh Biodiversity Opportunity Area (BOA), as highlighted in the SHLAA, and is likely to support protected species such as great crested newt and water vole. It may also provide suitable off-site habitat for SPA notified birds, golden plover and Bewick's swan.

Should the council wish to retain this allocation, Natural England advise it should be substantially strengthened to safeguard its ecological interest. Whilst they welcome criterion 8 which requires ecological assessment at project level and reinforcement of green infrastructure, the policy should specifically highlight the ecological value of the site, and include specific requirements for protection and enhancement of biodiversity and to retain the BOA as far as possible. **(Natural England)**

The policy should allow the freedom for employment uses such as healthcare and residential care homes to be included within the overall masterplan including the Mountfield Road employment site. Items 5 and 6 should be amended to allow for this possibility.

The land is open countryside in agricultural use. The Council has not demonstrated that this land is needed for meeting the housing requirement.

Additional criteria for this policy to include the requirement for an odour and vibration assessment to be undertaken to inform the masterplanning of the site. Additional criteria for this policy to ensure a connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider. (Southern Water)

The proposal will achieve positive, infrastructure-led, economic driven growth in Romney Marsh

The housing will back onto the industrial estate and affect amenity

The archaeological features of the site should be retained intact and used to promote tourism

The proposed site access junction with Lydd Road is likely to need to be a new 3 arm roundabout junction in order to provide sufficient capacity to cater for the proposed development. The new link road through the site should accord with the principles of a Local Distributor Road as set out in the Kent Design Guide. **(KCC Highways)**

Development within this area will have the effect of further separating the town's historic core from the surrounding open marshland, would result in encroachment into this marshland landscape, and would therefore have an adverse impact on the historic landscape around the town. **(KCC Heritage)**

RM6 Land Adjoining The Marsh Academy, Station Road, New Romney - Land adjoining Marsh Academy, Station Road is allocated for residential development with an estimated capacity of 29 dwellings. Development proposals will be supported where:  
 1. Appropriate and proportionate contributions are made to medical facilities in New Romney through a site specific S106 agreement  
 2. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority  
 3. The north, north-east edge of the development should have a strong focus on landscaping to form a buffer  
 4. Existing trees and hedgerows within / around perimeter of site are retained

The site is currently a field and is essential as is the biodiversity and habitat for wild animals and floral species

The trees on the site are essential to preserve the rural scene and backdrop

The Council has involved statutory consultees including Natural England, together with specialist consultees including Kent Wildlife Trust and Kent County Council Biodiversity team at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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.

Criterion 5 of this policy ensures that existing trees and hedgerows within/around perimeter of the site are retained and enhanced within any development proposal.

No change.

No change.

**RM5 Land adjoining The Marsh Academy, Station Road, New Romney (re-numbered)**  
 Land adjoining the Marsh Academy, Station Road should be safeguarded for a medical facility under the 'hub' model that could provide for other community uses, in addition to a pharmacy. Residential uses (C2 and C3) will be permitted on the site to support the delivery of the medical facility as enabling development.  
 Development proposals will be supported where:  
 1.A single comprehensive masterplan is formed for the site;  
 2.On-site medical facilities are provided under an appropriate healthcare hub that

and enhanced  
 5. It can be demonstrated that a replacement community facility is to be provided or is to be delivered elsewhere or is no longer required  
 6. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

It is shortsighted to allow the only secondary school in the area to sell even more of its land, thus limiting its future potential expansion	The Council has involved statutory consultees, including Kent County Council Education, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education support the Council that there is capacity available in existing schools to cater for the planned additional growth. Where improvements to school facilities are necessary to cater for the additional growth, comments from KCC will be taken into account when drafting the plan.	No change.	could provide for other community uses, in addition to a pharmacy, to serve the town of New Romney and the wider rural area; 3.A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority; 4.The north, north-east edge of the development should have a strong focus on landscaping to form a buffer between the Romney Marsh Local Landscape Area, utilising Landscape and Visual Impact Assessment to inform the master plan; 5.Existing trees and hedgerows within and around the perimeter of the site are retained and enhanced;
The only access from Station Road is already gridlocked at busy times	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to five in total) are 'pooled' to fund an identified improvement.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.	6.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; and 7.A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.
This development will over stretch the utilities services in the New Romney area	The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.	
Local schools are already full	The Council has involved statutory consultees, including Kent County Council Education, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education support the Council that there is capacity available in existing schools to cater for the planned additional growth. Where improvements to school facilities are necessary to cater for the additional growth, comments from KCC will be taken into account when drafting the plan.	No change.	
With the current push for development, there will be a future increased demand for both primary and secondary school places and this redundant site may in fact be required in the future for education use	The Council has involved statutory consultees, including Kent County Council Education, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education support the Council that there is capacity available in existing schools to cater for the planned additional growth. Where improvements to school facilities are necessary to cater for the additional growth, comments from KCC will be taken into account when drafting the plan.	No change.	
An interim use for the site as a community use should be considered as once it is housing it is lost forever for education use	A temporary use could be considered within a planning application, however agreement from the land owner would be required. The purpose of the Places and Policies Local Plan is to allocate sites that are considered acceptable in principle for uses that can be delivered within the Plan period.	Check restrictive covenants on the land with the andowner and look for an alternative, more suitable use for the site, for instance a medical hub to meet the needs of the community and to compensate for the new facility identified in previous Policy RM5 - Land South of New Romney which has now been deleted. Creation of new Policy RM5: Land adjoining The Marsh Academy, Station Road, New Romney to safeguard the site for a healthcare hub with appropriate supporting uses to meet the burgeoning requirement for new and/or improved healthcare facilities to serve the Romney Marsh area.	

The existing road infrastructure cannot cope with additional traffic	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to 5 in total) are 'pooled' to fund an identified improvement.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.
The development of part of the School site for residential use would lead to issues such as the safety of the children and rights of way being maintained for the school	The Places and Policies Local Plan allocates sites that are considered acceptable in principle for residential use that can be delivered within the Plan period. The detailed design and layout will be considered at the planning application stage where there will be a consultation period for any concerns regarding the impact of the design of the scheme on the character of the area, together with any concerns regarding neighbouring residential amenity, safety of the children and any impacts upon rights of way. Consultation comments can inform the final design and layout of the development site to overcome any concerns.	No change.
The current Youth Centre on the site would need to be relocated, as would the current substations on the site	Comment noted.	No change.
Potentially part of the site could be suitable for development rather than the whole site	Comment noted.	Check restrictive covenants on the land with the andowner and look for an alternative, more suitable use for the site, for instance a medical hub to meet the needs of the community and to compensate for the new facility identified in previous Policy RM5 - Land South of New Romney which has now been deleted. Creation of new Policy RM5: Land adjoining The Marsh Academy, Station Road, New Romney to safeguard the site for a healthcare hub with appropriate supporting uses to meet the burgeoning requirement for new and/or improved healthcare facilities to serve the Romney Marsh area.
Issues relating to overlooking and safeguarding would need to be considered to ensure child safety	Comment noted.	No change.
There could be an issue with parking and residents using the car park belonging to the Academy	The Council have new development management policies regarding parking requirements which can be found in the Transport chapter of the Plan. In particular, Table 13.1 IGN3: Guidance Table for Residential Parking, Table 13.2 Guidance Table for Non-Residential and Commercial Parking and Policy T2 Parking Standards all ensure that adequate parking spaces are provided within new developments.	No change.
A replacement community facility should be provided	The Council is aware that there is a need for a community facility in the Romney Marsh area and options and opportunities are being actively sought to address this deficiency.	Check restrictive covenants on the land with the andowner and look for an alternative, more suitable use for the site, for instance a medical hub to meet the needs of the community and to compensate for the new facility identified in previous Policy RM5 - Land South of New Romney which has now been deleted. Creation of new Policy RM5: Land adjoining The Marsh Academy, Station Road, New Romney to safeguard the site for a healthcare hub with appropriate supporting uses to meet the burgeoning requirement for new and/or improved healthcare facilities to serve the Romney Marsh area.

The existing hedge fronting the road may need to be removed if development takes place to ensure there is a safe passage along the road side for Academy students to use	Comment noted.	No change.	
Not all land in this allocation should be included for development in view of existing restrictive covenants	Comment noted.	Check restrictive covenants on the land with the andowner and look for an alternative, more suitable use for the site, for instance a medical hub to meet the needs of the community and to compensate for the new facility identified in previous Policy RM5 - Land South of New Romney which has now been deleted. Creation of new Policy RM5: Land adjoining The Marsh Academy, Station Road, New Romney to safeguard the site for a healthcare hub with appropriate supporting uses to meet the burgeoning requirement for new and/or improved healthcare facilities to serve the Romney Marsh area.	
Additional criteria for this policy to ensure a connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider. <b>(Southern Water)</b>	Additional criterion to ensure a connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider will be added to Policy RM6.	Include additional criterion in the pollicy wording of Policy RM5: Land Adjoining the Marsh Academy, Station Road, New Romney (criterion 7).	
Criteria 6 relating to archaeology is welcomed but suggest re-wording as follows: The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place <b>(KCC Heritage)</b>	Suggestion noted. This criterion will be re-worded to reflect the wording suggested by KCC Heritage to ensure that all policies are consistent and worded correctly.	Amend archaeology wording within Policy RM5: Land Adjoining the Marsh Academy, Station Road, New Romney (criterion 6).	
<p>RM7 Development at North Lydd - Kitewell Lane, R/O Ambulance Station, Lydd - These sites are proposed for residential development with an estimated capacity as follows:</p> <ol style="list-style-type: none"> <li>1. Kitewell Lane, R/O Ambulance Station, Lydd, - 8 dwellings</li> <li>2. Land South of Kitewell Lane, Lydd, - 9 dwellings</li> <li>3. Station Yard, Station Road, Lydd, - 30 dwellings</li> <li>4. Peak Welders, Lydd, - 18 dwellings</li> </ol> <p>Development proposals will be supported on these sites, either together or separately, where:</p> <ol style="list-style-type: none"> <li>1. A masterplan is produced showing all four sites and a vision for their integration with each other and the surrounding settlement</li> <li>2. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority</li> <li>3. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</li> <li>4. Provision is made for open and play space on site, and reinforces the integration and connectivity of green infrastructure as per Core Strategy Policy CSD4. At least a third of the land area on this site should be set aside as publicly-accessible open space</li> <li>5. The development should avoid adverse effects on the Dungeness, Romney Marsh and Rye Bay SSSI and incorporate biodiversity enhancement measures</li> <li>6. A Phase 1 Contaminated Land Assessment is required and, if necessary, mitigation measures enacted to the satisfaction of the responsible statutory body</li> </ol>	<p>Poplar Lane is too narrow, particularly for lorries passing through</p> <p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the 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), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.</p>	<p>The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.</p> <p>Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.</p> <p>The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.</p>	<p><b>RM6 Kitewell Lane, rear of the Ambulance Station, Lydd</b> (new policy)</p> <p>Kitewell Lane, rear of the Ambulance Station, Lydd is allocated for residential development with an estimated capacity of 8 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. Kitewell Lane is widened to a minimum of 4.1m in width with a 1.2m wide footpath to accommodate the proposed development, within the extent of the adopted highway. The access spur to serve the site is to be laid out as a shared surface with a 1m service strip on one side. The access strategy will be to the satisfaction of the local highway authority;</li> <li>2. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority;</li> <li>3. Appropriate protection, preservation and integration of the Local Wildlife Site is provided;</li> <li>4. The development avoids adverse effects on the adjacent Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest and Ramsar designations, incorporating biodiversity enhancement measures;</li> <li>5. Any potential contamination from the site's former use is investigated, assessed and if appropriate, mitigated as part of the development;</li> <li>6. A Phase 1 Habitat Survey is undertaken by a licensed ecologist to assess the presence of Protected Species on or near the site; and</li> <li>7. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ol>
Doctors surgeries in the local area are in special measures and can't cope with the existing population	The Council has involved statutory consultees, including NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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. The NHS Clinical Commissioning Group are aware that there is a deficiency of health facilities in the Romney Marsh area and options and opportunities are being actively sought to address this.	Work has been undertaken and a site has now been safeguarded for a new medical hub at the Marsh Academy on Station Road in Policy RM5: Land Adjoining The Marsh Academy, Station Road, New Romney.	
There is no employment in the area	An Employment Land Review has been completed and forms part of the evidence base for the Places and Policies Local Plan to demonstrate employment need in the District; see Chapter 10: Economy.	No change.	<p><b>RM7 Land South of Kitewell Lane, Lydd</b> (new policy)</p> <p>Land South of Kitewell Lane, Lydd is allocated for residential development with an estimated capacity of 9 dwellings</p>

Traffic in the area is at bursting point which put pressure on the dangerous junction at Hammond's Corner	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to five in total) are 'pooled' to fund an identified improvement.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.	Estimated capacity of 20 dwellings.  Development proposals will be supported where:  1.Vehicle access to the site is provided from Poplar Lane; 2.Development ensures pedestrian permeability throughout and beyond the site, with pedestrian links to Poplar Lane and Kitewell Lane; 3.A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority; 4.Any potential contamination from former use is investigated, assessed and if appropriate, mitigated as part of the development; 5.A Phase 1 Habitat Survey is undertaken by a licensed ecologist to assess the presence of Protected Species on or near the site; 6.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; and 7.Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.
The drains cannot take any more houses	A criterion ensures that a surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority. The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including water and utilities companies. Comments from these providers have been taken into account when drafting the plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.	<b>RM8 Station Yard, Station Road, Lydd</b> (new policy)  Station Yard, Station Road, Lydd is allocated for residential development with an estimated capacity of 30 dwellings.  Development proposals will be supported where:  1.The up-platform, main station building, goods shed, and loading dock are all retained and returned to use, ideally for retail or other compatible use, to provide the locality with missing services and to maintain the link with North Lydd's past. An assessment of these historic assets is undertaken; 2.A Traffic Regulation Order is sought to close access from Station Road onto Harden Road next to the application site, and ensure that traffic accesses the site from the junction slightly further south. This is due to the existing private access onto Station Road having limited visibility due to the railway bridge. This part of Harden Road should then become two-way for vehicular traffic; 3.A footpath connection is delivered by the scheme to link up with Ash Grove to enable sustainable journeys to and from the site; 4.A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority; 5.Appropriate protection, preservation and integration of the Local Wildlife Site is provided; 6.The development avoids adverse effects on the adjacent Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest and Ramsar designations, incorporating biodiversity enhancement measures; 7.Any potential contamination from the former use is investigated, assessed and if appropriate, mitigated as part of the development; 8.A Phase 1 Habitat Survey is undertaken by a licensed ecologist to assess the presence of Protected Species on or near the site; 9.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; 10.An appropriate number of self-build or custom built plots are provided in accordance with Policy HB4: Self-build and Custom Housebuilding Development; and 11.Appropriate and proportionate contributions are made to healthcare facilities in Lydd through a site-specific Section 106 agreement.
Local schools are full	The Council has involved statutory consultees, including Kent County Council Education, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education support the Council that there is capacity available in existing schools to cater for the planned additional growth. Where improvements to school facilities are necessary to cater for the additional growth, comments from KCC will be taken into account when finalising the plan.	No change.	
All brown field infill sites and this type of development should be encouraged in favour of character damaging coastal development	The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). The Core Strategy establishes the general level and distribution of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031). The Core Strategy focuses most of the development in the district to the Urban Area (comprising Folkestone and Hythe); 75% of the district's new housing development is planned for this area (to the nearest 5%). 10% of the district's new housing is planned for the Romney Marsh Area (to the nearest 5%), which includes the settlements of New Romney, Lydd and St Mary's Bay. The remaining 15% of new housing development (to the nearest 5%) is planned for the North Downs Area, which includes the settlements of Hawkinge, Lyminge and Sellindge). This distribution has taken account of available sites, constraints including infrastructure, the highway network, flood risk and landscape character, as well as access to services, such as shops, public transport, schools and employment opportunities.	No change.	
Provision must be made by the developers to improve both the infrastructure and amenities for the Lydd residents	The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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.	
The draft Policy RM7 should be sub-divided to reflect the physical diversity and land ownership and to reflect the positive approach of other sites in the Plan	The draft Policy RM7 was intended to create a masterplan approach to ensure infrastructure improvements in the locality could be delivered. However, following the removal of the Peak Welders site due to highways objections, this approach is no longer feasible. As a result, Policy RM7 will be sub-divided into individual site allocations in order to be consistent with other site allocations and to ensure that the approach does not create an obstacle for housing delivery on sites with no constraints.	Divide Policy RM7 into individual site policies.	
The requirement for a masterplan approach creates an obstacle for delivery of housing constrained by unrelated issues	The draft Policy RM7 was intended to create a masterplan approach to ensure infrastructure improvements in the locality could be delivered. However, following the removal of the Peak Welders site due to highways objections, this approach is no longer feasible. As a result, Policy RM7 will be sub-divided into individual site allocations in order to be consistent with other site allocations and to ensure that the approach does not create an obstacle for housing delivery on sites with no constraints.	Divide Policy RM7 into individual site policies.	



The site boundary should be altered to include additional land which includes an existing wide access to the north of Kitewell Lane which is significantly better than the alternative access adjacent to the former ambulance station	The site is adjacent to a designated Local Wildlife Site, therefore any increase to the site boundary to include an alternative access would encroach into this designation.	No change.	
The Lydd Commons and Pastures Local Wildlife site needs reviewing as there is no grassland present on the southern side of the embankment and this detached parcel of land could be included in the allocation to allow for access, enhanced ecological management and if appropriate, informal amenity space.	Kent Wildlife Trust advise that the policy should ensure there would be no increase in recreational pressure or disturbance during construction or occupation as a result of adjacent Wildlife Site, and that an additional criterion should be added to the policy to ensure there would be no impact. As a result, it is unlikely that this site can accommodate an alternative access arrangement.	No change.	
This site is located adjacent to Dungeness, Romney Marsh and Rye Bay SSSI, SPA and Ramsar site, and Dungeness SAC. <b>(Natural England)</b>	Comment noted.	No change.	
No justification has been provided in the Preferred Options document as to why the development of the four sites, on an individual or combined basis and without an overarching masterplan, would not constitute sustainable development.	The draft Policy RM7 was intended to create a masterplan approach to ensure infrastructure improvements in the locality could be delivered. However, following the removal of the Peak Welders site due to highways objections, this approach is no longer feasible. As a result, Policy RM7 will be sub-divided into individual site allocations in order to be consistent with other site allocations and to ensure that the approach does not create an obstacle for housing delivery on sites with no constraints.	Divide Policy RM7 in to individual site policies.	
The policy should ensure there would be no increase in recreational pressure or disturbance during construction or occupation as a result of adjacent Wildlife Site. Additional criteria should be added to the policy with bullet point 2. <b>(Kent Wildlife Trust)</b>	An additional criterion to ensure there would be no increase in recreational pressure or disturbance during construction or occupation as a result of adjacent Wildlife Site will be added to the Policy.	Include additional criterion in the policy wording.	
Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes at these sites. The need for easements will therefore need to be taken into account in the layout of the site. <b>(Southern Water)</b>	An additional criterion to ensure that any future development proposal will include the need for easements to be taken into account in the layout of the site will be added to the Policy.	Include additional criterion in the policy wording.	
The site is adjacent to a historic landfill site and may be contaminated land <b>(Environment Agency)</b>	A criterion in the Policy ensures that a Phase 1 Contaminated Land Assessment is required and, if necessary, mitigation measures enacted to the satisfaction of the responsible statutory body within any potential development proposal.	No change.	
Kitewell Lane will be required to be widened to a minimum of 4.1 metres in width together with a 1.2 metre wide footpath to accommodate the proposed development. <b>(KCC Highways)</b>	The Council has met with the Landowner / Developer who has confirmed that they will ensure access requirements are met in order to accommodate the proposed development.	No change.	
Peak Welders, Lydd (SHLAA ref 390) - There is no footpath in a southerly direction towards Lydd town centre and there is no possibility of a footpath being able to be provided due to bridge over the old Appledore to Lydd railway line. This is no way that a footpath could even be installed on the other side of Station Road as this is 3rd party land outside of the control of the applicant. There are therefore clear highway safety reasons why this site cannot be allocated. <b>(KCC Highways)</b>	As a result of the objection from Kent County Council Highways, this site will be removed from the Places and Policies Local Plan and will no longer be allocated for development.	Remove Peak Wealders allocation due to Kent County Council Highways objection.	
Criteria 3 relating to archaeology is welcomed but suggest re-wording as follows: The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place <b>(KCC Heritage)</b>	Suggestion noted. This criterion will be re-worded to reflect the wording suggested by Kent County Council Heritage to ensure that all policies are consistent and worded correctly.	Amend archaeology wording within Policy.	
RM8 Former Sands Motel, Land adjoining pumping station, Dymchurch Road, St Mary's Bay - Land at the former Sands Motel site is allocated for residential development with an estimated capacity of 85 dwellings. Development proposals will be supported where: 1. Highway improvements to serve the development should include the widening of the A259 by 1.2m from the north side of Jefferstone Lane southwards over a distance of approximately 135m, allowing right turn lanes	The adjacent rugby club land needs to be protected from residential development and should be designated for future leisure and community use for the existing and growing population of St. Mary's Bay and the wider Romney Marsh community	This site has not come forward to be considered for residential development in the Local Plan process.	<b>RM9 Former Sands Motel, Land adjoining pumping station, Dymchurch Road, St Mary's Bay (re-numbered)</b>  Land at the former Sands Motel site is allocated for residential development with an estimated capacity of 85 dwellings.  Development proposals will be supported where:

<p>into both Jefferstone Lane and the new development</p> <p>2. Existing vehicle access from Dymchurch Road is upgraded to serve the development</p> <p>3. Contributions are forthcoming to lengthen and widen the bus stop on the east side of the A259</p> <p>4. The existing pelican crossing will be upgraded to a puffin crossing.</p> <p>5. Development should ensure pedestrian permeability throughout and beyond the site</p> <p>6. The existing seasonal car park to the north of the site should be upgraded and enlarged to provide 205 parking spaces, 29 of which should be disabled. Surfacing should make provision for surface water drainage</p> <p>7. The site must be raised to provide a base platform at 5.5m ODN to make the development safe from flood risk</p> <p>8. A public coastal park and play area alongside the public car park are provided together with the future management of these areas</p> <p>9. The public coastal park and play area are to be no less than 0.82ha in size</p>	<p>The rugby club site has previously had planning permission granted for a swimming pool which would benefit Romney Marsh residents. Whilst a swimming pool in its own right may not be financially viable, use of the entire site in an upgraded format would create a working business model, a health and leisure complex by the sea, with nearby parking in the improved 205 space car park, resulting in a much needed swimming pool, a substantial number of jobs, serve the leisure needs of the community and provide a draw to the area from the wider Marsh community and beyond.</p>	<p>Comment noted, however if the site does not come forward for leisure use, the Council would be unable to force the landowner to develop it for such a use.</p>	<p>No change.</p>	<p>1.Highway improvements are provided to serve the development, including the widening of the A259 by 1.2m from the north side of Jefferstone Lane southwards over a distance of approximately 135m, allowing right turn lanes into both Jefferstone Lane and the new development;</p> <p>2.Existing vehicle access from Dymchurch Road is upgraded to serve the development;</p> <p>3.Contributions are provided to lengthen and widen the bus stop on the east side of the A259;</p> <p>4.The existing pelican crossing is upgraded to a puffin crossing;</p> <p>5.Development ensures pedestrian permeability throughout and beyond the site to the public rights of way network;</p> <p>6.The existing seasonal car park to the north of the site is upgraded and enlarged to provide 205 parking spaces, 29 of which should be disabled spaces. Surfacing should make provision for surface water drainage;</p> <p>7.The site is raised to provide a base platform at 5.5m ODN to make the development safe from flood risk;</p> <p>8.Extra flood resistant and resilient construction measures are incorporated into the design of the development to reduce the risk of life to occupants in an extreme flood event and improve flood risk management;</p> <p>9.A public coastal park and play area alongside the public car park are provided, together with arrangements for the future management of these areas, to be no less than 0.82ha in size;</p> <p>10.The development avoids adverse effects on the Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest and Special Protection Area, incorporating biodiversity enhancement measures;</p> <p>11.Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat;</p> <p>12.An appropriate number of self-build or custom built plots are provided in accordance with Policy HB4: Self-build and Custom Housebuilding Development;</p> <p>13.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; and</p> <p>14.A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.</p>
	<p>The residential amenity of existing residents should be considered</p>	<p>Safeguarding residential amenity is a material consideration that is supported in the Development Management policies within the Places and Policies Local Plan and will be assessed as part of any planning application.</p>	<p>No change.</p>	
	<p>Affordable housing for local people should be proposed</p>	<p>The site will be subject to the Council's affordable homes policy which ensures that 30% of the housing is affordable.</p>	<p>No change.</p>	
	<p>Public footpaths and rights of way should be retained in any development</p>	<p>Criterion 5 of Policy RM9 ensures that pedestrian permeability throughout and beyond the site is incorporated within any development proposal.</p>	<p>No change.</p>	
	<p>An open gym and amenity area for senior citizens should be included in any play area plans</p>	<p>Suggestion noted. A public coastal park and play area could include provision of an open gym area and will be suggested to the Open Space officer at the Council. If this cannot be provided on this site then there may be an alternative site nearby where it could be provided.</p>	<p>Discuss an open gym area to be included in the proposals with Open Space officer at the Council</p>	
	<p>Infrastructure improvements to are needed for a new Doctor's surgery</p>	<p>The Council has involved statutory consultees, including NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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. The NHS Clinical Commissioning Group are aware that there is a deficiency of health facilities in the Romney Marsh area and options and opportunities are being actively sought to address this; see Policy RM5.</p>	<p>Work has been undertaken and a site has now been safeguarded for a new medical hub at the Marsh Academy on Station Road (see Policy RM5).</p>	
	<p>Existing trees on the site should be retained</p>	<p>There are limited trees on this site that have significant amenity value. Where there are trees present on an allocated site that are identified as having significant current or future amenity value, there is an additional criterion within the site specific policy which ensures that existing trees and hedgerows within/around perimeter of the site are retained and enhanced within any development proposal.</p>	<p>No change.</p>	
	<p>The proposed car park is too large and is not required, or should at least include public conveniences on it</p>	<p>A public coastal park and play area is proposed as part of this site allocation which would attract more visitors to the area. The proposed car park will also provide suitable parking for access to the beach and promenade for visitors all year round. The car park is particularly popular during the summer season. There are existing public conveniences located on a nearby car park which is owned by the Council, therefore there is not considered to be a need for additional public conveniences on this site.</p>	<p>No change.</p>	
	<p>This site is located adjacent to Dungeness, Romney Marsh and Rye Bay SSSI, SPA and Ramsar site, and Dungeness SAC. <b>(Natural England)</b></p>	<p>Comment noted.</p>	<p>No change.</p>	
	<p>Additional criteria for this policy to ensure a connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider. <b>(Southern Water)</b></p>	<p>Additional criterion to ensure a connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider will be added to Policy RM9.</p>	<p>Include additional criterion in the policy wording (criterion 14).</p>	
	<p>Criteria 11 relating to archaeology is welcomed but suggest re-wording as follows: The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place <b>(KCC Heritage)</b></p>	<p>Suggestion noted. This criterion will be re-worded to reflect the wording suggested by Kent County Council Heritage to ensure that all policies are consistent and worded correctly.</p>	<p>Amend archaeology wording within Policy RM8 (criterion 13).</p>	

<p>RM9 Land rear of Varne Boat Club, Coast Drive, Greatstone - Land rear of Varne Boat Club, Coast Drive is allocated for residential development with an estimated capacity of 5 dwellings</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. Within dwellings, no sleeping accommodation is provided at ground floor level due to this site's location within Flood Zones 2 and 3</li> <li>2. A buffer zone of 15m is provided around the existing Environment Agency river culvert that traverses the site</li> <li>3. Development fronts Coast Drive, respecting and maintaining the established building line along this road</li> <li>4. Biodiversity enhancement measures should be investigated to minimise any effects on the Special Protection Area and wetland of international importance and Dungeness, Romney Marsh and Rye Bay SSSI.</li> <li>5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.</li> </ol>	<p>The site is not within an area with doctors, safe crossings or with enough school places. Infrastructure must be in place first.</p>	<p>The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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. Where improvements to school facilities are necessary to cater for the additional growth, comments from KCC Education will be taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL). The NHS Clinical Commissioning Group are aware that there is a deficiency of health facilities in the Romney Marsh area and options and opportunities are being actively sought to address this; see Policy RM5.</p>	<p>Work has been undertaken and a site has now been safeguarded for a new medical hub at the Marsh Academy on Station Road (see Policy RM5).</p>	<p><b>RM10 Land rear of Varne Boat Club, Coast Drive, Greatstone (re-numbered)</b></p> <p>Land rear of Varne Boat Club, Coast Drive is allocated for residential development with an estimated capacity of 5 dwellings</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. Within dwellings, no sleeping accommodation is provided at ground floor level due to the site's location within Flood Zones 2 and 3;</li> <li>2. A buffer zone of 15m is provided around the existing Environment Agency river culvert that traverses the site;</li> <li>3. Development fronts Coast Drive, respecting and maintaining the established building line;</li> <li>4. Biodiversity enhancement measures are put in place to minimise any effects on the Special Protection Area and wetland of international importance and Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest;</li> <li>5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest; and</li> <li>6. Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat.</li> </ol>
	<p>Coastal development should be a last resort since this is the character of the marsh. People come here on holiday to see the sea and not houses built by the sea.</p>	<p>The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). The Core Strategy establishes the general level and distribution of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031). The Core Strategy focuses most of the development in the district to the Urban Area (comprising Folkestone and Hythe); 75% of the district's new housing development is planned for this area (to the nearest 5%). 10% of the district's new housing is planned for the Romney Marsh Area (to the nearest 5%), which includes the settlements of New Romney, Lydd and St Mary's Bay. The remaining 15% of new housing development (to the nearest 5%) is planned for the North Downs Area, which includes the settlements of Hawkinge, Lyminge and Sellindge). This distribution has taken account of available sites, constraints including infrastructure, the highway network, flood risk and landscape character, as well as access to services, such as shops, public transport, schools and employment opportunities.</p>	<p>No change.</p>	
	<p>Adequate inland sites are proposed within the Plan and any coastal development should be considered as a last resort and deferred until the next Draft Local Plan, where the situation can be reassessed.</p>	<p>The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). The Core Strategy establishes the general level and distribution of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031). The Core Strategy focuses most of the development in the district to the Urban Area (comprising Folkestone and Hythe); 75% of the district's new housing development is planned for this area (to the nearest 5%). 10% of the district's new housing is planned for the Romney Marsh Area (to the nearest 5%), which includes the settlements of New Romney, Lydd and St Mary's Bay. The remaining 15% of new housing development (to the nearest 5%) is planned for the North Downs Area, which includes the settlements of Hawkinge, Lyminge and Sellindge). This distribution has taken account of available sites, constraints including infrastructure, the highway network, flood risk and landscape character, as well as access to services, such as shops, public transport, schools and employment opportunities.</p>	<p>No change.</p>	
<p>This site is located adjacent to Dungeness, Romney Marsh and Rye Bay SSSI, SPA and Ramsar site, and Dungeness SAC. <b>(Natural England)</b></p>		<p>Comment noted.</p>	<p>No change.</p>	
<p>The site is previously developed land in a sustainable location.</p>		<p>Support noted.</p>	<p>No change.</p>	
<p>The allocation will be infill development of a scale appropriate to its surroundings.</p>		<p>Support noted.</p>	<p>No change.</p>	
<p>Supporting evidence is available to demonstrate that flood risk and ecological impacts can be properly managed.</p>		<p>Support noted.</p>	<p>No change.</p>	

	Whilst accept that this now has planning permission, this site was affected by overtopping during the 2013 tidal surge and therefore we remain concerned about development at this location. The site lies in a hollow behind the boat club and although the proposed levels should ensure the ground floor remains dry in a 1 in 200 year overtopping event, it could be affected in an exceedance event. We understand the 2013 event to be in excess of 1 in 200 year but any overtopping will run to lower land so it is essential the floor levels are raised and the ground floor levels does not include ground floor sleeping. <b>(Environment Agency)</b>	Comment noted, however planning permission has already been granted on this site, therefore the principle of residential development here has already been assessed as being acceptable.	No change.	
RM10 Car park, Coast Drive, Greatstone (SHLAA ref: 1013) - Car park, Coast Drive is allocated for residential development with an estimated capacity of 16 dwellings Development proposals will be supported where: 1. A Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site 2. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority 3. Biodiversity enhancement measures should be investigated to minimise any effects on the Special Protection Area and wetland of international importance and Dungeness, Romney Marsh and Rye Bay SSSI 4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.	The site is in a flooding area	Whilst the site is within Flood Zone 3 according to the Environment Agency, the site is identified as Low Flood Risk in the SFRA 2115. However, it is noted that the EA have advised that there could be overtopping from the sea during storm events. The policy wording reflects this concern by ensuring that no living accommodation is provided on the ground floor.	No change.	<b>RM11 Car park, Coast Drive, Greatstone</b> (re-numbered)  Car park, Coast Drive is allocated for residential development with an estimated capacity of 16 dwellings.  Development proposals will be supported where:  1.A Traffic Assessment is undertaken to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site; 2.Extra flood resistant and resilient construction measures are incorporated into the design of the development to reduce the risk of life to occupants in an extreme flood event and improve flood risk management; 3.A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority; 4.Biodiversity enhancement measures are put in place to minimise any effects on the Special Protection Area and wetland of international importance and Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest; 5.Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat; 6.The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest; and 7.The England Coast Path is accommodated in the site layout to ensure pedestrian permeability throughout and beyond the site.
	The loss of the car park would result in a loss of tourism, visitors and related employment	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site.	No change.	
	The site borders a SSSI with animals and fauna and these would be destroyed by the development proposed	The Council has involved statutory consultees, including Natural England and Kent Wildlife Trust, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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. Natural England has raised no objection to this site allocation and it is therefore considered that there would be no adverse affect on the adjacent Site of Special Scientific Interest and Special Protection Area designations.	No change.	
	The proposed site encroaches onto land that does not belong to SDC	Comment noted. The boundary of the land ownership will be checked, however the sites are submitted to the Council by the landowners who wish to develop them. The site boundary is provided by the agents or landowners who submit their site for consideration to the Council.	No change.	
	The development will lead to the closure of Sotorios 103 restaurant	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site.	No change.	
	The existing residents will suffer from loss of privacy and outlook	Safeguarding residential amenity is a material consideration that is supported in the Development Management policies within the Places and Policies Local Plan and will be assessed as part of any planning application.	No change	
	The proposed site is too small to include the requirements of Kent Highways regarding road width, pavement width and site lines	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. KCC Highways were consulted on for this site allocation and raised no objections.	No change.	

The loss of the car park would result in congestion on nearby roads	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.
Beach use and access will be restricted	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site to retain access to the beach, local greenspace and beach huts for instance. There are accessible areas of open space retained along this coastal stretch for the enjoyment of the community, together with retention and improvement to the eastern part of the existing car park for continued public use.	No change.
The roads would not be able to cope with the extra traffic	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to five in total) are 'pooled' to fund an identified improvement.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.
There are a lack of doctors in the area for the existing community	The Council has involved statutory consultees, including NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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. The NHS Clinical Commissioning Group are aware that there is a deficiency of health facilities in the Romney Marsh area and options and opportunities are being actively sought to address this; see Policy RM5.	Work has been undertaken and a site has now been safeguarded for a new medical hub at the Marsh Academy on Station Road (see Policy RM5).
The car park is well used by members of the kite surfing community amongst others who use the beach all year round and bring revenue to local businesses	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site.	No change.
The development will ruin at least 2 businesses in the immediate locality	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site.	No change.

The site is not within an area with doctors, safe crossings or with enough school places. Infrastructure must be in place first.	The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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. Where improvements to school facilities are necessary to cater for the additional growth, comments from KCC Education will be taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL). The NHS Clinical Commissioning Group are aware that there is a deficiency of health facilities in the Romney Marsh area and options and opportunities are being actively sought to address this; see Policy RM5.	Work has been undertaken and a site has now been safeguarded for a new medical hub at the Marsh Academy on Station Road (see Policy RM5).
The site is the only coach car park in the area	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site.	
Development will spoil a place of local leisure and stop events held by RNLI & the Sailing Club	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site to retain access to the beach, local greenspace and beach huts for instance. There are accessible areas of open space retained along this coastal stretch for the enjoyment of the community, together with retention and improvement to the eastern part of the existing car park for continued public use.	No change.
Development will disturb sea defences as previous car park in Coast Drive	Comment noted. It is unlikely that sea defences will be disturbed but they could be improved through new development. No evidence is provided that harm will result.	No change.
The site lies outside the Settlement Boundary for Greatstone and is therefore in conflict with planning policy	As stated in the introduction to the Places and Policies Local Plan, the settlement boundary will be amended to include new allocations which are currently adjacent to the boundary.	No change.
The site is within Flood Zone 3 and there does not appear to be any evidence base within the allocation that addresses this matter and what processes have been undertaken to favour other sequentially preferable sites which have a lower flood risk than this site	The Core Strategy considers the District in three character areas and sets out housing requirements for each area. The majority of the Romney Marsh Area falls within Flood Zone 3 and as such it has been agreed with the EA that sequential testing can be conducted within the Romney Marsh Character Area to ensure there is new development. This is supported through the SFRA 2115 which maps flood hazard to ensure that the Council selects areas that are within a lower flood risk zone. This method was carried out throughout the SHLAA process.	No change.
The provision of an access and new road to serve the development would significantly impact upon the residential amenity of residents in the existing properties on the eastern side of Coast Drive	Safeguarding residential amenity is a material consideration that is supported in the Development Management policies within the Places and Policies Local Plan and will be assessed as part of any planning application.	No change.
The development of the site would be unneighbourly by reason of their size and scale and would have an unduly dominant impact upon the amenity of existing properties	Safeguarding residential amenity is a material consideration that is supported in the Development Management policies within the Places and Policies Local Plan and will be assessed as part of any planning application.	No change.

<p>The site is within very close proximity of the SSSI/SPA and it is queried what evidence base has been provided to prove whether or not that these areas would not be adversely affected from this site allocation.</p>	<p>The Council has involved statutory consultees, including Natural England and Kent Wildlife Trust, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; 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. Natural England has raised no objection to this site allocation and it is therefore considered that there would be no adverse affect on the adjacent Site of Special Scientific Interest and Special Protection Area designations.</p>	<p>No change.</p>
<p>The site is a vital and unique community amenity</p>	<p>Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site to retain access to the beach, local greenspace and beach huts for instance. There are accessible areas of open space retained along this coastal stretch for the enjoyment of the community, together with retention and improvement to the eastern part of the existing car park for continued public use.</p>	<p>No change.</p>
<p>An environmental/visitor's centre would be more beneficial to the local area</p>	<p>Unless there is demonstrable need for a facility of this kind, it would be difficult to justify an allocation for this use as the Council is required to demonstrate that the sites the Council is allocating are available and deliverable within the Plan period.</p>	<p>No change.</p>
<p>There is no reference to a traffic assessment to assess the loss of part of the car park and the impact upon local roads</p>	<p>Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site.</p>	<p>The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.</p> <p>Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.</p> <p>The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.</p>
<p>The existing access is a dangerous junction and needs improving as there is no traffic calming or speed cameras with a minimal police presence</p>	<p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to five in total) are 'pooled' to fund an identified improvement.</p>	<p>The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.</p> <p>Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.</p> <p>The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.</p>
<p>The development will worsen car parking for the Spar shop</p>	<p>Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site.</p>	<p>No change.</p>

The Flood Risk Assessment is based on assumptions rather than facts and contains errors	The SFRA followed the generally accepted methodology and was agreed by the Environment Agency. Any development proposal for this site would require a more detailed flood risk assessment at the planning application stage.	No change.
The site is used as a public open space for the community and is not just a car park	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site to retain access to the beach, local greenspace and beach huts for instance. There are accessible areas of open space retained along this coastal stretch for the enjoyment of the community, together with retention and improvement to the eastern part of the existing car park for continued public use.	No change.
There will be a loss of a tourist and leisure facility with no obvious alternative in the area	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site to retain access to the beach, local greenspace and beach huts for instance. There are accessible areas of open space retained along this coastal stretch for the enjoyment of the community, together with retention and improvement to the eastern part of the existing car park for continued public use.	No change.
The development would not maintain the character of the undeveloped coast	The Places and Policies Local Plan allocates sites that are considered acceptable in principle for residential use that can be delivered within the Plan period. The detailed design and layout will be considered at the planning application stage where there will be a consultation period for any concerns regarding the impact of the design of the scheme on the character of the area, together with any concerns regarding neighbouring residential amenity. Consultation comments can inform the final design and layout of the development site to overcome any concerns.	
The land is directly behind the existing building line	The Places and Policies Local Plan allocates sites that are considered acceptable in principle for residential use that can be delivered within the Plan period. The detailed design and layout will be considered at the planning application stage where there will be a consultation period for any concerns regarding the impact of the design of the scheme on the character of the area, together with any concerns regarding neighbouring residential amenity. Consultation comments can inform the final design and layout of the development site to overcome any concerns.	
Existing houses had to be built with no living accommodation at ground level due to flooding	The Places and Policies Local Plan allocates sites that are considered acceptable in principle for residential use that can be delivered within the Plan period. The detailed design and layout will be considered at the planning application stage where there will be a consultation period for any concerns regarding the impact of the design of the scheme on the character of the area, together with any concerns regarding neighbouring residential amenity and flooding. Consultation comments can inform the final design and layout of the development site to overcome any concerns.	No change.
Although the site is a brownfield site, it is a community asset and this facility should be maintained to promote tourism	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site to retain access to the beach, local greenspace and beach huts for instance. There are accessible areas of open space retained along this coastal stretch for the enjoyment of the community, together with retention and improvement to the eastern part of the existing car park for continued public use.	No change.
The allocation of this site will lead to pressure in the future for more car parking spaces to be allocated from the National Nature Reserve	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site. Any future application for a new car park would require planning permission and would be assessed on its own merits during the planning application stage.	No change.
Local people should be given the opportunity to manage the car park to improve its appearance	Comment noted, however the sites are submitted to the Council by the landowners who wish to develop them for residential or other uses. This is not an issue to be considered in the Local Plan as it falls outside the remit of a Local Plan.	No change.



This development will over stretch the utilities services in the New Romney area	The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.
Local schools are already full	The Council has involved statutory consultees, including Kent County Council Education, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education support the Council that there is capacity available in existing schools to cater for the planned additional growth. Where improvements to school facilities are necessary to cater for the additional growth, comments from KCC will be taken into account when drafting the plan.	No change.
The development would cause increased light/noise pollution	The Places and Policies Local Plan allocates sites that are considered acceptable in principle for residential use that can be delivered within the Plan period. The detailed design and layout will be considered at the planning application stage where there will be a consultation period for any concerns regarding the impact of the design of the scheme on the character of the area, together with any concerns regarding neighbouring residential amenity and light/noise pollution. Consultation comments can inform the final design and layout of the development site to overcome any concerns.	No change.
Priority should be given to inland and infill sites for development before developing the coast	The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). The Core Strategy establishes the general level and distribution of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031). The Core Strategy focuses most of the development in the district to the Urban Area (comprising Folkestone and Hythe); 75% of the district's new housing development is planned for this area (to the nearest 5%). 10% of the district's new housing is planned for the Romney Marsh Area (to the nearest 5%), which includes the settlements of New Romney, Lydd and St Mary's Bay. The remaining 15% of new housing development (to the nearest 5%) is planned for the North Downs Area, which includes the settlements of Hawkinge, Lyminge and Sellindge). This distribution has taken account of available sites, constraints including infrastructure, the highway network, flood risk and landscape character, as well as access to services, such as shops, public transport, schools and employment opportunities.	No change.
More car parks and car parking spaces are needed along the coast for visitors to the area as well as existing and new residents using the beach	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site.	No change.
Drainage in the vicinity is inadequate with frequent back-ups of foul sewers in wet weather	Criterion 2 of Policy RM11 ensures that a surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority. The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including water and utilities companies. Comments from these providers have been taken into account when drafting the plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.
The site allocation of 16 dwellings is considered low. A current planning application provides evidence that the site can accommodate 20 dwellings.	A dwelling per hectare calculation appropriate to the surrounding area was used to calculate the estimated capacity of 16 dwellings on this site. Given the constraints of the site, including the close proximity to the beachfront coupled with flooding issues together with the requirement to retain at least 50 public parking spaces; it is considered that 16 dwellings on the site is appropriate. Detailed proposals will be assessed against the Plan's design policies should a planning application come forward to ensure an acceptable scheme.	No change.

The site is not essential for development as required by policy SS1	The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). The Core Strategy establishes the general level and distribution of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031). The Core Strategy focuses most of the development in the district to the Urban Area (comprising Folkestone and Hythe); 75% of the district's new housing development is planned for this area (to the nearest 5%). 10% of the district's new housing is planned for the Romney Marsh Area (to the nearest 5%), which includes the settlements of New Romney, Lydd and St Mary's Bay. The remaining 15% of new housing development (to the nearest 5%) is planned for the North Downs Area, which includes the settlements of Hawkinge, Lyminge and Sellindge). This distribution has taken account of available sites, constraints including infrastructure, the highway network, flood risk and landscape character, as well as access to services, such as shops, public transport, schools and employment opportunities.	No change.	
There is no evidence to show that the car park is under used	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site.	No change.	
CPRE Kent objects to the loss of this car park to residential development for the following reasons: 1. There is significant local objection to the loss of this community asset. 2. It is an important and well used car park, providing an essential parking facility at this popular part of the coast. It is the only car park in the New Romney Town and coast area which can accommodate coaches and large motorhomes. 3. As a result of its capacity to accommodate coaches, the loss of this facility would be detrimental to local businesses and the local economy generally. 4. The car park has experienced fluvial flooding in the past after heavy rain or wet weather. 5. Drainage in the vicinity is inadequate with frequent back-ups of foul sewers in wet weather. This occurred recently. Further housing development in this area should not proceed without improvements to sewerage infrastructure. <b>(CPRE Kent)</b>	1. There are accessible areas of open space retained along this coastal stretch for the enjoyment of the community, together with retention and improvement to the eastern part of the existing car park for continued public use. 2. Criterion 1 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site. 3. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site, together with retention and improvement to the eastern part of the existing car park for continued public use. 4. Criterion 2 of Policy RM11 ensures that a surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority. 5. The council has involved infrastructure providers at all stages in drafting both the Core Strategy and PPLP, including water and utilities companies. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.	
This site is located adjacent to Dungeness, Romney Marsh and Rye Bay SSSI, SPA and Ramsar site, and Dungeness SAC. <b>(Natural England)</b>	Comment noted.	No change.	
The England Coast Path alignment follows through this proposed site. The car park provides valuable access to the beach, local greenspace and beach huts. Any development here must ensure that the England Coast Path is accommodated and the retention of some public parking. <b>(KCC PROW)</b>	Criterion 1 of Policy RM11 ensures that a Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site within any development proposal to ensure that sufficient parking spaces remain on the site to retain access to the beach, local greenspace and beach huts. There is potential for an additional criterion to be included within Policy RM11 to ensure that the England Coast Path is integrated into any future design proposal.	An additional criterion will be added to ensure that the England Coast Path is accommodated in the site layout to ensure pedestrian permeability throughout and beyond the site.	
We have objected to a planning application on this site due the proximity of the proposed dwellings to the frontage and the reliance the development will have on the continued maintenance of the beach. For further details please see Y16/1017/SH. We would wish to see this site removed. <b>(Environment Agency)</b>	The Environment Agency subsequently removed their objection to the site as it was discovered that the original drawings with the application were misleading and the proposed development was actually going to be set further back from the frontage than originally thought and didn't include the Crown Land. As such, as long as the site is developed as detailed within the planning application, the Environment Agency have no objection to its inclusion within Policy RM11 in terms of flood risk.	No change.	
RM11 The Old Slaughterhouse, 'Rosemary Corner', Brookland - The site is allocated for residential development with an estimated capacity of 5 dwellings. Development proposals will be supported where: 1. The design and layout of the development should avoid adverse effects on	Brookland is an inland area with good road links to both Ashford and Rye and the area lends itself well to sensible expansion of residential development. Support noted.	No change.	<b>RM12 The Old Slaughterhouse, 'Rosemary Corner', Brookland</b> (re-numbered)  The site is allocated for residential development with an estimated capacity of 5 dwellings.

<p>the setting of the nearby conservation area and listed buildings and heritage features, and where possible make enhancements</p> <p>2. A Phase 1 Habitat Survey should be undertaken by a licenced ecologist to assess the presence of Protected Species on or near the site</p> <p>3. The development preserves or enhances the character and setting of the nearby Brookland Conservation Area and Listed Buildings</p> <p>4. The north west and north east boundaries are softened with a strong landscape buffer</p> <p>5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.</p>	<p>The site is close to the conservation area, but separated from it by the modern development at Rosemary Corner, the rear gardens of residential properties in the High Street and some mature vegetation.</p>	<p>Comment noted.</p>	<p>No change.</p>	<p>Development proposals will be supported where:</p> <p>1.The design and layout of the development preserves or enhances the setting of the nearby Brookland Conservation Area, Listed Buildings and heritage assets;</p> <p>2.A Phase 1 Habitat Survey is undertaken by a licenced ecologist to assess the presence of Protected Species on or near the site;</p> <p>3.The north west and north east boundaries are softened with a strong landscape buffer; and</p> <p>4.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>
<p>RM12 Lands north and south of Rye Road, Brookland (SHLAA ref: 407a and 609) - These sites are allocated for residential development with an estimated capacity of 15 dwellings for land north and 10 dwellings for land south of Rye Road.</p> <p>Development proposals will be supported where:</p> <p>1. A masterplan is produced showing how the two sites integrate with each other and the existing settlement</p> <p>2. Substantial planting / landscaping should be included along the northern boundary of land north of Pod Corner, and on the south-eastern boundary of Land adjacent to Framlea. This is, respectively, to inhibit encroachment into open countryside, and to protect resident amenity from a significant road</p> <p>3. Existing trees and hedgerows around perimeter of sites are retained and enhanced</p> <p>4. Development on either site should create a strong frontage to Rye Road, and ensure the developments 'talk to' existing residential development in the locality, and to each other</p> <p>5. Existing watercourses on site are integrated into the development</p> <p>6. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority</p> <p>7. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</p>	<p>Inland and good road links to Ashford and Rye</p>	<p>Support noted.</p>	<p>No change.</p>	<p><b>RM13 Lands north and south of Rye Road, Brookland</b> (re-numbered)</p> <p>These sites are allocated for residential development with an estimated capacity of 15 dwellings for land north and 14 dwellings for lands south of Rye Road, including land adjoining Framlea.</p> <p>Development proposals will be supported where:</p> <p>1.A masterplan is produced showing how the three sites integrate with each other and the existing settlement; including the provision of on site open space and play space;</p> <p>2.Substantial planting and landscaping is included along the northern boundary of land north of Pod Corner, and on the south-eastern boundary of lands south of Rye Road adjacent to the Brookland Bypass. This is to prevent encroachment into open countryside and to protect resident amenity from a significant road, respectively;</p> <p>3.The 30mph speed limit is extended towards the A2070 roundabout in the interests of highway safety;</p> <p>4.Existing trees and hedgerows around the perimeter of the sites are retained and enhanced;</p> <p>5.Development on all sites should create a strong frontage to Rye Road, and ensure the developments complement existing residential development in the locality;</p> <p>6.Existing watercourses on the sites are integrated into the development;</p> <p>7.A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority;</p> <p>8.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place;</p> <p>9.The design of the development preserves or enhances the setting of the nearby Grade I and II Listed Buildings and Conservation Area;</p> <p>10.Provision is made for open and play space on site or nearby, and reinforces the integration and connectivity of green infrastructure in accordance with Core Strategy Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation;</p> <p>11.A Phase 1 Habitat Survey is undertaken by a licenced ecologist to assess the presence of Protected Species on or near the site;</p> <p>12.Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and</p> <p>13.An appropriate number of self-build or custom built plots are provided in accordance with Policy HB4: Self-build and Custom Housebuilding Development.</p>
<p>This is a smaller semi rural village location and development should be sympathetic to this and provide screening from the A259.</p>	<p>Comment noted.</p>	<p>No change.</p>		
<p>The Council's evidence base has consistently confirmed that the site has no significant constraints to bringing it forward for development.</p>	<p>Support noted.</p>	<p>No change.</p>		
<p>Land allocated under Policy RM12 presents a logical and sustainable location for new housing provision and meets the tests of soundness set out in NPPF</p>	<p>Support noted.</p>	<p>No change.</p>		
<p>The site is currently an arable field of limited ecological value and landscape quality, and with a high potential to accommodate development.</p>	<p>Support noted.</p>	<p>No change.</p>		
<p>The distance from the site to heritage assets in the village centre, combined with existing landscaping means that there would be no significant impact on the setting of these assets</p>	<p>Support noted.</p>	<p>No change.</p>		
<p>Developing this prominent site does not respond appropriately to the historic form and character of the settlement.</p>	<p>The historic and characteristic part of the village is located to the east of these sites. The character of the immediate vicinity is a built up, residential area adjacent to the main road, which separates the proposed sites from the historic character of the village centre.</p>	<p>No change.</p>		
<p>Drainage in the vicinity is inadequate with frequent back-ups of foul sewers in wet weather.</p>	<p>The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.</p>	<p>No change.</p>		

Access and egress on to Rye Road will be restricted as it a narrow lane. There are safety and visibility concerns.	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to 5 in total) are 'pooled' to fund an identified improvement.	The District Council will continue to work alongside County Council colleagues (the local highway authority) to identify where general improvements to the highway network (non-site specific) are required in order to progress concept design work to improve highway capacity and/or highway safety, providing highway modelling evidence can demonstrate a need for improvement.  Updates to Council Members and/or interested parties would be provided through reporting via the Shepway Joint Transportation Board, which meets quarterly. Residents deemed to be living sufficiently proximate to a proposed scheme of highway improvement would be contacted by the County Council as part of the consultation process once a concept design has been conceived for comment.  The 'next steps' would then require officers to work on securing scheme funding to advance project delivery, and a potential funding stream could be through a request for capital funding from Shepway DC's CIL funding arrangements. Other funding capital sources would also be explored, for example Local Transport Plan funding or South East Local Enterprise Partnership monies.
The land is open countryside in agricultural use. The Council has not demonstrated that this land is needed for meeting the housing requirement.	The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). This amount of development has already been accounted for regardless of the Otterpool Garden Town. The Core Strategy establishes the general level and distribution of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031). The Core Strategy focuses most of the development in the district to the Urban Area (comprising Folkestone and Hythe); 75% of the district's new housing development is planned for this area (to the nearest 5%). 10% of the district's new housing is planned for the Romney Marsh Area (to the nearest 5%), which includes the settlements of New Romney, Lydd and St Mary's Bay. The remaining 15% of new housing development (to the nearest 5%) is planned for the North Downs Area, which includes the settlements of Hawkinge, Lyminge and Sellindge). This distribution has taken account of available sites, constraints including infrastructure, the highway network, flood risk and landscape character, as well as access to services, such as shops, public transport, schools and employment opportunities.	No change.
The Grade I church with its unique detached belfry will require particular care for any development within its setting.	Comment noted.	No change.
Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes at these sites. The need for easements will therefore need to be taken into account in the layout of the site. <b>(Southern Water)</b>	Additional criterion to ensure that any future development proposal will include the need for easements to be taken into account in the layout of the site will be added to Policy RM13: Lands north and south of Rye Road, Brookland.	Include additional criterion in the policy wording (criterion 12).
The site is outside the settlement boundary	Whilst the sites are outside the current Settlement Boundaries; they are immediately adjacent to the boundary. The Settlement Boundary will be amended within the Places and Policies Local Plan to incorporate these sites.	Amend settlement boundaries.
The site could accommodate 16 dwellings rather than the 10 stated in the policy	A general calculation of 20 dwellings per hectare was used to inform the amount of dwellings proposed on this site based on the site area. Although this would amount to 12 dwellings, the figure was rounded down to 10 dwellings. The number of dwellings is a general guide to inform future planning applications which once tested at the planning application stage may increase or decrease subject to design, layout and siting. However, the level of development proposed is considered appropriate for this site given the rural character of the area.	No change.
The site could be identified specifically for self and custom build housing	Suggestion noted. The policy currently acknowledges that some self and custom build housing on this site could be achieved and there is scope to increase this provision in order to provide more self and custom build plots in the district.	No change.
As part of the development proposals for this site the 30mph speed limit will need to be extended towards the A2070 roundabout. <b>(KCC Highways)</b>	Comment noted. A criterion will be added to the policy to ensure that the 30mph speed limit is extended towards the A2070 roundabout.	Include additional criterion in the policy wording (criterion 3).
Criteria 7 relating to archaeology is welcomed but suggest re-wording as follows: The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place <b>(KCC Heritage)</b>	Suggestion noted. This criterion will be re-worded to reflect the wording suggested by Kent County Council Heritage to ensure that all policies are consistent and worded correctly.	Amend archaeology wording within Policy RM13 (criterion 8).

<p>RM13 Land adjacent to Moore Close, Brenzett - The site is allocated for residential development with an estimated capacity of 20 dwellings. Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. Vehicular access to this site should be from Moore Close</li> <li>2. Existing trees and hedgerows around perimeter of sites are retained and enhanced</li> <li>3. Existing watercourses on site are integrated into the development</li> <li>4. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority</li> <li>5. A Phase 1 Habitat Survey should be undertaken by a licenced ecologist to assess the presence of Protected Species on or near the site</li> <li>6. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</li> <li>7. The design of the development should be sensitive to the setting of the nearby Grade II Listed Buildings.</li> </ol>	<p>An inland area adjacent to existing development and not detrimental to the tourist industry or main roads</p>	<p>Support noted.</p>		<p><b>RM14 Land adjacent to Moore Close, Brenzett</b> (re-numbered)</p> <p>The site is allocated for residential development with an estimated capacity of 40 dwellings; or 20 dwellings for the southern section of the site and 6 dwellings for the northern part of the site, if the sites come forward individually.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1.A masterplan approach demonstrates how the sites integrate with each other and the existing settlement;</li> <li>2.Preferred vehicular access is from Rhee Wall Road, with an alternative access from Moore Close;</li> <li>3.A footpath and appropriate lighting is provided on Rhee Wall Road to connect with the existing footway to the east;</li> <li>4.Development creates a strong frontage to Rhee Wall Road, and ensure the developments complement nearby residential development;</li> <li>5.An appropriate number of self-build or custom built plots are provided in accordance with Policy HB4: Self-Build and Custom Housebuilding Development;</li> <li>6.Existing trees and hedgerows around the perimeter of the sites are retained and enhanced;</li> <li>7.Existing watercourses on the site are integrated into the development;</li> <li>8.A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority;</li> <li>9.A Phase 1 Habitat Survey is undertaken by a licenced ecologist to assess the presence of Protected Species on or near the site;</li> <li>10.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place;</li> <li>11.The design of the development preserves or enhances the setting of the nearby Grade II Listed Buildings; and</li> <li>12.An odour assessment is undertaken to inform the masterplanning of the site to ensure adequate distance between the waste water treatment works and any proposed sensitive land use for reasons of amenity.</li> </ol>
	<p>Additional criteria for this policy to include the requirement for an odour assessment to be undertaken to inform the masterplanning of the site (<b>Southern Water</b>)</p>	<p>Suggestion noted. Criterion including the requirement for an odour and vibration assessment to be undertaken to inform the masterplanning of the site will be added to Policy RM14.</p>	<p>Include additional criterion in the policy wording</p>	
	<p>The policy wording should be revised to reflect the site specific constraints and opportunities</p>	<p>The policy wording is considered to appropriately address site specific constraints and opportunities.</p>	<p>No change.</p>	
	<p>Criteria 6 relating to archaeology is welcomed but suggest re-wording as follows: The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place (<b>KCC Heritage</b>)</p>	<p>Suggestion noted. This criterion will be re-worded to reflect the wording suggested by Kent County Council Heritage to ensure that all policies are consistent and worded correctly.</p>	<p>Amend archaeology wording within Policy RM14 (criterion 10).</p>	
<p>Option 6 - Do you have any other sites you wish to be considered within the Romney Marsh Character Area?</p>	<p>PO18 - Land between Hillside and Brandet House, Rhee Wall Road, Brenzett, TN29 9UG</p>	<p>The site is adjacent to open fields and development on the site would introduce built up development in an otherwise open landscape with sporadic housing outside the main built form of Brenzett. However, an adjacent site has been allocated as a preferred option and this would lessen the impact of the development of this frontage site on the wider landscape. These two sites could come forward together for a more cohesive layout.</p>	<p>Allocate this site and incorporate into existing policy RM14: Land adjacent to Moore Close, Brenzett.</p>	<p>See <b>Policy RM14: Land adjacent to Moore Close, Brenzett.</b></p>
	<p>PO19 – Land adjacent to Framlea, Rye Road, Brookland, TN29 9RQ</p>	<p>Despite not meeting the size threshold, there is potential for this site to come forward with the larger site allocated as a 'preferred option' to the north. These two sites could come forward together for a more cohesive layout. The site is in a sustainable location adjacent to existing residential use. Planning permission has previously been granted on the site for four dwellings.</p>	<p>Allocate this site and incorporate into existing policy RM13: Lands north and south of Rye Road, Brookland.</p>	<p>See <b>RM13: Lands north and south of Rye Road, Brookland.</b></p>
	<p>PO20 – Cherry Gardens, Littlestone, TN28 8QR</p>	<p>This site could be well integrated into the existing fabric and there are very few constraints apart from the Tree Preservation Orders running along the south east boundary. Although there is concern around whether the site is sustainable, in terms of proximity to essentials services.</p>	<p>Allocate this site and create new site policy Policy RM1: Land off Cherry Gardens, Littlestone.</p>	<p><b>RM1 Land off Cherry Gardens, Littlestone</b></p> <p>Land off Cherry Gardens, Littlestone is allocated for residential development with an estimated capacity of 10 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1.Vehicular access to the site is provided from Cherry Gardens;</li> <li>2.Existing trees and hedgerows within and around the perimeter of the site are retained and enhanced, particularly along the northern, eastern and south eastern boundaries;</li> <li>3.The northern building edge is fragmented and softened with a strong focus on landscaping to form a buffer;</li> <li>4.The proposal acknowledges the surrounding urban grain, fronting dwellings onto streets and following the existing built edge wherever possible;</li> <li>5.A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority;</li> <li>6.The development avoids adverse effects on the adjacent Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest and Ramsar designations, incorporating biodiversity enhancement measures;</li> <li>7.A Phase 1 Habitat Survey is undertaken by a licensed ecologist to assess the presence of Protected Species on or near the site; and</li> <li>8.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ol>

PO21 – Land behind village hall car park, Orgarswick Avenue, Dymchurch, TN29 0NX	The site is located within the settlement boundary of the Urban Centre of Dymchurch. The site is predominately residential in character, although some industrial/commercial use also exists nearby; it also performs well against a number of sustainability criteria, such as proximity to local services. However, the site falls within area of 'significant' flood risk under the SFRA 2115 and there is likely to be sequentially more appropriate alternatives. Enabling development was also raised which is best pursued through the development management process than through a site allocation to ensure the relevant infrastructure is delivered.	No action required.
PO22 – Fairfield Court Farm, Brack Lane, Brookland, TN29 9RX	The site is not in a sustainable location and is located away from the built up form of Brookland. The site is surrounded by open fields and the introduction of built form and domestic paraphernalia associated with residential use in this location would have a detrimental impact on the existing landscape.	No action required.
PO23 – Land at Harden Road, Lydd, TN29 9LX	The site is forms part of an existing employment designation, on the edge of, but within the settlement boundary of the Service Centre of Lydd. The site is in a fairly sustainable location and is predominately residential in character, although some industrial/commercial use also exists nearby. It performs well against a number of sustainability criteria, such as proximity to essential services. Whilst the site is currently protected employment land, if an alternative employment site could be identified then there is potential for the site to come forward for residential use.	No action required.
PO24 – Land at Harden Road, Lydd, TN29 9NQ	The site is located within the settlement boundary of the Service Centre of Lydd. The site could potentially form an extension to the fairly recent Meadow View development to the west. Although this site is some distance from local services. There is also a slight concern over this site due to the potential for encroachment into the countryside. The light industrial works to the south-west will require some mitigation measures and careful site design / screening. Unlike a lot of land in this ward, the site does not fall within Flood Zone 3 and only poses a Moderate Flood Risk the SFRA 2115.	No action required.
PO25 – Land adjacent to Josephs Way, New Romney, TN28 8AQ	The site is located within the settlement boundary of the Strategic Town of New Romney. The 'triangle' shaped former allotment site would form an extension to the recent neighbouring 'Church Lane' development. It represents an infill site that is well-bounded to the east and west by Mountfield Industrial Estate and existing residential areas respectively; therefore having little or no impact on the local landscape. The site performs well against a number of the sustainability criteria especially its proximity to local services within the town. Whilst its compatibility with the neighbouring employment uses has raise as a potential concern, it is considered that any negative externalities could be minimised and/or mitigated through careful design i.e. screening. Enabling development was raised which is best pursued through the development management process than through a site allocation to ensure the relevant infrastructure is delivered.	No action required.
PO26 – Former Cemex Yard, Station Approach, New Romney, TN28 8LU	The site is located adjacent to the settlement boundary of the Strategic Town of New Romney/Littlestone. Whilst the site appears to be brownfield, it has since become naturalised and blended back into the landscape. The site is likely to require some remediation. Residential development in this location would have the effect of extending the linear development along Station Approach, perpendicular to the existing urban form, gradually increasing the pressure to urbanise the undeveloped area that currently separates Littlestone from Greatstone. In Flood Risk Zone 2&3. Even though only a short distance, the proposed site would be detached from existing properties on Station Approach. It is bounded on two sides by industrial uses and in close proximity to a recycling centre and sewage treatment works resulting in potentially poor residential amenity for future residents. The recent closure of the newsagents in Littlestone means that the site doesn't perform well against sustainability criteria regarding access to local services.	No action required.
PO27 – Dymchurch Recreation Ground, St. Mary's Road, Dymchurch, TN29 0PN	The site is located outside the settlement boundary of the Urban Centre of Dymchurch. The site performs well against a number of sustainability criteria, such as proximity to local services. However, the site falls within area of 'moderate' flood risk under the SFRA 2115 and there is likely to be sequentially more appropriate alternatives; it is also designated an open sports facility and as such any development on it would be contrary to NPPF. Enabling development was also raised which is best pursued through the development management process than through a site allocation to ensure the relevant infrastructure is delivered.	No action required.

<p>PO28 – Land at St Andrew’s Road, Littlestone Golf Club, Littlestone, TN28 8AD</p>	<p>The site is located just outside the strategic town settlement confines of New Romney (inc Littlestone). Overall, the site performs poorly against a number of the sustainability criteria. A key constraint would be the sites proximity to the adjacent Ramsar and SSSI and the impact any development may have on their associated wildlife and habitats. The site is also not within walking distance of any local facilities, meaning there would be a reliance on private transport and as such this would not constitute a sustainable location. The proposal would result in the net loss of an opens sports facility and the displacement of the existing car park facilities with no evidence about re-provision would also have a potential impact on landscape. Development would be high density because of the element of flatted development that would be at odds with the existing urban form which is predominately large detached properties in spacious plots; as well as being ‘back land’.</p>	<p>No action required.</p>
<p>PO30 - Land off Boarmans Road, Brookland</p>	<p>The site is located in between two separate settlement boundaries for the primary village of Brookland. Whilst the site appears to have few constraints that would prevent it coming forward for development there is concern around whether the site is sustainable, in terms of its proximity to local services. The site is not in walking distance of a convenience shop or doctors surgery; and the local school is also only ‘half form’ entry and over-subscribed. Unlike the other allocations at Brookland (Policies RM11 and RM12), which adjoin existing settlement boundaries, this site is detached and would have the effect of creating a further sporadic cluster of houses.</p>	<p>No action required.</p>
<p>PO31 - Land off Jenner’s Way, St. Mary’s Bay (Site A)</p>	<p>The site is located adjacent to the settlement boundary for the primary village of St. Mary’s Bay.</p> <p>Whilst the site appears to have few constraints that would prevent it coming forward for development there is concern around whether the site is sustainable, in terms of its proximity to local services. The site is not in walking distance of a convenience shop or doctors surgery.</p> <p>Unlike the other allocation in St Mary’s Bay which offers wider community benefits in terms of a coastal park and highways improvements, together with regenerating previously developed land, this site is Greenfield and currently in agricultural use and would offer no wider community benefits. Furthermore, given the settlement hierarchy in which St. Mary’s Bay is identified as a primary village, it is considered that the existing allocation of 85 dwellings in St. Mary’s Bay will meet the needs of the local population in accordance with the Core Strategy objectives.</p>	<p>No action required.</p>

Preferred Options Policy	Comments received	Response from the Council	Action by the Council	Revised Draft Policy
General North Downs	<p>•There is insufficient information in the plan to understand the housing need context within which new development is proposed within the AONB. In this regard it is necessary for the plan to indicate: completions to date; permissions; remaining requirement; and how the remaining requirement should be met by allocations to accord broadly with the spatial strategy. Demonstrating need and the relationship to the adopted spatial strategy, must be an essential part of allocating land for development in the AONB, particularly for major development (CPRE Shepway Committee),</p>	Noted; a table will be included in the Places and Policies Local Plan to explain the housing land supply position across the three character areas.	•Table 4.3 produced to explain the Housing Land Supply position.	
	<p>The plan proposes a number of allocations within and close to the AONB. The AONB Unit does not object to the majority of these, where they are considered to constitute small scale or modest development that can be accommodated within the landscape in a way that conserves and enhances the AONB.</p> <p>-Where allocations are proposed in or affecting the AONB, we welcome the incorporation of criterion that require high quality design to help ensure the AONB is conserved and enhanced and local distinctiveness is enhanced. We also consider it important that the height of buildings is specified to correspond to local character as well as controlled lighting within these allocations to help conserve dark night skies, an element of tranquillity that Management Plan Policy SD8 seeks to retain.</p>	Noted. Regarding the height of buildings corresponding to local character, this is already covered in Policy HB2, however additional text could be added to the accompanying text to make this clear. Light pollution is covered by Policy NES. Therefore the council does not feel it is appropriate to include a new criteria for each site within the AONB.	•New text will be added to all supporting para for policies in or affecting the AONB emphasising the importance of Policy HB2 and Policy NES; In addition it is considered important that within the AONB the height of buildings should correspond to local character (Policy HB2) as well as there being controlled lighting (NES) to help conserve dark night skies.	
	Where developments are with the AONB or its setting and will generate higher usage and access to the AONB, contributions should be sought for the management and maintenance of the public right of way network, hedges, fences etc. to reduce trespass and the development of urban fringe problems in the AONB landscape, (Kent Downs AONB Unit)	Noted; at planning application stage this would be looked at through Community Infrastructure Levy/Section 106 contributions if necessary.	No action required.	
Para 7.1- Intro to North Downs	•The countryside outside of the AONB to the south forms part of the setting of the Kent Downs AONB and we would like to see acknowledgement and reference to this in this paragraph. (Kent Downs AONB Unit)	•Noted, paragraph 7.1 will be amended to reflect this	•Amend paragraph 7.1.	The countryside outside of the AONB to the south forms part of the setting of the Kent Downs AONB, it has a more open aspect with a major transport corridor ...'
Para 7.2	•We consider it would be helpful to refer to proposals for major development within the AONB being considered against para 116 of the NPPF in paragraph 7.2. AONB Unit.	Noted	No action required.	
	•Further explanation should be given in respect of NPPF para 115 and how the Places and Policies Plan has approached the site selection process, taking into account the conservation of the landscape and scenic beauty in the AONB overall. In particular how opportunities have been taken to select and maximise development at those sites where conservation of the natural beauty of the AONB can be prioritised rather than a scatter gun approach which could lead to greater harm.	It has been through the Core Strategy (2013) and SHLAA process which considered impact on landscape and the sustainability of the settlements.	No action required.	
Para 7.3	•Typo- Request that reference to the Kent Downs AONB is amended to Kent Downs AONB Unit	•Thank you, this will be amended.	•Amend text to 'The Kent Downs AONB Unit'.	
Para 7.4- AONB Management Plan	•The paragraph should explain that the AONB Management Plan does not form part of the development plan and has not gone through an Independent Examination process, •We would like to see the wording of this paragraph amended to give more clarity to the role of the AONB Management Plan (Kent Downs AONB Unit),	•The paragraph will be amended to give more clarity to the role of the AONB Management Plan.	•Amend paragraph 7.4.	New wording:  'The Management Plan sets in place clear aims, policies and actions for the conservation management and enhancement of the AONB for a five year period and sets a longer term vision. The Management Plan has been formally adopted by the council as policy and provides guidance with planning applications and policy formulation'.
Para 7.5	•Amend wording: A number of documents have been produced by the Kent Downs AONB Unit and should be referred to by the LPA for guidance in policy making and decisions taking and by promoters and developers in formulating proposals, ALONG WITH ANY FURTHER GUIDANCE DOCUMENTS PRODUCED BY THE KENT DOWNS AONB UNIT. (Kent Downs AONB Unit)	•Wording will be amended to provide links to relevant documents.	•Amend paragraph 7.6.	Amend paragraph 7.6 to provide links to relevant documents produced by the Kent Downs AONB Unit.
Para 7.6	•Recommend that reference to the 'North Downs AONB' is corrected to the 'Kent Downs AONB' (Kent Downs AONB Unit)	•Agree, thank you this will be amended	•Amend reference.	Replace North Downs AONB' with 'Kent Downs AONB'.



General Hawkinge	<ul style="list-style-type: none"> <li>The infrastructure has not kept pace with current development, sufficient highway and social infrastructure will need to be put in place as the plan develops (CPRE Shepway)</li> </ul>	<ul style="list-style-type: none"> <li>The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). The Core Strategy establishes the general level of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031). The Core Strategy has been subject to a number of stages of consultation and has been tested and examined by an independent Inspector appointed by central government. The plan was found 'sound' through this process and was adopted by the council in 2013 to set the overall strategy for the district.</li> <li>The Core Strategy sets out a schedule of key infrastructure projects that are required to deliver growth over the plan period in Appendix 2 of the plan. A number of these improvements have been completed or are underway. In addition the council is undertaking more detailed work to produce an Infrastructure Delivery Plan (IDP) to identify progress with existing projects and highlight where new improvements are needed and how and when they will be delivered.</li> <li>The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.</li> <li>Core Strategy Policy S55: District Infrastructure Planning requires new development to provide for new infrastructure for which it creates a need, and states that the necessary infrastructure must exist already or a reliable mechanism must be in place to ensure that it will be provided at the time it is needed. The Core Strategy and Places and Policies Local Plans set out general infrastructure requirements; the detailed phasing and design of infrastructure will be determined as part of the planning application process and, depending on circumstances, may be secured as part of legal agreements tied into the planning permission.</li> </ul>	No action required.	
Statement 3- Settlement Boundary	<ul style="list-style-type: none"> <li>Unclear why SHLAA Site Land west of Canterbury Rd, Hawkinge (388) has been excluded from this document,</li> <li>Limuru, Cowgate Lane, Hawkinge (261) The findings of the SHLAA Report are strongly disputed,</li> </ul>	<ul style="list-style-type: none"> <li>The SHLAA identifies a pool of potential development sites and provides an evidence base to inform this document it does not guarantee an allocation. The SHLAA highlighted problems with the access to this site and also its impact on the AONB and North Downs escarpment.</li> <li>Disagree; the Council went through a standard assessment process for the SHLAA and sought the views of statutory bodies before finalising the work.</li> </ul>	No action required.	
<p>ND2 Former Officers Mess, Aerodrome Road, Hawkinge - The site is allocated for residential development with an estimated capacity of 70 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>The proposal achieves the highest quality design of both buildings and surrounding space and reinforces local rural distinctiveness through layout, design, scale and the use of high quality materials to help maintain the Kent Downs AONB as a special place</li> <li>Proposals enhance the western boundary through the use of extensive landscaping</li> <li>Existing trees and hedgerows within/around perimeter of site are retained and enhanced</li> <li>Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development</li> <li>The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</li> <li>Measures are taken to avoid pollution to groundwater.</li> </ol>	<ul style="list-style-type: none"> <li>Any historic assets which link to the Battle of Britain should be preserved and incorporated into site layout and design. Important to remember the past,</li> <li>The remaining airfield sites relating to the Battle of Britain should be preserved whenever possible and be developed as part of the Museum</li> <li>The building should have been retained as an historic building and converted to modern use,</li> <li>High quality materials and extensive landscaping should be essential features,</li> </ul>	<ul style="list-style-type: none"> <li>The buildings on the site have previously been demolished, in addition Historic England have not raised any concerns. However Kent County Council Heritage Team have asked for criteria 6 to be amended (see below).</li> <li>Noted; however the site now has planning permission.</li> <li>Noted; however the building has been demolished.</li> <li>Agree. Please see criteria 1, 2, 3 and 4 of Policy ND2.</li> </ul>	No action required.	

	<ul style="list-style-type: none"> <li>•A connection is provided to the local sewerage system at the nearest point of adequate capacity, (Southern Water),</li> </ul>	Agree.	Addition criteria added to Policy ND1: Former Officers' Mess, Aerodrome Road, Hawkinge.	Additional Criteria:  'A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider'.
	<ul style="list-style-type: none"> <li>•KCC- Suggest that requirement 5 is revised to: 5. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ul>	Agree.	Reword criteria 6 of Policy ND1.	New wording:  'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place'.
ND3 Mill Lane R/O Mill Farm, Hawkinge - The site is allocated for residential development with an estimated capacity of 14 dwellings. Development proposals will be supported where: 1. The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness through layout, design, scale and the use of high quality materials to help maintain the Kent Downs AONB as a special place 2. Existing trees and hedgerows within/around perimeter of site are retained and enhanced 3. Primary vehicle access can be provided on to Mill Lane with suitable visibility splays 4. Footpaths are provided to link in with the existing network 5. The public right of way retained and enhanced 6. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest 7. Measures are taken to avoid pollution to groundwater.	<ul style="list-style-type: none"> <li>•High quality materials and extensive landscaping should be essential features,</li> </ul>	Agree. Please see criteria 1 and 2 of Policy ND2: Mill Lane to the rear of Mill Farm, Hawkinge.	No action required.	
	<ul style="list-style-type: none"> <li>•KCC- Suggest that requirement 6 is revised to: 6. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ul>	Agree.	Reword criteria 6 of ND2.	New wording:  'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place'.
ND4 Land adjacent Kent Battle of Britain Museum, Aerodrome Road, Hawkinge - The site is allocated for residential development with an estimated capacity of 100 dwellings. Development proposals will be supported where: 1. The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness to help maintain the Kent Downs AONB as a special place 2. The proposal acknowledges surrounding street patterns and urban grain, with a greater density of housing against the existing built edge 3. Development should ensure pedestrian permeability within and beyond the site 4. Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development 5. The rural edge of the development should be fragmented and softened with a strong focus on landscaping 6. The primary vehicle access is located on Aerodrome Road with appropriate visibility splays 7. An appropriate contaminated land remediation strategy is provided 8. Assessment of non-designated heritage assets has been carried out and used to inform the design work 9. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest 10. Measures are taken to avoid pollution to groundwater Development proposals must be able to demonstrate survey work has been carried out with the Kent Battle of Britain Museum to establish parking requirements for the museum. These requirements must be fully met and incorporated into any scheme.	<ul style="list-style-type: none"> <li>•The Battle of Britain Museum is unique and a valuable Heritage Asset,</li> </ul>	Agree.	No action required.	Redrafted Policy:  <b>Land adjacent Kent Battle of Britain Museum, Aerodrome Road, Hawkinge</b>  <b>The site is allocated for a mixed-use scheme including residential development with an estimated capacity of 100 dwellings and a minimum of 1.09 ha of land for tourism use in connection with expansion of the Kent Battle of Britain Museum.</b>
	<ul style="list-style-type: none"> <li>•It is much too easy to forget and erase history,</li> </ul>	The Council is fully committed to meeting the needs of the Battle of Britain Museum and retaining as much history in the district as possible. The Heritage Strategy will provide recommendations on how this can be achieved. The Council has been working with the Battle of Britain Museum and the landowners to meet the needs of both the museum and future housing requirements in the district.	The policy has been amended to reflect the ongoing conversations between the Battle of Britain Museum and the landowners in order to meet the needs of both the museum and future housing requirements in the district. The site is proposed to be allocated for a mixed-use scheme including residential development and land for tourism use in connection with expansion of the Battle of Britain Museum	<ul style="list-style-type: none"> <li>•Development proposals will be supported where: 1.A comprehensive masterplan is prepared for the redevelopment of the site to ensure that the elements of residential, museum expansion, overflow informal parking and pedestrian connections, would not prejudice the development of the whole site;</li> <li>2.The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness through layout, design, scale and the use of high quality materials to help maintain the Kent Downs Area of Outstanding Natural Beauty as a special place;</li> <li>3.The proposal acknowledges surrounding street patterns and urban grain, with a greater density of housing against the existing built edge;</li> <li>4.Development ensures pedestrian permeability within and beyond the site, with links to the existing public rights of way network, the informal museum parking area and the museum;</li> <li>5.Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development;</li> <li>6.The rural edge of the development adjacent to Gibraltar Lane is retained as an undeveloped buffer, with the development that adjoins this softened with a strong focus on landscaping;</li> <li>7.The primary vehicle access is located on Aerodrome Road with appropriate visibility splays provided, as agreed with the Highways Authority;</li> <li>8.The application demonstrates impacts on strategic road network can be mitigated;</li> <li>9.The museum overflow informal parking area must have a grassed surface with no floodlighting or hard surfacing. When not in use for parking the area should be available for use as public open space;</li> <li>10.Any potential contamination from the former use is investigated, assessed and if appropriate, mitigated for the whole site as part of the development;</li> <li>11.An assessment of non-designated heritage assets is carried out and used to inform the design work. Features and structures associated with the site's former use as a World War II airfield are retained wherever possible to provide a link with the site's past;</li> <li>12.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; and</li> <li>13.Measures are taken to avoid pollution to groundwater.</li> </ul>
	<ul style="list-style-type: none"> <li>•The land must remain available for the museum to expand and grow, it is short sighted to develop the land. The council should support the Kent Battle of Britain museum's endeavours for expansion and preservation of the Hawkinge Battle of Britain heritage.</li> </ul>			
	<ul style="list-style-type: none"> <li>•One of the last pieces of the historic airfield in Hawkinge,</li> <li>•If the museum cannot expand it may have to move out of the district,</li> <li>•The land is heavily contaminated by buried asbestos and oil and fuel leaked from underground tanks,</li> <li>•The land could be used for museum car parking, which would help cap the contamination,</li> <li>•Possibility of unexploded ordnance,</li> <li>•Popular tourist attraction, attracting a significant number of visitors to the area, if the museum is allowed to expand and show more of its impressive collection, it will bring in even more visitors,</li> <li>•Retaining the site for the museum would have a positive impact on local economy, as visitors come to see and learn.</li> <li>•Previous communication issues between the land owner and the museum,</li> <li>•Ten years ago an understanding was reached with the Council that the land would be unallocated as the museum's charitable trust needs to expand its site in order to secure its long term future viability (David Brocklehurst- Chairman of the Museum),</li> <li>•Further discussions needed with the Museum and Council to determine their future plans and requirements,</li> <li>•I request that you remove the land rear of this museum from the list of sites listed for housing development and confirm that in planning terms it will be made available for the Charity to purchase. The Museum has funds which it has been raising over the last ten years with which to buy the site from the current owner (David Brocklehurst- Chairman of the Museum)</li> <li>•Its preservation and viability being entirely consistent with the Council's active Heritage Asset policy and its duties under section 12 of the NPPF guidelines which require the removal of conflict between Heritage Asset conservation and the development proposal described in ND3 Shepway District Council has an active Heritage Assets policy which ranks its past allocation of the 'Land adjacent KBoB...' ahead of draft Policy ND3, (D. Plumstead)</li> </ul>			

	<ul style="list-style-type: none"> <li>•A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider,(Southern Water),</li> </ul>	Agree.	Additional criteria added to Policy ND4 to say: A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.
	<ul style="list-style-type: none"> <li>•KCC- The former use of the site as part of a WW2 airfield could help to anchor a sense of place, character and history in any new development. We would suggest requirement 8 could be revised to reflect this: 8. Assessment of non-designated heritage assets has been carried out and used to inform the design work. Features and structures associated with the site's former use as a WW2 airfield are retained wherever possible so as to provide a link with the site's past.</li> </ul>	Agree.	Amend criteria to read: 'An assessment of non-designated heritage assets is carried out and used to inform the design work. Features and structures associated with the site's former use as a World War II airfield are retained wherever possible so as to provide a link with the site's past'.
	<ul style="list-style-type: none"> <li>•KCC- suggest that the requirement (9) in relation to archaeology should also be revised and would suggest the following alternative wording: 9. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ul>	Agree.	Amend criteria to read: 'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place'.
	<ul style="list-style-type: none"> <li>•Reservation of land for car parking overspill associated with the Museum is noted, however there should be further provision that this be dependent upon co-operation and assistance from the Museum Trust , (land owner)</li> </ul>	Noted.	No action required.
	<ul style="list-style-type: none"> <li>•The infrastructure could not cope with the extra demand from 100 dwellings,</li> </ul>	<p>The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.</p> <p>Core Strategy Policy SSS: District Infrastructure Planning requires new development to provide for new infrastructure for which it creates a need, and states that the necessary infrastructure must exist already or a reliable mechanism must be in place to ensure that it will be provided at the time it is needed. The Core Strategy and Places and Policies Local Plans set out general infrastructure requirements; the detailed phasing and design of infrastructure will be determined as part of the planning application process and, depending on circumstances, may be secured as part of legal agreements tied into the planning permission.</p>	No action required.
	<ul style="list-style-type: none"> <li>•As this constitutes a brownfield site and lies within the village confines we do not wish to object to the allocation of this for residential development, especially taking into account its previous allocation in earlier development plans. It is considered imperative however that in order to respect the existing settlement pattern of Hawkinge, that development does not extend into the south western part of the site so as to retain an undeveloped buffer adjacent to Gibraltar Lane. (Kent Downs AONB Unit),</li> </ul>	Noted, criteria 6 of Policy ND3 will be further strengthened.	Criteria will be amended to say: 'The rural edge of the development adjacent to Gibraltar Lane must be retained as an undeveloped buffer, with the development that adjoins this softened with a strong focus on landscaping'.
	Amend criteria 7 regarding contamination to ensure consistency across the document (Merebrook consultants )	Agree.	Amended criteria wording: 'Any potential contamination from former use is investigated, assessed and if appropriate, mitigated as part of the development'.
<p>ND5 Land at Duck Street, Elham - The site is allocated for residential development with an estimated capacity of 5 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness through layout, design, scale and the use of high quality materials to help maintain the Kent Downs AONB as a special place</li> <li>2. Existing planting along south and east boundaries must be retained</li> <li>3. Mitigation is provided for views from higher ground to the east</li> <li>4. A suitable access can be achieved with visibility splays</li> <li>5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.</li> </ol>	<ul style="list-style-type: none"> <li>•KCC Highways objects to an allocation on this site. The site cannot provide adequate visibility splays of 2.4 metres by 43 metres as the required visibility splays go over private land to the east and so therefore cannot be controlled.</li> <li>•KCC- Suggest that requirement 5 is revised to: 5. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> <li>•The square in Elham acts as a pinch point , this will development will increase the pressure,</li> <li>•The site is within the AONB and the open run of countryside along the length of the Nailbourne valley, of which this site forms part, is fundamental to the character of this part of the North Downs and the Elham Valley as a whole,</li> <li>•The site is outside settlement boundary,</li> <li>•This will set a precedent for development in the AONB ,</li> <li>•Ecological concerns, the site is rich in wildlife, including a badger set, ecology survey provided,</li> <li>•Contrary to National Planning Policy,</li> <li>•The NPPF requires new development to improve the quality and character of an area, this proposal would be contrary to this,</li> <li>•Flooding, sewerage and surface water runoff concerns, site is close to the Nailbourne. The Halt had to pump water away from their gardens and the road in the winter of 2013/14, additional concrete and tarmac just above the river would accelerate the run-off of water down to the river and would put additional pressure on The Halt,</li> <li>•loss of privacy, reduction of amenity and loss of light from existing dwellings in The Halt and Duck Street,</li> <li>•Elham Parish Council do not support the site and object on the following grounds: poor access, increased risk of flooding to other areas and potentially inadequate sewage system,</li> </ul>	<p>The site has numerous constraints (highways access, ecology, neighbouring amenity issues and its size) therefore on balance it has been decided to remove the site.</p>	Delete allocation for Land at Duck Street, Elham.

	<ul style="list-style-type: none"> <li>•Improved consultation process with the Parish and Local Residents,</li> <li>•The site will act as a standalone housing estate, not well integrated into the village,</li> <li>•This is an infill site, its East boundary is a continuation of the boundary of existing houses and there are houses across the boundary to the South and West. The developed site would integrate well in the area and is within walking distance of the village amenities,</li> </ul> <hr/> <ul style="list-style-type: none"> <li>•Need for affordable homes for first and second time buyers in the village,</li> <li>•Alternative sites may be available with less constraints,</li> <li>•Planning Applications turned down in the past for this site, a proposal to construct 3 new dwellings on this site was rejected on the grounds of poor access,</li> <li>•Suggested amendment- para 7.31 change fallow to meadow and criteria 2 the site's southern boundary is outside the site being in 3rd party ownership not in the control of the site so planting can be reduced or removed at any time.</li> <li>•The landowner confirms that the land at Duck Street Elham is available for this development,</li> </ul>			
<p>ND6 Land east of Broad Street, Lyminge - The site is allocated for residential development with an estimated capacity of 30 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness to help maintain the Kent Downs AONB as a special place</li> <li>2. The development has at least 2 self / custom build plots on site</li> <li>3. An assessment is carried out of the impact on the setting of the nearby listed building and appropriate measures but in place to mitigate any effects by preserving or enhancing the setting</li> <li>4. Existing trees and hedgerows within/around perimeter of site are retained and enhanced</li> <li>5. A strong landscape buffer is provided along the southern boundary in order to maintain the sense of openness and avoid settlement coalescence</li> <li>6. Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development and separation from the golf course</li> <li>7. Primary vehicle access is on to Canterbury Road, with suitable visibility splays provided</li> <li>8. Traffic calming measures are provided along the site boundary adjoining Canterbury Road to slow traffic to 30mph, this will include the relocation of the village entrance sign and gates</li> <li>9. The public right of way is enhanced between Lyminge and Etchinghill</li> <li>10. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</li> <li>11. Appropriate mitigation measures are employed to prevent pollution to groundwater.</li> </ol>	<p>Lyminge Parish Council (LPC) supports the residential designation of this site, particularly keen to support and enhance criterion 4 by stressing the need to keep the rural feel of the site by green areas with planting within the site and support criterion 9 with creation of the "missing link" in a safe "off main road" public right of way between Etchinghill and Lyminge.</p> <ul style="list-style-type: none"> <li>•Need for "extra care sheltered accommodation" in Lyminge, (Lyminge Parish Council)</li> <li>•Site should include homes for young families and first time buyers,</li> <li>•Car park for the doctors surgery should be enlarged as well as the surgery and school to cope,</li> <li>•A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider (Southern Water),</li> </ul>	<p>Support noted.</p> <p>The policy contains criteria regarding the boundary of the site and does state that open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development and separation from the golf course.</p> <p>Noted; if this site was to come forward for extra-care housing, this could be assessed at the planning application stage.</p> <p>Agree; any development will have to adhere to relevant policies in the Shepway Core Strategy Local Plan (2013), such as Policy CSD1- Balanced Neighbourhoods for Shepway and CSD2- District Residential Needs.</p> <p>The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway). Comments from these providers have been taken into account when drafting the plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.</p> <p>Core Strategy Policy SS5: District Infrastructure Planning requires new development to provide for new infrastructure for which it creates a need, and states that the necessary infrastructure must exist already or a reliable mechanism must be in place to ensure that it will be provided at the time it is needed. The Core Strategy and Places and Policies Local Plans set out general infrastructure requirements; the detailed phasing and design of infrastructure will be determined as part of the planning application process and, depending on circumstances, may be secured as part of legal agreements tied into the planning permission.</p> <p>Agree.</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>Addition criteria added to Policy ND4: Land east of Broad Street, Lyminge to state: 'A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider'.</p>	<p>Amedned Policy to read:</p> <p><b>Land east of Broad Street, Lyminge</b></p> <p>The site is allocated for residential development with an estimated capacity of 30 dwellings.</p> <p><b>Development proposals will be supported where:</b></p> <ol style="list-style-type: none"> <li>1.The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness through layout, design, scale and the use of high quality materials to help maintain the Kent Downs Area of Outstanding Natural Beauty as a special place;</li> <li>2.At least 2 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development;</li> <li>3.An assessment is carried out of the impact on the setting of the nearby Listed Building and appropriate measures but in place to preserve or enhance its setting;</li> <li>4.Carefully consideration is given to the spatial arrangement of dwellings within the site, with a higher density towards the existing built edge of Lyminge and a looser more irregular pattern opening onto the golf course;</li> <li>5.Existing trees and hedgerows within and around the perimeter of the site are retained and enhanced with native species unless required for access;</li> <li>6.A sensitive landscape buffer is provided along the southern boundary; it should soften the edge of the development, maintain the sense of openness and avoid settlement coalescence;</li> <li>7.Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development and separation from the golf course;</li> <li>8.Primary vehicle access is onto Broad Street, with suitable visibility splays provided, as agreed with the Highways Authority;</li> <li>9.Traffic calming measures (for example build-outs) are provided along the site boundary adjoining Broad Street to slow traffic to 30mph, this will include the relocation of the village entrance sign and gates;</li> <li>10.The public right of way is enhanced between Lyminge and Etchinghill, with a new public right of way provided to the rear of Broad Street House linking back into the existing footway network along Broad Street;</li> <li>11.Provision of a public bridleway along the alignment of the old railway line between Lyminge and Etchinghill is to be progressed with Kent County Council, with a proportionate contribution towards the cost of scheme implementation, alongside progression of relevant orders to permit the correct rights of public access across land under the control of the site promoter;</li> <li>12.Appropriate and proportionate contributions are made to healthcare improvements at the New Lyminge Surgery through a S106 agreement;</li> <li>13.The archaeological potential of the land is properly considered and understood and any</li> </ol>

<p>•Infrastructure issues i.e. sewage system capacity, Southern Water using the NAILBOURNE RIVER as open sewer,</p>	<p>The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.</p> <p>Core Strategy Policy SSS: District Infrastructure Planning requires new development to provide for new infrastructure for which it creates a need, and states that the necessary infrastructure must exist already or a reliable mechanism must be in place to ensure that it will be provided at the time it is needed. The Core Strategy and Places and Policies Local Plans set out general infrastructure requirements; the detailed phasing and design of infrastructure will be determined as part of the planning application process and, depending on circumstances, may be secured as part of legal agreements tied into the planning permission.</p>	<p>No action required.</p>	<p>proposal is informed by an appropriate desk-based assessment and a field evaluation;</p> <p>14. Appropriate mitigation measures are employed to prevent pollution to groundwater; and</p> <p>15. A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.</p>
<p>•Insufficient information given to understand the housing need context (CPRE),</p>	<p>The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). The Core Strategy establishes the general level and distribution of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031).</p> <p>The Core Strategy focuses most of the development in the district to the Urban Area (comprising Folkestone and Hythe); 75% of the district's new housing development is planned for this area (to the nearest 5%). 10% of the district's new housing is planned for the Romney Marsh Area (to the nearest 5%), which includes the settlements of New Romney, Lydd and St Mary's Bay. The remaining 15% of new housing development (to the nearest 5%) is planned for the North Downs Area, which includes the settlements of Hawkinge, Lyminge and Sellindge). This distribution has taken account of available sites, constraints including infrastructure, the highway network, flood risk and landscape character, as well as access to services, such as shops, public transport, schools and employment opportunities.</p> <p>The Core Strategy has been subject to a number of stages of consultation and has been tested and examined by an independent Inspector appointed by central government. The plan was found 'sound' through this process and was adopted by the council in 2013 to set the overall strategy for the district.</p> <p>The Core Strategy identifies a number of strategic sites in Folkestone, Hythe, New Romney and Sellindge which now all have planning permission. Development has also been completed in other locations throughout the district since the start date of the plan in 2006 and, in addition, a number of sites also have planning permission and have not yet started on site, or are currently under construction. The council monitors development on these sites every year to gain an up-to-date picture of how much building is taking place and in what locations. All of these developments have been taken into account in identifying the sites allocated in the Places and Policies Local Plan; an allowance has also been made for smaller, unidentified sites that come forward through the planning process (known as 'windfall sites'). The Places and Policies Local Plan seeks to allocate sites to meet the remaining requirement for the Urban, Romney Marsh and North Downs Areas that has not already been identified from these sources.</p>	<p>No action required.</p>	

<ul style="list-style-type: none"> <li>•Alternative Sites available (Lyndon Hall),</li> </ul>	<p>Lyndon Hall has previously been assessed through the SHLAA process and the outcome of this was that the site is not suitable as it acts as a soft boundary between the urban area and open countryside/AONB and marks the beginning of the Elham valley from the north of Elham. In addition the site has a number of additional constraints such as the negative effect on the setting of a listed building and the blanket Tree Preservation Order covering the whole site.</p>	<p>No action required.</p>
<ul style="list-style-type: none"> <li>•General local support for PROW enhancements but might need more thought and possible re-routing, suggested that the footpath should be extended around the back of Broad Street House, linking the two villages safely and enabling mutual access to amenities,</li> </ul>	<p>Further discussions are taking place with Kent County Council's Public Rights of Way team to see what can be achieved here and this will be reflected in amendments to the policy.</p>	<p>Criteria 10. 'The public right of way is enhanced between Lyminge and Etchinghill, with a new public right of way provided to the rear of Broad Street House linking back into the existing footway network along Broad Street.'</p>
<ul style="list-style-type: none"> <li>•KCC- Objects, unless amendment is incorporated. It has been a long-term ambition to provide public access along the alignment of the old railway line between Lyminge and Penne. This site allocation provides an opportunity to secure the northern extent of that route between Lyminge and Etchinghill. KCC PROW requests a change to point 9 to read: "Provision of a Public Bridleway along the alignment of the old railway line between Lyminge and Etchinghill".</li> </ul>		<p>Criteria 11. 'Provision of a public bridleway along the alignment of the old railway line between Lyminge and Etchinghill is to be progressed with Kent County Council, with a proportionate contribution towards the cost of scheme implementation, alongside progression of relevant orders to permit the correct rights of public access across land under the control of the site promoter.'</p>
<ul style="list-style-type: none"> <li>•KCC- The proposed development will need to provide further traffic calming measures such as build outs on Canterbury Road to reduce vehicle speeds to 30mph. Without these traffic calming features vehicle speeds are likely to be more than 30mph and the proposals are therefore unlikely to be supported by Kent Police.</li> </ul>	<p>Noted; criteria will be further strengthened.</p>	<p>Amended wording for criteria 9: 'Traffic calming measures (for example build outs) are to be provided along the site boundary adjoining Canterbury Road to slow traffic to 30mph, this will include the relocation of the village entrance sign and gates.'</p>
<ul style="list-style-type: none"> <li>•The nearby junction into Greenbanks is sufficiently busy, consideration should be given to altering this junction and there should be an adequate pedestrian island included,</li> </ul>	<p>Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. National policy (set out in the National Planning Policy Framework, paragraph 32) requires the submission of a Transport Assessment or Transport Statement for development (all types) that will generate significant of traffic movements. The Transport Assessment or Transport Statement must appraise in sufficient detail the transport implications of a proposed development, to include vehicular and non-vehicular modes. It is commonplace for there to be a requirement for proposals classified as 'major' development to implement a scheme of highway capacity and/or safety improvement to ensure the highway implications of a development proposal is appropriately mitigated to the satisfaction of the local highway authority and/or Highways England. A scheme of mitigation can either be implemented by a developer directly or through payment of a financial contribution to the local highway authority, which is typically used when contributions (up to five in total) are 'pooled' to fund an identified improvement.</p>	<p>No action required.</p>
<ul style="list-style-type: none"> <li>•The site is situated within the Kent Downs AONB, development here would be an inappropriate extension of the village southwards in this attractive valley (AONB Unit),</li> </ul>	<p>Lyminge is identified as a Rural Centre in the Shepway Core Strategy Local Plan (2013) and as such it is reasonable to expect some growth here. Very few sites were submitted to us through the SHLAA process in Lyminge and this site was the best one available for development adjoining the settlement with the added benefit of providing the opportunity to improve the links between Etchinghill and Lyminge.</p>	<p>No action required.</p>
<ul style="list-style-type: none"> <li>• The site is considered to constitute major development and development here would be contrary to para 116 of the NPPF that restricts major developments in AONBs except in exceptional circumstances and where it can be demonstrated that they are in the public interest. In addition it conflict with footnote 9 of para 114 of the NPPF (AONB Unit),</li> </ul>	<p>There is no clear definition of what constitutes major development in the AONB and appeal decisions show that whether a development proposal is judged 'major' will depend on local circumstances and is not simply a matter of scale and numbers. The site is needed to meet the requirements set out in the Core Strategy (2013) for Lyminge a Rural Centre. There is very limited scope for development elsewhere in Lyminge which lies within the AONB. It is considered that criteria in the policy will ensure that any development is sensitive to the site's landscape setting and helps maintain the AONB as a special place.</p>	<p>No action required.</p>

	<p>•Site fails to conserve and enhance the AONB (AONB Unit),</p> <p>•Small scale major development, and would need to satisfy the three tests set out in paragraph 116 of the NPPF, (Natural England),</p> <p>•Sets a precedent for further development of the AONB, makes remainder of golf course and land on opposite side of Canterbury Road vulnerable, especially if the 30mph speed limit is extended southwards,</p> <p>•KCC-We welcome the inclusion of a requirement (10) in relation to archaeology, but have concerns regarding the specific wording suggested. In particular, given the site's location close to a known Anglo-Saxon cemetery, it is possible that there may be buried archaeological remains present whose significance is such that they should be preserved in situ. We suggest that requirement 10 is revised to: 10. The archaeological potential of the land is properly considered and understood and any proposal is informed by an appropriate desk-based assessment and a field evaluation.</p> <p>•Archaeology- It is very important that test digs are carried out should this site be approved as this location is very close to a previous Saxon find,</p> <p>•Developer confirms that site is available,</p> <p>•Amendments- ND6 criteria 3, At para 7.36 the description of archaeology and Lyminge is a bit muddled. I think it is a suggested Saxon royal site as well as an early monastery (the two often go together). (Historic England),</p>	<p>The site is needed to meet the requirements set out in the Core Strategy (2013) for Lyminge a Rural Centre. There is very limited scope for development elsewhere in Lyminge which lies within the AONB. It is considered that criteria in the policy will ensure that any development is sensitive to the site's landscape setting and helps maintain the AONB as a special</p> <p>Noted, with the allocation the settlement confines will be redrawn to provide protection to the AONB outside these areas within the plan period. The allocation will meet the requirements set out in the Core Strategy for the village of Lyminge. It is considered that criteria in the policy will ensure that any development is sensitive to the site's landscape setting and helps maintain the AONB as a special place.</p> <p>Agree.</p> <p>Agree, criteria 13 will be amended to better reflect this, see above.</p> <p>Noted.</p> <p>Noted; this text will be rewritten.</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>Amend criteria 13 to read: 'The archaeological potential of the land is properly considered and understood and any proposal is informed by an appropriate desk-based assessment and a field evaluation;'</p> <p>Amend criteria 13 to read: 'The archaeological potential of the land is properly considered and understood and any proposal is informed by an appropriate desk-based assessment and a field evaluation;'</p> <p>No action needed.</p> <p>New wording: 'An understanding of the history of Lyminge has been helped by a strong local focus on archaeological work which has taken place in the village for over half a century. 1,300 years ago, an Anglo-Saxon monastery stood in the village of Lyminge, presided over by a royal abbe. Excavations have shown that Lyminge was an important place before this, with Anglo-Saxon occupation extending back into the fifth century.'</p>	
<p>Para 7.41</p> <p>Para 7.45</p> <p>Para 7.51</p>	<p>•Amendments- para 7.41 Sellindge lies within the setting of the AONB.</p> <p>Reference to the 'North Downs AONB' should be amended to 'Kent Downs AONB' to give the AONB its correct title.</p> <p>Para 7.51 Gibbins Brook spelling incorrect in doc.</p>	<p>Agree.</p> <p>Agree.</p> <p>Agree - however this site is no longer allocated and the accompanying text is proposed to be removed.</p>	<p>Amend text.</p> <p>Amend text.</p>	<p>Amend paragraph 7.46 to read: 'Sellindge is not located in the Kent Downs AONB <i>however it does lie within the setting of the AONB.</i> '</p> <p>Amend text in paragraph 7.51 to read: '... with views to the Kent Downs AONB.'</p>
<p>ND7 General Sellindge Policy - These sites are proposed for residential development with an indicative capacity as follows:</p> <ul style="list-style-type: none"> <li>- The Piggeries, Main Road Sellindge- 8 dwellings</li> <li>- Land West of Jubilee Cottage, Swan Lane, Sellindge- 15 dwellings</li> <li>- Land rear of Brook Lane Cottages, Brook Lane, Sellindge- 11 dwellings</li> <li>- Land at Barrow Hill, Sellindge- 15 dwellings</li> <li>- Silver Spray, Sellindge- 5 dwellings</li> </ul> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. The design incorporates adequate landscaping to mitigate impact on the setting of adjoining countryside</li> <li>2. Existing trees and hedgerows around the site boundary are retained and enhanced</li> <li>3. The proposal acknowledges surrounding street patterns and the urban grain, fronting dwellings on to existing streets and following the existing built edge where possible</li> <li>4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</li> </ol> <p>Site Specific Criteria:</p> <p>The Piggeries, Main Road</p> <ol style="list-style-type: none"> <li>1. The development should avoid direct effects on the nearby ancient woodland</li> </ol> <p>Land West of Jubilee Cottage</p> <ol style="list-style-type: none"> <li>1. An assessment is carried out of the impact on the setting of the nearby Grade II Listed Building and appropriate measures put in place to preserve or enhance the setting</li> <li>2. The north west building edge is fragmented and softened with a strong landscape buffer</li> </ol> <p>Land rear of Brook Lane Cottages</p> <ol style="list-style-type: none"> <li>1. The design, layout and landscaping of the site should seek to reduce adverse effects on the character of the AONB</li> <li>2. Appropriate mitigation/enhancement measures should be incorporated into the design to</li> </ol>	<p>•Sellindge facing enough development,</p>	<p>The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). The Core Strategy establishes the general level and distribution of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031).</p> <p>The Core Strategy focuses most of the development in the district to the Urban Area (comprising Folkestone and Hythe); 75% of the district's new housing development is planned for this area (to the nearest 5%). 10% of the district's new housing is planned for the Romney Marsh Area (to the nearest 5%), which includes the settlements of New Romney, Lydd and St Mary's Bay. The remaining 15% of new housing development (to the nearest 5%) is planned for the North Downs Area, which includes the settlements of Hawkinge, Lyminge and Sellindge). This distribution has taken account of available sites, constraints including infrastructure, the highway network, flood risk and landscape character, as well as access to services, such as shops, public transport, schools and employment opportunities.</p>	<p>No actions required.</p>	<p>Amended Policy to read:</p> <p><b>The following sites are allocated for residential development with indicative capacities as follows:</b></p> <ul style="list-style-type: none"> <li>•The Piggeries, Main Road Sellindge - 5 dwellings;</li> <li>•Land West of Jubilee Cottage, Swan Lane, Sellindge - 15 dwellings;</li> <li>•Land at Barrow Hill, Sellindge - 15 dwellings; and</li> <li>•Silver Spray, Sellindge - 5 dwellings.</li> </ul> <p><b>Development proposals will be supported where:</b></p> <ol style="list-style-type: none"> <li>1.The design incorporates adequate landscaping to mitigate impact on the setting of the countryside;</li> <li>2.Existing trees and hedgerows around the site boundary are retained and enhanced;</li> <li>3.The proposal complements the surrounding street pattern and urban grain, fronting dwellings onto existing streets and following the existing built edge wherever possible; and</li> <li>4.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ol> <p><b>Site Specific Criteria</b></p> <p><b>The following additional site-specific criteria should also be complied with:</b></p> <p><b>The Piggeries, Main Road:</b></p> <ol style="list-style-type: none"> <li>1.The development should avoid direct effects on the nearby ancient woodland; and</li> <li>2. A connection is provided to the local sewerage system at the nearest point of adequate</li> </ol>

appropriate mitigation/amenity measures should be incorporated into the design to reduce effects on the nearby SSSI.

The Core Strategy has been subject to a number of stages of consultation and has been tested and examined by an independent Inspector appointed by central government. The plan was found 'sound' through this process and was adopted by the council in 2013 to set the overall strategy for the district.

The Core Strategy identifies a number of strategic sites in Folkestone, Hythe, New Romney and Sellindge which now all have planning permission. Development has also been completed in other locations throughout the district since the start date of the plan in 2006 and, in addition, a number of sites also have planning permission and have not yet started on site, or are currently under construction. The council monitors development on these sites every year to gain an up-to-date picture of how much building is taking place and in what locations. All of these developments have been taken into account in identifying the sites allocated in the Places and Policies Local Plan; an allowance has also been made for smaller, unidentified sites that come forward through the planning process (known as 'windfall sites'). The Places and Policies Local Plan seeks to allocate sites to meet the remaining requirement for the Urban, Romney Marsh and North Downs Areas that has not already been identified from these sources.

No action required.

permission is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.

Land West of Jubilee Cottage:

- 1.An assessment is carried out of the impact on the setting of the nearby Grade II Listed Building and appropriate measures put in place to preserve or enhance its setting;
- 2.The design, layout and landscaping of the site mitigates the impact on the setting of the Kent Downs Area of Outstanding Natural Beauty including incorporation of landscaping to filter views of the development from the Area of Outstanding Natural Beauty to the north;
- 3.Any potential contamination from the former use of the adjoining land is investigated, assessed and if appropriate, mitigated as part of the development; and
- 4.A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.

•Traffic concerns and road safety, speed reductions (roundabout suggested) and crossing points needed on A20

The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.

No action required.

In addition, the Council is undertaking more detailed work to update its Infrastructure Delivery Plan (IDP) to identify where and when improvements to the highway network will be required and how the improvements will be delivered.

Policies within the Places and Policies Local Plan set out the general framework for development on sites the plan allocates. More detailed assessment may also be required as part of the planning application process to promote a scheme

•Infrastructure issues, i.e. school, doctors,

The Places and Policies Local Plan is intended to allocate sites to meet the remaining level of development set out in the Shepway Core Strategy Local Plan (2013). The Core Strategy establishes the general level of development in the district from 2006 to 2026 (provision is also made for the period immediately beyond to 2031). The Core Strategy has been subject to a number of stages of consultation and has been tested and examined by an independent Inspector appointed by central government. The plan was found 'sound' through this process and was adopted by the council in 2013 to set the overall strategy for the district.

No action required.

The Core Strategy sets out a schedule of key infrastructure projects that are required to deliver growth over the plan period in Appendix 2 of the plan. A number of these improvements have been completed or are underway. In addition the council is undertaking more detailed work to produce an Infrastructure Delivery Plan (IDP) to identify progress with existing projects and highlight where new improvements are needed and how and when they will be delivered.

The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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.

Core Strategy Policy SSS: District Infrastructure Planning requires new development to provide for new infrastructure for which it creates a need, and states that the necessary infrastructure must exist already or a reliable mechanism must be in place to ensure that it will be provided at the time it is needed. The Core Strategy and Places and Policies Local Plans set out general infrastructure requirements; the detailed phasing and design of infrastructure will be determined as part of the planning application process and, depending on circumstances, may be secured as part of legal agreements tied into the planning permission.

SHLAA Site 402- A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider, (Southern Water).

Agree.

Additional criteria added to ND5: General Sellindge Policy to state: 'A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.'

SHLAA Site 402- Kent Highways- The width of the site access at only 3 metres is only acceptable to serve a maximum of 5 dwellings in accordance with Kent Design guide standards. An access width of 4.1 metres would be required to serve 8 dwellings but this cannot be provided due to the narrowness of the access. Objects to more than 5 dwellings.

Agree; the site indicative capacity will be amended to reflect these concerns.

Amend the indicative capacity given in both paragraph 7.52 and Policy ND5 for The Piggeries, Main Road, Sellindge to 5 dwellings.

•SHLAA ref:618- The site is used by walkers to cut through to Moorstock Lane.

There is not a public right of way across this site; however there is a public footpath which gives access to Moorstock a bit further along Swan Lane, just past the entrance to Greenfields.

No action required.

SHLAA ref 618: The contamination status of this site may need to be addressed through the planning process, the site is located adjacent to a historic landfill site (Environment Agency).

Noted; supporting text will be amended to raise the issue of contamination.

Insert addition sentence onto the end of paragraph 7.54 to state: 'The site adjoins a historic landfill site; the contamination status of the land will need to be addressed at the planning application stage.'  
New criteria to be added to Policy ND5: General Sellindge Policy to state: 'Any potential contamination from the adjoining lands former use is investigated, assessed and if appropriate, mitigated as part of the development;'

Flooding in the lower end of the plot.

In terms of flooding the site is over 1ha and will require a site specific flood risk assessment as part of the planning application. Any future development will need to avoid areas at risk of flooding within the site.

Add text to supporting paragraph 7.55 to state: 'The potential risk of flooding will need to be addressed in any planning application'.

SHLAA ref 618: A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider, (Southern Water)

Agree.

Addition criteria added to ND5: General Sellindge Policy to state: 'A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider;'

•SHLAA Site 627- access difficulties, poor junction, speed restrictions ignored. Adjacent SSSI Gibbin's Brook sufficient construction safeguards and pollution prevention measures will be necessary as part of any forthcoming application to ensure the SSSI is protected from potential pollution via surface run-off and foul drainage (Natural England).  
-adjacent a SSSI which needs to be protected from potential pollution via surface run-off and foul drainage,  
- KCC Highways objects to an allocation on this site. A suitable access point cannot be provided for a total of 11 dwellings; the access serving the site is currently single file and already serves a parking area for the properties to the rear of Brook Lane.

Noted; this site is proposed to be deleted.

Site 627, Land rear of Brook Lane Cottages, Brook Lane Sellindge will be deleted as a draft allocation.

	<ul style="list-style-type: none"> <li>•SHLAA Site 1005- increases linear development, another access on to busy A20, overlooking, well defined site boundaries, CPRE is concerned that this is not a sustainable location for development of this scale, also a concern that the proposal will consolidate development, close to an historic asset (bronze age burial mound)</li> <li>•Alternative sites (Rhodes House, Grove House, Sellindge East),</li> <li>•Mitigation of impact on the setting of the AONB for the two sites on Swan Lane, amended wording is suggested: "The design, layout and landscaping of the site should seek to mitigate impact on the setting of the Kent Downs AONB including incorporation of landscaping to filter views of the development from the Kent Downs AONB to the north." (AONB Unit)</li> <li>•KCC- We welcome the inclusion of a requirement (4) in relation to archaeology, but have concerns regarding the specific wording suggested. Suggest that requirement 4 is revised to: 4. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ul>	<p>This site is bounded on three sides by development and is well contained; it adjoins the settlement boundary and there is also direct pavement access to the villages facilities, therefore this site is seen as sustainable in the SHLAA assessment process. Kent Highways have been consulted and have not objected to another access onto the A20. The the policy includes a requirement in relation to archaeology (criteria 4), Kent County Council Heritage department and Historic England have both been consulted and no concerns have been raised about the site's proximity to the burial mound.</p> <p>These sites have been either ruled out through the SHLAA process, or there were sequentially preferential sites within Sellindge, or there was no need for any more sites within the village.</p> <p>Agree; however Site 627 Land rear of Brook Lane Cottages is proposed for deletion</p> <p>Noted.</p>	<p>No action required.</p> <p>No action required.</p> <p>Amend criteria 2 for Land West of Jubilee Cottage to state: 'The design, layout and landscaping of the site should seek to mitigate impact on the setting of the Kent Downs AONB including incorporation of landscaping to filter views of the development from the Kent Downs AONB to the north;'</p> <p>Amend criteria 4 to state: 'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
<p>ND8 Former Lympe Airfield - Site 1 is allocated for residential development with an estimated capacity of 125 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>1. Existing trees and hedgerows within/around perimeter of site are retained and enhanced as part of a comprehensive landscaping scheme</li> <li>2. The northern building edge is fragmented and softened with a strong landscape buffer</li> <li>3. Open spaces and planting are used to provide a visual link to the countryside and North Downs Scarp and an attractive backdrop to development</li> <li>4. Site 1 has on site open space to meet the recreational needs of residents</li> <li>5. The development has at least 6 self / custom build plots on site</li> <li>6. Appropriate and proportionate contributions are made to improvements at the Newingreen Junction</li> <li>7. Site 2 remains undeveloped</li> <li>8. A new footpath across Site 2 is provided in parallel with the development of Site 1</li> <li>9. The proposal acknowledges the surrounding urban grain, fronting dwellings on to existing streets and following the existing built edge where possible</li> <li>10. Footpaths are provided to link in with the existing network</li> <li>11. A primary vehicle access is provided on to Aldington Road</li> <li>12. An assessment of non-designated heritage assets and an archaeological survey is carried out and appropriate mitigation measures put in place if required</li> <li>13. Adequate waste water infrastructure has been provided</li> <li>14. Contaminated land is fully remediated prior to construction works.</li> </ol>	<ul style="list-style-type: none"> <li>• Planning permission has already been refused on this site and dismissed at Appeal, land was recently subject to a successful appeal against development, supported by SDC</li> <li>•This development would be in opposition to what is set out in the Core Strategy 2013,</li> <li>• There is a lack of consistency with this policy and the Otterpool Park allocation which incorporates this site ,</li> <li>•Important to retain as it will provide an important gap between proposed Otterpool development and Lympe village,</li> <li>• Important green gap between the village and industrial estate, allowing views towards the North Downs scarp,</li> <li>•A connection must be provided to the local sewerage system at the nearest point of adequate capacity, (Southern Water).</li> <li>•Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes at these sites. The need for easements will therefore need to be taken into account in the layout of the site, (Southern Water)</li> <li>•Opposed by Lympe Parish Council and many residents,</li> <li>•Well used open space, community asset,</li> <li>• Opportunity for health and wellbeing</li> </ul>	<p>The previous planning application and subsequent appeal was for a much higher housing density of 250 dwellings on the site. It was the volume of development rather than the principle of development that the appeal was dismissed on. This draft allocation has an estimated capacity of half the number of dwellings at 125 on site 1, it also safeguards a large area of open space ensuring in remains undeveloped (site 2).</p> <p>Lympe is identified as a primary village in the Core Strategy (2013), therefore some housing would be expected here. Few sites were submitted through the SHLAA process in Lympe, and this site was the best one available for development adjoining the settlement, outside the AONB and in a sustainable location with the benefit of retaining a large area of undeveloped land for the public to continue to enjoy.</p> <p>Proposals for a new garden settlement will be addressed in the Core Strategy Review which is currently at an early stage. The Places and Policies document looks to allocate sites to meet the housing need identified in the Core Strategy (2013).</p> <p>Noted; Site 2 will act as a green gap.</p> <p>Agree; it is important to retain a sense of openness and a green gap, also to avoid settlement coalescence. These requirements are met by retaining site 2 as undeveloped open land.</p> <p>Agree.</p> <p>Agree.</p> <p>Noted; however the District Council needs to identify housing in the North Downs. Sequential this site is preferential in landscape terms as it lies outside the AONB. In addition the site's planning history would suggest that it is a sustainable location for development.</p> <p>Site 2 is 33ha and this will remain undeveloped open space to be used by the public.</p> <p>Agree; health and wellbeing policies will apply to this site and other allocations in the Places and Policies Local Plan (see Chapter 16: Health and Wellbeing).</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>Additional criteria to Policy ND6: Former Lympe Airfield to state: 'A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider;'</p> <p>Additional wording in the supporting text, paragraph 7.72 to state: 'The layout of any scheme should also seek to either avoid building over, or facilitate the diversion of existing sewage infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and improvement.'</p> <p>Policy Criterion: 'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p>	<p>Amedned Policy to read:</p> <p><b>Site 1 is allocated for residential development with an estimated capacity of 125 dwellings and Site 2 is to be retained as an open space/landscape buffer.</b></p> <p><b>Development proposals will be supported where:</b></p> <ol style="list-style-type: none"> <li>1.Existing trees and hedgerows within and around the perimeter of the site are retained and enhanced as part of a comprehensive landscaping scheme;</li> <li>2.The northern building edge is fragmented and softened with a strong landscape buffer;</li> <li>3.Open spaces and planting are used to provide a visual link to the countryside and North Downs Scarp and an attractive backdrop to development;</li> <li>4.Mitigation and enhancement measures should be incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat;</li> <li>5.A landscape buffer is provided between the existing edge of the village to the east of the site and the new development;</li> <li>6.On-site open space is provided within Site 1 to meet the recreational needs of residents;</li> <li>7.At least 6 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development;</li> <li>8.Appropriate and proportionate contributions are made to improvements at the Newingreen Junction and expansion of Oaklands Health Centre through a Section 106 agreement;</li> <li>9.Site 2 remains undeveloped and enhanced to retain the separation between Lympe and the Business Park;</li> <li>10.A new footpath across Site 2 is provided in parallel with the development of Site 1;</li> <li>11.The proposal complements the surrounding street pattern and urban grain, fronting dwellings onto existing streets and following the existing built edge wherever possible;</li> <li>12.Footpaths are provided to link to the existing public rights of way network;</li> <li>13.A primary vehicle access is provided onto Aldington Road and an emergency access is provided onto Aldington Road or Tourney Close;</li> <li>14.An assessment of non-designated heritage assets and an archaeological survey is carried out and appropriate mitigation measures put in place if required;</li> <li>15.Features and structures associated with the site's former use as a WWII airfield are retained wherever possible to provide a link with the site's past;</li> <li>16.Any potential contamination from its former use is investigated, assessed and if appropriate, mitigated as part of the development;</li> <li>17.A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider; and</li> <li>18.Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.</li> </ol>

	<ul style="list-style-type: none"> <li>•Site is of historical significance,</li> </ul>	Agree; criterion 14 includes a requirement for the assessment of non-designated archaeological remains, archaeological survey and appropriate mitigation measures. In addition a new criterion is proposed.	New criterion added to ND6: Former Lympe Airfield to state: 'Features and structures associated with the site's former use as a World War II airfield are retained wherever possible so as to provide a link with the site's past;'
	<ul style="list-style-type: none"> <li>•Archaeological potential,</li> </ul>	Agree; please see criterion 14 of Policy ND6: Former Lympe Airfield.	No action required.
	<ul style="list-style-type: none"> <li>•KCC- The former use of the site as part of a former WW2 airfield could help to anchor a sense of place, character and history in any new development. We would suggest an additional requirement be included to reflect this: 13. Features and structures associated with the site's former use as a WW2 airfield are retained wherever possible so as to provide a link with the</li> <li>•Highway and infrastructure constraints, i.e. sewage system, school, roads</li> </ul>	Agree.	New criterion added to ND6: Former Lympe Airfield to state: 'Features and structures associated with the site's former use as a World War II airfield are retained wherever possible so as to provide a link with the site's past;'
		The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including Kent County Council (the education and transport authority and lead local flood authority for Shepway), 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 plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; 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 action required.
	<ul style="list-style-type: none"> <li>•KCC Highways- An emergency access onto Aldington Road is required. Alternatively an emergency access can be provided onto Tourney Close.</li> </ul>	Agree, criterion 13 of Policy ND8 will be amended to reflect this.	Amend criteria 13 to state: 'A primary vehicle access must be provided on to Aldington Road. An emergency access should be provided on to Aldington Road or Tourney Close;'
	<ul style="list-style-type: none"> <li>•The site lies in the immediate setting of the Kent Downs AONB, with the boundary of the AONB on the opposite side of Aldington Road. This land provides a welcome green gap between existing residential development at Lympe and development at the Link Park Industrial Estate, helping to maintain a rural environment and allowing fine views towards the North Downs scarp. Furthermore the site is visible from a large section of the Kent Downs scarp to the north. The AONB Unit is concerned that development here would fail to conserve and enhance the setting of the AONB (AONB Unit)</li> </ul>	The district council set out a requirement for housing in the North of the district in the Core Strategy (2013). Sequentially in landscape terms this site is preferential as it is located outside of the AONB and adjacent to the build form. The policy ensures that the majority of the land is retained as undeveloped to maintain views of the AONB scarp and to retain a green gap.	No action required.
	<ul style="list-style-type: none"> <li>•This is considered to be small scale major development, and would need to satisfy the three tests set out in paragraph 116 of the NPPF,</li> </ul>	Disagree; this paragraph only applies to sites within the AONB, this site lies outside of the AONB.	No action required.
	<ul style="list-style-type: none"> <li>•Site 2 should be designated as a Local Green Space and be protected in perpetuity for local people.</li> </ul>	Noted; Local Green Spaces can be identified through a Neighbourhood Plan.	No action required.
	<ul style="list-style-type: none"> <li>•Sets a precedent for development of remainder of the airfield,</li> </ul>	This allocation will ensure a large area of undeveloped land is retained for the public to continue to enjoy.	No action required.
	<ul style="list-style-type: none"> <li>•Impact on existing community. Landscaping buffer between existing residential houses and proposed development needed</li> </ul>	A new criterion will be added.	New criterion to be added to Policy ND6: Former Lympe Airfield to state: 'A landscape buffer is provided between the existing edge of the village to the east of the site and the new development;'
	<ul style="list-style-type: none"> <li>•Bund to the north is removed and the material used to build up the poor bunds around the industrial site, better tree planting around the exiting Industrial Units to screen them from the North Downs.</li> </ul>	The bunds cannot be removed as they form part of the landscaping for the proposed Phase 1 and Phase 2 extensions to the industrial estate.  There are conditions on the two respective planning permissions that the bunds are retained for that purpose.	No action required.
	<ul style="list-style-type: none"> <li>•Poor access to amenities,</li> </ul>	The village facilities are all within walking distance on a network of pavements which the new development will link into.	No action required.
	<ul style="list-style-type: none"> <li>•Phides confirm site availability and give their support to policy. They highlight possible error in SA assessment of the site, and want flexibility with affordable housing in order to deliver community benefits,</li> </ul>	Noted.	No action required.
	<ul style="list-style-type: none"> <li>•Phides- self/custom build plots should be discounted from any affordable housing, CIL or section 106 requirements.</li> </ul>	Disagree; Government policy promotes the provision of self- and custom-build homes to diversify the housing market.	No action required.
	Amend criteria 14 regarding contamination to ensure consistency across the document (Merebrook consultants )	Agree.	Amended wording of criterion 16 to state: 'Any potential contamination from former use is investigated, assessed and if appropriate, mitigated as part of the development;'
ND9 Land rear of Barnstormers, Stone Street, Stanford - The site is allocated for residential development with an estimated capacity of 5 dwellings. Development proposals will be supported where: 1. The proposal achieves the highest quality design of both buildings and surrounding space and reinforces local rural distinctiveness 2. Existing trees and hedgerows within/around perimeter of site are retained and enhanced 3. An assessment of the impact on the setting of Stanford Windmill must be carried out and the setting preserved or enhanced 4. Planting is used to provide a visual link to the countryside and an attractive backdrop to the development 5. The archaeological potential of the land is properly considered and measures agreed to monitor	<ul style="list-style-type: none"> <li>• These plans no longer make sense given the plans for the Lorry Park which will be located adjacent to the site.</li> <li>•Backland development,</li> <li>•Proximity to Grade II listed Stanford Mill, development would diminish the rural aspect in which the windmill is set</li> <li>•Within the setting of the Kent Downs AONB,</li> <li>•The site is rich in native species,</li> <li>•Covenant in place to keep the field as arable / grazing land,</li> <li>•KCC- We welcome the inclusion of a requirement (5) in relation to archaeology, but have concerns regarding the specific wording suggested. Suggest that requirement 5 is revised to: 5. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ul>	This site will be removed as it is no longer available.	Delete site.

and respond to any finds of interest.	<ul style="list-style-type: none"> <li>Item 5 (Archaeology) cannot be carried out without clearing the site at the detriment of all the other policy criteria,</li> <li>overlooking, loss of privacy and visually overbearing impact,</li> <li>Density out of keeping with surrounding plots,</li> <li>KCC Highways- The existing access onto Stone Street will need to be widened to accommodate the proposed development. There is no footpath along Stone Street and there are no facilities in Stanford and so the site is not sustainable.</li> <li>No clear site access proposals, site is landlocked,</li> </ul>			
<p>ND10 Land at Folkestone Racecourse - The site is allocated for residential development with an estimated capacity of 11 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>The proposal achieves the highest quality design of both buildings and surrounding space and reinforces local rural distinctiveness</li> <li>Existing trees and hedgerows within/around perimeter of site are retained and enhanced</li> <li>Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development</li> <li>Adequate off street parking must be provided</li> <li>An assessment of the impact of development on the setting of nearby Scheduled and Grade I Listed Westenhanger Castle has been sort and adhered to ensuring the layout of development protects its setting</li> <li>The proposal acknowledges surrounding street pattern and urban grain, fronting dwellings on to Stone Street and following the existing built edge</li> <li>The development includes or safeguards appropriate land for the expansion of parking facilities at Westenhanger Station as part of a masterplan and includes measures to reduce on street parking congestion along Stone Street</li> <li>The development ensures that there is no adverse impact on water quality from wastewater overflow</li> <li>The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.</li> </ol>	<ul style="list-style-type: none"> <li>These plans no longer make sense given the plans for Otterpool Park, highly likely that the racecourse area included in Policy ND9 will be part of the Otterpool Park new garden town,</li> <li>The impact of the lorry park needs to be considered,</li> <li>Proximity to Westenhanger Castle,</li> <li>KCC- Policy only seeks to preserve the setting, whereas we think opportunity should be sought not only preserve the asset's setting, but to also look for ways in which the setting could be enhanced: 5. The setting of Westenhanger Castle has been appropriately and thoroughly assessed and understood and this information has been used to inform a proposal that preserves and where possible enhances the setting of the Scheduled and Grade I Listed site.</li> <li>KCC- the allocation site takes in the current access drive to Westenhanger Castle. Driving through the present racecourse is how one first experiences the historic site and this should not become an experience of a "housing estate". We think that this should be specifically acknowledged in the policy.</li> <li>KCC- We welcome the inclusion of a requirement (9) in relation to archaeology, we have concerns regarding the specific wording suggested. In particular given the site's location it is possible that there might be buried archaeological remains whose significance is such that they should be preserved in situ. We suggest that requirement 9 is revised to: 9. The archaeological potential of the land is properly considered and understood and any proposal is informed by an appropriate desk-based assessment and a field evaluation.</li> <li>Low density and fronting dwellings on to Stone St. supported by AONB Unit,</li> <li>A connection is provided to the local sewerage system at the nearest point of adequate capacity,</li> <li>Historic England suggest new wording for criteria 5, "The contribution that setting makes to the significance of Westenhanger castle as a scheduled monument and grade I listed building has been assessed and the proposal preserves or enhances its significance".</li> <li>There is archaeological potential at the site which is not based on the castle e.g. it was a WW1 military camp and one of the wooden huts may still exist and racecourse structures will need to be assessed for heritage value, (Historic England)</li> <li>Additional traffic on this road will cause difficulties,</li> <li>KCC Highways- A footpath connection is required from the site to Westenhanger Station to allow both residents and users of the proposed car park to access the Station.</li> <li>KCC- Public Footpath HE227 runs along the boundary of this site. Policy should provide to protect and enhance this route and in particular ensure that any notable views are retained. The allocation should also deliver a new footway along its frontage of Stone Street.</li> <li>Important to reflect local settlement pattern</li> <li>Loss of open green space,</li> </ul>	This site is subject to review as part of the Core Strategy Review process; the policy will be removed.	Delete site.	
<p>ND11 Camping and Caravan Site, Stelling Minnis - The site is allocated for residential development with an estimated capacity of 11 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>Design and lay out take account of the residential amenity of neighbouring dwellings</li> <li>The proposal achieves the highest quality design of both buildings and surrounding space and reinforces local rural distinctiveness to help maintain the Kent Downs AONB as a special place</li> <li>Existing trees and hedgerows within/around perimeter of site are retained and enhanced</li> <li>The west and south west building edge is fragmented and softened with a strong landscape buffer</li> <li>Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development</li> <li>Biodiversity enhancement measures are incorporated into the design of the development.</li> <li>The proposal acknowledges surrounding street patterns and urban grain, fronting dwellings on to existing streets and following the existing built edge where possible</li> <li>A primary vehicle access is provided on to Minnis Lane</li> <li>Replacement car parking for the public house is provided</li> <li>The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.</li> </ol>	<ul style="list-style-type: none"> <li>Any development will need to be sensitive to the environment and the community,</li> <li>The Minnis, needs development with the provision of houses large &amp; small to ensure the viability of the community and to support village life,</li> <li>The relocation of the bus shelter must be agreed with both Stelling Minnis Parish Council, the community and the owners of the private Stelling Minnis Common, on whose land it both currently stands and will be re-located to,</li> <li>Any development proposals must include additional car parking facilities for the Rose &amp; Crown to avoid the current situation where the majority of customers are forced, by severe lack of parking facilities on site, to park on the Stelling Minnis Common causing an enormous amount of damage,</li> <li>Any development will need to include very careful consideration of the position of a new entrance to the site off Minnis Lane (off Crown Lane would be totally impractical, because of its width restriction and the potential disruption to residents),</li> <li>Concerns over Stone Street junction,</li> <li>A 20mph speed limit should be introduced to Minnis Lane as part of any prospective development conditions.</li> <li>Supported by Parish Council with additional criteria, <ul style="list-style-type: none"> <li>Any development must include an element of affordable or low cost houses with priority being given to persons with local connections.</li> <li>Adequate parking facilities must be allowed for the Customers of the Rose and Crown PH to park on its own land without customers needing to resort to illegal parking on the private Stelling Minnis Common in any prospective development of the land..</li> <li>The relocation of the bus shelter must be agreed with both Stelling Minnis Parish Council and the owners of the private Stelling Minnis Common, on whose land it both currently stands and will be re-located to, as part of any plans for development</li> </ul> </li> </ul>	<p>Agree; this is the aim of the policy through the list of criteria.</p> <p>Agree.</p> <p>The existing bus shelter is on private land, and so conversations will need to be advanced with the landowner, Stagecoach and the Parish Council concerning repositioning the bus shelter.</p> <p>Agree; please see criteria 9.</p> <p>Agree. Detailed access arrangements will be assessed as part of the planning application process.</p> <p>Noted; however Kent County Council, the Highways Authority, have also been consulted and have not raised any concerns in</p> <p>Whilst the request for the introduction of a 20 mph limit is noted, the consideration of such requests sits with Kent County Council as local highway authority applying a criteria-based methodology to review requests for speed limit changes.</p> <p>Noted. 1, Agree the allocation would be subject to Core Strategy (2013) Policy CSD1 and we would support priority being given to people with a local connection. This point will be added into the Statement 1 box which covers generic site policies in Chapter 4: Introduction. 2, Criteria 9 should address this point. 3, Conversations will need to be advanced with the landowner of Stelling Minnis Common.</p>	<p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>No action required.</p> <p>New sentence added onto the end of the 2nd bullet point in 'General Policy Requirements' in Chapter 4 stating: 'For affordable housing need the council will support priority being given to people with a local connection to a specific parish or village;'</p>	<p>New Policy to read:</p> <p><b>The site is allocated for residential development with an estimated capacity of 11 dwellings.</b></p> <p><b>Development proposals will be supported where:</b></p> <ol style="list-style-type: none"> <li><b>The proposal achieves the highest quality design of both buildings and surrounding space and reinforces local rural distinctiveness through layout, design, scale and the use of high quality materials to help maintain the Kent Downs Area of Outstanding Natural Beauty as a special place;</b></li> <li><b>Existing trees and hedgerows within and around the perimeter of the site are retained and enhanced unless required for access or unless significant design considerations warrant their removal;</b></li> <li><b>The west and south west building edge is fragmented and softened with a strong landscape buffer;</b></li> <li><b>Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development;</b></li> <li><b>The development considers the possibility of enhancing or providing community public space to the rear or the public house which could function as a pub garden and or recreational area (natural play space). The development should acknowledge this space;</b></li> <li><b>Biodiversity enhancement measures are incorporated into the design of the development;</b></li> <li><b>A primary vehicle access is provided onto Minnis Lane, with pedestrian links to Crown Lane;</b></li> <li><b>The relocation of the bus shelter is agreed with both Stelling Minnis Parish Council and the owners of the Stelling Minnis Common;</b></li> </ol>

	<p>•Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes at these sites. The need for easements will therefore need to be taken into account in the layout of the site,</p>	Agree.	<p>In the supporting text, paragraph 7.85, new text added to state: 'The layout of any scheme should also seek to either avoid building over, or facilitate the diversion of existing sewerage infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and improvement.'</p> <p>Criterion 11 added to Policy ND7: Camping and Caravan Site, Stelling Minnis to state: 'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'</p>	<p>9.Replacement car parking is provided for the public house;</p> <p>10.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; and</p> <p>11.Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.</p>
	<p>•KCC- Suggest that requirement 10 is revised to: 10. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>	Noted.	Amend criterion 10 to state: 'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place;'	
<p>ND12 Land adjoining 385 Canterbury Road, Densole - Site 1 is allocated for residential development with an estimated capacity of 25 dwellings, site 2 is considered suitable for allotments if there is demand or to remain as agricultural land.</p> <p>Development proposals will be supported where:</p> <p>1. The proposal achieves the highest quality design of both buildings and surrounding space and reinforces local rural distinctiveness to help maintain the Kent Downs AONB as a special place</p> <p>2. Existing trees and hedgerows within/around perimeter of site are retained and enhanced</p> <p>3. The western building edge is fragmented and softened with a strong landscape buffer</p> <p>4. Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development</p> <p>5. The proposal acknowledges surrounding street patterns and urban grain, fronting dwellings on to existing streets and following the existing built edge</p> <p>6. A primary vehicle access is provided on to Canterbury Road with suitable visibility splays</p> <p>7. New footpaths and crossing points are provided to link in with the existing network</p> <p>8. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</p> <p>9. Measures are taken to avoid pollution to groundwater.</p>	<p>•Greenfield site in the Kent Downs AONB, in agricultural use, with potentially significant harmful impacts on this sensitive landscape,</p>	<p>This site is set within the existing built form of Densole which is to the east, north and south, therefore the impact on the AONB would be reduced. Criteria within the policy will ensure that development is of the highest quality and helps to maintain the Kent Downs AONB as a special place.</p>	No action required.	<p>New Policy to read:</p> <p>Site 1 is allocated for residential development with an estimated capacity of 25 dwellings; Site 2 is considered suitable for allotments if there is demand or to remain as agricultural land.</p> <p>Development proposals will be supported where:</p> <p>1.The proposal achieves the highest quality design of both buildings and surrounding space and reinforces local rural distinctiveness through layout, design, scale and the use of high quality materials to help maintain the Kent Downs Area of Outstanding Natural Beauty as a special place;</p> <p>2.Existing trees and hedgerows within and around the western and northern site boundary are retained and enhanced;</p> <p>3.The western building edge is fragmented and softened with a sensitive landscape buffer;</p> <p>4.Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development;</p> <p>5.The proposal complements the surrounding street pattern and urban grain, fronting dwellings onto existing streets, that are set back from the existing built line with front gardens (similar to those in the immediate area) and following the existing built edge;</p> <p>6.Developments fronts onto Coach Road and Canterbury Road;</p> <p>7.The development includes a 'green corner' on the south east corner of the site that builds a focal point for Densole. This 'green space' should acknowledge the existing triangular road island and include sensitive planting to soften the development and provide interest. The new dwellings adjacent to this green space should address it;</p> <p>8.The public right of way is retained and enhanced;</p> <p>9.At least 1-2 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development;</p> <p>10.Traffic calming measures, new footpaths and crossing points are provided to link in with the existing public rights of way network;</p> <p>11.The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest;</p> <p>12.Measures are taken to avoid pollution to groundwater;</p> <p>13.A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider; and</p> <p>14.Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.</p>
	<p>•Small scale major development, and would need to satisfy the three tests set out in paragraph 116 of the NPPF, it is contended that these tests would not be met here,(Natural England)</p>	<p>There is no clear definition of what constitutes major development in the AONB and appeal decisions show that whether a development proposal is judged 'major' will depend on local circumstances and is not simply a matter of scale and numbers. The site is needed to meet the requirements set out in the Core Strategy (2013) and there is very limited scope for development elsewhere within Densole in such a central location. Criteria within the policy will ensure that development is of the highest quality and helps to maintain the Kent Downs AONB as a special place.</p>	No action required.	
	<p>•NPPF confirms that allocations of land for development should prefer land of lesser environmental value, counting the AONB as high value and paragraph 14 of the NPPF advises that Local Plans should meet objectively assess need,</p>	<p>This allocation will meet the need identified within the Core Strategy (2013) which has already been tested at examination. This site is set within the existing built form of Densole which is to the east, north and south therefore the impact on the AONB would be reduced. Criteria within the policy will ensure that development is of the highest quality and helps to maintain the Kent Downs AONB as a special place.</p>	No action required.	
	<p>•Large allocation in comparison to the existing size of the village,</p>	<p>Disagree; it reflects the existing built form within the area and would be frontage development allowing for an allotment if required and extensive landscaping while retaining the public right of way. Criteria within the policy will ensure that development is of the highest quality and helps to maintain the Kent Downs AONB as a special place.</p>	No action required.	
	<p>•Sustainability of the settlement. There are limited local services and the occupants would be likely to rely on the private car.</p>	<p>Densole is identified as a secondary village in the Core Strategy (2013) which is a small country settlement, but it would still be expected to accommodate a small amount of growth. A number of sites were submitted during the SHLAA process and this site was the most central to the village and the least harmful in terms of landscape and townscape. Criteria within the policy will ensure that development is of the highest quality and helps to maintain the Kent Downs AONB as</p>	No action required.	
	<p>•Directly impact on the public footpath which crosses the site northwest-southeast, (Policy needs criteria to pick up on this public right of way, retained and enhanced),</p>	<p>Agree; a new criterion will be added to the policy to retain and enhance the public footpath.</p>	<p>New criterion added to Policy ND8: Land adjoining 385 Canterbury Road, Densole to state: 'The public right of way is retained and enhanced.'</p>	
	<p>•Highway capacity, safety and visibility concerns, A260 is a busy road and site is on a bend, frequent accidents at or near the junction of Coach road and Canterbury Road,</p>	<p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority). Comments from these organisations have been taken into account when drafting the plan. More detailed assessment may also be required as part of the planning application process to promote a scheme of development on an allocated site. As the site will provide frontage development to Canterbury Road it is considered there would be a strong case to require a speed limit reduction as part of the overall package of highway improvements with this allocation, which would bring wider benefits to the village as a whole. However the consideration of such requests sits with Kent County Council as local highway authority who apply a criteria-based methodology to review</p>	<p>Amend criterion 10 to state: 'Traffic calming measures, new footpaths and crossing points are provided to link in with the existing public rights of way network;'</p> <p>New paragraph 7.90 to state: 'As the site will provide a frontage development onto Canterbury Road, development should facilitate a speed limit reduction, footway improvements and a gateway feature as part of its contribution to highway improvements. The site promoter will be required to enter discussions with Kent County Council and Kent Police as part of the planning application process.'</p>	
	<p>•No safe crossing for pedestrians from Coach Road to the other side of Canterbury Road</p>	<p>Please see criterion 10 which requires new footpaths and crossing points be provided to link in with the existing public rights of way network.</p>	See above.	
	<p>•Not supported by Swingfield Parish Council for the following reasons: The proposed access to the residential from A260 is a major concern as this is a very busy road on a bend and access from Coach Road would mean traffic joins the A260 on an already busy junction.</p> <p>No reference is made to the footpath that bisects the site directly behind the exiting bus shelter, which is one of the reasons for previous applications being refused.</p> <p>Parish Council would not support the extension of Site 1 or any further development on adjoining land</p>	<p>Noted. As the site will provide frontage development onto Canterbury Road it is considered that there would be a strong case to require a speed limit reduction as part of the overall package of highway improvements with this allocation, which would bring wider benefits to the village as a whole. In addition, as stated above, a new criterion will be included in the revised policy to retain and enhance the public footpath that bisects the site.</p>	See above.	
	<p>•Southern Water- A connection is provided to the local sewerage system at the nearest point of adequate capacity,</p>	Agree.	<p>New criterion 13 added to state: 'A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider;'</p>	

	<ul style="list-style-type: none"> <li>Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes at these sites. The need for easements will therefore need to be taken into account in the layout of the site,</li> </ul>	Agree.	Add the following additional criterion 14 to Policy ND8 to state: 'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes;'	
	<ul style="list-style-type: none"> <li>KCC- Suggest that requirement 9 is revised to: 9. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ul>	Agree.	Amend criterion 11 to state: 'The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest;'	
	Amend diagram to include road access to the allotments.			
<p>ND13 Etchinghill Nursery, Etchinghill - The site is allocated for residential development with an estimated capacity of 30 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness to help maintain the Kent Downs AONB as a special place</li> <li>Existing trees and hedgerows within/around perimeter of site are retained and enhanced</li> <li>A strong landscape buffer is provided along the southern and south east boundary</li> <li>Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development</li> <li>Primary vehicle access is on to Canterbury Road, with suitable visibility splays provided and widening where appropriate</li> <li>New footpaths and crossing points are provided to link in with the existing footpath network</li> <li>The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</li> <li>The design of the development should seek to minimise effects on the setting of the nearby Listed Buildings</li> <li>Mitigation / enhancement measures are investigated to avoid adverse effects on the Folkestone to Etchinghill Escarpment SSSI.</li> </ol>	<ul style="list-style-type: none"> <li>The scale of the proposed development is inappropriate and would be an inappropriate extension of the village southwards, (AONB Unit)</li> <li>Development would be clearly visible from much of the North Downs Way National Trail,</li> <li>Development here would be contrary to para 116 of the NPPF that restricts major developments in AONBs except in exceptional circumstances and where it can be demonstrated that they are in the public interest (AONB Unit),</li> <li>Constitute major development and would need to satisfy the three tests set out in paragraph 116 of the NPPF,</li> <li>Enhanced traffic management will be required to extend the 30 mile an hour limit,</li> <li>Scheme should include "village gates" to Etchinghill at the south eastern extremity of the site to slow traffic entering Etchinghill from the south east (Lyminge PC),</li> <li>Suggestion of vehicular access to Tedders Leas Lane and then onto the Canterbury Road via a triangle junction being a safer option?</li> <li>The footpath should extend to the Coombe at the point where the North Downs Way crosses the Canterbury Road so that walkers have the option of diverting into the village rather than continuing along the NDW,</li> <li>Charlier and Sons (Owner) confirm the site is available and deliverable with the next 5 years,</li> <li>Development must be of a high standard,</li> <li>Opportunity for the developer to provide a shop as part of the development,</li> <li>A connection is provided to the local sewerage system at the nearest point of adequate capacity and Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes at these sites. The need for easements will therefore need to be taken into account in the layout of the site,</li> <li>Drainage and flood issues, the site lays at almost the lowest point within the valley, surrounded by hills with natural springs,</li> <li>Landscape buffer supported, but should be around all the site, with a variety of trees,</li> <li>Trees at the rear of Upstreet Cottages have for many years been home to a large number of wild life. They should be kept &amp; enhanced. Many trees and bushes have recently been cleared from the site.</li> </ul>	<p>Etchinghill is identified as a Secondary Village in the Shepway Core Strategy Local Plan (2013) and as such it is reasonable to expect some small growth here. This site adjoins the settlement boundary, is part brownfield and with development already on the opposite side of Canterbury Road it is felt that the impact on the landscape would be minimal.</p> <p>This site is on the edge of the village adjoining development on two sides, in addition criteria 2 and 3 aim to soften the development.</p> <p>A new table will be included in the revised plan to explain housing figures and how the Council is meeting the requirement that approximately 15% of new dwellings should be allocated in the North Downs area according to the Plan's Spatial Strategy by 2030/31.</p> <p>There is no clear definition of what constitutes major development in the AONB and appeal decisions show that whether a development proposal is judged 'major' will depend on local circumstances and is not simply a matter of scale and numbers. The site is needed to meet the requirements set out in the Core Strategy (2013) and there is limited scope for additional development within Etchinghill. Criteria within the policy will ensure that the development is of high quality and helps to maintain the Kent Downs AONB as a special place.</p> <p>The limited extent of the site at the frontage with Tedders Leas Lane requires the principal site access to be formed from Canterbury Road; this has been confirmed by Kent Highways. There is an opportunity to connect site ND9 to the footway network that currently terminates on the north-eastern side of Canterbury Road a short distance north of the junction with St Mary's Drive, see criterion 6. There will be the opportunity to reinforce the village gateway features on Canterbury Road as part of the development.</p>	<p>No action required.</p> <p>No action required.</p> <p>Addition of Table 4.3 to set out the Housing Land Supply Position for the Places and Policies Local Plan.</p> <p>No action required.</p> <p>Amend criterion 6 to state: 'New footpaths, crossing points and measures to calm traffic are provided to link in with the existing public rights of way network;' New text in paragraph 7.98 to state: 'There will be the opportunity to reinforce the village gateway features on Canterbury Road as part of the development.'</p> <p>No action required.</p> <p>Agreed; please see criterion 1.</p> <p>Agreed; if there is demand.</p> <p>Agree.</p> <p>Noted. As the site is over 1 ha it will be required to have a site specific flood risk assessment at the planning application stage; however new wording will be added to the supporting text.</p> <p>Support noted and agree. To strengthen the policy it is proposed to amend criteria 2 and 3.</p> <p>Noted. Please see amended wording for criteria 2 and 3 above.</p>	<p>New Policy to read:</p> <p><b>The site is allocated for residential development with an estimated capacity of 30 dwellings, with the provision of a new community use such as a small village store.</b></p> <p><b>Development proposals will be supported where:</b></p> <ol style="list-style-type: none"> <li>The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness through layout, design, scale and the use of high quality materials to help maintain the Kent Downs Area of Outstanding Natural Beauty as a special place;</li> <li>Proposals include a landscaping scheme, particularly around the southern boundary, retaining the existing trees and hedgerows unless required for access, to ensure a soft edge to the village and retain its rural character;</li> <li>Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development;</li> <li>At least 1-2 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development;</li> <li>Primary vehicle access is onto Canterbury Road, with suitable visibility splays provided and widening where appropriate;</li> <li>New footpaths, crossing points and measures to calm traffic are provided to link in with the existing public rights of way network;</li> <li>The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place;</li> <li>The design of the development minimises effects on the setting of the nearby Listed Buildings;</li> <li>Mitigation and enhancement measures are provided to avoid adverse effects on the Folkestone to Etchinghill Escarpment Site of Special Scientific Interest;</li> <li>Appropriate contributions are made towards a new public bridleway along the alignment of the old railway line between Lyminge and Etchinghill and healthcare improvements at the New Lyminge Surgery through a Section 106 agreement;</li> <li>A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider; and</li> <li>Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.</li> </ol>

	<ul style="list-style-type: none"> <li>Lyminge Parish Council is supportive of the inclusion of this site, however criterion 2 should be enhanced by the inclusion of green spaces with planting within the site to reflect the rural nature of the site and supports criteria 6 but wishes it to be more specific by the addition of a tarmac footpath along Canterbury Road from the south eastern corner of the site to link up to the existing footpath outside Upstreet Cottages. In addition a tarmac footpath should be created from the site adjoining Teddars Leas Road to its junction with Canterbury Road.</li> </ul>	Noted. Criteria 2 and 3 have been amended, please see above. Regarding Criteria 6 it is felt that a metalled footpath along Beachborough/Canterbury Road would not be in keeping with the rural character of the village and would require the removal of an extensive amount of trees and hedgerows. However new footpaths could be set behind the trees and hedgerows in a similar fashion to those on the opposite side of the road.	Amend and merge criteria 2 and 3 to state: 'Proposals include a landscaping scheme, particularly around the southern boundary, retaining the existing trees and hedgerows unless required for access, to ensure a soft edge to the village and retain its rural character.'	
	<ul style="list-style-type: none"> <li>The planning office should consult with the Etchinghill Residents Association as well as the Parish Council,</li> </ul>	Noted.	No action required.	
	<ul style="list-style-type: none"> <li>Scope exists for a more modest high quality development on the brownfield northern half of the site (AONB Unit),</li> </ul>	The brownfield element of the site is fairly small and located to the rear which would be problematic in terms of access. A better scheme which relates well to the village can be achieved with the larger confines. Criteria within the policy will ensure that the development is of high quality and helps to maintain the Kent Downs AONB as a special place.	No action required.	
	<ul style="list-style-type: none"> <li>KCC- Suggest that requirement 7 is revised to: 7. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ul>	Agree.	Amend criteria 7 to state: 'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'	
<p>ND14 Land adjacent to the Golf Course, Etchinghill - The site is allocated for residential development with an estimated capacity of 11 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> <li>The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness to help maintain the Kent Downs AONB as a special place</li> <li>The highest quality materials are used and traditional building techniques are employed</li> <li>Existing trees and hedgerows within/around perimeter of site are retained and enhanced</li> <li>Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development</li> <li>The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</li> <li>The development avoids adverse effects on groundwater.</li> </ol>	<ul style="list-style-type: none"> <li>As part of these developments, the footpath should be extended around the back of Broad Street House, linking the two villages safely and enabling mutual access to amenities with walking to school in Lyminge for Etchinghill children a viable and safe option.</li> </ul>	Noted and agree. Further discussions are taking place with Kent County Council's Public Rights of Way team to see what can be achieved here. New criterion and text will be added.	Add new criterion regarding linking Etchinghill and Lyminge to state: 'Provision of a public bridleway, along the alignment of the old railway line between Lyminge and Etchinghill, is progressed with Kent County Council, with a proportionate contribution towards the cost of scheme implementation, alongside progression of relevant orders to permit the correct rights of public access across land under the control of the site'	<p>Amended Policy to read:</p> <p><b>Land adjacent to the Golf Course, Etchinghill</b></p> <p><b>The site is allocated for residential development with an estimated capacity of 8 dwellings.</b></p> <p><b>Development proposals will be supported where:</b></p> <ol style="list-style-type: none"> <li>The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness through layout, design, scale and the use of high quality materials to help maintain the Kent Downs Area of Outstanding Natural Beauty as a special place;</li> <li>The highest quality materials are used and traditional building techniques are employed;</li> <li>Existing trees and hedgerows within and around the perimeter of the site are retained and enhanced;</li> <li>Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development;</li> <li>Provision of a public bridleway, along the alignment of the old railway line between Lyminge and Etchinghill, is progressed with Kent County Council, with a proportionate contribution toward the cost of scheme implementation, alongside progression of relevant orders to permit the correct rights of public access across land under the control of the site promoter;</li> <li>Appropriate and proportionate contributions are made to healthcare improvements at the New Lyminge Surgery through a Section 106 agreement;</li> <li>Measures to calm traffic are improved and reinforced;</li> <li>The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; and</li> <li>The development avoids adverse effects on groundwater.</li> </ol>
	<ul style="list-style-type: none"> <li>Traffic management needed,</li> </ul>	A refresh/reinforcement of the existing gateway feature will be investigated as part of any planning application but must be proportionate to any development therefore it is unlikely that it would be possible to extend the 30 miles an hour zone to New Barn Corner. The consideration of such requests sits with Kent County Council as local highway authority who would apply a criteria-based methodology to review requests for speed limit changes.	New criterion added to Policy ND10: Land adjacent to the Golf Course, Etchinghill to state: 'Measures to calm traffic are improved and reinforced;'	
	<ul style="list-style-type: none"> <li>Consideration should be given to extending the 30 miles an hour zone back to New Barn corner, where the existing village sign is situated.</li> </ul>			
	<ul style="list-style-type: none"> <li>The proposed development should include "village gates" to Etchinghill to the west of the proposed development site in close proximity to the existing AONB sign. The purpose of this suggested criterion is to ensure that traffic approaching this proposed site and its even busier junction is travelling at 30mph before the entrance to the Golf Club (Lyminge PC),</li> </ul>			
	<ul style="list-style-type: none"> <li>Lyminge Parish Council (LPC) is supportive of the inclusion of this site. In particular LPC supports criterion 3 and wishes it to be enhanced by the inclusion of green spaces with planting within the site to reflect the rural nature of the site.</li> </ul>	Noted.	No action required.	
	<ul style="list-style-type: none"> <li>Worry that development here would set a precedent for further development of the golf course and the AONB,</li> </ul>	Noted; with the allocation the settlement confines will be redrawn to provide protection to the AONB outside these areas within the plan period. The allocation will meet the requirements set out in the Core Strategy for Etchinghill. Criteria within the policy will ensure that the development is of high quality and helps to maintain the Kent Downs AONB as	No action required	
	<ul style="list-style-type: none"> <li>KCC- Suggest that requirement 5 is revised to: 5. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</li> </ul>	Agree.	Amend criterion 8 to state: 'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'	
	<ul style="list-style-type: none"> <li>Pentland Homes (Site owner) confirms the sites availability for development,</li> </ul>	Noted.	No action required.	
Option 7- Do you have any other sites you wish to be considered within the North Downs Character Area?	<ul style="list-style-type: none"> <li>PO9- Peene, 0.23ha parcel of land to the south of Newington Road, Peene. 423 SHLAA Site, non-qualifying due to not meeting the size threshold. Applicant has supplied an illustrative layout supporting this representation (prepared by RDA Architects) explaining that the site can accommodate up to 5 dwellings.</li> </ul>	This site is not considered to be in a sustainable location in terms of the SHLAA process, there are no facilities within a walkable distance.	No action required.	
	<ul style="list-style-type: none"> <li>Etchinghill, Teddars Leas Road, 423a? SHLAA Site, seeks the inclusion as an allocation of a 1.28ha parcel of land to the north of Teddars Leas Road.</li> </ul>	This site is considered to be on 'the wrong side' of the former railway and development here would be encroachment into the countryside and AONB as there is no development to the north east of Etchinghill.	No action required.	
	<ul style="list-style-type: none"> <li>East Hawkinge, 316 SHLAA Site, site has been changed to try to accommodate the council's suggestions, now consists of 2.5ha of land for a 50 dwelling scheme with access taken from the Berries.</li> </ul>	<p>The site adjoins the settlement boundary of Hawkinge, a rural centre in the North Downs Character Area with good facilities and transport links. The site is relatively close and walkable to the centre of Hawkinge.</p> <p>The site area has once again been revised and reduced in size to respond to the previous SHLAA conclusions, from 10ha to 2.5ha. However, the site is a greenfield expansion within the Kent Downs AONB and sequentially would not be a preferred site while there remain brownfield sites or sites within the settlement boundary.</p>	No action required.	

<p>•Sellindge (West) two new sites, the land is on Ashford Road, Sellindge and comprises agricultural land situated between existing residential development. The first site PO1a is 0.52ha and the second site PO1b is 3.16ha.</p>	<p>PO1a (small parcel)- The site is open countryside and an outlying greenfield gap in the linear and sporadic development which has taken place along the Ashford Road (A20) in Sellindge. These gaps allow views to further open countryside and towards the AONB beyond, helping to maintain the rural feel and character of the village. The infill would merge two small pockets of existing development. However the Core Strategy (2013) focused on creating a central village core and a broad location was allocated. It was further suggested that the outlying pockets of development might have their settlement boundaries removed in the future. The allocation of this site would further reinforce the linear nature of the village and the lack of identify this has created in the past.</p> <p>The site is a fair walk away from the central Sellindge area where most of the facilities are located, however it is only a short walk away from the Church, Public House and Potten Farm shop.</p> <p>PO1b (large parcel)- The site is open countryside and an outlying greenfield gap in the linear and sporadic development which has taken place along the Ashford Road (A20) in Sellindge. These gaps allow views to further open countryside and the AONB beyond, helping to maintain the rural feel and character of the village. The infill would merge two small pockets of existing development. The site also extends further back and is not just infill but a large extension into the open countryside and the setting of the AONB beyond.</p> <p>The Core Strategy (2013) focused on creating a central village core and a broad location was allocated. It was further suggested that the outlying pockets of development might have their settlement boundaries removed in the future. The allocation of this site would further reinforce the linear nature of the village and the lack of identify this has created in the past.</p> <p>The site is a fair walk away from the central Sellindge area where most of the facilities are located however it is only a short walk away from the Church, Public House and Potten Farm shop.</p>	<p>No action required.</p>	
<p>•PO2- Newingreen, 1.43ha site situated between existing residential development fronting Ashford Road,</p>	<p>The site is unsuitable to be considered for development within the Places and Policies Local Plan document because at present Newingreen is not identified as a sustainable location within the Core Strategy. However this site would be appropriate to look at again if put forward for development as part of the Core Strategy Review.</p>	<p>No action required.</p>	
<p>•PO4- Lyminge, 3.8 ha site on the south western edge of the village which is capable of accommodating 50 dwellings,</p>	<p>The site would go against the current urban form in the area, to the south west the pattern of development is currently more open, resulting in encroachment into the countryside. In addition the site's impact on the AONB, potential archaeology and access difficulties require specific consideration and investigation.</p>	<p>No action required.</p>	
<p>•PO5- Lyminge, Canterbury Rd, 2 acres, 8-10 houses</p>	<p>This site is considered to be on 'the wrong side' of the former Elham Valley Railway and development here would be encroachment into the countryside and AONB as there is very limited development to the East of Lyminge.</p>	<p>No action required.</p>	
<p>•PO6-Lympne, land north of Aldington Road (zoo car park) 25.25ha, Site 2,</p>	<p>The site lies adjacent on the western side of the Lympne Industrial Estate, completely detached from the settlement boundary of Lympne village.</p> <p>Whilst this site offers few constraints, development in this location would constitute urbanisation of the countryside and impact on the setting of the neighbouring AONB. The distances to the closest services and a lack of pedestrian footways mean that development in this location would not constitute sustainable development.</p> <p>It is considered that this site is not an appropriate location for residential development as part of the Places and Policies Local Plan but could be assessed for the Core Strategy Review if put forward for development as part of that process.</p>	<p>No action required.</p>	



<p>PO7- Lympe, land south of Aldington Road/West of Castle Close, 11.95ha.</p>	<p>The site lies adjacent to the village of Lympe. Whilst the site performs well against a number of the sustainability criteria, it is considered that a development of this scale would represent a significant expansion of village – more appropriate for higher order settlements - that would potentially result in serious and harmful impacts on the SSSI, AONB and surrounding landscape.</p> <p>Development would represent a large encroachment into the countryside bringing the urban form across Aldington Road to the ridge of the escarpment. The site's proximity to the SSSI would likely to have significant impact on nature conservation and biodiversity. Whilst the tree belt to the south offers a screen to the site, it is likely that some roofscapes and street lighting would be visible looking into the site from the Romney Marsh and detracting from the qualities of the AONB and historic landscape.</p>	<p>No action required.</p>	
<p>•Elham, various</p>	<p>These sites had various constraints and none were appropriate for development.</p>	<p>No action required.</p>	
<p>•PO8- Stanford, 0.9ha, land to the rear of Touchwood</p>	<p>This is backland development located behind houses fronting Stone Street, so bounded by gardens on two sides and open countryside. Although centrally located in the village it would act as a freestanding estate and there are very few facilities in Stanford.</p>	<p>No action required.</p>	

Preferred Options Policy	Comments received	Response from the Council	Action by the Council	Revised Draft Policy
<b>General Comments Housing &amp; Built Environment</b>	Add policy to ensure developments include a mix of housing, types, tenures and sizes, so there is a range of types (such as lifetime homes, extra care housing, bungalows) if people wish to downsize and release family housing.	Detail regarding house style and size is dealt with at the planning application stage and will be assessed against the design criteria set out in the Places and Policies Local Plan. The range of housing sought from new developments is set out in Core Strategy Policy CSD2 - District Residential Needs and it is not the purpose of the Places and Policies Local Plan to repeat the existing policy framework.	No change necessary.	
	Policies need better justification and wording to ensure they are clear and effective. Many of the policies depend upon application specific negotiation or viability assessment to take place before an implementable scheme can be agreed. This will be time consuming resulting in delays. This is not in the spirit of national planning policy.	Comment noted. Many of the policies have been amended with more clarification added to ensure they are clear and effective.	No change necessary.	
	Issues and Options document provided a specific policy (GD2) for residential amenity with three options including; criteria to ensure adequate amenity, internal standards and provision of private space. No such policy has been included in the Preferred Options document; there is simply reference to residential amenity throughout the document as a consideration in achieving other aims.	Residential amenity is safeguarded in Policy HB8: Alterations and Extensions to Residential Buildings which includes a criterion stating 'alterations or extensions should protect the residential amenity of the occupants of neighbouring properties and ensure avoidance of unacceptable overlooking and interlooking'. This policy also refers to the 45 degree rule to prevent overshadowing. In addition, policy HB3: Internal and External Space Standards relates to space in new developments.	No change necessary.	
	London Ashford Airport and its potential impacts upon the form and the residential amenity of future developments must be taken into account in the local plan strategy in order to accord with paragraph 123 of the NPPF. There has been no justification as to the reasoning for removing such a policy and the NPPF specifically addresses the importance of the operation of existing business. We request that the impact of the future expansion of LAA is recognised as a material consideration in addressing the allocation of land for residential development. The document proposes a large number of dwellings within the vicinity of the airport.	The London Ashford Airport expansion has planning permission, so it is not considered necessary for a new policy in this Plan.	No change necessary.	
<b>Policy HB1 Quality Places Through Design</b> Planning permission will be granted where the proposal: 1. Makes a positive contribution to its location and surroundings, enhancing integration whilst also respecting existing buildings and land uses, particularly with regard to layout, scale, form, density and materiality so as to ensure all proposals create places of character 2. Facilitates and enables circulation and ease of movement within the locality for all users, promoting low vehicle speeds, integrated resident and visitor parking and prioritising active forms of travel with roads, footways and paths appropriately located to allow for natural surveillance whilst maximising legibility 3. Creates, enhances, improves and integrates areas of public open space, green infrastructure, biodiversity and other public realm assets 4. Does not lead to an adverse impact on the amenity of future occupiers, neighbours, or the surrounding area and avoids the creation of single aspect north facing dwellings 5. Provides clear definition between the public and private realm, incorporating high quality landscaping and boundary treatments and delivering quality public spaces, inclusive of details of their future maintenance and management 6. Complies with other relevant policies within this plan and the Core Strategy, responding positively to the design policies and guidance listed and within relevant Village Design Statements and Neighbourhood Plans.	The increased demand for retirement accommodation	Comment noted.	No change necessary.	<b>HB1 Quality Places Through Design</b> Planning permission will be granted where the proposal: 1. Makes a positive contribution to its location and surroundings, enhancing integration while also respecting 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; 2. Facilitates circulation and ease of movement within the locality for all users, promoting low vehicle speeds, integrated resident and visitor parking and prioritising active forms of travel with roads, footways and paths appropriately located to allow for natural surveillance while maximising legibility; 3. Creates, enhances and integrates areas of public open space, green infrastructure, biodiversity and heritage and other public realm assets; 4. Does not lead to an adverse impact on the amenity of future occupiers, neighbours, or the surrounding area, taking account of loss of privacy, loss of light and poor outlook. In assessing the potential impacts of new build residential development on neighbouring dwellings, the Council will apply the same guidelines as for alterations and extensions set out in Policy HB8; 5. Provides a clear definition between the public and private realm, incorporating high quality hard and soft landscaping, boundary treatments, public open spaces and lighting, including details of future maintenance and management; and 6. Complies with other relevant policies within the development plan and responds positively to the design policies and guidance contained within relevant Town and Village Design Statements and Neighbourhood Plans.
	Development should also sit well (and in proportion) with its neighbours and, in the case of Hythe, within its historic setting. Conservation areas should be treated more sensitively than they are at present.	Comment noted.	No change necessary.	
	Discrepancies between the artist's impression and the final built form/scale. Strict checks need to be made of the accuracy of the relationship with adjacent buildings so residents have factual information on which to base their comments to avoid lack of trust by the community for the Planning process and the impression that residents are being misled.	National and local validation requirements require scaled drawings, including site plans, elevations and floor plans, to be submitted with each planning application in order to make it valid. Whilst artist's impressions are useful to visualise proposed schemes, they should not be relied upon by residents to illustrate the size and scale of the proposed development. Residents should always refer back to the scaled drawings to assess any impacts on their properties.	No change necessary.	
	Communities already have their own identities and will feel threatened by new development. Any proposals should take account the current community and their health and well being and needs too.	The policy wording states that the proposal should enhance integration whilst also respecting existing buildings. Health and Wellbeing policies within Chapter 16 of the plan, particularly Policy HW2: Improving the Health and Wellbeing of the Local Population and Reducing Health Inequalities, ensure that health and wellbeing of the local population is assessed.	No change necessary.	
	Bayeuxfields development in Hawkinge - planners must ensure that council services are able to accommodate new developments. E.g. trees encroach on to footpaths, weeds and grass grow in gutters, block paved paths and communal parking areas, road and path markings have worn away, damaged or faded street signs, lack of parking restrictions leads to blocked footpaths, garages are usually used for storage, insufficient number of litter bins, locations of bus stops for a route extension still not determined, transport plans should be developed in parallel with construction, local household recycling site was closed. There is a lack of local services. Expanding communities need more health centres, schools, shops, restaurants, community facilities and pubs. Omission of these means the construction of ever increasing dormitories with no community enhancement.	For larger housing schemes, a management company would usually be established and details of maintenance submitted to the Council for consideration, however often disputes regarding long-term maintenance should be dealt with privately by the management company and residents concerned. In addition, the Infrastructure Delivery Plan identifies where new infrastructure is necessary to serve the existing and proposed population and contributions will be sought to provide these additional facilities.	No change necessary.	
	Distinctive Character should not mean deliberately incongruous. Form, scale, detailing and materials are essential particularly in historic settings like Hythe on the seafront and other areas which are highly visible to the community.	Policy HB2: Cohesive Design ensures cohesive and high quality design for developments to integrate into the neighbourhood and create a place with locally inspired or otherwise distinctive character which relates well to the local landscape.	No change necessary.	
	There is a need for high quality architecture & materials. To date there is a distinct lack of architectural quality and skills. Housing is often poorly designed & poorly finished. This diminishes the visual & social quality of the area	Policy HB2: Cohesive Design ensures cohesive and high quality design for developments to integrate into the neighbourhood and create a place with locally inspired or otherwise distinctive character which relates well to the local landscape.	No change necessary.	
	Traffic impact seems to be ignored, no evidence of a Transport Plan to mitigate the impact of future developments. Bus services, cycle facilities, road safety schemes should be a requirement for all substantial proposals so Section 106 monies can be accumulated to carry out necessary works.	Individual site policies include a requirement for a transport assessment to be carried out for large scale schemes. In addition, policies within Chapter 13 relating to transport ensure that proposed development schemes consider street hierarchy, layout and parking standards.	No change necessary.	
	Hythe Town Council supports this policy. <b>(Hythe Town Council)</b>	Support noted.	No change necessary.	
	Include 'Town', to read "...within relevant Town and Village Design Statements and Neighbourhood Plans" <b>(New Romney Town Council)</b>	Criteria including reference to <b>Town</b> Design Statement will be added to Policy HB1: Quality Places Through Design.	Include additional criteria in the policy wording	

	Phides support the Council's design objectives outlined within Policy HB1 and accept the need for developments to be accordance with design policies and guidance listed within relevant Village Design Statements and Neighbourhood Plans, but these documents should themselves supplement adopted and emerging Development Plan policies rather than seek to inform them.	Noted.	No change necessary.	
	It is important that new development respects existing character and does not harm, and where possible enhances, the significance of heritage assets (NPPF para 129). The historic environment is not mentioned in the text at present and so it is suggested that item 3 be amended to:  <i>3. Creates, enhances, improves and integrates areas of public open space, heritage assets, green infrastructure, biodiversity and other public realm assets (KCC Conservation)</i>	Suggestion noted. This criterion will be re-worded to reflect the wording suggested by Kent County Council Conservation to ensure that all policies are consistent and worded correctly.	Amend criterion 3 wording within Policy HB1	
	Inclusion of planted areas is admirable but financial allowance must be made to maintain those areas. This was not the case when Bayeuxfields was built in Hawkinge, the only landscaping work regularly carried out is mowing common areas. Trees overhang paths, shrubs encroach onto footpaths, giving some areas a look of dereliction.	Details regarding landscaping are often dealt with by planning condition, and for larger schemes a management company would be established and details of maintenance submitted to the Council for consideration, however often disputes regarding maintenance should be dealt with privately by the management company and residents concerned.	No change necessary.	
	Policy should emphasise the importance of the context of site and its surroundings. This should include the restoration and integration of existing natural features, and the use of locally relevant architectural features and materials. Development should strengthen local distinctiveness, even if a modern/innovative architecture is deemed appropriate. It is important that development responds to settlement character, form and pattern, and takes account of landscape pattern (such as field boundaries), historic features and the cultural context. Development should also take account of dark skies and tranquillity as valued features. Tranquillity and light pollution mapping is available on the CPRE website. Part 4 of the policy refers to avoiding the creation of single aspect north facing dwellings. The policy should be more proactive and ensure that layout and design takes advantage of local climate and site conditions to incorporate passive solar heating and energy efficient landscaping strategies. (CPRE Shepway)	Policy HB2: Cohesive Design ensures that new development should work with the site and its context, and also makes reference to existing landscape features, together with local landscape character and distinctiveness. This policy will be re-worded as statements rather than questions to remove any ambiguity for developers and set out clearly what is expected from new development, however the themes of the policy will remain the same.	Reword policy HB2 to give clearer guidance.	
	Drawings included in applications must show accurately scaled plans, elevations and artist's perspectives. These submissions must not mislead the Planning Committee and public. There has been an example in Hythe where inaccurate drawings lulled the public into believing that the scale of a development was appropriate.	National and local validation requirements require scaled drawings, including site plans, elevations and floor plans, to be submitted with each planning application in order to make it valid. Whilst artist's impressions are useful to visualise proposed schemes, they should not be relied upon by residents to illustrate the size and scale of the proposed development. Residents should always refer back to the scaled drawings to assess any impacts on their properties.	No change necessary.	
	There is a heavy emphasis on cycling to the detriment of other forms of transport. The plan needs to recognise that the topography of East and Central Folkestone is not conducive to cycling and that the profile of residents in terms of age, wealth (both extremes) is unlikely to result in high usage of cycling facilities. Heritage Assets in the District need to play a more important role in new developments (Shepway HEART Forum)	Cycling contributes to the health and wellbeing of people in the district. This comment is noted in respect to Folkestone, however other parts of the district benefit from well-connected cycle infrastructure, including the national cycle network, which positively supports the objectives to increase cycling use. Use of public transport is also supported in Policy HB2: Cohesive Design.	No change necessary.	
	There is no justification put forward to identify why single aspect north facing dwellings are unacceptable.	Comment noted.	No change necessary.	
	We welcome the acknowledgement of the Sandgate Design Statement in paragraph 9.9(Sandgate Parish Council)	Support noted.	No change necessary.	
	It would be useful if a design guide were in place for all areas in Shepway.	Suggestion noted.	No change necessary.	
<b>Policy HB2 Cohesive Design</b> Development will be permitted if it accords well and/or 'speaks to' the existing locality, where the site and surroundings are physically and visually interrelated in respect of building form, mass, height and elevational details. Any proposals should also ensure that the local character is protected, particularly with regards to sky and tree lines, and the protection of spaces between the buildings. An explanation of the rationale behind siting, massing and proposed elevation as well as spatial treatments will be required for all applications. For major developments, complex or sensitive sites, a design statement will be required which demonstrate compliance with Building for Life 12. This should contain consideration of the following: <b>Integrating into the Neighbourhood Connections:</b> Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones; whilst also respecting existing buildings and land uses along the boundaries of the development site? <b>Facilities and services:</b> Does the development provide (or is it close to) community facilities such as shops, schools, workplaces, parks, play areas, pubs and cafés? <b>Public transport:</b> Does the scheme have good access to public transport to help reduce car dependency? <b>Meeting local housing requirements:</b> Does the development have a mix of housing types and tenures that suit local requirements? <b>Creating a Place Character:</b> Does the scheme create a place with a locally inspired or otherwise distinctive character? How does it relate to the local landscape character or any distinctiveness? <b>Working with the site and its context:</b> Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and micro-climates? Creating well defined streets and spaces. Are buildings designed and	With regard to the amenity space could you please add outdoor facilities to dry washing naturally  Support, particularly regarding character, working with the site and context(Hythe Town Council)	Domestic paraphernalia such as washing lines are not a consideration for planning policy and if necessary will be conditioned at the planning application stage.  Support noted.	No change necessary.  No change necessary.	<b>HB2 Cohesive Design</b>  For major housing developments or complex proposals or on sensitive sites, a design statement should be prepared which demonstrates compliance with Building for Life 12, as far as is reasonably practicable. The statement should demonstrate how the proposal:  Integrates into the Neighbourhood 1.Integrates into its surroundings by reinforcing existing connections and creating new ones where appropriate; while also respecting existing buildings and land uses along the boundaries of the development site; 2.Provides (or is located close to) community facilities such as shops, schools, workplaces, parks, play areas, pubs and cafés; 3.Has good access to public transport to help reduce car dependency; and 4.For housing development, provides a mix of housing types and tenures that meet local requirements.  Creates a Place 5.Creates a place with a locally inspired or otherwise distinctive character, well related to the local landscape character; 6.Takes advantage of existing topography, landscape features (including water courses), trees which contribute positively to the landscape; wildlife habitats, existing buildings, heritage assets, site orientation and micro-climates; 7.Integrates buildings with landscaping to define and enhance streets and spaces and turn street corners well; and 8.Makes it easy for residents and visitors to find their way around.  Creates Streets and Homes 9.Creates streets that encourage low vehicle speeds and social interaction; 10.Provides well integrated parking that does not dominate the street;
	Heritage assets have a significant role to play in establishing a sense of place; they add character and distinctiveness to towns and villages that may be otherwise essentially similar. It is suggested that the section on 'Working with the site and its context' makes specific reference to the role of heritage assets:  <i>Working with the site and its context: Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, heritage assets, existing buildings, site orientation and micro-climates? (KCC Heritage)</i>	Suggestion noted. This criterion will be re-worded to reflect the wording suggested by Kent County Council Heritage to ensure that all policies are consistent and worded correctly.	Amend criterion 3 wording within Policy HB2: Cohesive Design.	
	You cannot force people to use public transport. Elderly people in particular like to use their cars - and are unable to use bicycles! Hythe has an above average of older age groups.It is also essential to include facilities for off-street parking. This is not easy in Hythe's conservation area, but it is not an impossible task either with some carefully thought out plans.	Public transport use is encouraged within policy HB2: Cohesive Design to help reduce car dependency, however it is noted that public transport use is not always convenient or accessible for some residents in Shepway.	No change necessary.	
	The policy should go further to emphasise the importance of demonstrating that layout and design has responded to landscape character and pattern, has retained and enhanced habitat networks and has responded to settlement character and form and any historic (including cultural) context. In addition, development proposals should demonstrate that they are able to contribute to delivering a modal shift to sustainable transport modes. (CPRE Shepway)	This policy will be re-worded as statements rather than questions to remove any ambiguity for developers and set out clearly what is expected from new development.	Reword policy HB2 to give clearer guidance.	

<p><b>Creating well defined streets and spaces:</b> Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are the buildings designed to turn street corners well?  <b>Easy to find your way around:</b> Is the scheme designed to make it easy to find your way around?  <b>Street and Home</b> Streets for all: Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?  <b>Car parking:</b> Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?  <b>Public and private spaces:</b> Will public and private spaces be clearly defined and designed to be attractive, well managed and safe?  <b>External storage and amenity space:</b> Is there adequate external storage space for bins and recycling as well as vehicles and cycles?</p>	<p>There is a heavy emphasis on cycling to the detriment of other forms of transport. The plan needs to recognise that the topography of East and Central Folkestone is not conducive to cycling and that the profile of residents in terms of age, wealth (both extremes) is unlikely to result in high usage of cycling facilities. Heritage Assets in the District need to play a more important role in new developments. <b>(Shepway HEART Forum)</b></p>	<p>Cycling contributes to the health and wellbeing of people in the district. This comment is noted in respect to Folkestone, however other parts of the district benefit from well connected cycle infrastructure, including the national cycle network, which positively supports the objectives to increase cycling use. Use of public transport is also supported in Policy HB2: Cohesive Design.</p>	<p>No change necessary.</p>	<p>10. Provides well integrated parking that does not dominate the street;  11. Clearly defines public and private spaces and ensures they are attractive, can be well managed and are safe; and  12. Provides adequate external storage space for refuse and recycling as well as storage for vehicles and cycles.</p>
<p><b>Policy HB3</b>  <b>Development of residential gardens</b>  Development proposals involving the complete or partial redevelopment of residential garden land will be permitted provided that:  1. The proposal responds to the character and appearance of the area, taking into account the views from streets, footpaths and the wider residential and public environment  2. The size of plot to be developed is of an appropriate size and shape to accommodate the proposal, taking into account the scale, layout and spacing of existing and surrounding buildings, the amenity of adjoining residents, and the requirements for living conditions set out in Policies HB5  3. Any loss of biodiversity value on the site will be mitigated, and where practicable measures to enhance biodiversity through habitat creation or improvement are incorporated.</p>	<p>The Sandgate Society opposes a default position that building in back gardens would be permissible. This would/could change area characteristics and promote high density housing. A default position should be development is not permitted with applications assessed on individual merit taking into account design. <b>(Sandgate Society)</b></p>	<p>The policy wording ensures that garden development will only be permitted subject to certain criteria including character and appearance of the area and appropriate plot size and shape. The policy wording will, however, be amended to ensure that the policy relates to residential gardens within settlement boundaries so that garden development in the countryside is restricted.</p>	<p>Amend Policy HB10: Development of Residential Gardens to ensure that the policy relates to residential gardens within settlement boundaries so that garden development in the countryside is restricted.</p>	<p><b>HB10 Development of Residential Gardens</b> (please note this chapter has been re-ordered)  Development proposals involving the complete or partial redevelopment of residential garden land within settlement boundaries will be permitted provided that:  1. The proposal responds to the character and appearance of the area, as well as the layout and pattern of the existing environment, taking into account views from streets, footpaths and the wider residential and public environment;  2. The plot to be developed is of an appropriate size and shape to accommodate the proposal, taking into account the scale, layout and spacing of nearby buildings, the amenity of adjoining residents and the requirements for living conditions set out in Policy HB3: Internal and External Space Standards;  3. Adequate access and parking is provided; and  4. The proposal incorporates established trees wherever possible. Any loss of biodiversity value on the site is mitigated, and where practicable, measures to enhance biodiversity through habitat creation or improvement are incorporated.</p>
<p>Strongly support. Building on gardens has often led to overcrowding. <b>(Hythe Town Council)</b></p>	<p>Kent Downs AONB Unit is concerned that this does not restrict development of residential gardens in open countryside. This could cause inappropriate residential development outside of settlements, and within the AONB. This is not in compliance with para 55 of the NPPF that seeks to avoid isolated new homes in the countryside. Reference to the proposal being within an existing town or village should be included in policy wording. <b>(Kent Downs AONB Unit)</b></p>	<p>The policy wording ensures that garden development will only be permitted subject to certain criteria including character and appearance of the area and appropriate plot size and shape. The policy wording will, however, be amended to ensure that the policy relates to residential gardens within settlement boundaries so that garden development in the countryside is restricted.</p>	<p>Amend Policy HB10: Development of Residential Gardens to ensure that the policy relates to residential gardens within settlement boundaries so that garden development in the countryside is restricted.</p>	
<p>Oppose. This permits 'back garden' development of new, separate dwellings splitting existing plots. Such developments should not be default and should only be accepted if there are overriding merits to an application. <b>(Sandgate Parish Council)</b></p>	<p>Support noted.</p>	<p>The policy wording ensures that garden development will only be permitted subject to certain criteria including character and appearance of the area and appropriate plot size and shape. The policy wording will, however, be amended to ensure that the policy relates to residential gardens within settlement boundaries so that garden development in the countryside is restricted.</p>	<p>Amend Policy HB10: Development of Residential Gardens to ensure that the policy relates to residential gardens within settlement boundaries so that garden development in the countryside is restricted.</p>	
<p>9.14 Please add to the end of paragraph 'and the historic environment',  It is suggested that an additional point is added in HB3:  4. The proposal will not result in unacceptable harm to heritage assets (whether designated or not) or their setting. <b>(KCC Heritage)</b></p>	<p>Suggestion noted. An additional criterion will be added to reflect the wording suggested by Kent County Council Heritage to ensure that all policies are consistent and worded correctly.</p>	<p>Additional criterion to be added within Policy HB3: Internal and External Space Standards.</p>		
<p>Objecting. Policy fails to take account of sustainability in the location of the site and access to services and employment without relying on a private car. Development in a garden that is not associated with a settlement should be considered isolated rural development, would not represent sustainable development. The importance of sustainability of location, and the relationship to a settlement is not clear in this policy. The restraint on development of gardens in rural areas should be clear. Importance of gardens to wildlife is important to recognise, as are their value in reducing rainwater run-off from urban areas. Supporting text should reference these issues. Policy should refer to the necessary design responses in more detail. Although biodiversity is mentioned, the supporting text would benefit from discussing potential design responses, such as ensuring gardens are permeable to wildlife (e.g. hedgehog gaps in fences), the benefits of retaining / replacing garden ponds, and the potential for designing bat/swift etc. boxes into new buildings. The policy should reference the wider landscape and countryside setting. The contribution of gardens to historic character and pattern is also relevant. The impact of additional development on the availability of car parking may be relevant. Should make reference to prevailing density, and the massing and height of existing buildings. <b>(CPRE Shepway)</b></p>	<p>The policy wording ensures that garden development will only be permitted subject to certain criteria including character and appearance of the area and appropriate plot size and shape. The policy wording will, however, be amended to ensure that the policy relates to residential gardens within settlement boundaries so that garden development in the countryside is restricted.</p>	<p>The policy wording ensures that garden development will only be permitted subject to certain criteria including character and appearance of the area and appropriate plot size and shape. The policy wording will, however, be amended to ensure that the policy relates to residential gardens within settlement boundaries so that garden development in the countryside is restricted.</p>	<p>Amend Policy HB10: Development of Residential Gardens to ensure that the policy relates to residential gardens within settlement boundaries so that garden development in the countryside is restricted.</p>	
<p><b>Policy HB4</b>  <b>Alterations and extensions to existing buildings</b>  Alterations and extensions to existing buildings should reflect the scale, proportions, materials, roofline, and detailing of the original building and should not adversely affect the amenity enjoyed by the occupiers of neighbouring properties or have a detrimental impact upon the streetscene, either in itself or on a cumulative basis.  Applications for extensions to existing residential buildings will be permitted in the following cases:  1. The extension does not cause undue overshadowing of neighbouring property and allows adequate light and ventilation to existing rooms within the building. Single storey extensions should be designed so as to fall within a 45o angle from the centre of the nearest ground floor window of a habitable room or the kitchen of the neighbouring property. In the case of two-storey extensions, the 45o angle is taken from the closest quarter point of the nearest ground floor window of a habitable room or kitchen  2. Side extensions may be added to detached or semi-detached dwellings where space is available. Care should be taken to avoid creating a terracing effect which could result by extending up to the boundary. A minimum distance of 1 metre should be maintained from the boundary and any part of the extension above single storey level including the roof.  3. Single storey flat-roofed extensions will be permitted only if they are well-designed, and the proposed extension would not be generally visible from a public place and would serve only as an adjunct to the main building. Use of 'green' or 'brown' roofs is to be encouraged. Two storey flat-roofed extensions cannot be considered acceptable, unless the property itself is of a flat roof design.  4. Loft conversions requiring dormer extensions will be in proportion to the existing roof, thus maintaining overall building proportions. This will avoid presenting a top-heavy and flat-roofed appearance. Planning applications for extensions in roof spaces which front a highway will ensure that the proposed structure avoids damage to the architectural and aesthetic character of the existing building, and maintains the integrity of the overall streetscene.  5. Alterations or extensions should protect the residential amenity of the occupants of</p>	<p>Hythe Town Council supports this policy. <b>(Hythe Town Council)</b></p>	<p>Support noted.</p>	<p>No change necessary.</p>	<p><b>HB8 Alterations and Extensions to Residential Buildings</b> (please note this chapter has been re-ordered)  Alterations and extensions to existing buildings should reflect the scale, proportions, materials, roof line and detailing of the original building and not have a detrimental impact on the street scene, either by themselves or cumulatively. Alterations and extensions should protect the residential amenity of the occupants of neighbouring properties and ensure avoidance of unacceptable overlooking and inter-looking.  Applications for extensions to existing residential buildings will be permitted where:  1. The extension does not cause undue overshadowing of neighbouring properties and allows adequate light and ventilation to existing rooms within the building. Single storey extensions should be designed so as to fall within a 45o angle from the centre of the nearest ground floor window of a habitable room or the kitchen of the neighbouring property. In the case of two-storey extensions, the 45o angle is taken from the closest quarter point of the nearest ground floor window of a habitable room or kitchen. This covers all elevations of the neighbouring property and conservatories, if they are clearly used as a habitable room. Patio or fully glazed doors will be treated as windows for this test, but not solid panel doors or those half-glazed;  2. For side extensions care should be taken to avoid creating a terracing effect which could result by extending up to the boundary. A minimum distance of one metre should be maintained from the boundary to any part of the extension above single-storey level;  3. Single-storey flat-roofed extensions will be permitted only if they are well-designed, and the proposed extension would not be generally visible from a public place and would serve only as an adjunct to the main building. Use of 'green' or 'brown' roofs will be encouraged. Two-storey flat-roofed extensions will not be considered acceptable, unless the property itself is of a flat roof design;  4. Loft conversions requiring dormer extensions will be in proportion to the existing roof, thus</p>
	<p>The general consistency of policies for residential amenities (including gardens) and particularly extensions and annexes in the countryside with those in Rother District Council's emerging 'Development and Site Allocations Local Plan – Options and Preferred Options' is noted. <b>(Rother District Council)</b></p>	<p>Comment noted.</p>	<p>No change necessary.</p>	

<p>neighbouring properties and ensure avoidance of unacceptable overlooking or interlooming.</p> <p>6. Garages should be set back 5.5 metres from the highway boundary. This will enable a vehicle to stand clear of the highway whilst the doors are being opened or for cleaning or maintenance purposes.</p> <p>7. The following additional criteria for extension should be met in addition to the above, to maintain the visual quality of the street:</p> <p>a. The width of the extension should be less than or equal to half the width of the original frontage of the property.</p> <p>b. The depth of the extension should be less than or equal to half the depth of the garden.</p> <p>c. The extension should respect the building line to all streets onto which the property faces.</p> <p>d. The extension should be subservient to the property.</p> <p>e. The extension should maintain the open character of the plot, where this is a feature of the streetscene. In addition to the above, proposals for alterations and extensions (including annex accommodation) to buildings in the countryside should be proportionate to the size and scale of the original dwelling and must not adversely impact on the quality and character of the landscape or be detrimental to the rural setting.</p> <p>Extensions or annexes for dependants accommodation, especially in the countryside, should be attached and have access to the existing dwelling, and should not be converted to two dwellings when the need for the annex has ceased.</p>	<p>Garages should be set back at least 6 metres from the edge of the highway boundary as garage doors open outwards and protrude into the space in front. <b>(KCC Highways)</b></p> <p>It is suggested that the additional point is added into Policy HB4 to take account of the Historic Environment in altering and converting buildings:</p> <p>'Alterations or extensions should respect the building and location's historic character and should not result in unacceptable harm to heritage assets (whether designated or not) or their setting.' <b>(KCC Conservation)</b></p>	<p>Suggestion noted. This criterion will be re-worded to reflect the wording suggested by Kent County Council Highways to ensure that all policies are consistent and worded correctly.</p> <p>Suggestion noted. This criterion will be re-worded to reflect the wording suggested by Kent County Council Conservation to ensure that all policies are consistent and worded correctly.</p>	<p>Amend criterion 9 of Policy HB8: Alterations and Extensions to Residential Buildings to accord with comments received from Kent County Council Highways</p> <p>Amend criterion 7 wording within Policy HB8: Alterations and Extensions to Residential Buildings.</p>	<p>maintaining overall building proportions. They should avoid presenting a top-heavy and flat-roofed appearance. Planning applications for extensions in roof spaces which front a highway will ensure that the proposed structure avoids damage to the architectural and aesthetic character of the existing building, and maintains the integrity of the street scene;</p> <p>5. To maintain the visual quality of the street:</p> <ul style="list-style-type: none"> <li>• The width of the extension should be less than or equal to half the width of the original frontage of the property;</li> <li>• The depth of the extension should be less than or equal to half the depth of the garden;</li> <li>• The extension should respect the building line to all streets onto which the property faces;</li> <li>• The extension should be subordinate to the property;</li> <li>• The extension should be of materials that complement those of the existing building;</li> <li>• Fenestration should complement the proportions and alignment of fenestration in the existing building; and</li> <li>• The extension should maintain the open character of the plot, where this is a feature of the street scene;</li> </ul> <p>6. Alterations and extensions to dwellings in flood zones 2 and 3 shall not have floor levels below those of the existing dwelling, and this should be demonstrated on the submitted drawings. This is to ensure the safety of the occupants;</p> <p>7. Alterations and extensions should respect the building and location's character and should not result in unacceptable harm to heritage assets (whether designated or not) or their setting;</p> <p>8. Proposals for alterations and extensions to dwellings in the countryside should be proportionate to the size and scale of the original dwelling and must not adversely impact on the quality and character of the landscape or be detrimental to the rural setting; and</p> <p>9. Garages should be set back six metres from the highway boundary. This is to enable a vehicle to stand clear of the highway while the doors are being opened or for cleaning or maintenance purposes.</p> <p>The Council will also apply the considerations set out above in assessing the impact of new build residential development on existing dwellings neighbouring or close to the proposal.</p>
<p><b>Policy HB5</b> <b>Internal and external space standards</b></p> <p>Planning permission will be granted for all new development and conversions where the proposed scheme:</p> <p>1. Meets, and wherever viable exceeds, the nationally described internal space standards;</p> <p>2. Provides an area of private open space for each new or converted dwelling as one or more of the following:</p> <p>a. A private usable balcony area with a minimum depth of 1.5m.</p> <p>b. An area of private garden for the exclusive use of an individual dwellinghouse of at least 10m in depth and the width of the dwelling.</p> <p>3. Demonstrates consideration of the acoustic environment of outside spaces so they can be enjoyed as intended.</p> <p>4. In the case of certain types of conversions, including those in Conservation Areas, an area of private garden for the exclusive use of the residents of a set of flats, provided pro rata, may be acceptable in place of individual balconies or terraces. For example, a building containing seven flats, three of which have four bedspaces; four of which have three bedspaces, should seek to provide a private amenity area of at least 45m<sup>2</sup> ((3*7)+(4*6)). In exceptional cases, on particularly constrained sites, commuted sums to provide off-site amenity areas may be paid.</p> <p>The District Council will consider variation to the external space standards if it can be demonstrated through the Design and Access Statement.</p>	<p>Ensure that new communities are 'dementia friendly' –familiar, legible, distinctive, accessible, comfortable, safe <b>(Hythe Town Council)</b></p> <p>The general consistency of policies for residential amenities(including gardens) and particularly extensions and annexes in the countryside with those in Rother District Council's emerging 'Development and Site Allocations Local Plan – Options and Preferred Options' is noted. <b>(Rother District Council)</b></p> <p>The policy is currently unsound in specification for compliance with the Nationally Described Space Standard in several respects. The Council cannot require that applicants exceed 'wherever viable' the national standard. Once a local planning authority has adopted the national standard as a policy in its plan then that is all applicants are required to comply with. The Council cannot make applicants go further than the Building Regulations and the optional technical standards. The Written Ministerial statement of 25 March 2015 states that: "From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities...should not set in their emerging Local Plans...or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings." The Written Ministerial Statement goes on to say: "Local planning authorities may also need to review their local information requirements to ensure that technical detail that is no longer necessary is not requested to support planning applications." The only detail the applicants need to provide is to demonstrate that the scheme complies with Building Regulations and the Nationally Described Space Standard (NDSS). They are not required to submit any further information. Secondly, 'where viable' places the onus on the applicant. It is the Council's responsibility to ensure that its policies are viable. Thirdly, it is unclear what the applicant would be required to do to exceed the NDSS to the satisfaction of the Council. Because the policy lacks precision and clarity it is contrary to the NPPF. Fourth, we note that the Council observes that many new developments already meet or exceed the NDSS (paragraph 9.25). The WNS requires that LAs demonstrate a clearly evidenced need for the optional technical standards. The Local Plan suggests that sub-optimal space standards in new dwellings is not an issue in Shepway. The Council will also need to assess the impact of adopting the Nationally Described Space Standard on the viability of development alongside its other policies. <b>(Home Builders Federation Ltd)</b></p>	<p>Policy HB2: Cohesive Design relates to the 12 'Building for Life' principles in new build development. Part of this criteria is to ensure development creates a place with a locally inspired or otherwise distinctive character, well-related to the local landscape character and makes it easy for residents and visitors to find their way around.</p> <p>Comment noted.</p> <p>The policy will be amended to include the nationally described space standards table and the requirement to exceed these standards will be removed from the policy.</p>	<p>No change necessary.</p> <p>No change necessary.</p> <p>Amend Policy HB3: Internal and External Space Standards to comply with national space standards.</p>	<p><b>HB3 Internal and External Space</b> (please note this chapter has been re-ordered)</p> <p>Planning permission will be granted for new build residential development and conversions for residential use where the proposed scheme:</p> <p>1. Meets the nationally described technical housing space standard, or subsequent updates to the standard, including minimum floor-to-ceiling heights;</p> <p>2. Provides an area of private open space for each new or converted dwelling as one or both of the following:</p> <ul style="list-style-type: none"> <li>• A private usable balcony area with a minimum depth of 1.5m for flats, as long as this does not reduce the privacy of neighbouring dwellings;</li> <li>• An area of private garden for the exclusive use of an individual dwelling house of at least 10m in depth and the width of the dwelling. In the case of infill developments there should be sufficient space retained for the original dwelling;</li> </ul> <p>3. Demonstrates consideration of the acoustic environment of outside spaces so they can be enjoyed as intended;</p> <p>4. Provides each dwelling with discretely designed and accessible storage space for the different types of refuse bin; and</p> <p>5. Provides bicycle storage in accordance with Policy T5: Cycle Parking.</p> <p>[Nationally described space standard table inserted here]</p> <p>For certain types of conversions, including those of heritage assets or buildings in Conservation Areas, a communal garden for the exclusive use of the residents of a group of flats may be acceptable in place of individual balconies or terraces. On particularly constrained sites, as an exception, commuted sums may be paid to provide off-site amenity areas.</p> <p>The Council will only consider variations to the external space standards if it can be demonstrated through the Design and Access Statement or site masterplanning that such an approach is needed to reflect the character of the area or provide for a mix of units within a development that create a higher density suitable to the urban nature of the site. In such instances communal or public open space should be provided or be made available within the immediate locality.</p> <p>A minimum of 20 per cent of homes on major new build developments will meet the accessibility and adaptable Building Regulation M4(2) Adaptable Homes standards, with an aspiration that all dwellings meet these standards</p>

	<p>In accordance with the PPG (Para 019 Reference ID: 56-018-20150327), the Council is proposing to adopt the Nationally Described Space Standards. The PPG starts where there is a need for internal space standards 'Local Planning Authorities should justify requiring internal space policies'. (Para: 020 Reference ID: 56-020-20150327). No justification has been provided. The policy therefore, is not 'Consistent with National Policy' and is 'Unsound'. The policy should be deleted. Should the Council provide further justification then the Policy should be applied flexibly to such developments as Shorncliffe Garrison which already benefit from Outline consent, informed by a viability assessment. The assessment did not allow for the introduction of Space Standards and as such the requirement to meet such standards on future phases could risk delivery. The impact of introducing these standards on the viability of permitted development must be taken into consideration and existing consented schemes be excluded from any future requirement if justified. Policy HB5 also proposes the inclusion of external space standards for houses and apartments. Although we welcome the wording of the policy in flexibility in the application of external space standards if it can be demonstrated through a D&amp;A Statement, there is no justification provided for the prescribed garden or balcony sizes. In addition, paragraph 9.28 states that private balconies on the front elevation of flats, on a building on or close to the back edge of the pavement is not likely to provide acceptable private outdoor space. In these circumstances the Policy advocates the use of recessed balconies. We object to the prescriptive requirements of the preamble to this policy as an unreasonable and inflexible approach, imposing design requirements. This is contrary to the NPPF (paras 59 and 60). No justification has been provided for such an approach which would be inflexible and is not reasonably required. As such, the Policy is not 'Justified', would not make the Local Plan 'Effective', is not 'Consistent with National Policy' and is not 'Positively Prepared'. Paragraph 9.28 should be deleted.</p>	<p>There is no requirement for our own locally set standards in the district so the policy reflects the nationally described space standards and therefore no justification is required.</p>	<p>No change necessary.</p>	
<p><b>Policy HB6</b> <b>Self-build/ Custom build development</b> The Council will support self and custom build development by requiring all sites within the Folkestone and Hythe Urban Area delivering more than 40 dwellings to supply no less than 5% of dwelling plots for sale to self or custom builders on the districts Register. Within the North Downs and Romney Marsh Areas sites delivering more than 20 dwellings must supply no less than 5% of dwelling plots for sale to self or custom builders on the districts Register. Subject to the following criteria: 1. Design parameters for custom and self build shall be included within any outline planning application 2. Plots shall be appropriately marketed as self and custom build for a period of at least 12 months before consideration is given to a return to open market units 3. Self and custom build shall be appropriately integrated within the wider development, in accordance with overarching policy requirements and contribute towards the maintenance and management of the public realm</p>	<p>Hythe Town Council supports this policy (<b>Hythe Town Council</b>)</p> <p>It is imperative that the demand for self-build plots be confirmed in consultation with the Council as early in the planning application process as possible. Criterion (2) of Policy HB6, which requires plots to be marketed for 12 months before consideration is given to a return to open market units, could be disruptive to delivery of housing on a site where no such demand is subsequently identified. Phides consider that this policy should include greater flexibility. This should include reference to the monitoring of the Register should demand fall below the potential supply from the proposed allocations. In the case of ND7 (former Lympe Airfield), the Council seeks at least 6 self/custom build plots, it is important that self and custom building housing be integrated with the wider development and that it makes its own contributions in terms of infrastructure and future management and maintenance. The Policy should therefore acknowledge that plots for self-build are discounted from affordable housing, CIL or section 106 requirements.</p>	<p>Support noted.</p> <p>National guidance in the National Planning Policy Framework states that local planning authorities should identify and make provision for the housing needs of different groups in the community including those wishing to build their own homes. Planning Practice Guidance also makes it clear that the Government is keen to support and encourage individuals and communities who want to build their own homes, and is taking active steps to stimulate the growth of the self-build market.</p>	<p>No change necessary.</p>	<p><b>HB4 Self-build and Custom Housebuilding Development</b> (please note this chapter has been re-ordered)</p> <p>The Council will support self-build and custom housebuilding development by requiring:</p> <ol style="list-style-type: none"> <li>1. All sites within the Folkestone and Hythe Urban Area delivering more than 40 dwellings to supply no less than 5 per cent of dwelling plots for sale to self-build or custom housebuilders on the Council's register; and</li> <li>2. All sites within the North Downs and Romney Marsh Areas delivering more than 20 dwellings to supply no less than 5 per cent of dwelling plots for sale to self-build or custom housebuilders on the Council's register.</li> </ol> <p>Development on sites on and above these thresholds shall be subject to the following criteria:</p> <ul style="list-style-type: none"> <li>• Design parameters for self-build and custom housebuilding plots shall be submitted within any outline planning application as part of the Design and Access Statement and shall be in compliance with other policies in the plan;</li> <li>• Plots shall be provided with outline planning permission, services to the boundary and access to the public highway or internal road layout;</li> <li>• Plots shall be appropriately marketed to self-build and custom housebuilders for a period of at least 12 months from commencement of the development before consideration is given to a return to open market units; and</li> <li>• Self-build and custom housebuilding plots shall be appropriately integrated within the wider development, in accordance with relevant policy requirements and contribute towards the wider plan objectives for the maintenance and management of the public realm.</li> </ul> <p>The Council will consider proposals for self-build and custom build homes on schemes below these thresholds positively, subject to other policies in the plan. The Council will encourage local communities to provide plots for self-build and custom build homes in Neighbourhood Plans.</p>
	<p>Self / Custom build may not be appropriate in all sites. The policy should be more flexible and should accord to the level of registration on to the statutory self/custom build register</p>	<p>National guidance in the National Planning Policy Framework states that local planning authorities should identify and make provision for the housing needs of different groups in the community including those wishing to build their own homes. Planning Practice Guidance also makes it clear that the Government is keen to support and encourage individuals and communities who want to build their own homes, and is taking active steps to stimulate the growth of the self-build market.</p>	<p>No change necessary.</p>	
	<p>Cannot support the policy in current format. It is considered that channelling self and custom build housing into large housing schemes is potentially counterproductive and will dissuade prospective self builders from building their own home. Self/custom build housing is a fledgling housing concept which appeals to people because they can design and build a bespoke home for themselves. The danger of shoe-horning self build plots into planned housing estates is that it reduces the attractiveness of the product to the market. One of the key objectives of the self and custom housebuilding act was to promote greater diversity in the industry, supporting small scale developers and reducing the dependence on the major housebuilders for delivery. The draft policy essentially puts self/custom building into the control of the major housebuilders when it is not their specialism or priority. The policy should be amended to avoid channelling self/custom build at volume housebuilding sites and instead support self build housing on smaller scale sites, where the environment is more likely to be conducive to delivering bespoke homes and where self builders are not dissuaded from self building next to/within volume housebuilding developments. (<b>Invicta Self and Custom Build Ltd</b>)</p>	<p>National guidance in the National Planning Policy Framework states that local planning authorities should identify and make provision for the housing needs of different groups in the community including those wishing to build their own homes. Planning Practice Guidance also makes it clear that the Government is keen to support and encourage individuals and communities who want to build their own homes, and is taking active steps to stimulate the growth of the self-build market.</p>	<p>No change necessary.</p>	
	<p>Whilst we acknowledge the Government's support for the provision of housing land for self and custom-building in the Local Plan, making provision of serviced plots of land for such a development is not a statutory requirement. The Government only requires Councils to keep a register. Paragraph 9.37 of the Preferred Options Draft Plan advises that: "Further evidence of need for self and custom-build will be informed by future SHLAA's and SHMA's as well as the register itself." It is submitted that there is insufficient justification for such provision to be made as part of the policy.</p>	<p>National guidance in the National Planning Policy Framework states that local planning authorities should identify and make provision for the housing needs of different groups in the community including those wishing to build their own homes. Planning Practice Guidance also makes it clear that the Government is keen to support and encourage individuals and communities who want to build their own homes, and is taking active steps to stimulate the growth of the self-build market.</p>	<p>No change necessary.</p>	
<p><b>Policy HB7</b> <b>Local Housing Needs in Rural Areas</b> Planning permission will be granted for proposals for local needs housing development within or adjoining villages of a suitable scale and type to meet identified needs provided that: 1. The need cannot satisfactorily be met on sites with planning consent for housing or through an allocated site in this Local Plan or from redevelopment, infill or conversion in line with other policies in the Plan. 2. The local need has been clearly identified by a detailed parish survey. It may be necessary to take into account the needs in adjacent parishes so as to relate catchment areas to settlements. 3. There is no satisfactory alternative means of meeting the identified needs. 4. The development has been designed and will be available at a cost capable of meeting the identified local need. 5. The site is well related in scale and sitting, to the village and its services and is capable of development without significant adverse countryside, conservation, environmental or highway safety impact.</p>	<p>Support this policy, but query whether there is a typo in criteria 5; 'sitting' should be replaced with 'siting'. (<b>Kent Downs AONB Unit</b>)</p> <p>Support, but would like to see the policy more specific. (<b>Hythe Town Council</b>)</p> <p>In point 5 add 'historic environment' into point. eg. '... without significant adverse countryside, conservation, environmental, historic environment or highway safety impact' (<b>KCC Heritage</b>)</p>	<p>Suggestion noted, the policy wording will be corrected.</p> <p>Support noted.</p> <p>Comment noted, the policy will be amended to incorporate this change.</p>	<p>Amend criterion from 'sitting' to 'siting'</p> <p>No change necessary.</p> <p>Amend criterion to include historic environment as follows: 'The site is well related in scale and sitting, to the village and its services and is capable of development without significant adverse countryside, conservation, environmental, historic environment or highway safety impact'</p>	<p><b>HB6 Local Housing Needs in Rural Areas</b> (please note this chapter has been re-ordered)</p> <p>Planning permission will be granted for proposals for local needs housing within or adjoining villages of a suitable scale and type to meet identified needs provided that:</p> <ol style="list-style-type: none"> <li>1. The need cannot satisfactorily be met on: sites with planning consent for housing; through an allocated site in this local plan or a Neighbourhood Plan; from redevelopment, infill or conversion in line with other plan policies; or by other means;</li> <li>2. The local need has been clearly identified by a detailed parish survey and the size, mix and tenure of the dwellings would help to meet the identified need. It may be necessary to take into account the needs in adjacent parishes so as to relate catchment areas to settlements;</li> <li>3. The development has been designed and will be available at a cost capable of meeting the identified local need; and</li> <li>4. The site is well-related in scale and siting, to the settlement and its services and is capable of development without significant adverse landscape, ecological, environmental, historic</li> </ol>

<p>6. The proposal does not involve cross subsidy. In allowing local needs housing it will be necessary to ensure that the subsequent occupancy of the housing is controlled, by condition or agreement, so that the accommodation remains available to meet local needs.</p>	<p>Objecting, CPRE Kent broadly supports this policy and agrees that housing development at villages makes an important contribution to sustainable rural communities. CPRE is pleased to see the supporting text gives guidance on the information that should be sought from a local housing needs survey. It is difficult to construct housing needs surveys that contain all the necessary information and it would be more helpful if the document were to refer to existing guidance, such as the 'Kent Protocol' titled: Rural Homes: Supporting Kent's Rural Communities . The policy should recognise that housing proposals to meet local needs will normally be expected to have Parish Council support. CPRE supports Part 6 of the policy, which refers to delivering Local Needs Housing without reliance on cross subsidy. Some Council's do allow a small element of cross-subsidy (supported by an open book development appraisal for the proposal containing inputs assessed and verified by a chartered surveyor) to facilitate the delivery of affordable homes. CPRE would support a limited cross-subsidy to meet another identified need (e.g. bungalows or self-build plots) in exceptional circumstances if essential in viability terms and supported by the parish. <b>(CPRE Shepway)</b></p>	<p>Comment noted.</p>	<p>No change necessary.</p>	<p>environment or highway safety impacts.</p> <p>5. If a viability appraisal demonstrates that it is not viable to provide all the homes in the scheme as affordable dwellings, consideration will be given in order of preference to:</p> <ul style="list-style-type: none"> <li>• Changing the tenure mix of the affordable homes and/or the application of any available public subsidy; and only then to</li> <li>• Including the minimum market housing necessary to make the scheme viable and still remain an exception site.</li> </ul>
<p><b>Policy HB8</b> <b>Residential Development in the Countryside</b> Planning permission will be granted for replacement dwellings located in the countryside provided that:</p> <ol style="list-style-type: none"> <li>1. The existing dwelling has a lawful residential use;</li> <li>2. It can be demonstrated that the scale, bulk, massing, location within the site, and materials used does not harm the wider landscape, the functioning of neighbouring uses or the amenities of nearby residents; and</li> <li>3. It can be demonstrated that a suitable access can be achieved.</li> </ol> <p>Where permission is granted, Permitted Development Rights will be removed in order to control future alterations or extensions that may impact on the landscape and rural character of an area. Where permission is granted and an alternative location is proposed, planning conditions will be imposed to ensure that the existing dwelling is removed within 3 months of the occupation of the replacement dwelling.</p> <p>Planning permission for residential related outbuildings, such as annexes or garages, will be granted provided that it can be demonstrated that the scale, bulk, massing, location within the site, and materials used does not harm the wider landscape, the functioning of neighbouring uses or the amenities of nearby residents</p>	<p>Support. Need to reinforce conditions when planning permission is granted for residential outbuildings (last paragraph) <b>(Hythe Town Council)</b></p> <p>Much of Kent has historically had a dispersed settlement pattern. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. Historic England, Kent County Council and Kent Downs AONB have published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character. The Kent Farmsteads Guidance has been endorsed by the County Council and it is recommended that Shepway District Council considers adopting the guidance as SPD, as part of the Local Plan process. We would be happy to discuss this further. <b>(KCC Heritage)</b></p> <p>Title 'residential development in the countryside' is misleading as policy only relates to replacement dwellings. The supporting justification to this policy makes reference to development in the countryside associated with rural workers dwellings, re-use of redundant buildings, and development of buildings of exceptional quality. Policy guidance should be provided for these developments too. <b>(CPRE Shepway)</b></p>	<p>Support noted.</p> <p>Suggestion noted.</p> <p>The title of this policy will be amended to 'Replacement Dwellings in the Countryside' (Policy HB5) to avoid confusion. A separate policy relating to 'Dwellings to Support a Rural-based Enterprise' (Policy HB7) will be added, in addition to Policy HB6 'Local Housing Needs in Rural Areas'. High quality design is captured in Policy HB1.</p>	<p>No change necessary.</p> <p>No change necessary.</p> <p>Amend title of policy and creation of new Policy HB7: Dwellings to support a rural-based enterprise to provide policy guidance for these developments.</p>	<p><b>HB5 Replacement Dwellings in the Countryside</b> (please note this chapter has been re-ordered)</p> <p>Planning permission will be granted for replacement dwellings in the countryside provided that:</p> <ol style="list-style-type: none"> <li>1. The existing dwelling has a lawful residential use;</li> <li>2. It can be demonstrated that the scale, bulk, massing, external appearance, architectural detailing, materials, lighting and location within the site does not harm the wider landscape, the functioning of neighbouring uses or the amenities of nearby residents; and</li> <li>3. It can be demonstrated that a suitable access can be achieved.</li> </ol> <p>Where permission is granted, Permitted Development Rights may be removed in order to control future alterations or extensions that may impact on the landscape and rural character of an area.</p> <p>Where permission is granted and an alternative location is proposed, a planning condition will be used to ensure that the existing dwelling is removed within three months of the occupation of the replacement dwelling.</p> <p>Planning permission for residential-related outbuildings, such as garages, will be granted provided that it can be demonstrated that the scale, bulk, massing, location within the site and materials used do not harm the wider landscape, the functioning of neighbouring uses or the amenities of nearby residents.</p> <p><b>HB7 Dwellings to Support a Rural-based Enterprise</b> (new policy)</p> <p>1. Proposals for permanent dwellings in the countryside for full-time workers in agriculture, forestry or in another business where a rural location is essential, will be permitted if special circumstances can be demonstrated by meeting the following criteria:</p> <ul style="list-style-type: none"> <li>• There is a clear existing functional need for one or more workers to be readily available at most times;</li> <li>• The enterprise has been established for at least three years and is, and is likely to remain, financially viable;</li> <li>• There is no other accommodation within the site, holding or nearby which is currently suitable and available, or could be made available and suitable through conversion and change of use;</li> <li>• A dwelling or building suitable for conversion to a dwelling within the site or holding has not been sold on the open housing market without an agricultural or other occupancy condition in the last year; and</li> <li>• The proposed dwelling is no larger than that required to meet the reasonable needs of the enterprise;</li> </ul> <p>2. Where it cannot be demonstrated that the enterprise has been established for at least three years and is financially viable, or where it is a new enterprise, the siting of a temporary dwelling may be permitted for up to three years where the other criteria are met, and in addition there is clear evidence demonstrating:</p> <ul style="list-style-type: none"> <li>• A firm intention and ability to develop the enterprise;</li> <li>• That the enterprise has been planned on a sound financial basis;</li> <li>• That the functional need cannot be fulfilled by another existing building on the site or holding or any existing accommodation; and</li> </ul> <p>3. Where a new dwelling is permitted, this will be the subject of a condition ensuring the occupation will be limited to a person solely or mainly working, or last working, in agriculture, forestry or in another business where a rural location is essential, or a surviving partner of such a person, and to any resident dependents; and</p> <p>4. The relaxation of an occupancy condition will only be permitted where it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>• There is no longer a continued need for the dwelling on the site or holding or for the enterprise, or to house surviving partners and any resident dependents;</li> <li>• There is no long term need for a dwelling with restricted occupancy to serve a need in the locality; and</li> <li>• The property has been marketed locally for a reasonable period (a minimum of 12 months) at a price which reflects the existence of the occupancy condition.</li> </ul>

<p><b>Accessible Dwellings and Water Efficiency - Building Regulations</b></p> <p><b>Paragraph 9.46 - 9.49</b></p>	<p>Paragraphs need to be re-ordered and separated into separate sections. It is not clear what, if anything, is changing relative to the Core Strategy and whether any more policy provision should be made. Does 'passported across in this plan period', simply mean that the water efficiency element of Policy SS7 remains relevant? Presumably the Code for Sustainable Homes reference in Policy SS7 is not 'passported' across? Although the Code for Sustainable Homes cannot now be a local requirement given the outcomes of the Housing Standards Review, the plan does still need to recognise that new development should proactively seek to reduce carbon emissions and maximise the contribution of new development to sustainable living. Passive design principles, including using site layout and orientation to make use of local climate and site conditions can make a significant contribution to reducing energy consumption and remain within the proper remit of the local plan. Much of this is covered in policy CC2, so a reworking of these paragraphs, together with clarification of the relationship to CC2 will assist. It is not clear how policies SS6 and SS7 in the Core Strategy relate to Lifetime Homes Standards and water consumption restrictions in non-residential development. How does the paragraph on water efficiency on non-residential buildings relate to CC2 in terms of viability? It is not clear whether paragraphs 9.48 or 9.49 are amending an existing policy, or whether a new policy is missing. <b>(CPRE Shepway)</b></p>	<p>The 20% Lifetime Home requirement was included in Policy CSD2 of the Core Strategy which is compliant with the National Planning Policy Framework and underwent an examination by a government inspector where it was found to be sound and legally compliant. The Places and Policies Local Plan provides a factual update to the existing Core Strategy policy in response to the deletion of Lifetime Homes in the Written Ministerial Statement of 2015. The Building Regulations Part M4(2) is the nearest comparable standards to Lifetime Homes.</p>	<p>No changes necessary.</p>	<p><b>Access and Inclusion</b> (amended paragraphs)</p> <p>Local planning authorities are required by the NPPF to develop robust policies that help to create safe and accessible environments (paragraph 58). They should also encourage high quality and inclusive design (paragraph 57) and use evidence to plan to meet the needs for housing for different groups (paragraph 50).</p> <p>The Council will expect all buildings and places to meet the highest standards practicable for access and inclusion. Building Regulations Part M addresses access to and use of buildings. The Regulations contain a basic minimum standard for access and use which should be applied to all new dwellings (M4(1)), and two optional requirements for increasing accessibility for those with lower levels of mobility.</p> <p>Core Strategy Policy CSD2: District Residential Needs requires all developments of 10 dwellings or more (Class C3) to include 20 per cent of market dwellings which meet Lifetime Homes standards, unless demonstrated to be unfeasible in design or viability terms. The Council will now require all developments of 10 dwellings or more to include a minimum of 20 per cent of market dwellings meeting M4(2) Category 2 (Accessible and Adaptable Dwellings), which can include units of M4(3) Category 3 (Wheelchair User Dwellings) if desired or as part of affordable or extra-care housing requirements. This requirement will apply to new build schemes only, and will be secured through the use of planning conditions.</p>
	<p>It is noted that Rother District Council also recognises the need for high levels of water efficiency and that it's preferred option is to adopt the higher Optional Technical Standard of 110 litres per person per day. <b>(Rother District Council)</b></p>	<p>Support noted.</p>	<p>No changes necessary.</p>	
	<p>In paragraph 9.47 the Council will require even tighter water efficiency standards of 90 lpppd on strategic developments. This is further than allowed by the optional technical standard. This is contrary to national policy: "From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities...should not set in their emerging Local Plans...or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings."The Council can adopt the optional technical standard for water but cannot require applicants to go further than this. This proposal by the Council is contrary to the government's review of technical standards which was to create a simpler, streamlined system which will reduce burdens and help facilitate the supply of homes. The Council will also need to assess the impact on the viability of development. The fact that the Council already has this as policy in an earlier local plan does not remove the need to update policies as it brings forward a new plan to ensure that policies are in accordance with new national policy. Policy CC2 should reflect this requirement <b>(Home Builders Federation Ltd)</b></p>	<p>Shepway is classed as 'seriously water stressed'. Paragraph 9.47 will be deleted as the correct requirement of 110 litres of water per person per day are included in the Climate Change chapter within Policy CC2: Sustainable Design and Construction. The 90 litres per person per day refers to site specific Core Strategy policies which already benefit from planning permission.</p>	<p>Delete paragraph 9.47 to ensure the correct requirements of litres of water per person per day is included in the Climate Change chapter in Policy CC2: Sustainable Design and Construction.</p>	
	<p><b>Water Resources</b></p> <p>1. Paragraph 9.47 refers to a "designated Water Scarcity Status Area". Shepway is actually classed as "seriously water stressed" in our classifications Water stressed areas - final classification (2013)</p> <p>2. Optional higher standard for water efficiency - Paragraph 9.47 and policy CC9 quote 105 litres per person per day, paragraph 14.2 and policy CC2 say 110 litres. The standard referred to in <a href="https://www.gov.uk/government/publications/sanitation-hot-water-safety-and-water-efficiency-approved-document-g">https://www.gov.uk/government/publications/sanitation-hot-water-safety-and-water-efficiency-approved-document-g</a> is 110 litres, which includes an allowance of 5 litres for external use.</p> <p>3. Paragraph 9.47, referring to policies SS6 and SS7, refers to a more stringent water efficiency requirement of 90 litres per person per day (presumably internal). This is mentioned again in paragraph 14.9 Option 37 CC9. We have not met this option from any other local authority. The web based planning guidance only ever refers to a higher standard of 110 (including external use) e.g. 2.3. The estimated consumption of wholesome water of a new dwelling should be no more than 125 litres/person/day or 110 litres/person/day where the optional requirement applies.</p> <p>Other authorities have interpreted this to mean these are the only 2 options available. However we are aware that in the specific case where a development has attempted to achieve water neutrality, a higher standard has been required in the past. The FAQ to the hyperlinked document may offer scope for a higher requirement through "Do I have to follow Approved Document G? No. The Approved Documents provide guidance about compliance with specific aspects of the Building Regulations in some of the more common building situations. There is no obligation to adopt any particular solution contained in the Approved Document if you prefer to meet the relevant requirement in some other way. <b>(Environment Agency)</b></p>	<p>1. and 2. Noted. Paragraph 9.47 will be deleted as the correct requirements of 110 litres of water per person per day are included in the Climate Change chapter within Policy CC2: Sustainable Design and Construction.</p> <p>3. Core Strategy Policies SS6 and SS7 are site-specific policies which already benefit from planning permission and both of which meet the more stringent requirement of 90 litres of water per person per day so it is not necessary to amend this.</p>	<p>Delete paragraph 9.47 to ensure the correct requirements of litres of water per person per day is included in the Climate Change chapter in Policy CC2: Sustainable Design and Construction.</p>	
	<p>The Council will require that 20% of all homes on schemes of 10 or more dwellings will be built to Part M4 (2). The Council will need to demonstrate the need for this optional standard in accordance with the guidance in the NPPG. It will also have to assess the viability of this in combination with its other local plan policies. Part M4(3) cannot be applied to the market element of the scheme. We refer the Council to the NPPG. Need to prepare an updated policy (perhaps to policy CC2) to reflect new technical standards, as it is asking for compliance with something which is different from Lifetime Homes (a standard that was broadly equivalent to Part M4 (2)). Lack of specificity means that what is required from applicants in terms of the split between Part M4 (2) and (3) is very unclear. This would be contrary to planning policy (NPPF, paragraphs 14). This updated policy will need to replace Policy CSD2 of the Core Strategy. This Local Plan should explain how the existing Core Strategy policy will be updated and replaced by this Plan. This is necessary to reflect the WMS of 25 March 2015. 9.48 is vague in guiding applicants because it says that the requirement is subject to design and viability considerations. It is the Council's responsibility to demonstrate the viability of its policies not the applicant. The Council should be confident that the majority of development in the District is capable of providing 20% Part M4(2) and Part M4(3) dwellings and then such caveats will be unnecessary. Why does the requirements only apply to the 'market' element of a development. Why is the affordable housing element precluded? <b>(Home Builders Federation Ltd)</b></p>	<p>The 20% Lifetime Home requirement was included in Policy CSD2 of the Core Strategy which is compliant with the National Planning Policy Framework and underwent an examination by a government inspector where it was found to be sound and legally compliant. The Places and Policies Local Plan provides a factual update to the existing Core Strategy policy in response to the deletion of Lifetime Homes in the Written Ministerial Statement of 2015. The Building Regulations Part M4(2) is the nearest comparable standards to Lifetime Homes.</p>	<p>No change required.</p>	
<p><b>Affordable Housing &amp; Starter Homes</b></p>	<p>Address the minimum level of affordable housing provided on all developments above the new threshold</p>	<p>Comment noted.</p>	<p>Additional explanation to be added in the pre-able to clarify Council's position on affordable homes.</p>	<p>Addition of highlighted box after Policy HB2.</p>



<p><b>Paragraph 9.50 - 9.51</b></p>	<p>The AONB Unit is concerned with the statement: “the requirement for affordable housing contributions on developments of 10 or fewer dwellings will not be enforced as this is now superseded by the changes made by the Government”. The AONB Unit is keen to ensure that a lower threshold for affordable housing on sites of five units or more retained within the AONB is retained. There is need for affordable housing in AONBs which is recognised in the Kent Downs AONB Management Plan (policy VC3), which supports appropriate supply of affordable housing for those with proven local needs and workers whose activities directly contribute to the purposes of AONB designation. Having a lower threshold in AONBs should increase the supply of affordable housing in AONBs and therefore potentially reduce the need for exception sites to be released in the AONB, which by their nature are more likely to be located where they would have a greater detrimental impact on the protected landscape. The introduction of a lower threshold also complies with advice in respect of affordable housing as set out in the NPPG.</p>	<p>The requirement for affordable housing within the Kent Downs AONB will remain consistent with the NPPF and Policy CSD1 of the Core Strategy which requires developments of five dwellings or more to provide affordable homes. The policy wording will be amended to ensure this is made clear.</p>	<p>Additional explanation to be added in the pre-amble to clarify Council's position on affordable homes.</p>	<p>Addition of highlighted box after Policy HB2.</p>
<p><b>Policy HB9</b>  <b>Conversion and reconfiguration of residential care homes and institutions</b>  There will be an increased need over this plan period for the relocation and reconfiguration of existing residential care homes and institutions (C2 or sui generis use class) in the district. Where this cannot be achieved with the existing building, there will be a need for the building's conversion to other uses, or else an impetus for the demolition and reconstruction. Planning permission will be granted for the conversion of a residential care home/institution (C2) to residential (C3), hotel/b&amp;b (C1) or non-residential institution (D1) use if the following are satisfied:  1. Applicants should provide a report demonstrating that the building is no longer viable for the use.  2. The applicant has provided a viability report demonstrating that institutional use is not economically sustainable.  3. Design and layout take account of the design policies presented within this plan, and sustainable construction and Building for Life 12 criteria are observed as far as is reasonably practical.  4. Conversion demonstrates acceptable level of traffic movements.  5. Conversion does not result in increased noise or disturbance which impacts upon neighbouring residential amenity.  6. In the case of C3 use, the development provides affordable housing in accordance with policy CSD1 (Core Strategy 2013).  The local planning authority will seek to avoid the demolition of an existing residential care home or institution in a Conservation Area or where the building contributes to the character of the area.</p>	<p>Hythe Town Council supports this policy</p>	<p>Support noted.</p>	<p>No changes necessary.</p>	<p><b>HB11 Loss of Residential Care Homes and Institutions</b> (please note this chapter has been re-ordered)   Planning permission will be granted for the conversion of a residential care home or institution (C2) to residential (C3), hotel or bed and breakfast (C1) or non-residential institution (D1) use, or the demolition of the building or buildings and new build development for these uses, if the following are satisfied:   1. The applicant has provided a viability report demonstrating that:  • A residential care or institutional use in the current building is not economically sustainable;  • Extension or adaption is not viable; and  • The property has been actively marketed at a reasonable rate for a period of at least 12 months and no reasonable offers have been made;  2. Design and layout take account of the design and sustainable construction policies within this plan, as far as is reasonably practical;  3. It can be demonstrated that levels of traffic movements can be successfully accommodated on the local road network and that parking can be provided in accordance with the requirements of Policy T2;  4. Development does not result in increased noise or disturbance which impacts on neighbouring residential amenity; and  5. In the case of redevelopment for residential (C3) use, the development provides affordable housing in accordance with Core Strategy Policy CSD1: Balanced Neighbourhoods for Shepway.   The Council will resist the demolition of a residential care home or institution that is a heritage asset or where the building is within a Conservation Area.</p>
<p><b>Policy HB10</b>  <b>Development of new or extended residential institutions (C2 use)</b>  Planning permission will be granted for the development of new residential institutions, or the conversion of existing properties, subject to the following requirements:  1. Accommodation will be designed and built to the Care Quality Commission's (CQC) Fundamental Standards.  2. They will be situated in sustainable locations with access to local services, leisure and community facilities, to include shops, healthcare and public transport as per Core Strategy Policy DSD and SS3.  3. They are located in areas at lower risk of flooding, as per Core Strategy Policy SS3.  4. Consideration has been given to compatibility with surrounding land uses, so that such development does not cause substantial disturbance or detrimental impact to neighbours. Similarly, the development should not be located in an area subject to significant noise or other disturbance, or reasonably likely to be so as a result of the expansion of existing neighbouring businesses, as per NPPF paragraph 123.  5. Design and layout are to take account of the design policies presented within this plan, as well as sustainable construction and Building for Life 12 criteria.  6. Sufficient open and defensible amenity space should be provided and retained around the property for use by residents, staff and visitors.  7. The site and immediate surroundings should have a gentle topography to facilitate pedestrian movement and access to services.  8. The application demonstrates local need for the expansion, or new facility.</p>	<p>Hythe Town Council supports this policy</p>	<p>Support noted.</p>	<p>No changes necessary.</p>	<p><b>HB12 Development of New or Extended Residential Institutions (C2 Use)</b>(please note this chapter has been re-ordered)   Planning permission will be granted for the development of new residential institutions, or the conversion of existing properties to this use, subject to the following requirements:   1. Accommodation is designed and built to the Care Quality Commission's (CQC) Fundamental Standards;  2. The proposal is in a sustainable location with access to local services, leisure and community facilities, including shops, healthcare and public transport in accordance with Core Strategy Policies DSD: Delivering Sustainable Development and SS3: Place-Shaping and Sustainable Settlements Strategy;  3. The proposal is compatible with surrounding land uses, so that the development does not cause substantial disturbance or detrimental impact to neighbours and is not located in an area subject to significant noise or other disturbance, or reasonably likely to be so as a result of the expansion of existing businesses, in accordance with National Planning Policy Framework paragraph 123;  4. The design and layout of the proposal are in accordance with the design policies in this Local Plan, as well as the parking requirements of Policy T2;  5. Sufficient open and defensible amenity space is provided for use by residents, staff and visitors; and  6. The site and immediate surroundings have a gentle topography to facilitate pedestrian movement and access to services and public transport facilities.</p>

<p><b>Policy HB11</b>  <b>Accommodation for Gypsies and Travellers</b>  Planning permission will be granted for Gypsy and Traveller accommodation which will contribute to meeting the needs of those households conforming to the above definition, and which can also be demonstrated to meet all the following criteria:  1. The development will safeguard the health of occupiers and provide a satisfactory level of amenity for them, by reference to a range of factors including but not limited to the space available for each family, noise, odour, land contamination, other pollution or nuisance, flood risk and the disposal of refuse and foul water;  2. The site is in a sustainable location being adequately accessible to main transport routes and within a 10 minute walk of local services and facilities along a formal pedestrian footway;  3. The development will not give rise to an unacceptable impact on amenity for residents in the vicinity of the development, or, in the case of nearby commercial users, result in the imposition of new constraints on the way in which such users can operate their business; and  4. If the proposal involves the development of land originally identified in this Local Plan for another purpose, the loss of such land is justified by the desirability of providing additional Gypsy and Traveller accommodation, and represents the appropriate planning balance in the circumstances.  5. There is no adverse effect on the visual or other essential qualities of the AONB, SSSI, national or local nature reserve or conservation area.</p> <p>The exception to the above criteria relate to applications for the expansion of existing permitted Gypsy and Traveller sites, in which case only criteria 1 and 3 will apply. However, it must be demonstrated that those households still conform to the DCLG Gypsy and Traveller definition, and that expansion will result in additional Gypsy and Traveller pitches.</p>	<p>Hythe Town Council supports this policy</p>	<p>Support noted.</p>	<p>No changes necessary.</p>	<p><b>HB14 Accommodation for Gypsies and Travellers</b> (please note this chapter has been re-ordered)</p> <p>Planning permission will be granted for gypsy and traveller accommodation which will contribute to meeting the needs of those households conforming to the definition set out in 'Planning policy for traveller sites', subject to the following:</p> <ol style="list-style-type: none"> <li>The development safeguards the health of occupiers and provides a satisfactory level of amenity for them, by reference to factors including but not limited to: the space available for each family; noise; odour; land contamination; other pollution or nuisance; flood risk; and the disposal of refuse and foul water;</li> <li>The site is in a sustainable location, well related to a settlement with a range of services and facilities and is, or can be made, safely accessible on foot, by cycle or public transport;</li> <li>Adequate vehicular access, sight lines and space for turning and manoeuvring can be provided;</li> <li>The development will not give rise to an unacceptable impact on amenity for residents in the vicinity of the development, or, in the case of nearby commercial users, result in the imposition of new constraints on the way in which such users can operate their businesses;</li> <li>If the proposal involves the development of land originally identified in this Local Plan for another purpose, the loss of such land is justified by the desirability of providing additional gypsy and traveller accommodation; and</li> <li>There is no adverse effect on the landscape, environmental or other essential qualities of countryside, including the Kent Downs Area of Outstanding Natural Beauty or Natura 2000 sites, Sites of Special Scientific Interest, national or local nature reserves or heritage assets.</li> </ol> <p>The exception to the above criteria relate to applications for the expansion of existing permitted gypsy and traveller sites, in which case only criteria 1 and 4 will apply. However, it must be demonstrated that those households still conform to the gypsy and traveller definition, and that expansion will result in additional gypsy and traveller pitches.</p>
	<p>Provision of transit pitches. Their absence in Shepway gives an excuse for illegal encampments, with high costs of eviction for landowners. To exclude transit pitches is to ignore and perpetuate the problem.</p>	<p>The Gypsy and Traveller Accommodation Assessment (2014) concluded that transit requirements were not necessary due to the low level of quantifiable need for transit accommodation in the areas. However, an update to the GTAA is being undertaken which will inform future policies within the Core Strategy Review.</p>	<p>No change necessary.</p>	
	<p>This policy does nothing to adress the need for permanent and temporary sites for travellers. There are instances of travellers passing through the area and resorting to parking on public land because there are no sites where they can legally stop. The policy should commit the council to tackling the issue rather than ignoring it.</p>	<p>The Gypsy and Traveller Accommodation Assessment (2014) concluded that transit requirements were not necessary due to the low level of quantifiable need for transit accommodation in the areas. However, an update to the GTAA is being undertaken which will inform future policies within the Core Strategy Review.</p>	<p>No change necessary.</p>	
	<p>Southern Water supports the inclusion of the text in criteria 1 of the policy</p>	<p>Support noted.</p>	<p>No change necessary.</p>	

**New Policies:**

<p>N/A</p>	<p>There has been an increasing demand for applications seeking planning permission for annexe accommodation. It was considered that the emerging Places and Policies Local Plan did not offer the same level of protection as policy HO13 from the Local Plan Review (2013); and therefore a new policy should be included in order to assess applications for annexe accommodation effectively.</p>	<p>Following a series of internal discussions, it was decided to include a new policy for annexe accommodation to ensure planning applications were determined consistently.</p>	<p>Drafted new policy HB9 Annexe Accommodation</p>	<p><b>HB9 Annexe Accommodation</b></p> <p>Annexes to accommodate those people with special housing requirements due to a need for supervision and care, including elderly relatives or disabled persons, especially in the countryside, should be attached wherever possible. Proposals for attached annexes will be judged against the relevant criteria in Policy HB8. The attached annexe shall have internal access to the existing dwelling and should be physically capable of being incorporated into the main dwelling when the need for the annexe ceases.</p> <p>Proposals for detached annexe accommodation to a residential property will be permitted where:</p> <ol style="list-style-type: none"> <li>It has been demonstrated why the annexe cannot be attached;</li> <li>The existing residential property enjoys a lawful residential use;</li> <li>The proposed annexe would not materially harm any neighbouring uses;</li> <li>The scale and appearance of the proposed annexe is sympathetic and modest in proportion to the main dwelling and site;</li> <li>The proposed annexe should have a clear dependency in terms of siting and function with the main dwelling;</li> <li>The proposed annexe is designed sensitively to complement the existing dwelling and is clearly ancillary in scale and visually subordinate to it in design and massing;</li> <li>The proposed annexe respects the dwelling's character and does not result in unacceptable harm to heritage assets (whether designated or not) or their setting;</li> <li>Where the proposed annexe is outside the settlement boundary, it does not have an adverse impact on the quality and character of the landscape or its rural setting; and</li> <li>Supporting evidence has been submitted to justify the need for the annexe accommodation.</li> </ol> <p>A residential annexe in flood zones 2 and 3 shall not have floor levels below that of the existing dwelling, and this should be demonstrated on the submitted drawings.</p>
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N/A	There has been an increasing demand for applications seeking planning permission for Houses in Multiple Occupation (HMOs). It was considered that the emerging Places and Policies Local Plan did not offer the same level of protection as policy HO10 from the Local Plan Review (2013); and therefore a new policy should be included in order to assess applications for HMOs effectively.	Following a series of internal discussions, it was decided to include a new policy for HMOs to ensure planning applications were determined consistently.	Drafted new policy HB13 Houses in Multiple Occupation (HMOs)	<p>HB13 Houses in Multiple Occupation (HMOs)</p> <p>Proposals for Houses in Multiple Occupation (HMOs) will only be permitted where the proposed development, taken by itself or in combination with existing HMOs in the vicinity of the site, would not result in an unacceptably harmful impact on:</p> <ol style="list-style-type: none"> <li>1. Residential amenity, caused by increased noise and disturbance;</li> <li>2. The character or appearance of the street scene or neighbourhood;</li> <li>3. The character or appearance of the building, including from inappropriate or insufficient arrangements for storage, including for refuse and bicycles; and</li> <li>4. Highway safety, caused by insufficient on-site parking provision thereby resulting in an unacceptable increase in on-street parking.</li> </ol> <p>Off-street car parking should be provided in accordance with the parking standards set out in Policy T2. Parking provision should not cause unacceptable detriment to the street-scene through the loss of trees or gardens.</p> <p>Proposals that do not provide for sufficient off-street and dedicated parking in accordance with the parking standards will be required to provide a parking survey, undertaken by an independent technical consultant, in accordance with the Lambeth methodology to demonstrate that adequate on-street parking capacity will remain available once a proposal is completed and occupied.</p> <p>Permissions granted will normally be subject to a condition that restricts the number of occupants allowed to reside at the property as their main residence</p>
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Preferred Options Policy	Comments received	Response from the Council	Action by the Council	Revised Draft Policy
<p><b>General Comments - Economy</b></p>	<p>Much socio-economic evidence for development at the airport has been prepared and tested publically. The Secretaries of State for Communities and Local Government and Transport accepted the airport's clear business case in 2013 through granting planning permission for its development and expansion. The area surrounding LAA is in need of an economic boost. Unemployment is high, earnings are low and employment opportunities are limited and likely to become more so as activity at Dungeness declines. Evidence in relation to economic performance in the local area highlights the need for regeneration to counter the economic underperformance in the area around LAA. The airport has an important role to play in economic regeneration, both through creating jobs and providing a wider stimulus to economic growth. The development of LAA has the potential to generate wider economic benefits for the area, over and above direct employment impacts, tourism jobs and income. The airport's potential contribution could be significant.</p>	<p>Comments noted.</p>	<p>The supporting text for the economy chapter will be updated to acknowledge the role and contribution of London Ashford Airport to the local economy; the airport's aspirations for the future; and the council's commitment to ensure that economic growth opportunities link to the airport are realised.</p>	
<p><b>Economy</b> <b>Paragraphs 10.3, 10.4 &amp; 10.9</b></p>		<p>The National Planning Policy Framework (paragraph 112) seeks to safeguard the long term potential of best and most versatile agricultural land (ie: grades 1, 2 and 3a).</p>		
	<p>Where is Employment Land Review 2016? Evidence base in appendix 3 refers to an Employment Land Review 2011.</p>	<p>The Employment Land Review (2017) is available to view on the Council's website.</p>	<p>The supporting text for the Economy chapter will be updated to reflect the findings and conclusions of the Economic Development Strategy (2015-2020) and Employment Land Review (2017).</p>	
<p><b>Policy E1</b> <b>Employment Sites</b> The sites identified below are protected for business uses under use classes B1, B2 and B8, unless otherwise stated. Site Floorspace (m2) Uses Shearway Business Park, Folkestone 14,700 B1 - B8 Cheriton Parc, Folkestone 15,000 B1a Ingles Manor, Folkestone 2,000 B1 Hawkinge West, Hawkinge, 30,000 B1 &amp; B8 Folkestone Nickolls Quarry, Hythe 21,000 B1 Link Park (Areas 1 &amp; 2) Lympne 73,175 B1, B1c, B2 &amp; B8 Hythe Mountfield Road Phase 3 &amp; 4, New Romney 9,000 B1, B1c, B2 &amp; B8 Romney Harden Road, Lydd 840 B1 &amp; B1a Dengemarsh Road, Lydd 11,725 B1 Mixed A proportion of non-business class uses (up to 25%) will be permitted provided it can be demonstrated that: 1. The use will add to the attractiveness and function of the employment site; and 2. There is full justification of its the location within the overall employment site.</p>	<p>The options at the issues &amp; options stage do not correlate with policy E1. Option 9 was to retain existing employment land which is reflected in policy E1. However many of these sites are out of town and poorly served by public transport and yet no mention is made of transport. Option 10 referred to directing business to sustainable locations and option 12 referred to ensuring transport connections but there is no mention of this in policy E1. Option 11 referred to ensuring economic development contributes to climate change avoidance no mention of this in policy E1. There is a now a section on climate change but I think it should also be included in economic development. Unless issues such as transport and climate change issues are addressed in the policy it cannot be considered to be sustainable. E1 is ineffective as it just lists employment land sites that will be protected. There is no indication as to what type of employment/development on these sites, it's hard to see how the council can help to attract new employers to the area unless they can present a more specific vision. Option 14 had ideas about new office developments in Folkestone &amp; Hythe Town Centres; start ups and live-work units in all town centres and opportunities for small businesses in New Romney town centre but none of those ideas have been included in either policy E1 or the town centre policies.</p> <p>Where is evidence that employers are willing to create new jobs at these sites? How many jobs? Will they be well paid? Without this information how can you ensure that there are the right kind of houses to match with the type of new jobs that you hope will be created? Unless there is a more substantial and meaningful employment strategy (i.e. other than just safeguarding some employment land) the plan to build 8000 new homes is not sustainable.</p>	<p>Policy E1 states the type of employment uses that would be considered appropriate on specific employment allocations by Use Class Order. The Use Class differentiates between office, industrial, factory and warehouse accommodation.</p> <p>Option 10/12: The majority of employment allocations are located in sustainable locations either in or on the urban edge of key settlements; and/or with strong access to the strategic road network.</p> <p>The National Planning Policy Framework (paragraph 32) already requires the submission of a Transport Assessment or Transport Statement for all developments that generate significant amounts of traffic movements. The Transport section of the Places and Policies Local Plan sets out the indicative thresholds for developments requiring preparation of Transport Assessment including employment developments. The TA/TS should assess both traffic impact and transport sustainability, including an assessment of how well a scheme addresses the needs of pedestrians, cyclists and private and public transport users.</p> <p>Option 11: Policy CC1 of the Places and Policies Local Plan states that all new build dwellings and non-residential buildings of 1000m2 or more are required to reduce carbon emissions. It also suggests ways in which this could be achieved.</p> <p>Option 14: Employment land for office development (Use Class B1a) is proposed in Folkestone at Cheriton Parc, Shearway in Folkestone Harbour. Land is also allocated for a mix of employment use for opportunities for small businesses at Nickolls Quarry, Link Park and Smiths Medical site in Hythe; and Mountfield Road, New Romney</p> <p>Shepway has many assets on which to build and to attract further investment. We need 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 Shepway in the future. The Shepway Economic Development Strategy 2015-2020 indicates that existing employment land allocations (Local Plan 2013 Review) are in the wrong locations to meet current business demand in the sectors that have been identified as having growth potential. There is also unsatisfied demand across many sectors with many commercial buildings that are available being too old and of too poor quality to meet occupier needs.</p>	<p>No action proposed.</p> <p>No action proposed.</p>	<p><b>E1 New Employment Allocations</b></p> <p>The sites identified below are protected for business uses under use classes B1 (business), B2 (general industrial) and B8 (storage and distribution), unless otherwise stated.</p> <p><u>Site</u></p> <p>Shearway Business Park, Folkestone: 11,650sqm / B1 - B8 Cheriton Parc, Folkestone: 15,000sqm / B1a Ingles Manor, Folkestone: 1,600sqm / B1 Park Farm (Silver Spring site), Folkestone: 10,000/ B1 Affinity Water site, Cherry Garden site, Folkestone: 3,500sqm / B1a Folkestone Harbour: 500sqm / B1a Hawkinge West, Hawkinge, Folkestone: 2,366sqm / B1 and B8 Nickolls Quarry, Hythe: 15,000sqm / B1 Link Park (Phase1 and 2) Lympne Hythe: 73,175sqm / B1, B1c, B2 and B8 Mountfield Road Phase 3 and 4, New Romney: 9,010sqm / B1, B1c, B2 and B8 Harden Road, Lydd: 840sqm / B1 and B1a Dengemarsh Road, Lydd: 11,725sqm / B1 Mixed</p> <p>A proportion of non-business class uses (up to 25 per cent) will be permitted provided it can be demonstrated that:</p> <p>1. The use will add to the attractiveness and function of the employment site; 2. There is full justification of its location within the wider employment site; and 3. Proposals comply with other Local Plan policies, including those relating to Retail and Leisure.</p>

	<p>Support allocation at Link Park (Phases 1 and 2). Link Park, with 82,000 sqm of consented floorspace is the largest allocated site and is essential to economic development objectives. The land at Link Park has good prospects for future development. Occupancy rates on the existing developed areas are now very high and the next phases of development are progressing. Phides Estates are confident that the development will be completed within the Plan period. The employment site at Lympe can play a vital role in allowing existing smaller companies to expand and remain in the district. Examples of such companies include: Spicers, M.C. Truck and Bus, Alcaline Transport, Nutalls Transport, Sico Europe, Folkestone Fixings, Laser Transport. Whilst Phides accept that the focus on allocated employment sites should be for B1, B2 and B8 uses, it is recommended that the Policy be less prescriptive in the event that other employment generating sui generis uses should come forward and should these be compatible with the local area and the function of the particular employment site. It is therefore requested that as well as including a clause that a proportion of non-business class uses of up to 25% will be permitted (subject to satisfying certain criteria) alternative employment generating uses, including sui generis uses, should also be permitted if they add to the function and attractiveness of the employment site.</p>	<p>Officers consider that the allowance within the Policy E1: New Employment Allocations for proportion of non-business class uses of up to 25 per cent provides sufficient flexibility for the site to include alternative employment generating uses, including sui generis uses.</p>	<p>No action proposed.</p>	
	<p>The economic value and potential of LAA should be recognised in chapter 10 and policy E1. LAA is a significant employer for the District and extending the airport will strengthen its importance as an employer and economic driver. Paragraph 10.6 references the four priorities of the Shepway Development Strategy for economic growth LAA represents a fundamental economic asset for the District, with the potential for further economic contribution but there is no reference to LAA in this section. Paragraph 21 of the NPPF provides a requirement to support existing business sectors, plan positively for the location and identify priority areas for infrastructure provision. LAA should be identified in this section due to its existing status as an important business. To support sustainable economic growth balance is required between economic and environmental considerations. Policy should support economic development unless the adverse impacts would significantly and demonstrably outweigh benefits in accordance with NPPF.</p>	<p>Comments noted.</p>	<p>The supporting text for the Economy chapter will be updated to acknowledge the role and contribution of London Ashford Airport to the local economy; the airport's aspirations for the future; and the council's commitment to ensure that economic growth opportunities link to the airport are realised.</p>	
	<p>Outline permission for Ingles Manor will, in 2017, see the closure of two successful businesses on this site. Up to twenty jobs will be lost and an unknown number of visitors and customers to those businesses being lost to Shepway.</p>	<p>The Folkestone Garden Centre are investigating alternative locations in the Folkestone area to re-establish themselves in the town in the future. The proposals for Ingles Manor also includes 1,600 sqm of office floorspace in an appealing strategic location between Folkestone Central Railway Station and the Leas. This will create new business and job opportunities that will help meet the objectives of Core Strategy Policy CSD6: Central Folkestone Strategy and contribute to the wider regeneration of the district and East Kent.</p>	<p>No action proposed.</p>	
N/A	<p>The ELR (2017) concludes that in the case of a number of the Districts older employment sites, whilst the units are of a low quality - they are generally well occupied, which suggests that these sites are meeting a need for low cost industrial units</p> <p>There has been an increasing number of applications seeking planning permission for the redevelopment of these sites. It was considered that the emerging Places and Policies Local Plan did not offer the same level of protection as the Local Plan Review (2013); and therefore potentially vulnerable to similar applications in the future.</p>	<p>Following a series of internal discussion it was decided to include a new policy that clarified the future of existing employment allocations.</p>	<p>Drafted new Policy E2</p>	<p><b>E2 Existing Employment Allocations</b></p> <p>Existing employment sites are protected for business purposes under classes B1 and B8. Proposals to fully or partly redevelop existing employment sites for alternative uses will be permitted provided that it is demonstrated that:</p> <ol style="list-style-type: none"> <li>1.The existing or former employment use is no longer appropriate in terms of neighbouring uses or impacts on the natural environment; or</li> <li>2.The site or premises has been subject to sustained marketing over a six month period prior to the submission of the planning application but the site or premises has remained unlet or unsold for all appropriate types of B class employment use and no reasonable offers have been received;</li> <li>3.It does not prevent or limited opportunities for any remaining land left undeveloped coming forwarded for employment purposes;</li> <li>4.Any established businesses are relocated to appropriate alternative premises within the local area; and</li> <li>5.The site is unviable for redevelopment for an alternative employment use.</li> </ol> <p>In addition, proposals should demonstrate that the proposed new use does not undermine neighbouring employment uses or their future development.</p> <p>Existing Employment Allocations</p>
<p><b>Policy E2 Tourism</b></p> <p>Proposals that will provide new, or an upgrade to, sustainable tourism facilities including; hotels, guesthouses, bed and breakfast, self catering accommodation and new visitor attractions will be permitted provided that:</p> <ol style="list-style-type: none"> <li>1. The location is well related to the highway network and is accessible by a range of means of transport including walking and cycling and by public transport</li> <li>2. The massing, materials and overall design of the proposal does not have a detrimental impact on the wider landscape, heritage assets or surrounding built form</li> <li>3. There is no detrimental impact on neighbourhood amenities</li> <li>4. There is no detrimental impact on biodiversity assets</li> <li>5. Evidence is provided that demonstrates how the proposal contributes to the diversification of tourist attractions in the District and the need for it.</li> </ol> <p>In exceptional circumstances, permission will be granted for new tourist proposals in the countryside where there is evidence that justifies the requirement of the location and meets the criteria 1 to 5 above.</p>	<p>It will be important to ensure proposals conserve and enhance the landscape and scenic beauty of the AONB. Policy should provide consideration of proposals within the AONB and its setting, particularly where located in the open countryside. This could be by inclusion of the following wording at the end of the policy: "and where located within the Kent Downs AONB or its setting, does not constitute major development and complies with policy NE3".</p>	<p>Comment noted.</p>	<p>Delete the final paragraph of Policy E2 (reassigned Policy E3) to include the following additional criteria:</p> <p>'New tourist accommodation and attractions in the countryside, or expansions to existing sites, will be permitted in exceptional circumstances where it can be demonstrated that:</p> <ol style="list-style-type: none"> <li>a) For new accommodation and/or attractions, available sites within or on the edge of settlements are not suitable and clearly indicate why an open countryside location is needed;</li> <li>b) There are no suitable vacant buildings in the locality that could be converted;</li> <li>c) The development is viable and will have significant economic and other benefits to the locality to outweighs harm.</li> <li>d) Where located within the Kent Downs AONB or its setting and does not constitute major development.' </li></ol>	<p><b>E3 Tourism</b></p> <p>Planning permission will be granted in or on the edge of centres in the settlement hierarchy for proposals to provide new tourism development including hotels, guesthouses, bed and breakfast, self catering accommodation and new visitor attractions where:</p> <ol style="list-style-type: none"> <li>1. The location is well related to the highway network and is accessible by a range of means of transport, including walking and cycling and by public transport;</li> <li>2. The massing, materials and overall design of the proposal does not have a detrimental impact on the wider landscape, heritage assets or surrounding built form;</li> <li>3. There is no detrimental impact on neighbourhood amenities;</li> <li>4. There is no detrimental impact on biodiversity assets; and</li> <li>5. Evidence is provided that demonstrates how the proposal contributes to the diversification of tourist attractions in the district and the need for the development.</li> </ol> <p>New tourist accommodation and attractions in the countryside, or expansions to existing sites, will be permitted in exceptional circumstances where it can be demonstrated that:</p> <ol style="list-style-type: none"> <li>1. For new accommodation and/or attractions, available sites within or on the edge of settlements are not suitable and why an open countryside location is needed;</li> </ol>

	Integrate existing tourist areas, particularly the 'five stars' in Hythe: the beach; the canal; the Romney Hythe and Dymchurch railway; the High Street; St Leonard's Church.	Comment noted. This section of the chapter aims to promote all tourism attractions within the district. The suggestion to integrate existing tourist areas around Hythe is considered to be better suited to a Tourism Strategy rather than being incorporated into planning policy in the Places and Policies Local Plan.	No action proposed.	2. There are no suitable vacant buildings in the locality that could be converted; 3. The development is viable and will have significant economic and other benefits to the locality to outweigh any harm; and 4. Where the proposal is located within the Kent Downs Area of Outstanding Natural Beauty or its setting, it does not constitute major development.  Proposals for new residential accommodation to serve tourism development in the countryside will be required to comply with Policy HB7.
	CPRE strongly objects to this policy. The policy does not provide safeguards to ensure development is sensitively and sustainably located. Supporting text indicates that new development should be located within settlements and where outside settlements, should rely on utilising existing buildings. This approach is not clear in the policy itself. The first part of the policy does not indicate the importance of the relationship of new development to a settlement. Reference to new tourism facilities is not appropriate here given the final paragraph and the reference to 'new tourism proposals' in the countryside being granted in exceptional circumstances. The first part of the policy should only refer to proposals within existing settlements, and proposals that seek the change of use of existing rural buildings for tourism purposes, or are seeking sensitive extension to existing tourism facilities. The second part of the policy refers to 'exceptional circumstances'. The circumstances in which tourism development in the open countryside might be permitted should be set out in more detail. It could discuss the need to demonstrate: a) that available sites within or on the edge of settlements are not suitable and clearly indicate why an open countryside location is needed; b) that there are no suitable vacant buildings in the locality that could be converted; c) the development is viable and will have significant economic and other benefits to the locality to outweigh harm. The applicants should enter into a legal agreement to ensure facilities/accommodation remains in holiday use. Development should also have to meet general criteria. Criteria 1-5 are supported but should ensure the proposal is of appropriate scale/nature for its location, would not impact on rural lanes with the amount and nature of traffic, and should not impact on nocturnal character or tranquility of its location. Also reference the AONB and relevant policy.	Comment noted.	Amend the first paragraph of Policy E2 (reassigned Policy E3) to read:  'Planning permission will be granted in or on the edge of centres in the settlement hierarchy for proposals to provide new tourism development including hotels, guesthouses, bed and breakfast, self catering accommodation and new visitor attractions where: ...'  Delete final paragraph and amend with additional criteria:  'New tourist accommodation and attractions in the countryside, or expansions to existing sites, will be permitted in exceptional circumstances where it can be demonstrated that:  a) For new accommodation and/or attractions, available sites within or on the edge of settlements are not suitable and why an open countryside location is needed; b) There are no suitable vacant buildings in the locality that could be converted; c) The development is viable and will have significant economic and other benefits to the locality to outweigh harm. d) Where located within the Kent Downs AONB or its setting and does not constitute major development.'	
	There is no reference to LAA in this section. Paragraph 21 of the NPPF provides a requirement to support existing business sectors, plan positively for the location and identify priority areas for infrastructure provision. LAA should be identified in this section due to its existing status as an important business within the District. We are concerned that the presumption in favour of tourism development only relates to accommodation and new attractions. LAA has significant tourism value and the airport should be recognised as being one of the main drivers of tourism for the area.	This section of the chapter aims to promote all tourism attractions within the district, but these have not been listed individually in the text. Therefore, officers consider it unnecessary to make specific reference to London Ashford Airport in this section.	No action proposed.	
	As a resident who can see potential in a number of elements but who sees little support, combined with being a member of the Shorncliffe Trust, we have presented to you a good business plan evidencing a number of high grade jobs and increased tourism spend. Lack of support for this means that this is unlikely to happen regardless of comments are made. Policy E2, item 5 seems like a supportive statement, unfortunately, the local authority seem not to be.	Comment noted.	No action proposed.	
	Not enough is being made of the Historic Assets in the District, and the enormous story that can be told at Shorncliffe Garrison. The advice given by Historic England, the British Council for Archaeology, KCC Archaeology, the Victorian Society, and the efforts over 10 years of The Shorncliffe Trust and others have largely been ignored, and the developers Taylor Wimpy allowed to dictate the form of the development there, that has no regard whatsoever to section 9 of the paper, and Policy	Kent County Council is in the process of preparing a Heritage Strategy for Shepway District Council. The emerging Heritage Strategy has fed into the development of the draft Places and Policies Local Plan.	No action proposed.	
<p><b>Policy E3</b> <b>Hotels/Guest Houses</b> Applications for the change of use or redevelopment of hotels/guest houses or self-catering units which would result in a loss of visitor accommodation will only be permitted where it can be shown that it is no longer practicable to use the premises as holiday accommodation by reason of one of the following criteria:</p> <ol style="list-style-type: none"> <li>1. The standard and type of accommodation that is, or could be provided at reasonable cost, is unsuited to meet visitor demands</li> <li>2. In the case of hotels and guest houses, the premises or site are poorly located in relation to the areas of main tourist activity or tourist routes, and uses in the immediate vicinity are predominantly unrelated to tourism or incompatible with continued tourist use of the premises.</li> </ol>	We welcome the criteria to ensure decisions are considered on a site by site basis but we suggest that the presumption in favour of retaining the existing use should be removed in order to support making the best use of brownfield land. In view of this, we believe the final approach in Option 16 of the Preferred Options document should be adopted, which supports new visitor accommodation and encourages improvements to existing visitor accommodation.	Officers consider that it is necessary for the Policy to start from a position of a presumption in favour of retaining existing hotel uses. It is important to try and protect and retain existing hotels and guest houses in the town centre and on the Leas, which are currently undergoing a revival picking up on the growing visitor market. In order to promote Folkestone as a tourist and business destination it is crucial that these hotels thrive and survive.	Amend Policy E3 (reassigned Policy E4) to include new criteria requiring the business to be marketed for a period of 12 months.	<p><b>E4 Hotels and Guest Houses</b> Applications for the change of use or redevelopment of hotels, guest houses or self-catering units which would result in a loss of visitor accommodation will only be permitted where:</p> <ol style="list-style-type: none"> <li>1. The standard and type of accommodation that is, or could be provided at reasonable cost, is unsuited to meet visitor demands; or</li> <li>2. In the case of hotels and guest houses, the premises or site are poorly located in relation to the areas of main tourist activity or tourist routes, and uses in the immediate vicinity are predominantly unrelated to tourism or incompatible with the continued tourist use of the premises; and</li> <li>3. In addition to the above, it has been demonstrated that the business has been marketed at a reasonable rate and for a period of 12 months.</li> </ol>

<p><b>Policy E4</b> <b>Touring and Static Caravan sites</b> Proposals for upgrading existing lawful touring and static caravan sites will be permitted where they can meet the following criteria:</p> <ol style="list-style-type: none"> <li>1. The proposal would not harm the character or appearance of the countryside or coastline or conflict with other countryside and environmental protection policies</li> <li>2. Sites should have good access via a local distributor road to the primary road network, and any local roads involved in gaining access to the site should be capable of accommodating the extra traffic generated without undue hazard or inconvenience to local residents or other road users</li> <li>3. Minor expansions should be situated so as to minimise their effect upon local amenity, and should as far as possible, be screened from public roads, open spaces or footpaths and where necessary a scheme of landscaping should be submitted with the proposal to achieve this</li> <li>4. The proposal should not significantly affect the best and most versatile agricultural land</li> <li>5. The proposal should not substantially interfere with the amenities of residents in nearby dwellings</li> <li>6. That the upgrading is compliant with the holiday use</li> <li>7. The demand for the upgrading can be demonstrated</li> </ol> <p>Proposals for change of use to residential use will only be permitted where:</p> <ol style="list-style-type: none"> <li>1. The site is within an existing settlement boundary and is well related to the built up area</li> <li>2. The site is acceptable in terms of highway access</li> <li>3. The site does not have a significant impact on the wider landscape</li> <li>4. It can be demonstrated that the accommodation is no longer required for holiday accommodation</li> <li>5. The location is not within an area of high flood risk.</li> </ol>	<p>Suggest revised wording to criterion 3 of the second part of the policy to ensure that the landscape of the district is appropriately protected: "The proposal would result in an enhancement of landscape character "</p>	<p>The second part of the Policy covers circumstances where a tourist touring and static caravan site is proposed to change to a permanent residential use. Officers consider that the current wording of the policy is sufficient to ensure that there is not a significant impact on the site, but given the site would remain as caravan accommodation that it would be very difficult to achieve an 'enhancement' of the landscape.</p>	<p>No action proposed.</p>	<p><b>E5 Touring and Static Caravan, Chalet and Camping Sites</b></p> <p>Proposals for the infilling, expansion and diversification of existing lawful touring and static caravan, chalet and camping sites will be permitted where:</p> <ol style="list-style-type: none"> <li>1. The proposal would not harm the character or appearance of the countryside or coastline or conflict with other countryside and environmental protection policies;</li> <li>2. The site has good access through a local distributor road to the primary road network, and any local roads needed to gain access to the site are capable of accommodating the extra traffic generated without undue hazard or inconvenience to local residents or other road users;</li> <li>3. Minor expansions are located to minimise their effect on local amenity, and should as far as possible, be screened from public roads, open spaces or footpaths, and where necessary a scheme of landscaping should be submitted with the proposal to achieve this;</li> <li>4. The proposal does not significantly affect the best and most versatile agricultural land;</li> <li>5. The proposal does not substantially interfere with the amenities of residents in nearby dwellings;</li> <li>6. The diversification is compliant with the holiday use; and</li> <li>7. The demand for the infilling, expansion and diversification can be demonstrated.</li> <li>8. Change of use to residential use will only be permitted where: <ul style="list-style-type: none"> <li>•The site is within an existing settlement boundary and is well-related to the built up area;</li> <li>•The site is acceptable in terms of highway access;</li> <li>•The proposal would not have a significant impact on the wider landscape and biodiversity;</li> <li>•It can be demonstrated that the accommodation is no longer required for holiday use by demonstrating that the business has been marketed at a reasonable rate and for a period of twelve months.</li> <li>•The location is not within an area of high flood risk.</li> </ul> </li> </ol>
<p><b>Policy E5</b> <b>Farm Diversification</b> Planning permission will be granted for the diversification of farm businesses provided that:</p> <ol style="list-style-type: none"> <li>1. The proposal is compatible with surrounding buildings and the location in a rural area in terms of scale and design</li> <li>2. There would be no detrimental impact on local amenity or the character, appearance or nature conservation value of the rural landscape. This criterion will be given additional weight in the Kent Downs Area of Outstanding Natural Beauty, and nature conservation designations</li> <li>3. Adequate provision can be made to meet access, servicing and parking requirements</li> <li>4. The proposal would not prejudice the agricultural working of the farm unit</li> <li>5. Where practicable, the proposal re-uses an existing agricultural building.</li> </ol>	<p>Supporting text need to be clear how this policy relates to Policy E2, in terms of tourism accommodation. An additional criterion should be added which requires the applicant to demonstrate that the business has been marketed at a reasonable rate and for an appropriate period of time.</p>	<p>The Local Plan should be read as a whole. Policy E6: Farm Diversification should be read in conjunction with policies E3 and E7.</p> <p>Policy E6 already covers the need for adequate provision for access, servicing and parking for farm businesses so as to ensure that rural lanes are kept clear and do not become congested. In regards to highway capacity, Kent Highways as a statutory consultee, will comment on applications and advise accordingly.</p>	<p>Amend Policy E4 (reassigned Policy E5) to read:  'It can be demonstrated that the accommodation is no longer required for holiday use'</p>	<p><b>E6 Farm Diversification</b></p> <p>Planning permission will be granted for the diversification of farm businesses where:</p> <ol style="list-style-type: none"> <li>1. The proposal is compatible with surrounding buildings and the location in terms of scale and design;</li> <li>2. There would be no detrimental impact on local amenity or the character, appearance or nature conservation value of the rural landscape. This criterion will be given additional weight in the Kent Downs Area of Outstanding Natural Beauty, and nature conservation designations;</li> <li>3. Adequate provision is made for access, servicing and parking;</li> <li>4. Any retailing proposed relates to the sale of farm produce and would not harm the viability of retail facilities in nearby centres in accordance with Policy RL8: Development Outside Town, District and Local Centres;</li> <li>5. The proposal would not prejudice the agricultural working of the farm unit; and</li> <li>6. Where practicable, the proposal re-uses an existing agricultural building.</li> </ol>
<p><b>Policy E6</b> <b>Farm Shops</b> Planning permission for retail use on a farm will be permitted where:</p> <ol style="list-style-type: none"> <li>1. The retailing proposed relates to the sale of farm produce and would not harm the viability of retail facilities in nearby rural towns and villages</li> <li>2. The proposal is acceptable as part of farm diversification scheme</li> <li>3. In considering proposals, a condition may be attached to planning permission to limit the range and / or source of goods sold.</li> </ol>	<p>No comments</p>	<p>Policy on farm shops has been incorporated into Policy E6: Farm Diversification.</p>	<p>No action proposed.</p>	<p>See above</p>
<p><b>Policy E7</b> <b>Reuse of rural buildings</b> Planning applications for the re-use or adaptation of rural buildings to alternative uses will be approved where proposals would meet the following criteria:</p> <ol style="list-style-type: none"> <li>1. The building is of permanent and substantial construction, is of a form, bulk and general design which is in keeping with its surroundings and, is capable of conversion without substantial rebuilding</li> <li>2. The proposed conversion is sympathetic to the building's intrinsic character, appearance and setting and is capable of being implemented without significant extensions or alterations to the existing building</li> <li>3. Development would not prejudice the agricultural working of a farm unit or the vitality and functioning of nearby rural towns and villages</li> <li>4. Adequate provision can be made to meet access, servicing and parking requirements without detriment to the visual or other amenities in the locality</li> <li>5. Where a rural building can accommodate a business reuse in accordance with criteria 1-4 above, proposals for conversion to a residential use which is not ancillary to a scheme for business reuse will require to be justified by the applicant through a statement detailing the efforts made to secure a business reuse in the first instance</li> <li>6. For residential, including holiday use, the proposal would involve the re-use of a traditional building of architectural or historic merit</li> <li>7. The proposal will not damage the fabric or character of any traditional building or the historic character and significance of the farmstead and in the case of a Heritage Asset, whether designated or not, the proposal will not damage the architectural, archaeological or historic interest of the asset or its setting</li> </ol>	<p>Policy E7 would benefit from review, rewording and perhaps splitting into two policies. Currently it covers both business and residential conversions but appears only in the economic section, passing reference is made at 9.42 to NPPF policy on rural conversions but there is no related policy. The criteria of policy E7 appear at odds with NPPF advice. The NPPF makes specific provision in paragraph 55 for exceptions for residential uses in the rural areas and lists two examples which apply to conversions:</p> <ul style="list-style-type: none"> <li>• where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or</li> <li>• where development would re-use redundant or disused buildings and lead to an enhancement to immediate setting.</li> </ul> <p>The criteria of policy E7 appear unduly restrictive with criteria 5 and 6 at odds with the NPPF policy in paragraph 55. If there will be an enhancement to the immediate setting through residential conversion this is sufficient for policy support in principle. There is no justification to add requirements relating to commercial use or for the building to be of architectural or historic merit. Similarly if the building for conversion to residential use is a heritage asset, there are no grounds to require a justification for residential rather than business use.</p>	<p>The Policy only covers the re-use of rural buildings for employment / economic purposes. The opening paragraph of the Policy will be amended to clarify this.</p> <p>The Council is seeking a business-first approach for the re-use of rural buildings. This is consistent with the National Planning Policy Framework (paragraph 28) to support economic growth in rural areas. Where a business use cannot be found for the building in question, then the special circumstances listed in paragraph 55 would then apply.</p>	<p>Amend first paragraph of Policy E7 to read:  'Planning applications for the conversion of existing rural buildings and/or the creation of new buildings that support the development and expansion of the rural economy or tourist industry (including visitor accommodation) will be approved where ...'  Condense Criteria 1, 2, &amp; 7 of Policy E7  Policy Criteria (6) to be deleted from Policy E7</p>	<p><b>E7 Reuse of Rural Buildings</b></p> <p>Planning applications for the conversion of existing rural buildings and/or the creation of new buildings that support the development and expansion of the rural economy or tourist industry (including visitor accommodation), will be approved where:</p> <ol style="list-style-type: none"> <li>1. The building is of permanent and substantial construction and the proposed conversion is sympathetic to the building's intrinsic character, appearance and setting and is capable of being implemented without significant extensions or alterations to the existing building and would not damage the historic fabric, character or setting of a historic asset;</li> <li>2. Development would not prejudice the agricultural working of a farm unit or the vitality and functioning of nearby rural towns and villages;</li> <li>3. Access, servicing and parking requirements can be met without detriment to the visual or other amenities in the locality;</li> <li>4. The proposal is within the Kent Downs Area of Outstanding Natural Beauty or its setting, it is of a high quality of design of buildings and surrounding space and reinforces local distinctiveness to help maintain the Area of Outstanding Natural Beauty as a special place;</li> <li>5. There is no detrimental impact on residential amenity; and</li> <li>6. There is no detrimental impact on the protected species, sites or features of nature conservation interest.</li> </ol> <p>Where a rural building can accommodate a business reuse in accordance with criteria 1 to 3 above, proposals for conversion to a residential use which is not ancillary to a scheme for business reuse, will need to be justified through a statement detailing the efforts made to secure a business reuse in</p>

<p>the interest of the asset or its setting.</p>		<p>Noted.</p>	<p>Amend Policy E7 to include the additional following criteria:</p> <p>'Where the proposal is within the Kent Downs Area of Outstanding Natural Beauty or its setting, it is of a high quality of design of buildings and surrounding space and reinforces local distinctiveness to help maintain the Area of Outstanding Natural Beauty as a special place.'</p> <p>'There is no detrimental impact on residential amenity; and'</p>	<p>will need to be justified through a statement detailing the efforts made to secure a business case in the first instance and, in addition, the proposal would involve the re-use of a traditional building of architectural or historic merit that is worthy of retention.</p>
	<p>An additional criterion should be added which seeks to ensure that new uses do not increase traffic to the detriment of the character of rural lanes. A further criterion related to protected species, such as bats, is essential.</p>	<p>Comment noted</p>	<p>Amend Policy E7 to include the additional following criteria:</p> <p>'There is no detrimental impact on the protected species, sites or features of nature conservation interest.'</p>	
<p><b>Policy E8</b> <b>Broadband provision</b> Planning permission will be granted on sites where it can be demonstrated that the highest broadband speeds available for the locality will be achieved, and has been 'designed in' to the development. Provision of a fully serviced and future-proofed site in terms of broadband infrastructure will be secured by planning condition.</p>	<p>KCC is supportive of the inclusion of a specific policy on broadband connectivity.</p> <p>There is concern about the phrase 'where it can be demonstrated that the highest broadband speeds available for the locality will be achieved' in E8. Without getting too technical, one of the opportunities that new development affords it 'fibre-to-the-premise' can be installed at negligible cost. Indeed, in some instances, broadband infrastructure providers will even pay the developers so they can install this connectivity. Fibre-to-the-premise offers significantly faster broadband speeds, and is, therefore, more future-proofed to meet future data needs than fibre-to-the-cabinet solutions which are currently being retrofitted into the existing housing stock and rely on the existing copper network.</p> <p>Unfortunately, KCC is aware that in some developments, where broadband connectivity provision is being made, developers are installing fibre-to-the-cabinet using copper, which is a missed opportunity.</p> <p>KCC would encourage SDC to go even further with this policy and adopt a similar policy to the one that Ashford BC has recently proposed. They did a considerable amount of research in developing this policy and KCC supported them in this work. The policy factored in a 'reasonableness' consideration for dealing with the issue in rural areas that may be off the fibre footprint – by recognising the role of alternative technologies. KCC would welcome an opportunity to work with SDC to develop this policy further.</p>	<p>Comment noted.</p>	<p>Amend Policy E8 to adopt best practice regarding provision of broadband infrastructure.</p>	<p><b>E8 Provision of Fibre to the Premises</b></p> <p>All major developments within Shepway District will enable Fibre to the Premises (FTTP).</p> <p>For smaller schemes the Council will expect FTTP to be provided where practical.</p> <p>Where it can be demonstrated that FTTP is not practical due to special circumstances, then technologies that can provide speeds in excess of 24Mbps should be delivered wherever practical.</p>



Preferred Options Policy	Comments received	Response from the Council	Action by the Council	Revised Draft Policy
<b>Policy C1</b> <b>Creating a sense of place</b> The council will expect all new major development to demonstrate a deliverable and fully resourced project for fostering a sense of place through such methods as landscaping, public art, water features and/or lighting. This programme and its logic will be fully outlined in the Design and Access Statement submitted as part of the application. This will apply to the following: 1. Residential developments comprising 10 or more dwellings 2. Other developments where the floor area to be built is 500m2 gross or greater, including office, manufacturing, warehousing and retail developments. In larger, phased development, it is acceptable for this to come forward in later phases so that it involves a critical mass of population. Any programme for community-building and placemaking must engage the local community and could be community-led, having regard to the local circumstances of the site and/or local aspirations. Where physical public art is provided on a permanent basis, it needs to form part of managed open space or, if transferred to Town or Parish Councils, contributions and commuted maintenance sums for up to 10 years will be required to include the cost of decommissioning where appropriate.	Hythe Town Council supports this policy	Support noted	No action	Add additional paragraphs after para 11.4 to read:
	It is hard to imagine that every development in the borough must provide for all or any of the items listed. It would be more sensible to fund these requirements through CIL. We note that 'public realm improvements' is on the Council's Regulation 123 list so it would be contrary to national policy to seek additional contributions to this item through S106.	It is not expected that developments should provide all the items listed, these are examples. The Council is looking for integration of development with existing communities as well as creating a sense of place. This could be undertaken as part of the design statement for a development. This is directly linked to the development so Community Infrastructure Levy funds would not be suitable.	No action	<b>"There are many ways a new development can create a sense of place. Two examples are either through links to heritage of the area or public art (which can include landscaping, water features or lighting and not just installations).</b>  <b>Heritage plays a fundamental role in providing the unique character and distinctiveness of a place, grounding the place in its history and roots. Without heritage the product of proposals may be essentially similar and without its unique selling points a regenerated area is at an economic disadvantage. Buildings, open spaces, historic features and patterns of roads and lanes are what ultimately define the character of settlements. It is therefore important that any change is sensitive to this character, adding to and developing distinctiveness rather than diminishing it and creating uniformity or blandness'.</b>  Amend first paragraph of Policy to read:  <b>The council will expect all new major development to demonstrate a deliverable and fully resourced project for fostering a sense of place through such methods as landscaping, public art, water features and/or lighting. This programme and its logic should be fully outlined in the Design and Access Statement submitted as part of the application.</b>
	The wording of the Policy only acknowledges methods of place making as including landscaping, public art, water features and/or lighting. There are many methods for creating a sense of place as detailed within paragraph 58 of the NPPF. To make the policy 'Justified', 'Effective' and 'Consistent with National Policy', the policy wording should be amended as follows: 'The Council will expect all new major development to demonstrate a deliverable and fully resourced project for fostering a sense of place through such methods as landscaping, public art, water features, and/or lighting, building design or any other design/layout techniques. This programme and its logic will be fully outlined in the Design and Access Statement submitted as part of the application.'	The suggested text is agreed	Amend Policy as suggested	
	Para 11.4 Hythe is a place where both residents and visitors identify with it on an emotional level. It is successful through its mix of a vibrant High Street, things to do, its historic setting and its open spaces with fabulous views to - and particularly from - the sea. Change to any of these key elements will inevitably affect the way Hythe is perceived and will also affect the quality of life of those who live there. Princes Parade is a very important part of the mix and should not be tampered with in a negative way. It should remain an open space for the enjoyment of all, providing a distinct break in development between Seabrook and the Hotel Imperial. Green space such as this adds to one's sense of well-being and emotional attachment to a place, and the fact that 'nothing happens there' should be viewed as a positive.	Noted.  The response to Princes Parade is set out in the Urban Area section of this document.	No action	
	We still consider that a policy requiring the inclusion of public art would conflict with the NPPF and CIL regulations and we consider that Option 18 of the Preferred Options document should be removed. We also assert that Option 18 as included in the Preferred Options document is redundant as it is already provided for through CIL and section 106 Agreements, if the council deem this necessary.	The policy does not require public art, the policy is looking to create a sense of place and engage with the local community, through possible measures such as public art. This could be undertaken as part of the design statement for a development. This is directly linked to the development so Community Infrastructure Levy funds would not be suitable.	No action	
	Para 11.4 The text in this paragraph correctly identifies the need for a 'Sense of Place' as a key feature of successful development and says that " Successful places have often established themselves through history and are associated with particular events and buildings ." However, the text, and policy C1, suggests that this is to be achieved entirely by public art. We consider that it is highly unlikely that new development will have a sense of place entirely because of public art. To ensure that development 'fits' in to the local community the historic environment is also going to be important. If new developments have no sense of place – no sense that they belong to the towns and villages to which they will mostly be appended – then they are more likely to experience social and economic problems. To achieve this sense of place it will help if the new communities work with the 'grain' of existing patterns of settlement and landscape in Shepway, complementing what has gone before. An appropriate layout of new roads and lanes that complements existing patterns, the scale, massing, building materials and orientation of new buildings and the retention of existing historic buildings and features are far more likely to give a new development the Sense of Place that the Council desires. Policy C1 should be rewritten to fully reflect the role that the historic environment plays in creating a sense of place and ensures that the added value that the conservation and use of designated and undesignated heritage assets delivers to the community is realised. The Heritage Strategy in preparation should be used to assist in developing this policy further.	Agreed, the historic environment can play a part in creating a sense of place in new developments and the text and policy should be amended to reflect this.	Amend text and policy to reflect how the historic environment can help create a sense of place.	

<p><b>Policy C2</b>  <b>Safeguarding community facilities</b>  Planning permission for development leading to the loss of an existing community facility will be granted, where it can be demonstrated that all the following criteria have been met:  1. There is no longer a demand for the facility within the locality supported with evidence that the premises have been actively marketed for a period of 12 months  2. The sale price is realistic for the existing use, supported with a written valuation from a commercial estate agent  3. The proposed development would provide an alternative beneficial facility to the local community  4. There is provision for new or replacement facilities to meet an identified need in locations which are well related and easily accessible to the settlement or local community.</p>		<p>Support noted. Text needs to be updated to highlight legislation regarding Assets of Community Value.</p>	<p>Supporting text to be updated.</p>	<p>Supporting text to be amended to:</p> <p>'Community facilities are one of Britain's oldest and most popular social institutions but they are under pressure and many are closing, leaving communities without pubs, post offices, bank's and newsagent's.</p> <p>Many community facilities provide a meeting place where social networks are strengthened and extended. This is especially important in rural areas. Pubs, for example, host a wide variety of community-oriented events and activities that add considerably to local civic life. They are becoming hosts for a range of important public services including; post offices, general stores and providing broadband internet access. Community pubs, or at least pubs with certain characteristics, also have a cultural as well as a practical community value. This is because pubs are felt to offer things such as tradition and authenticity that are becoming rarer in a world transformed by global commercial pressures.</p> <p>The Government has introduced 'Assets of Community Value', which provides some additional protection against development for land or property of importance to a local community under the Localism Act 2011. This Act enables voluntary and community organisations to nominate an asset to be included on their local authority's register of asset of community value so that when it becomes available on the market, they can make a bid for it.</p> <p>To ensure further protection of community assets, the policy below will need to be considered before any development proposals for alternative uses are granted permission'.</p>
<p><b>Policy C3</b>  <b>Provision of open space</b>  The Local Planning Authority considers it appropriate that development of 5 or more dwellings contributes or provides for the provision of open space, unless there is sufficient existing open space within close proximity that can accommodate the additional demand. This open space is expected to be in accordance with the standards set out by Fields in Trust as a benchmark guide for informal open space. It is to be noted that provision of or contributions towards each category will be sought as per this national guidance, with major development expected to provide to the standard of 3.2ha per 1,000 population.  Minimum quantity Walking guidelines guidelines (ha/1000 people)  Parks and gardens 0.80 710m  Amenity green space 0.60 480m  Natural and semi-natural 1.80 720m  Total / Average 3.2 637m  Table 11.1  It is to be noted that this gross open space calculation may include provision of sustainable urban drainage systems (SuDS) provided they do not compromise the safety of open space users; informal sports pitches; and formal play spaces providing they are made accessible to all.  Any new open space should be transferred to and maintained in perpetuity by a management company or, in certain cases, the local Town or Parish Council subject to payment of a commuted sum.</p>	<p>How can this be consulted on when the study of open space requirements has not been published? As stated, this study 'will update the requirements in this policy in the next draft of the plan' - i.e. the version of the plan that is out to consultation is incomplete and there will not be a sufficient statutory consultation for the open spaces provision.</p> <p>Need to clarify what are the "certain cases" in the last paragraph</p> <p>This policy is unsound because it would not necessarily meet the tests of necessity in the NPPF. It would be more appropriate to fund the provision of open space through the CIL. We note that open space is already on the Council's Regulation 123 list so it would be inappropriate to seek additional contributions to this item through S106.</p> <p>Princes Parade fulfils all the criteria outlined in this paragraph (supporting para 11.18).  Study should have been carried out before land allocated</p> <p>There are proposals to develop some areas of open space - egg Princes Parade - in this stage of the Local Plan. HCS is concerned that the outcome of the current study of open space requirement, mentioned in paragraph 11.22 of the document, is not constrained in any way by development proposals at this stage of the Local Plan and that any deficiencies in open space provision will be met by proposals for additional open space at the next stage of the Local Plan.</p>	<p>The Plan was the first draft and for public engagement, to seek views on the policy direction. The review of open spaces has also involved seeking the views of the public through questionnaires. It is important that the local plan process is not slowed down as then other earlier studies would then be out of date.</p> <p>The term 'in certain cases' was used so that there was no onus on the Parish or Town Councils to take on new open spaces, only where they agree to it. Amend text to reflect this. amend text to read 'or, if agreed, ...'.</p> <p>There will be cases where new development will need to provide facilities as the increased population will put further strain on the existing facilities. Each residential proposal will be treated on its own merits and both Section 106 contributions and the Community Infrastructure Levy provide options.</p> <p>Noted. The area identified for development is not all publicly accessible, being a former refuse waste disposal tip. The policy for Princes Parade requires the provision of at least 45% of the site (including the promenade) to be accessible open space.</p>	<p>Amend policy in light of Open Space study.</p> <p>Amend text to read 'or, if agreed,'</p> <p>No action</p> <p>No action</p>	<p>Supporting text and standards to be amended to reflect Open Space Review recommendations.</p> <p>New Policy:</p> <p><b>Provision of Open Space</b></p> <p>To meet the additional need in open space generated by new residential developments the Council will require proposals of 20 or more dwellings to provide for open space in accordance with the standards in Table 12.1 above.</p> <p>Where full provision on-site would not be appropriate or desirable, or the proposed development is less than 20 dwellings, the space needed may be met by commuted sum payment towards the provision or improvement of open space nearby on a scale related to the size and scale of the development.</p> <p>This gross open space calculation may include provision of publicly available: Sustainable Drainage Systems (SuDS), provided they do not compromise the safety of open space users;  - Informal sports pitches; and  - Formal play spaces.</p> <p>Any new open space should be transferred to and maintained in perpetuity by a management company or, if agreed, the local Town or Parish Council, subject to payment of a commuted sum.</p> <p>Existing open spaces, as defined on the Policies Map, will be safeguarded. Development proposals that would result in the loss of open spaces will be granted provided that:  - An assessment has been undertaken which clearly identifies the open space is surplus to requirements; or  - The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of the standards in Table 12.1 above; or  - The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p>
<p><b>Policy C4</b>  <b>Formal play space provision</b>  The Council will seek the provision of an adequate level of public open space for leisure, recreation and amenity purposes.  Areas should be set out and located so as to minimise annoyance to nearby occupiers, maximise children's safety and be visible from neighbouring properties. Play areas should be within walking distance of all dwellings containing child bed spaces.  Planning permission for new residential or mixed-use development will be granted subject to the provision on site or contribution off site towards formal play space. The following table sets out the requirements:  <b>Table 11.2</b>  £ = Provided on site  £ = Contribution required  A deferred contribution may be acceptable towards the improvement of an existing equipped/designated play space in lieu of on site provision.  In addition to the above, the following specifications must be observed so that a play space of an appropriate size is created and that disturbance to neighbouring residential properties is minimised:  <b>Table 11.3</b></p>	<p>Add 'Adult Play'. The equipment installed in Oaklands Park is popular with adults and provides free fitness facilities.</p> <p>This policy is unsound because it would not meet the tests of necessity in the NPPF. It would be more appropriate to fund the provision of play space through the CIL. We note that play space is already on the Council's Regulation 123 list so it would be inappropriate to seek additional contributions to this item through S106.</p> <p>It is noted that the existing Playing Pitch Strategy referred to dates from 2011. Sport England has since produced new guidance on the development of Playing Pitch Strategies and would therefore recommend this part of the evidence base is now reviewed in order to ensure that it is both up to date and robust. Please note that Sport England does not support a standards-based approach and is likely to OBJECT to any local plan that comes forward without a robust evidence base.</p> <p>We still consider that unless it is absolutely necessary for the council to regulate development, it should avoid it. (airport)</p>	<p>Noted.</p> <p>If there is a need for play space as a result of the development then play space can be requested through Section 106 contributions.</p> <p>The District Council has set new standards based on an up-to-date open space study.</p> <p>Noted.</p>	<p>Amend text to reflect Strategy recommendations.</p> <p>No change necessary.</p> <p>No change necessary.</p> <p>No change necessary.</p>	<p>Supporting text and standards to be amended to reflect Play Space Review recommendations.</p>

	<p>I do not support any development on Princes Parade for the reasons which I will set out in my response to policy UA25. I do not understand why option 24 is still referring to a school when this has been ruled out.</p> <p>In the Jan 2015 Consultation, the first alternative of developing Princes Parade is considered to be flawed both on technical and financial grounds, also because of the harm that would be caused to the heritage asset (RMC), and because of the loss of unique vistas that depend on this unique site remaining undeveloped. This was overwhelmingly rejected by 80% of respondents and has been ignored by making UA25 the Preferred Option. The second alternative, based upon building a leisure centre on an alternative site, is strongly supported, with the preferred site being Nickolls Quarry for which there are substantial advantages to the community as well as important cost advantages. Nickolls Quarry offers major sustainability advantages that will be forfeited if the leisure centre were to be built on Princes Parade. I also strongly support the third alternative in addition to that above. Princes Parade should be re-instated to its former state as green open space for public leisure use.</p>	<p>Noted. The options set out in this draft plan are referring to the earlier Issues and Options stage. The responses to Princes Parade are set out in the Urban Character Area chapter. The Princes Parade policy is to be amended so that there is a minimum of 45% of the area for public open space.</p>	<p>No change necessary.</p>	
<p><b>Policy C5</b> <b>Local Green Spaces</b> Within the designated Local Green Spaces, identified on the Policies Map development will only be permitted where: 1. It is justified by the needs of agriculture or recreation; 2. It can be demonstrated that it cannot be accommodated elsewhere; 3. It does not result in the loss of ecological habitats; 4. Measures are incorporated to reduce, as far as practicable, any harmful effects on the special character of the designated area.</p>	<p>Given the reasons for creating Local Green Spaces i.e. the significant health benefits of having easy access to open space, I don't think that there could ever be any justification for allowing any built development on an LGS and the policy to be amended to that effect.</p>	<p>There are no Local Green Space designations currently in the district. These are designations that must meet the criteria set out in the National Planning Policy Framework. It is considered by the Council that the areas of land that have been put forward do not meet this criteria.</p>	<p>Amend text to reflect the support for Local Green Spaces</p>	<p>New text to be added:  "The Council will support and assist local communities with the assessment and designation of Local Green Spaces, based on the NPPF assessment criteria, through Neighbourhood Plans".</p>
	<p>Policy UA25 (Princess Parade) is inconsistent with this key Policy C5, which must take precedence. I strongly support this Local Green Spaces Policy C5 as derived from the Sustainability Appraisal</p>	<p>It is considered that the area put forward does not meet the criteria in the National Planning Policy Framework for designating Local Green Spaces.</p>	<p>No change necessary.</p>	
	<p>Condition 3 is too strict. All development will cause some loss of habitat. However there needs to be compensatory habitats provided elsewhere where possible.</p>	<p>Noted, but policy is to be deleted</p>	<p>No change necessary.</p>	
	<p>Policy C5 but as mentioned above HNPG would like to see the Green Infrastructure Strategy completed before allocating sites which have value as green spaces. Once identified for housing their value as green spaces is obviously lost or severely compromised. Of the sites identified in Appendix 2 Table 2.1, Fully support all sites with exception of 129 and 157 (see below). -Support site 129 Eversley Woods subject to future clarification as to future of the reserved primary school site in Eversley Road. - 157 Foxwood School site is identified for housing development which we support</p>	<p>The Open Space Review has been undertaken and this will inform the update of the Green Infrastructure Strategy. Whilst support is noted, it is considered that the sites do not meet the National Planning Policy Framework criteria for Local Green Space.</p>	<p>No change necessary.</p>	
	<p>Southern Water understands Shepway's intention to identify and protect Local Green Spaces, however, we can not support the current wording of this policy as it could create a barrier to statutory utility providers. Accordingly, in line with the NPPF and National Planning Practice Guidance and to ensure sustainable development, we propose that the following criteria are added to the list of considerations for each policy detailed separately in the table below (new text underlined):</p> <p>'C5 Local Green Space Within the designated Local Green Spaces, identified on the Policies Map development will only be permitted where:</p> <p>1. It is justified by the needs of agriculture or recreation; or utility infrastructure ;...</p> <p>3. It does not result in the significant loss of ecological habitats</p>	<p>Noted, however the policy is to be removed.</p>	<p>No change necessary.</p>	
	<p>KCC Heritage: Add an extra criteria: 5. "It will not result in unacceptable harm to heritage assets (whether designated or not) or their setting".</p>	<p>Noted, but the policy is to be removed.</p>	<p>No change necessary.</p>	
	<p>Suggested site for Local Green Space is "Former Rugby Club" Dymchurch Road, St. Mary's Bay. The seaward side of the land is already SSSI and therefore unusable but the land from Dymchurch Road to the public footpath should be considered as a Local Green Space and would work in harmony with the development of leisure facilities, including community swimming pool, on the site. This remains the only open space within the urban area of St. Mary's Bay.</p>	<p>Noted, it is considered that this site does not meet the criteria as it is not considered to be 'demonstrably special'. The land is, however, designated as a Site of Special Scientific Interest by reason of a diverse range of biological and geological features.</p>	<p>No change necessary.</p>	
	<p>KCC Heritage: Kent County Council has been working with the Kent Gardens Trust for some years to identify parks, gardens and green spaces of local character and (often) historic significance, carrying out such programmes for Tunbridge Wells, Sevenoaks, Medway and Dover. The survey programmes allow the LPA to identify a number of candidate spaces and then the KGT volunteers, assisted by a professional landscape advisor, review their history, development and significance. The sites have included historic parks and gardens, municipal parks, green spaces close to historic monuments and other spaces that have historically been left open. The output is a report for each accompanied by a Statement of Significance. At present we are looking for a new district to survey and Shepway would be an ideal location. We would be pleased to discuss this matter further.</p>	<p>Noted. This work would be helpful if local communities were to put forward Local Green Spaces through Neighbourhood Planning.</p>	<p>No change necessary.</p>	
	<p>Petition of more than 272 residents nominating area to the west side of Hythe known as the Roughs. It is argued that the area is reasonably close to the community and is demonstrably special as the area is SSSI and AONB, and is local habitat for local wildlife, is a tranquil area and has important archaeological remains.</p>	<p>Whilst The Roughs are a special area they are not considered to meet the National Planning Policy Framework criteria as it is a large tract of land. The Roughs are, however protected by Area of Outstanding Natural Beauty status, they are a 'Lachgate Area' (land stability), and there is a large area covered by Site of Special Scientific Interest designation.</p>	<p>No change necessary.</p>	

<b>Appendix 2 Options for Local Green Spaces</b> 43 sites submitted during Issues and Options consultation.	All sites received support. Majority of sites received support from of 1 to 6 people. 17 supported the designation for Princes Parade			
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Preferred Options Policy	Comments received	Response by the Council	Action by the Council	Revised Draft Policy/Text
<p><b>Policy T1</b> <b>Street hierarchy and site layout</b></p> <p>Planning permission for new major development will be granted if the Design and Access Statement submitted as part of the application demonstrates attention has been paid to street design. An application should demonstrate the following:</p> <p>Street hierarchy considering pedestrians first and private motor vehicles last.</p> <p>Permeability through and beyond the site for all users.</p> <p>The creation of an environment that is safe for all street users, which encourages walking, cycling and use of public transport.</p> <p>A range of street types creating legibility throughout the development, meeting the needs of all users, and not allowing vehicles to dominate.</p> <p>Active frontages only, throughout the development, for the purposes of natural surveillance and creating characterful places.</p> <p>Excessive street furniture and signage is included only when necessary for reasons of safety and comfort of the population.</p> <p>Developers should ensure, with the support of Kent County Council as Highways Authority, active travel routes are a priority, both within developments and linking sites to other services, community facilities and transport hubs.</p>	<p>Support the aspiration to make streets safer for walkers and cyclists. Request to ensure that Cycle Shepway is consulted at an early stage in any planned development (ref 429)</p> <p>There is a need to improve cycling infrastructure across the district and/or better maintain existing cycle paths. It was hoped that the 2011 adopted Shepway Cycling Plan was hoped there would be greater investment in cycle infrastructure. It is recommended that a representative from Cycle Shepway is co-opted onto the Joint Transportation Board to move forward on securing investment in cycle infrastructure (Ref 486)</p> <p>Consider an option of 'Play streets' for new residential areas. Children could then play with their friends safely outside, with their parents watching from kitchen / living room windows.' (ref 871) - Hythe Town Council</p> <p>CPRE Kent welcomes and supports the clear prioritisation of active travel over private vehicles.' (Ref 1571) - CPRE Shepway</p> <p>In the preferred options document, a number of transport policies have been removed (T3, T4 and T5) and are replaced by the new Policy T1 relating to hierarchy and site layout. The removal of the requirement for travel plans to be provided for developments under 1,000sqm gross commercial floorspace is welcomed.</p> <p>In relation to Policy T1, more specific criteria for Design and Access Statements is proposed than was previously the case. The street hierarchy should be dependent upon access and location in order to avoid being unnecessarily restrictive. Development should include a sustainable travel priority, but the explicit hierarchy requirement should be considered on a site by site basis rather than a requirement for all developments. Noted that "excessive street furniture" is only required when necessary, and this terminology of "excessive" is too vague, and all street furniture should only be required when necessary in accordance with Regulation 122 of the CIL Regulations. (Ref 1675 &amp; 1676) - London Ashford Airport</p> <p>PROW:</p> <p>Supports, with the following request. In respect of "Active Frontages" it is important to distinguish that this particularly relates to publically accessible areas. From a rights of way perspective this is a vital component of encouraging active travel and designing out any issues of personal security or safety fears (Ref 1976)</p>	<p>Noted. No change required.</p> <p>The response relates to the development management process that deals with planning applications, as opposed to the plan-making function of the local planning authority. The local planning authority has a requirement to consult with statutory stakeholders in conjunction with planning applications. Whilst Cycle Shepway is not recognised as a statutory consultee, officers are aware of the important role played by Cycle Shepway in promoting cycling, and accessibility to the cycle network(s) as part of a successful design for a site and off site connections.</p> <p>Noted. No change required.</p> <p>The request made for Cycle Shepway to have a representative attend future meetings of the Joint Transportation Board is outside the remit/function of the Local Plan. The request will be separately shared with the appropriate contact(s).</p> <p>Noted.</p> <p>Not all newly-planned streets are suitable to be identified as 'play streets' - this is dependent on the specifics of site design and layout. As a general objective the layout of residential areas must either promote active play on site or otherwise provide access to active play.</p> <p>Noted.</p> <p>The reference to street furniture could be amended to read "appropriate street furniture". There is no requirement for the policy to be more specific, as the detailed requirements would be defined on a case-by-case basis to be specified and agreed between a site promoter and the local planning authority and/or local highway authority as part of pre-application discussions and/or ongoing discussions once a planning application is 'live'.</p> <p>Noted. The policy wording is to be subject to a minor edit to reflect the point made concerning active frontages - refer to revised wording of Policy T1: Street Hierarchy and Site Layout.</p>	<p>No change required.</p> <p>No change required.</p> <p>No change required.</p> <p>No change required.</p> <p>No change required.</p> <p>The policy wording is to be subject to a minor edit to reflect the point made concerning active frontages particularly in relation to publicly-accessible areas.</p>	<p>Revised Wording</p> <p><b>Policy T1</b></p> <p><b>Street hierarchy and site layout</b></p> <p>Planning permission for new major development will be granted if the Design and Access Statement submitted as part of the application demonstrates attention has been paid to street design. An application should demonstrate the following:</p> <ol style="list-style-type: none"> <li>1. Street hierarchy considering pedestrians first and private motor vehicles last.</li> <li>2. Permeability through and beyond the site for all users.</li> <li>3. The creation of an environment that is safe for all street users, which encourages walking, cycling and use of public transport.</li> <li>4. A range of street types creating legibility throughout the development, meeting the needs of all users, and not allowing vehicles to dominate.</li> <li>5. Active frontages throughout the development, <b>particularly in relation to publicly-accessible areas</b>, for the purposes of natural surveillance and creating characterful places.</li> <li>6. <b>Appropriate</b> street furniture and signage is included only when necessary for reasons of safety and comfort of the population.</li> <li>7. Developers should ensure, with the support of Kent County Council as Highways Authority, active travel routes are a priority, both within developments and linking sites to other services, community facilities and transport hubs.</li> </ol>
<p><b>Policy T2</b> <b>Residential parking</b></p> <p>Planning permission will be granted for schemes providing residential parking where the resident and visitor parking is sufficient and well integrated so that it does not dominate the street. Applicants should demonstrate:</p> <ol style="list-style-type: none"> <li>1. Priority has been given to on-street parking in well-designed streets.</li> <li>2. That there is sufficient parking for residents and visitors, with a preference for unallocated parking.</li> <li>3. Parking is positioned close to people's homes.</li> <li>4. Parking courtyards are small in size, with no more than five properties using each courtyard, and they are well overlooked.</li> <li>5. Any roofed parking structures are proportionate so that they do not dominate the streetscene, and are well-integrated into the overall design of the development.</li> <li>6. A variety of parking treatments on a single site of more than 5 dwellings.</li> <li>7. A preference for tandem on-plot parking if more than one space is provided.</li> <li>8. Spaces are of sufficient size to comfortably host a larger car, and on-plot spaces have sufficient space for the movement of wheeled waste bins to a collection point (as required)</li> <li>9. A charging point for electric vehicles is included in every private car parking space.</li> <li>10. Covered cycling facilities have been integrated into the residential parking offer.</li> </ol> <p>Rear serviced parking layouts are to be discouraged, and will be permitted only where alternatives are not feasible.</p> <p>A Transport Assessment (TA) will be expected at both pre-application and application stages to give a clear indication of how the proposed scheme impacts upon any existing adjoining on-street residential parking.</p>	<p>Need to define what is meant by sufficient parking' (ref 208)</p> <p>Commented - 'Hythe Town Council strongly supports this policy.' (Ref 872) - Hythe Town Council</p>	<p>Noted. No change required.</p> <p>The car parking requirement is defined in associated parking guidance/standards that are applied by the local highway authority.</p> <p>Noted</p>	<p>No change required.</p>	<p>Amended wording for Policy T2 Residential parking</p> <p>Planning permission will be granted for schemes providing residential parking where the resident and visitor parking is sufficient and well integrated so that it does not dominate the street. Applicants should demonstrate:</p> <ol style="list-style-type: none"> <li>1. Priority has been given to on-street parking in well-designed streets.</li> <li>2. That there is sufficient parking for residents and visitors, with a preference for unallocated parking.</li> <li>3. Parking is positioned close to people's homes.</li> <li>4. Parking courtyards are small in size, with no more than five properties using each courtyard, and they are well overlooked.</li> <li>5. Any roofed parking structures are proportionate so that they do not dominate the streetscene, and are well-integrated into the overall design of the development.</li> <li>6. A variety of parking treatments on a single site of more than 5 dwellings.</li> <li>7. A preference for tandem on-plot parking if more than one space is provided.</li> <li>8. Spaces are of sufficient size to comfortably host a larger car, and the proposed layout provides sufficient space for the movement of wheeled waste bins to a waste collection point (as required)</li> <li>9. A charging point for electric vehicles is included in every private car parking space.</li> <li>10. Covered cycling facilities have been integrated into the residential parking offer.</li> </ol> <p>Rear serviced parking layouts are to be discouraged, and will be permitted only where alternatives are not feasible.</p> <p><b>A Transport Assessment (TA) will be required in support of planning applications where appropriate and required by the local planning authority in accordance with defined thresholds on development size and accordance with national planning policy. For smaller schemes of development a Transport Statement might be satisfactory, subject to agreement with the local highway authority at the pre-application stage.</b></p> <p><b>The purpose of an assessment in reference to residential parking is to provide a clear indication of how the proposed scheme impacts upon any existing adjoining on-street residential parking. Wider issues, such as highway capacity and highway safety and accessibility by non-vehicle modes, are also considered as part of an assessment.</b></p> <p><b>The dimensions for a car parking space are 2.5 metres(width) by 5 metres (length), unless the space</b></p>

	<p>Commented that 'If parking is provided then controls should be in place to ensure people use it. Situations where cars are street parked, for example, rather than left in communal areas further away, must be avoided. An excuse for street parking has been the small size of garages for modern cars. I see that this is taken into account in updated planning guidelines, but measures must be in place to have garages used for parking not storage.' (ref 1077)</p>	<p>Noted. The location where vehicle users elect to park their private vehicles is not subject to methods of control, to include private driveways and the public highway, providing parked vehicles are not parked on restricted areas, e.g. yellow lines, which is a civic enforcement matter.</p> <p>How property owners that benefit from a garage make use of the garage is down to individual choice, although parking standards do not count garages towards the quantum of 'on-plot' parking. Car barns do contribute towards parking provision but must be kept permanently open.</p>	<p>No change required.</p>	<p>is adjacent to a structure/obstruction (e.g. wall or fence), in which case the width measurement needs to be increased by 0.2 metres for every obstruction.</p>	
	<p>Tandem on-plot parking for homes which are provided with more than one parking space should not be encouraged unless it can be clearly demonstrated that it is not going to lead to unacceptable unplanned parking. (Ref 1573) - CPRE Shepway, objecting</p>	<p>Noted. Tandem parking arrangements allow for a better layout in respect of landscaping and amenity. An important component of parking is how it is designed into a development layout, and layouts that incorporate tandem parking with the appropriate amount of visitor parking have been shown to operate successfully.</p>	<p>No change required.</p>		
	<p>We have no objection to the principle of the Parking Standards; however, the Policy is not clear as to which parking standards are applicable to new development. Paragraph 12.23 states that Kent County Council's Interim Guidance Note 3 (IGN3) provides an "appropriate foundation for parking design" and requires proposals for residential development to accord with this document; however, continues as the following: 'While this is a useful indicative guide (IGN3), there is scope for adaption to the variation in specific development context across the district, and context must be another consideration in parking provision.' The wording of Policy T2 itself does not refer to IGN3 but states that 'planning permission will be granted for schemes providing residential parking where the resident and visitor parking is sufficient and well integrated so that it does not dominate the street.' The NPPF (para 154) advises that Local Plan policies must be 'clear'. The use of IGN3 as an indicative guide with consideration given to undefined local context results in a significant element of uncertainty as to how the policy might be applied. Point 8 of Policy T2 requires spaces to be sufficient to comfortably host a 'larger car' and have sufficient space for 'the movement of wheeled waste bins to a collection point.' The size of a larger car and the space required to move a wheeled bin are both undefined within the policy and are therefore not 'clear' or 'justified'. The Policy is therefore inconsistent with NPPF (para 154) which requires policies to be clear on what will and will not be permitted. We therefore suggest that point 8 is deleted and replaced with specific size requirements for parking spaces in line with the adopted Kent County Council standards. The requirement for spaces to be large enough to host a large car is however unjustified since there is no evidence to substantiate this requirement which is overly prescriptive.  Point 9 requires a charging point for electric vehicles to be included in every private car parking space. There is no National planning guidance in relation to the requirements of electric vehicle charging points and no evidence has been provided as to why this is necessary for every dwelling. As such, this requirement has not been 'justified' is not 'Consistent with National Policy' and should therefore be deleted. The final paragraph to Policy T2 requires a Transport Assessment (TA) to be provided at both pre-application and application stages which could include Reserved Matters. As detailed at Para 32 of the NPPG and within the Planning Practice Guidance, a Transport Assessment is not required for all forms of development. The requirement for the provision of a TA in all circumstances is therefore not 'justified' or 'Consistent with National Policy' and the Policy should be amended as the following: A Transport Assessment (TA) will be expected in support of Planning Applications where appropriate and required by National Planning Policy at both pre-application and application stages to give a clear indication of how the proposed scheme impacts upon any existing adjoining on-street residential parking. (ref 1908)</p>	<p>The dimensions of a parking space should be defined, as should the width required to manoeuvre a wheelie bin past a parked car. Suggested that the dimensions are 2.5 metres (width) by 5 metres (length) for a parking bay, unless adjacent to a structure (e.g. wall or fence) whereby the width measurement needs to be increased by 0.2 metres for every obstruction. It is suggested that a 1.2 metre width is appropriate to manoeuvre a wheelie bin.</p> <p>There needs to be an amendment to correctly explain the criteria for a Transport Assessment. The purpose of pre-application advice is to encourage applicants to engage with the local highway authority in advance of submitting a planning application to ensure the scope of the transport work is to the satisfaction of the local highway authority.</p> <p>The County Council as local highway authority consistently apply the standards set out in the Ashford Borough Council Parking Supplementary Planning Document (SPD) when examining and clarifying the car parking requirement for schemes of residential development in Shepway District. The Ashford SPD parking guidance was based on data obtained from hundreds of post-occupation surveys conducted by the County Council. As such, the standards set out in the Parking SPD are aligned to car parking demand by unit size and site location, as opposed to older standards that were based on Government policy in the form of the now superseded Planning Policy Guidance Note 3.</p>	<p>Amendment required. To explain the criteria for a Transport Assessment</p> <p>No change proposed.</p>		
	<p>KCC Highways support the proposed policy (Ref 1978)</p>	<p>Noted</p>	<p>No change proposed.</p>		
	<p><b>Policy T3</b> <b>Residential garages</b> Application for residential development or conversion will be approved if: 1. Free-standing or integral garages have not been included in the number of parking spaces in suburban or rural areas. 2. Integral garages are 'oversized' in town centre or edge of centre locations to allow for use both for car and sundry storage.</p>	<p>Hythe Town Council supports this policy (Ref 873)</p> <p>The use of 'Car Ports' should be specified to only provide for off-street parking. Garages are typically too small to accommodate a car or converted to provide additional living accommodation, which should be resisted (ref 459)</p>	<p>Noted. Amendment required - refer to revised wording.</p> <p>Noted. The requirement to keep car ports permanently open, i.e. not to enclose the structure is already a point specified by the local highway authority when responding to planning application proposals. This requirement is also specified as a planning condition attached to a relevant planning permission.</p> <p>No change required.</p>	<p>Amended wording for Policy T3 Residential garages.</p> <p><b>Application for residential development or conversion proposing the provision of garage space will be approved if:</b></p> <p><b>1. Free-standing or integral garages have not been included in the number of parking spaces in suburban or rural locations.</b></p> <p><b>2. Integral garages are 'oversized' in town centre or edge of centre locations to allow for use both for car and sundry storage.</b></p>	
	<p>KCC Highways supports the proposed policy (Ref 1980)</p>	<p>Noted</p>	<p>No change proposed.</p>		
	<p><b>Policy T4</b> <b>Lorry parking</b> Applications for the provision of lorry parking and service facilities will be approved subject to the following criteria: 1. The site should be accessed from a designated strategic road network. 2. Proposals for the mitigation of noise from lorry movements and any associated commercial operations will need to be specifically addressed as part of any application. 3. Substantial landscaping and screening should be provided to mitigate the visual impact of the development and based on a strong landscape framework. 4. Suitable mitigation will be required to deal with artificial lighting to restrict the impact of the development on neighbouring existing residential properties or vulnerable uses. 5. Adequate space for access, sight lines, turning and manoeuvring must be provided in addition to the required parking spaces. These spaces may only be used for any purposes other than parking. 6. The minimum dimensions of a lorry parking space should be 15 metres by 3.5 metres (50 sq. metres). Every effort should be made to inhibit the circulation of lorries, other than for delivery purposes, on local distributor and access roads within the district, to protect the amenity of local residents. New residential development will be encouraged to include measures to discourage the parking of lorries.</p>	<p>In the Issues and Options consultation document, there was an intention to include a requirement for Lorry Parking to have no negative impact on the Kent Downs AONB. It is therefore disappointing that this has not been carried through to the draft policy wording. In order to meet its requirements under S85 of the CRoW Act 2000, Shepway District Council is urged to review the policy to ensure the AONB and its setting is appropriately conserved and enhanced in assessing proposals for lorry parking.' (ref 279)</p> <p>There is mention of mitigation of noise but no mention of air quality. This is a major omission' (ref 377) - Shepway Green Party</p> <p>Pollution generated by lorry traffic should be regularly and closely monitored to ensure that residents are not subjected to harmful levels of toxins/ pollution from lorry traffic exhaust (ref 460)</p>	<p>Noted. No change required.</p> <p>The proposed Lorry Holding Area in Stanford West is being taken forward by Highways England, outside of the planning system (to include preparation of the Places and Policies Local Plan). Accordingly, the site has not been included as a site allocation in the Places and Policies Local Plan.</p> <p>Noted. Amendment proposed to Policy T4: Parking for Heavy Goods Vehicles to include reference to air quality.</p> <p>Noted. The policy wording is to be amended to include reference to air quality.</p> <p>Air quality is monitored on an annual basis, and there are currently no Air Quality Management Areas (AQMAs) within Shepway District. The air quality implications of a lorry park proposal are subject to assessment and review as part of a planning application submission.</p>	<p>No change proposed.</p> <p>Amend second bullet point of Policy T4: Parking for Heavy Goods Vehicles:</p> <p>2. Proposals for the mitigation of <b>noise and air quality impacts</b> from lorry movements and any associated commercial operations will need to be specifically addressed as part of any application.</p> <p>"Amend second bullet point of Policy T4: Parking for Heavy Goods Vehicles:</p> <p>2. Proposals for the mitigation of <b>noise and air quality impacts</b> from lorry movements and any associated commercial operations will need to be specifically addressed as part of any application."</p>	<p>Amended Wording to Policy T4 Lorry parking</p> <p><b>Applications for the provision of lorry parking and service facilities will be approved subject to the following criteria:</b></p> <p><b>1. The site should be accessed from a designated strategic road network.</b></p> <p><b>2. Proposals for the mitigation of noise and air quality impacts from lorry movements and any associated commercial operations will need to be specifically addressed as part of any application.</b></p> <p><b>3. Substantial landscaping and screening should be provided to mitigate the visual impact of the development and based on a strong landscape framework.</b></p> <p><b>4. Suitable mitigation will be required to deal with artificial lighting to restrict the impact of the development on neighbouring existing residential properties or vulnerable uses.</b></p> <p><b>5. Adequate space for access, sight lines, turning and manoeuvring must be provided in addition to the required parking spaces. These spaces may only be used for any purposes other than parking.</b></p> <p><b>6. The minimum dimensions of a lorry parking space should be 16 metres by 3.5 metres (56 sq. metres).</b></p> <p><b>Every effort should be made to inhibit the circulation of lorries, other than for delivery purposes, on local distributor and access roads within the district, to protect the amenity of local residents.</b></p>
	<p>Hythe Town Council supports this policy (ref 874)</p>	<p>Noted</p>	<p>No change proposed.</p>		
	<p>All the policy measures in T4 are supported in principle, but they must additionally require employment uses which are established or extended, resulting in an increase in HGV movements, to demonstrate that sufficient provision is made for the movement and parking of HGVs in a way that does not lead to the public highway being used inappropriately.' (Ref 1574) - CPRE Shepway, objecting</p>	<p>No action required.</p> <p>Reference to the circulation of lorries on local roads is a point on vehicle routing rather than lorry parking. Kent County Council has a remit for managing the routing of large vehicles, and KCC has recently published a Freight Action Plan.</p> <p>No change proposed.</p>	<p>No change proposed.</p>		



Paragraph 12.3 - commented that it is difficult for a layman to understand precisely what is meant by this statement, with reference made that on-street parking is only really successful where streets are wide, but designs need to be future proofed. The Victorians never anticipated the car, and beautiful as the architecture is in the roads leading to the seafront in Hythe they are narrow, prone to major on-street parking and very congested. They are also subject to drivers driving outside their capacity for safe driving, and perhaps should have 20 mph speed limits' (Ref 797)	Noted. The local plan cannot seek to resolve historical issues, such as the layout of Victorian streets. However, policy specifies how new development is to be laid out to ensure sufficient levels of parking are provided through appropriately designed internal streets.	No change required.	
Paragraph 12.22 - agreement that insufficient parking leads to blocked and congested streets. Reference is made to the prevailing situation in the Conservation Area of Hythe, and also in more modern parts of West Hythe Ward. The respondent suggests that unless the UK brings in the Japanese rule that you cannot buy a car unless you can prove that you have a place to park it, what is the solution - other than making all new planning applications conditional on having some form of off-street parking.' (Ref 798)	Noted. The request made is one that would require legislative changes at a national level and is not a matter the local plan can seek to endorse.	No change required.	
Paragraph 12.22 - commented that insufficient parking leads to blocked and congested streets, which specific reference made to the Conservation Area of Hythe, and also in more modern parts of West Hythe Ward. Recommendation made that the UK should endorse the Japanese model that you cannot buy a car unless you can prove that you have a place to park it, or otherwise ensuring that all new planning applications are conditional upon providing off-street parking. (ref 798)	Noted. Comments as per response to ref 797		
Section 12 - Commented that 'As a growing settlement Hythe needs better transport links. In particular, a better connection with HS1 trains at Sandling Station - more stopping trains and better public transport links. The Plan should identify this as an issue and a priority for future infrastructure funding.' (Ref 1846) - Hythe Neighbourhood Plan Group	Noted. The frequency of service stops on HS1 is subject to timetabling determined by the Department for Transport (DfT). A change to accommodate more stops at Sandling would not be accepted by the DfT as this would affect timetabling arrangements elsewhere on the service. Service coverage of public transport connections is determined by Stagecoach and improvements to service frequency requires major investment, and is not a request for which a solution can be proposed in the Places and Policies Local Plan. One could argue that if the patronage demand was there the service frequency of public transport connections would be improved.	No change required.	
Picture 12.1 - Commented that 'This hierarchy leads to restrictions in vehicular access for elderly, disabled and assumes growth in cycling. Shepway district already has cycle lanes which are solely used by cars with cyclists preferring the footpath. No action is being taken on cars using these lanes because it would simply increase traffic jams. There should be more focus on getting high net worth individuals to be able to use the facilities, retail, tourist and social, this makes economic sense. Buses again are not used by higher spenders which downgrades the type of retail units in town (see Bouverie Square)' (Ref 1083)	Noted. The comments raised over the use of cycle lanes is a civil matter that falls outside the scope of the local plan. As Folkestone is the principal urban centre within Shepway district there is a need to maintain good public transport connections across the transport network.	No change required.	
Option 26 (page 283) commented that 'We need to base this on the type of residents we have and their normal mode of transport, you cannot force bus use' (Ref 1084)	Noted. The local plan is seeking to reinforce and extend the public transport network wherever possible, particularly where there is passenger demand/potential for growth.	No change required.	
Picture 12.3 - commented 'Just looking at this image it appears that there is just under one car space per household, many household have more than one vehicle and hence no space for visitors to park at any time of the day' (Ref 1086)	Noted. Picture 12.3 depicts an example of on-street parking and it is understood that the parking shown is in respect of visitor parking.	No change required.	
Paragraph 12.39 - commented 'There is over-emphasis on cycling throughout this document. Cycling is fine for parts of the population but not for the elderly, disabled, mothers with young children. Encouraging cycling is fine but not at the expense of other modes of transport' (Ref 1087)	Noted. In response, cycling is an important component of mode choice and is a key part of the health and wellbeing agenda.	No change required.	
Section 12 (overarching comments) - 'There is a serious need for an overview of the road system in Folkestone, much of the traffic flows make little sense and cars are forced onto torturous routes to get to the east end and harbour areas from the west and through unattractive areas to get to the harbour from the motorway.' (Ref 1088)  The topography of the area is not conducive to cycling, it is not flat like Copenhagen and this needs to be recognised in this document. Some roads are far too steep.' (Ref 1088)	Noted. Folkestone's road system has been subject to recent improvement at Tontine Street and The Tram Road. The Council will continue to work alongside the County Council to establish if further amendments to the road network are required. On cycling, Shepway district is well served by local and national cycle infrastructure, and whilst not every part of the district lends itself to being easily accessible by cycling it is crucial to invest in and strengthen the network as a whole.	No change required.	
Picture 12.2 - commented 'This layout is a perfect example of planners ignoring completely a provision for visitors' parking. If no parking is provided it does not mean that visitors will not come, they will simply park on grass verges or in other unsuitable places. There should always be adequate provision for visitors.' (1148)	Noted. A photograph can only ever represent a 'snapshot' perspective, and the associated commentary does identify a number of issues with the design/layout, to include car parking provision. The intention of the case study example is to not replicate the features evidenced in the picture.	No change required.	
Comment on Box 4 (IGN 3 guidance) - 'While we support the focus away from travel by private vehicles, we also support the principle of densification in urban areas. However houses with more than one bedroom in such areas are highly likely to be occupied by more than one adult and a blanket limit of one parking space per unit, even for homes of 4+ bedrooms, could lead to problematic and inappropriate on-street parking elsewhere.' (Ref 1572) CPRE Shepway, objecting	Noted. The parking standards do not limit the required provision to one space per unit.	No change required.	
We are very unsatisfied that the Transport section of the Preferred Options has neglected to recognise the LAA benefits for the District. In the Issues and Options document, Policy T6 related explicitly to the airport and provided an option to carry forward the 2006 Policy TR15 or to create a new policy.  The initial justification for Policy T6 came from the Shepway Transport Strategy which includes an aim to "support improved access to London Ashford (Lydd) Airport" and there is recognition that smaller airports such as LAA provide a valuable role in the local economy. In our previous representations, dated 11 March 2015, we highlighted that the planning consent for development at LAA and the willingness of its owners to invest in Shepway should be fully supported and encouraged. Indeed, with the closure of Manston Airport, LAA is potentially more important for Shepway and Kent. The council should work with LAA to draft a suitable policy which supports LAA's economic future over the plan period.  It would seem that neither of these policies (Policy T6 and Policy TR15) have been pursued and the document states that Policy TR15 is "no longer required". We note that the Sustainability Appraisal (SA) raised concerns in relation to climate change and noise level impacts from further development at LAA in paragraph 6.40. However, as identified in paragraph 6.63 of the SA, if a new policy was to be adopted, measures to safeguard the internationally important wildlife communities, climate change and noise level can be undertaken to reduce any impact on these areas. It is noted in 6.64 that there are policies within the Preferred Options that will protect wildlife communities, such as NE1.  Although planning permission has been granted for development at the airport and Policy TR15 was provided for the expansion of the airport, it is still a necessary policy to support LAA, given its an	Noted. As proposals to expand London Ashford Airport have been granted planning consent by the Local Planning Authority there is no need to maintain a dedicated policy for LAA within the Places and Policies Local Plan.	No change required.	
Table 12.1 - commented 'The parking requirements are inadequate. Business units/warehouses/offices in Shepway are nearly all on the edges of the Urban Area, meaning people need to drive to get to their places of work. The ratio of spaces to bedrooms might be suitable in a city context, with plentiful public transport, but not in Folkestone, Hythe or New Romney. These regional centres would fall into the "suburban" category when it comes to proximity of bus stops/train stations. If the planning officers calculated how many cars they have between their own households, they would soon realise the parking guidance table is impracticable.' (Ref 1278)	Noted. The parking standards for non-residential uses reflect the 'journey to work' profile of employees who typically drive to/from such places of employment (by land use class). In many cities it is acceptable for new development proposals to come forward with zero 'on-site' car parking provision, to reflect levels of accessibility to non car-borne modes (e.g. cycling, walking, public transport). It would not be appropriate to look at past trends in respect of car ownership per household versus car parking provision as the trend data would be skewed by housing stock by age/form whereby no 'on-plot' car parking was provided - for example, Victorian terraced housing.	No change required.	
Section 12 (General comment) 'Hythe Civic Society (HCS) represents some 850 individual subscribers who are committed to Hythe and interested in its future development.  In order that development allowed under this policy adds to the vitality and viability of the town centre it is essential that planning consents given, particularly for residential development, have sufficient parking within the proposed development so that the existing, but insufficient, public car parking spaces are kept open for visitors to the town centre.  This comment may be more appropriate for the Transport chapter but there are no proposed policies for car parking in town centres. (Ref 1459) - Hythe Civic Society	Noted. The local plan requires a site promoter that cannot provide adequate on-site parking to satisfy the parking standards then a parking survey will have to be conducted to appraise whether there is sufficient on-street capacity to meet the parking demand. If a development proposal would result in off-site parking problems then the proposal will not be supported.	No change required.	



<p>The general comment is made that it is not easy to find anywhere in the document any overview of the effect of traffic on the existing road capacity in Hythe and its surrounding areas. Calls are made that road communications MUST be improved very significantly to cater for the traffic generated by Martello and Otterpool, and full details should be included in the next iteration of the plan.</p> <p>In reference to infrastructure needs comments are made that with so many new dwellings being proposed in Shepway will the infrastructure be able to keep pace? Suggestions proposed included new wider roads, in addition to an increase in bus services and the concept of Park &amp; Ride to serve Hythe to lessen local traffic movements. Reference is made to the need for new sewage treatment plants. (Ref 1308) Hythe Civic Society (request made in reference 1310 to ignore submission 1308)</p>	<p>Noted. The highway improvements secured as part of the permitted scheme at Nickolls Quarry will result in off-site highway improvements in accordance with trigger points agreed between the applicant (now developer) and the local highway authority. The Otterpool Park Garden Town masterplan will be subject to public consultation in due course, and is outside the scope of this local plan. Reference is made to non-transport infrastructure, e.g. sewerage treatment capacity, which is not relevant to this policy.</p>	<p>No change required.</p>	
<p>Commented: 'It is not possible to easily find any strategic overview of the effect that existing and proposed developments have on the transportation network in Hythe and surrounding areas. For example: 1 The residential developments on land Shornecliff Camp southwards on Horn Street and at the bridge over the railway. 2 The just commenced development at Martello Lakes upon the Scanlons Bridge one-way system and also on Lympe Hill towards junction 10 and the M20.</p> <p>Local Plans are meant to be comprehensive and forward looking documents. It is deeply regrettable that Kent Highways appears to have no overall future vision for Hythe and only plan on a piecemeal development by development basis. HCS believes that this is a major failing of the Local Plan and needs to be rectified.' (Ref 1310) - Hythe Civic Society</p>	<p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.</p>	<p>No change required.</p>	
<p>Section 12 (general comment) - It is commented that the removal of the one-way road system originally established to serve the port would encourage more visitors to Folkestone Town Centre. The suggestion is made that additional underground car parking is provided. The Road of Remembrance is cited as a local road that requires serious thought about strengthening and widening to allow a frequent bus service and light vehicular traffic to pass between the Town Centre and Harbour/seafront development. (Ref 1332)</p>	<p>Noted. Folkestone's road system has been subject to recent improvement at Tontine Street and The Tram Road. The Council will continue to work alongside the County Council to establish if further amendments to the road network are required.</p> <p>Tontine Street now accommodates two-way movements for buses, and this intervention has heralded a significant change in public transport accessibility between the town centre and the harbour/seafront development. The suggestion of undertaking improvements to the Road of Remembrance to facilitate a public transport service is not required because of the role that can now be performed by Tontine Street.</p> <p>Investment in delivering new public car parking is typically led by the private sector, and the costs of providing underground car parking are likely to be prohibitive.</p> <p>On cycling, Shepway district is well served by local and national cycle infrastructure, and, whilst not every part of the district lends itself to being easily accessible by cycling, it is crucial to invest in and strengthen the network as a whole.</p> <p>No change proposed.</p>	<p>No change required.</p>	
<p>Section 12 (general comment) - "Transport. Throughout this document there is a heavy emphasis on cycling to the detriment of other forms of transport. The plan needs to recognise that the topography of East and Central Folkestone is not conducive to cycling and that the profile of residents in terms of age, wealth (both extremes) is unlikely to result in high usage of cycling facilities." (ref 1793) - Shepway Heart Forum</p>	<p>Noted. Whilst there are areas of Folkestone that present challenging topography for cyclists, Folkestone benefits from connections to the national cycle network via NCR2. The vast majority of cycling routes are 'on-road', and do not take up an amount of road space that could otherwise be devoted for car-borne traffic. On that basis cycling infrastructure does not compromise highway capacity.</p>	<p>No change required.</p>	

Preferred Options Policy	Comments Received	Response by the Council	Action by the Council	Revised Draft Policy/Text
Natural Environment - General Comments	<ul style="list-style-type: none"> <li>request that paragraph 13.28 in reference to Dark Skies is amended to also refer to the Kent Downs AONB (Ref 281)</li> </ul>	Agreed.	Include reference to the Area of Outstanding Natural Beauty as parts are classified as dark.	Include additional text: ‘...and parts of the Kent Downs AONB ...’
	<ul style="list-style-type: none"> <li>There are a number of sites which have been taken forward however which may impact on local biodiversity assets and/ or the Kent Downs AONB.</li> <li>This is despite Natural England having highlighted these issues in our previous advice on the Strategic Housing Land Availability Assessment (SHLAA) (our ref 185023, 26 May 2016).</li> <li>Pleased to note the importance of the Kent Downs AONB is related to in the PPLP (paragraph 7.2) along with relevant national planning policy which gives great weight to conserving the AONB (paragraph 115 of the National Planning Policy Framework (NPPF)), although this section should also refer to the setting of the AONB which is listed as a special characteristic and quality for which the AONB is notified (Dramatic landform and views).</li> <li>The Kent Downs AONB management plan also includes the following objective in relation to the setting: ‘The setting and views in and out of the AONB are conserved and enhanced’.</li> <li>Natural England should be consulted in accordance with our Impact Risk Zones (IRZs). These are available on Magic.gov.uk and are designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England.</li> <li>For allocations which may impact on the AONB, we advised the council to undertake a preliminary Landscape and Visual Impact Assessment (LVIA) to assist site selection and justification. However it does not appear this exercise has been undertaken.</li> <li>There are a number of allocations taken forward which we advise may not be in accordance with national policy, the adopted Core Strategy policy CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation and PPLP Policy NE3 To protect the District’s landscapes and countryside. (Ref 1711)</li> </ul>	Initial assessment has been carried out as part of the Strategic Housing Land Availability Assessment. Include reference to the High Level Landscape Assessment in the supporting text.	Include reference to the High Level Landscape Assessment in the supporting text.	
	<ul style="list-style-type: none"> <li>With regard to agricultural land and soils, we would also like to note we are satisfied the PPLP will not result in a significant loss of Best and Most Versatile land (total BMV loss due to site allocations is approximately 7ha). We also welcome the provision in Policy HW3 Development that supports healthy, fulfilling and active lifestyles which includes a provision for restricting development where there would be loss of BMV unless there is an overriding planning reason to do so and mitigation is provided.</li> <li>However Natural England wishes to highlight the importance of Green Infrastructure (GI) in delivering the PPLP, which we do not consider is currently well reflected in the Preferred Options</li> <li>We are delighted to note the council will develop a GI Plan for the District, which is underpinned by the NPPF in paragraph 114 which states that local planning authorities should: ‘set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure’.</li> <li>However the PPLP needs to be clearly linked with it. At present, only policies NE1 and 2 refer to GI. Yet its multi-functional ecosystem services and benefits for people and wildlife mean a well developed and managed GI network across the District is capable of helping deliver the PPLP across all of its major policy areas and sustainable development in general.</li> <li>This includes Housing and the Built Environment (sustainable design), Economy (tourism), Community (sense of place, open space), Natural Environment (access, biodiversity, protected landscape), Climate Change (sustainable construction, flood risk, SuDS), Health and Wellbeing (healthy lifestyles) and Historic Environment (communal gardens, archaeology).</li> <li>In addition the aims of the GI Plan should reach beyond the District to include neighbouring LPAs, demonstrating a Duty to Cooperate, eg Rother DC with respect to work on the SAS and Dover DC and other East Kent authorities on GI where there are opportunities to link up areas of chalk grassland and woodland.</li> <li>Such is the overarching importance of GI, we advise a specific development management GI policy is included. This should reflect the benefits of GI, explain how it will help deliver other policy areas of the PPLP, and set out how this can be achieved through the GI Plan. Natural England would be happy to work with the council in developing its GI Plan (Ref 1763)</li> </ul>	More reference to Green Infrastructure will be added to policies in the Places and Policies Local Plan Submission Draft. Core Strategy Policy CSD4 also includes requirements for Green Infrastructure provision.	No change proposed to this section.	
	<ul style="list-style-type: none"> <li>The plan does not, currently, provide sufficient evidence to demonstrate that development in the borough (and potentially beyond the borough) will not individually, or cumulatively have an adverse effect on the integrity of Natura 2000 sites. Recreational impacts are important, but other impacts including those related to air and water pollution may be relevant. This should be discussed in detail with Natural England, KWT and RSPB.</li> <li>Insert a new policy which ensures development is only permitted if there is no adverse effect on the integrity of SPA, SAC or Ramsar sites alone, or in combination with other plans or projects (Ref 1562)</li> </ul>	The Habitats Regulations Assessments of Core Strategy and Places and Policies Local Plan demonstrate this. Policy NE2: Biodiversity will be amended in terms of the levels of protection for designated sites.	No change proposed.	
	<ul style="list-style-type: none"> <li>Paragraph 13.49 - A co-ordinated approach to marine planning is essential since development or other coastal activity can cause erosion or other effects elsewhere along the coast. This could adversely affect the sensitive nature of seabed ecology and biodiversity, marine ecology (mammals etc.) and heritage assets such as the Goodwin sands (Ref 1569)</li> </ul>	Agreed, that is why the Places and Policies Local Plan refers to the Marine Plan and includes policy NE5: Integrated Coastal Zone Management. The Marine Management Organisation is also a consultee on the Places and Policies Local Plan throughout the process of its preparation.	No change proposed	
	<ul style="list-style-type: none"> <li>Paragraph 13.2 - we are slightly concerned about the reference to the Council having, “commissioned a study to consider how access to Dungeness may be managed and inform the final drafting of policy”. Whilst we understand that this work is currently being undertaken, this does leave a high level of uncertainty about how the policy will actually work, including whether access management at the sensitive sites, increased wardening and provision of alternative sites will be financially supported by developer contributions. Clearer wording of what might be expected in this forthcoming policy detail, as a result of the study, would be welcomed (Ref 1651)</li> </ul>	Noted.	Update text	
	<ul style="list-style-type: none"> <li>In section 13.1, there is reference to the sections of the NPPF which are concerned with “ensuring access to high quality open spaces for the community and recognising the contribution to health that such open space makes” and to section 11 of the NPPF (“Conserving and enhancing the natural environment”) which sets out government guidance on how the planning system should contribute to and enhance the natural environment. It also comments on the requirements placed on Local Planning Authorities under section 85 of the Countryside and Rights of Way Act (2000). It appears that other legislation such as the Natural Environment and Rural Communities Act 2006 and the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003 could, for the protection that they confer on “priority species” and on waterbodies of all sorts, have been mentioned here or later.</li> <li>There is the suggestion that climate change is a “more recent challenge”. Given that Svante Arrhenius identified the mechanism for climate change in 1896, this is bizarre statement. It is not a recent challenge albeit that the need for positive action to reduce emissions and mitigate the effects of climate change is becoming ever more urgent.</li> <li>It is suggested that “designated sites are still the most important tool for nature conservation”.</li> <li>Given the recommendations of the Lawson report (Lawton, J.H. et al (2010) Making Space for Nature: a review of England’s wildlife sites and ecological networks, simplistically that there should be more, bigger, better-managed, joined-up ecological networks), this statement should be revised to reflect the aspiration to deliver more for wildlife and for priority habitats irrespective of whether they are currently within the boundaries of designated sites (Ref 1780)</li> </ul>	Noted. Legislation has been selected particularly relating to the relevant section; it is not considered practical to reference all potential legislation. Change ‘recent’ to ‘other’. There is value in areas outside designated sites and the Green Infrastructure Plan will reflect this, but designated sites are an important tool for nature conservation.	No change proposed	
	<ul style="list-style-type: none"> <li>Paragraph 13.11 - The Environment Agency supports the conclusions in section 13.11 (Ref 1783)</li> </ul>	Noted	No change proposed	

	Para 13.13 At present this summary of the Kent Downs AONB presents the landscape as though it were an almost entirely natural phenomenon although it does make mention of farming. In fact the landscape is the results of thousands of years of interaction between the natural environment and human action. The pattern of roads, tracks, lanes, farms and settlements that we see today comprises the District's historic landscape and forms a crucial part of its character.(1998)	The summary is based on information from the Kent Downs AONB Unit and clearly states the influence of farming and pressure from development.		Amend supporting text (Para 13.2 in Preferred Options document) with additional text:  "However access also needs to be managed due to the potentially damaging impact of recreational activity on over-wintering birds at the Dungeness Complex of Sites, SPA/SAC, <b>sensitive habitats and the Folkestone to Etchinghill Escarpment SAC</b> ."  No change to policy.
<b>Policy NE1</b> <b>Enhancing and managing access to the natural environment</b> To enhance access to the natural environment the Council will: 1) Target opportunities for improvements on routes and links from urban areas where access is currently poor 2) Improve access to key open spaces from all areas 3) Manage access to SACs / SPA and require or enhance land to divert recreation activities away from those designations by the provision of enhanced facilities elsewhere, for example urban parks	Option 28 comments • Support policy NE1 to improve access to the natural environment • Hoped the Council will continue to support the creation of the Cinque Ports Cycle Route from Sandwich to Rye, particularly to seek a route through the sensitive Dungeness area. • Such a route would enhance the experience for locals and visitors by reducing vehicular traffic on the Marsh roads (Ref 434)	The coastal path is now open. Kent County Council strategic route goes across the top of Dungeness.	No change proposed	NE1 Enhancing and Managing Access to the Natural Environment  To enhance access to the natural environment the Council will: 1.Target opportunities for improvements on routes and links from urban areas where access is currently poor, except where there would be an adverse impact on sensitive areas; 2.Improve access to key open spaces identified in the Green Infrastructure Strategy from all areas; and 3.Manage access to Special Areas of Conservation and Special Protection Areas through the implementation of the Dungeness Sustainable Access Strategy and identify or enhance land elsewhere to divert recreation activities away from those designations by the provision of enhanced facilities, such as at urban parks.
	• Priority should be given to protecting Natural open space as opposed to the more urban open spaces often already protected by covenants or common land designation. • As the built environment increases these wild areas will become more rare and therefore more precious and worthy of protection (Ref 461)	The Green Infrastructure Plan will include network of priority areas. Urban open spaces are also valuable and not necessarily more 'protected'.	No change proposed	
	• Hythe Town Council supports this policy (Ref 877)	Welcome support.	No change proposed	
	• Option 28 - concern with the aim in Policy NE6 of the Issues and Options document to manage access to the Special Areas of Conservation (SAC) and Special Protection Areas (SPA). • managing access through land use planning is unlikely to be achievable and this policy serves little purpose, and option 28 should not be taken forward in its current form (Ref 1684)	Disagree, development contributions can help to pay for stewards, the provision of alternative routes, etc.	No change proposed	
	• NE1 Enhancing and managing access to the natural environment We welcome policy NE1 and are pleased the PPLP specifically refers to the need to enable access to the natural environment, as well as managing access appropriately on sensitive sites such as the Dungeness sites. The GI Plan and forthcoming Sustainable Access Strategy (SAS) will be key in achieving this. Please note we provide more detailed comments on the SAS in relation to the HRA in Annex Two. • This policy should also serve to relieve potential recreational pressure on other designated sites including Folkestone to Etchinghill Escarpment SAC (Ref 1742)	Noted.	No change proposed	
	• The reference to the joint Sustainable Access Strategy work is noted and should inform our respective policies in order to maintain the integrity of the Dungeness Complex (Ref 1749)	Noted.	No change proposed	
	• Part 3 of this policy mentions the management of access to internationally designated nature conservation sites. The plan does not, currently, provide sufficient evidence to demonstrate that development in the borough (and potentially beyond the borough) will not individually, or cumulatively have an adverse effect on the integrity of Natura 2000 sites (Ref 1563)	The Habitats Regulations Assessment demonstrates this; the HRA of the Core Strategy included areas of strategic development.	No change proposed	
	• Kent Wildlife Trust supports the additional reference added to policy NE1 since the Issues and Options consultation, which refers to the managed access to the SAC and SPA sites. The reference, "require or enhance land to divert recreation activities away from those designations by the provision of enhanced facilities elsewhere, for example urban parks" should be made clearer, however. We would suggest that "allocate new or existing land" and "enhance this land for recreation activities in order to divert..." would provide more clarity (Ref 1652)	This will not be through Local Plan allocations, but will be on a site-by-site basis.	No change proposed	
	• Option 28 – Kent Wildlife Trust would query the removal in NE6 part B of Dungeness SAC/SPA, as the Trust would like the Local Plan actual policy wording (rather than within supporting text) to refer directly to Dungeness SAC/SPA complex, as a site under particular pressure, in addition to the Folkestone to Etchinghill SAC (Ref 1653)	Remove reference to reflect the need to also protect Folkestone to Etchinghill Special Area of Conservation, rather than just Dungeness.	amend supporting text to read: "... <b>sensitive habitats and the Folkestone to Etchinghill Escarpment SAC</b> ."	
	PROW: Support with the following request. As the statutory document for access improvements the County Council's "Countryside and Coastal Access Plan" should be referred here. ( 1990)	Noted.	No change proposed	
<b>Policy NE2</b> <b>Biodiversity</b> Planning permission will be granted for development where it can be demonstrated that all the following criteria have been met: 1. The biodiversity value of the site is safeguarded; 2. Demonstrable harm to habitats or species which are protected or which are of importance to biodiversity is avoided or mitigated; 3. The proposal has incorporated features that enhance biodiversity as part of good design and sustainable development, this should include the creation of new pollinator habitat suitable to the scale of development. 4. The proposal protects, manages and enhances the District's network of ecology and biodiversity sites, including the international, national and local designated sites (statutory and non-statutory), priority habitats, wildlife corridors and stepping stones that connect them; 5. Any individual or cumulative adverse impacts on sites are avoided; 6. The benefits of development outweigh any adverse impact on the biodiversity on the site. Exceptions will only be made where no reasonable alternatives are available; and planning conditions and/or planning obligations may be imposed to mitigate or compensate for the harmful effects of the development; this may include securing biodiversity offsetting as compensation for the impacts. Such compensation will be directed to biodiversity opportunity areas (BOAS) within the District or projects identified by the District's Green Infrastructure Plan	Good to see the requirement to create new pollinator habitat.	Noted	No change proposed	New Policy NE2
	• Point 6 of policy NE2 specifies that a development will only be permitted "no reasonable alternatives are available". • This appears to rule out development on Princes Parade! The proposed use of the site will damage the current Biodiversity of the site and the setting of the ancient monument so should be ruled out as there is an alternative site identified for the proposed use at Martello Lakes (Ref 462)	Please see response to Princes Parade UA18.	No change proposed	<b>Biodiversity</b>  <b>European Sites</b>  Development will safeguard and protect all sites of European and Global importance, designated as Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites. Development must not result in significant adverse effects on these internationally important nature conservation sites, either alone or in combination with other projects and plans. The Council will expect development proposals to demonstrate and contribute to appropriate mitigation and management measures to maintain the ecological integrity of the relevant European site(s).  <b>National Sites</b>  For nationally important sites, including Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR), where developments may have a significant impact, an ecological impact assessment will be required. For proposals where impacts cannot be avoided or adequately mitigated, these will be refused, unless exceptional circumstances can be demonstrated.
	Option 29 • Prince's Parade is currently a wild area of natural biodiversity. • Offsetting with an equivalent wild area will be most unlikely as areas of this nature are becoming increasingly rare in the District due to the pressure of development (Ref 463)	Please see response to Princes Parade UA18.	No change proposed	<b>Local Sites</b>  Local sites, including Local Nature Reserves (LNR), Key Wildlife Sites (KWS) and Regionally Important Geological and Geomorphological Sites (RIGS) will be safeguarded from development, unless the benefits of the development outweigh the nature conservation or scientific interest of the site. Where development is considered necessary, adequate mitigation measures or, exceptionally, compensatory measures, will be required, with the aim of providing an overall improvement in local biodiversity and/or geodiversity. Opportunities will be sought to access and enhance the value of such sites for educational purposes, particularly in relation to promoting public awareness and appreciation of their historic and aesthetic value.  <b>Protected Species</b>  Development proposals that would adversely affect European Protected Species (EPS) or Nationally Protected Species will not be supported, unless appropriate safeguarding measures can be provided (which may include brownfield or previously developed land (PDL) that can support priority habitats and/or be of value to protected species).  <b>Development and the Natural Environment</b>  All new development will be required to conserve and enhance the natural environment, including all sites of biodiversity or geodiversity value (whether or not they have statutory protection) and all legally protected or priority habitats and species. The Council will support development that: •Enhances, retains and protects existing sites and features of nature conservation value including wildlife corridors, ancient woodland and geological exposure that contribute to the priorities established through the Biodiversity Action Plan and the Green Infrastructure Plan; •Does not reduce, and where feasible, improves species' ability to move through the environment in response to predicted climate change, and to prevent isolation of significant populations of species; and •Incorporates features that enhance biodiversity as part of good design and sustainable development, including the creation of new pollinator habitat suitable to the scale of development.
	• For point 6 – Hythe Town Council would like to see the development benefits quantified (Ref 878) • It is noted that Options Policy NE2 is included as an option under Option 29, and Approach A is supported • Biodiversity analysis can only work on a case by case basis. • Option 29 also includes Policy NE4 which is viewed as superfluous as there are adequate policies which deal with the protection, management and enhancement of important habitats. • Option 29 of policy NE4 is unnecessary and ineffective and should not be included in the local plan to accord with paragraph 182 of the NPPF • Policy NE5 is the final policy included in Option 29, and Approach D is supported, with the proviso that the requirement for an ecological survey should only be made if it is necessary and on a site by site basis (Ref 1685)	This will depend on the levels of development. The amounts of Community Infrastructure Levy collected will be reported on regularly.  NERC2006 provides a duty to have regard to conserving biodiversity as part of policy and decision-making. Paragraph 113 of National Planning Policy Framework requires criteria-based policies. The preferred policy option takes on the Sustainability Appraisal issues to target biodiversity enhancement to the Biodiversity Opportunity Areas and takes a strategic approach to protecting/enhancing the district's ecological networks and wildlife corridors. This policy will be backed up by a revised Green Infrastructure Strategy for the district.	No change proposed	
	• Despite Natural England's previous advice on the SHLAA, which does not appear to have been taken into consideration, there are several sites being taken forward which we do not consider have not been fully justified in terms of impacts on biodiversity and landscape. We advise the council to reconsider these locations to confirm potential impacts, and where no suitable alternatives are available, to provide safeguards to protect and enhance biodiversity as far as possible (Ref 1729)	Noted, please see responses to sites.		
	• NE2 Biodiversity • In Policy NE2 we are pleased to see wide ranging criteria including safeguarding of biodiversity on proposed development sites and protection and enhancement of designated sites and protected habitats and species. We also welcome the provision for protecting, managing and enhancing the District's biodiversity network. We also encourage sustainable design which benefits biodiversity. • Preservation and enhancement of biodiversity will need to form a critical element of the GI Plan, and we are pleased to note Biodiversity Opportunity Areas (BOAs) will be used in focussing biodiversity enhancement and where necessary compensation across the district, as was recommended in the Sustainability Appraisal (Ref 1760)	Noted.	No change proposed	
	• The reference to the joint Sustainable Access Strategy work is noted and should inform our respective policies in order to maintain the integrity of the Dungeness Complex (Ref 1750)	Noted.	No change proposed	The District has a number of undesignated sites, which may nevertheless host rare species or valuable habitats. Where a site is indicated to have such an interest, the applicant should observe the precautionary principle and the Council will seek to ensure that the intrinsic value of the site for biodiversity and any community interest is enhanced or, at least, maintained.

<p>This policy and its supporting text does not provide sufficient guidance to ensure that development minimises impacts on biodiversity and achieves net gains. The NERC Act 2006 imposes a legal duty on local authorities to protect and enhance biodiversity. We suggest that the following changes are made:</p> <p>a) Make distinctions between the hierarchy of internationally, nationally and locally designated sites. Ensure that it is understood that the duty to 'protect and enhance' does not only relate to protected sites.</p> <p>b) Detailed policy wording should establish the importance of ensuring development contributes to the creation of habitat networks and ensures that existing connecting features such as ditches and hedgerows are retained wherever possible. This should include reference to Biodiversity Opportunity Areas. Supporting text should explain the importance of 'living landscapes' and landscape scale biodiversity networks (including BOA's) for resilient habitat networks that allow species to respond to a changing climate.</p> <p>c) Detailed policy wording should be included which refers to irreplaceable habitats, such as ancient woodland, marshland, certain hedgerows, veteran trees and traditional orchards.</p> <p>d) Include detailed policy wording and supporting text to ensure that development is accompanied by appropriate surveys early in the development process. This is particularly important when it is known, or likely, that the development site is used by species or habitats, subject to UK or European Law. Survey should be carried out by a suitably qualified ecologist. The policy options included the following text: 'Require developers to provide ecological survey at the time of submitting a planning application unless there is clearly no ecological interest on the site'. This should assist to ensure that surveys are completed in a timely manner. Requests for species surveys after submission can delay determination of the application, since the presence/population of some species can only be assessed in particular seasons. Even an assessment that there is 'no ecological interest' will often need to be made by a qualified ecologist.</p> <p>e) Include supporting text which ensures the relationship between the planning process and Biodiversity Action Plans and the national Strategy 'Biodiversity 2020' is clear. Habitats and species of principal importance are not mentioned.</p> <p>f) Part 3 of the policy should include reference to 'new pollinator habitat and native species planting'</p> <p>g) Part 6 of the policy should be amended to ensure it is clear that mitigation provided on-site or in the immediate locality is preferred to off-site compensation for adverse effects. It needs to be clear that mitigation must be in the control of the developer. The supporting text needs to provide information on protected species, advise applicants to consult Natural England's standing advice and ensure there is reference to legal procedures triggered by Regulations (including the Habitats Regulations 2010) (Ref 1564)</p>	<p>In response to these points: (a) Policy NE2: Biodiversity will be amended; (b) Text will refer to Biodiversity Opportunity Areas and the Green Infrastructure Plan; (c) Examples are given in the policy, but these cannot be comprehensive and cover all possible habitats; and (d) Policies refer to appropriate surveys.</p>	<p><b>European Sites</b> Development will safeguard and protect all sites of European and Global importance, designated as Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites. Development must not result in significant adverse effects on these internationally important nature conservation sites, either alone or in combination with other projects and plans. The Council will expect development proposals to demonstrate and contribute to appropriate mitigation and management measures to maintain the ecological integrity of the relevant European sites).</p> <p>With specific regard to recreational impacts, the Council will use core catchment zones that identify potential impact areas which extend beyond the relevant European site itself. Development proposals within such areas will take account of any relevant published findings and recommendations.</p> <p><b>National Sites</b> Nationally important sites, including Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR), will be safeguarded from development, unless the benefits of the development can be demonstrated to outweigh the identified national importance of the nature conservation interest or scientific interest of the site.</p> <p><b>Local Sites</b> Local sites, including Local Nature Reserves (LNR), Key Wildlife Sites (KWS) and Regionally Important Geological and Geomorphological Sites (RIGS) will be safeguarded from development, unless the benefits of the development outweigh the nature conservation or scientific interest of the site. Where development is considered necessary, adequate mitigation measures or, exceptionally, compensatory measures, will be required, with the aim of providing an overall improvement in local biodiversity and/or geodiversity. Opportunities will be sought to access and enhance the value of such sites for educational purposes, particularly in relation to promoting public awareness as well as appreciation of their historic and aesthetic value.</p> <p><b>New Development and the Natural Environment</b> All new development will be required to conserve and enhance the natural environment, including all sites of biodiversity or geodiversity value (whether or not they have statutory protection) and all legally protected or priority habitats and species. The Council will support development that enhances existing sites and features of nature conservation value (including wildlife corridors and geological exposures) that contribute to the priorities established through the Local Nature Partnership. Consideration of the ecological networks in the District that may be affected by development should take account of the Gloucestershire Nature Map, river systems and any locally agreed Nature Improvement Areas, which represent priority places for the conservation and enhancement of the natural environment. In this respect, all developments should also enable and not reduce species' ability to move through the environment in response to predicted climate change, and to prevent isolation of significant populations of species. The District will have a number of undesignated sites, which may nevertheless have rare species or valuable habitats. Where a site is indicated to have such an interest, the applicant should observe the precautionary principle and the Council will seek to ensure that the intrinsic value of the site for biodiversity and any community interest is enhanced or, at least, maintained. Where an impact cannot be avoided or mitigated (including post-development management and monitoring), compensatory measures will be sought. The Council may, in exceptional circumstances, allow for biodiversity offsets, to prevent loss of biodiversity at the District level.</p> <p><b>Protected Species</b> Development proposals that would adversely affect European Protected Species (EPS) or Nationally Protected Species will not be supported, unless appropriate safeguarding measures can be provided (which may include brownfield or previously developed land (PDL) that can support priority habitats and/or be of value to protected species).</p>	<p>Where an impact cannot be avoided or mitigated (including post-development management and monitoring), compensatory measures will be sought. The Council may, in exceptional circumstances, allow for biodiversity offsets, to prevent loss of biodiversity at the district level. Such compensation will be directed to Biodiversity Opportunity Areas (BOAs) within the district or projects identified in the Council's Green Infrastructure Plan.</p>
<ul style="list-style-type: none"> <li>• Kent Wildlife Trust welcomes the reference in the Biodiversity section to targeting any compensation efforts towards Biodiversity Opportunity Areas (BOA's) and to projects identified within the Green Infrastructure Plan. However, it needs to be made clearer in bullet point 6 that compensation is last resort following through the "mitigation hierarchy", where in the first instance avoidance and subsequently mitigation has not been possible. This is in line with national policy NPPF and good practice guidance in the Biodiversity British Standard BS 42020:2013.</li> <li>• The Trust particularly welcomes the reference made in bullet point 4 of the "protection, management and enhancement of locally designated sites" and would welcome a further reference here to County sites (Local Wildlife Sites and Roadside Nature Reserves).</li> <li>• Bullet point 3, which refers to the enhancement of biodiversity is excellent and could be further strengthened by bringing it in line with national policy in the NPPF (paragraph 109) by reference to the opportunity for "net gain in biodiversity where possible".</li> <li>• Biodiversity Opportunity Areas</li> <li>• It is helpful for the BOA's to be illustrated on a map in the Local Plan itself; rather than simply being referred to, or cross referenced into another document (Ref 1654)</li> </ul>	<p>Amended policy clarifies this. The hierarchy in the amended policy will do this. Noted. include on policies map</p>	<p>Please see amendments above</p>	
<ul style="list-style-type: none"> <li>• The policy does not comply with the tests of necessity in the NPPF. It surely cannot be the case that every development in the District will have an impact on biodiversity so not all applications for development must demonstrate how the criteria in the policy have been met (Ref 1604)</li> </ul>	<p>include more mention of GI plan and integrated into more policy areas such as Health and Wellbeing, housing. Also have overarching policy in Core Strategy</p>		
<p>This policy would benefit from being more specific and detailed and would be preferable if the policies are written in such a way that "planning permission will not be permitted unless...."</p> <p>Point 1: This states that the biodiversity value of the site will be maintained – however, it is suggested that it should really state that the development has demonstrated that it has avoided and minimised any adverse impact on existing biodiversity features and the mitigation is appropriate, achievable and has demonstrated that it has followed the mitigation hierarchy</p> <p>Point 2: This should focus on designated sites rather than both species and habitats. Point 1 should address protected species. There are SPA/Ramsars and SAC within Shepway so separate policy line for the protection of designated sites is suggested; similar to:</p> <p>The proposal has demonstrated that it will not adversely impact on the features of the designated sites that define its value or ecological pathways to the site. The designated sites are shown on policy map xxx (1996)</p>	<p>The policy has been amended.</p>	<p>Please see amendments above</p>	

	<ul style="list-style-type: none"> <li>The Environment Agency support this policy but suggest that there are other documents e.g. the River Basin Management Plan and associated documents to which the Council "must, in exercising their functions so far as affecting a river basin district, have regard to" (Regulation 17, The Water Environment (Water Framework Directive) (England and Wales) Regulations 2003) that could be listed or referred to here (Ref 1782)</li> </ul>	Relevant evidence documents are listed on the Council's website.	No change proposed	
<p><b>Policy NE3</b></p> <p><b>To protect the District's landscapes and countryside</b></p> <p>The impact of individual proposals and their cumulative effect on Kent Downs AONB and its setting will be carefully assessed. Planning permission will be granted where it can be demonstrated that all the following criteria have been met:</p> <ol style="list-style-type: none"> <li>The natural beauty and locally distinctive features of the AONB are conserved and enhanced;</li> <li>Proposals reinforce and respond to, rather than detract from, the distinctive character and special qualities of the AONB;</li> <li>Either individually or cumulatively, development does not lead to actual or perceived coalescence of settlements or undermine the integrity or predominantly open and undeveloped, rural character of the AONB and its setting; and</li> <li>Is appropriate to the economic, social and environmental well-being of the area or is desirable for the understanding and enjoyment of the area (where this is consistent with the primary purpose of conserving and enhancing natural beauty); and</li> <li>The policy aims of the Kent Downs AONB Management Plan.</li> </ol> <p>6. Special Landscape Areas are defined as follows and illustrated on the policies map: North Downs (including the scarp and crest) Old Romney Shoreline Dungeness</p> <p>Proposals should protect or enhance the natural beauty of the Special Landscape Area. The District Planning Authority will not permit development proposals that are inconsistent with this objective unless the need to secure economic and social wellbeing outweighs the need to protect the SLAs countywide landscape significance.</p> <p>7. Local Landscape Areas are defined as follows and illustrated on the proposals map: Romney Marsh Sandgate Escarpment and Seabrook Valley Eaton Lands Coolinge Lane and Enbrook Valley Mill Lease Valley</p> <p>Proposals should protect or enhance the landscape character and functioning of Local Landscape Areas. The District Planning Authority will not permit development proposals that are inconsistent with this objective unless the need to secure economic and social wellbeing outweighs the need to protect the area's local landscape importance.</p> <p>8. Outside of designated landscape areas, proposals should demonstrate that their siting and design are compatible with the pattern of natural and man-made features of the Landscape Character Areas, including cultural and historical associations. Opportunities for remediation and improvement of damaged landscapes will be taken as they arise.</p>	<ul style="list-style-type: none"> <li>The AONB Unit supports the inclusion of a policy that seeks to protect the Kent Downs AONB and its setting and the inclusion of descriptive character of the AONB qualities in the supporting text.</li> <li>For clarity it's considered necessary to insert the words "The natural beauty and locally distinctive features of the AONB AND ITS SETTING are conserved and enhanced" in criterion 1</li> <li>Important to include reference to the AONB produced supporting design guidance within the policy wording itself and suggest the inclusion of an additional criterion.</li> <li>The policy and supporting text lacks reference to tranquillity.</li> <li>The NPPF at paragraph 123 confirms that planning policies should identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason (Ref 280)</li> </ul>	Agreed.	Amend Policy NE3: Protecting the District's Landscapes and Countryside, point 1 and point 5.  Amend point 2 to include reference to tranquillity.	Amended Policy to read: NE3 Protecting the District's Landscapes and Countryside  Kent Downs Area of Outstanding Natural Beauty  The impact of individual proposals and their cumulative effect on the Kent Downs Area of Outstanding Natural Beauty (AONB) and its setting will be carefully assessed. Planning permission will be granted where it can be demonstrated that all the following criteria have been met: 1.The natural beauty and locally distinctive features of the AONB and its setting are conserved and enhanced; 2.Proposals reinforce and respond to, rather than detract from, the distinctive character and special qualities including tranquillity of the AONB. The design scale, setting and materials of new development must be appropriate to the AONB; 3.Either individually or cumulatively, development does not lead to actual or perceived coalescence of settlements or undermine the integrity of the predominantly open and undeveloped, rural character of the AONB and its setting; 4.Development is appropriate to the economic, social and environmental well-being of the area or is desirable for the understanding and enjoyment of the area (where this is consistent with the primary purpose of conserving and enhancing natural beauty); and 5.Development meets the policy aims of the Kent Downs AONB Management Plan and AONB Unit produced supporting design guidance.
	<ul style="list-style-type: none"> <li>Prince's Parade should be added to the list of protected sites of 'Local Landscape Areas' as it is a unique area contributing to the character of the area, seafront and the setting of the Ancient Monument (Ref 464)</li> </ul>	Please see responses to Princes Parade in the Urban Character Area.	No change proposed	understanding and enjoyment of the area (where this is consistent with the primary purpose of conserving and enhancing natural beauty); and 5.Development meets the policy aims of the Kent Downs AONB Management Plan and AONB Unit produced supporting design guidance.
	Option 30 - "Prince's Parade should be included in the Landscape Appraisal to be commissioned as it " makes an important contribution at a local level to the natural beauty of the district " as well as to the setting of the Nationally important Ancient Monument (Ref 465)	Please see responses to Princes Parade in the Urban Character Area.	No change proposed	Special Landscape Areas  Special Landscape Areas (SLAs) are defined as follows and shown on the Policies Map: •North Downs (including the scarp and crest); •Old Romney Shoreline; and •Dungeness.
	<ul style="list-style-type: none"> <li>Point 5 – change to "The policy aims of the Kent Downs AONB Management Plan have been met." (Ref 879)</li> </ul>	It is not considered that this would improve the policy.	No change proposed	Proposals should protect or enhance the natural beauty of the Special Landscape Area. The Council will not permit development proposals that are inconsistent with this objective unless the need to secure economic and social wellbeing outweighs the need to protect the SLAs' county-wide landscape significance.
	<ul style="list-style-type: none"> <li>Support in principle for Policy NE3 to protect District landscape and countryside in the Preferred Option document</li> <li>Approach B under Option 30 is supported but the policy is superfluous.</li> <li>If areas are of such intrinsic quality that they be afforded special protection, they should be included in the AONB.</li> <li>Areas outside the AONB are protected by other policies. Therefore, there is no requirement to appraise or develop policies relating to land outside the AONB in this regard (Ref 1686)</li> </ul>	The Preferred Option seeks to protect the setting of the Area of Outstanding Natural Beauty and high quality in whole of the district. Only option B would neglect other areas in the district.	No change proposed	Local Landscape Areas  Local Landscape Areas are defined as follows and illustrated on the Policies Map: •Romney Marsh; •Sandgate Escarpment and Seabrook Valley; •Eaton Lands; •Coolinge Lane and Enbrook Valley; and •Mill Lease Valley.
	NE3 To protect the District's landscapes and countryside  <ul style="list-style-type: none"> <li>We welcome Policy NE3 which sets out the importance of the Kent Downs AONB and its setting, the need for its protection and enhancement, and that it specifically refers to the aims of the AONB Management Plan.</li> <li>Whilst the NPPF briefly refers to national policy on protected landscape in Section 7 (North Downs Character Area), we advise NE3 is reinforced by directly referring to NPPF paragraphs 115 and 116, including the tests against which major development proposals should be assessed (Ref 1762)</li> </ul>	Noted.	No change proposed	Proposals should protect or enhance the landscape character and functioning of Local Landscape Areas. The Council will not permit development proposals that are inconsistent with this objective, unless the need to secure economic and social wellbeing outweighs the need to protect the area's local landscape importance.  Landscape Character Areas
	<ul style="list-style-type: none"> <li>CPRE Kent believes it is essential that the areas designated as Special Landscape Area have special qualities which justify their continued designation in the local plan. The same goes for the other local designations for the most part.</li> <li>The Local Plan needs to positively promote their retention because of their special quality. The lack of a detailed assessment is an unacceptable reason for their retention. It does not reflect their importance to spatial planning in the district and is of great concern to CPRE. Most districts, including Maidstone, Canterbury and Swale (all of which are at examination), are successfully arguing retention of local landscape designations. They are important tools and the Council should proactively promote retention of these designations. The Special Landscape Areas may need to be renamed.</li> <li>The policy should seek to ensure that the value, character, amenity and tranquillity of the district's landscapes are protected and enhanced where appropriate. To assist with this assessment, it is important that the Council ensures (whether designated or not) that an up-to-date and detailed landscape assessment is completed for the whole district. This should also recognise the presence of habitat networks.</li> <li>The policy should make reference to 'tranquillity'. Noise, light pollution and traffic movements, for example, can have a negative impact on the tranquillity of landscapes.</li> <li>Part 1 of policy should refer to conserving and enhancing and the 'setting' of the AONB. Reference should be made to guidance produced by the AONB Unit.</li> <li>CPRE Kent objects strongly to Part 6 of the policy. Landscapes do not have to be designated to be considered 'valued' for the purpose of the NPPF. This criterion must be reworded. GLVIA guidelines assist with determining whether a landscape is valued. 'Protect and enhance' is still relevant (Ref 1565)</li> </ul>	Include reference to the High Level Landscape Assessment in the supporting text.  Tranquillity will be included in the policy.  It is not agreed that the policy only values designated areas; however it is important to distinguish between designated and non-designated areas.	Update Policy as outlined in response.	Proposals should demonstrate that their siting and design are compatible with the pattern of natural and man-made features of the Landscape Character Areas, including their cultural and historical associations.  Opportunities for remediation and improvement of damaged landscapes will be taken as they arise.
	<ul style="list-style-type: none"> <li>The Mill Lease/Leese Valley should be protected and for that reason, the SHLAA "Green" site 621 (Land opposite 24 Station Road) must be removed from the sites suitable for development.</li> <li>SHLAA "Amber" site 622 (Saltwood Care Centre Tanners Hill) should also be retained as a Local Landscape Area (Ref 1279)</li> </ul>	Noted.	No change proposed	
	Heritage: When considering the impact of development proposals in the countryside, it is important to understand the historic development of the landscape so that its essential character can be conserved. The landscape contains many surviving historic features, such as the patterns of tracks, lanes and hedgerows that give character to the district. The Kent Historic Landscape Characterisation (2001) has identified the broad historic character of the landscape of Kent. Where it is to be applied locally further study is needed to refine its conclusions but it remains an essential tool for understanding Shepway's landscape. To be fully effective in local planning and development control, the Historic Landscape Characterisation should be backed up by more detailed case-by-case analysis, to add greater detail through secondary sources. Some parts of Kent have now been covered by such an assessment and we would suggest that Shepway District Council could work with us to take forward a Shepway study.  PROW: Supports (1999)	Noted. This is part of the emerging Heritage Strategy, also the Romney Marsh landscape assessment includes some historic references.	No change proposed	
<p><b>Policy NE4</b></p> <p><b>Equestrian Development</b></p> <p>Planning applications for equestrian-related development, including the change of use of land, will be permitted where proposals meet the following criteria:-</p> <ol style="list-style-type: none"> <li>There would be no detrimental impact on the character or appearance of the rural landscape, especially within the Kent Downs Area of Outstanding Natural Beauty and the Special Landscape Areas;</li> <li>Existing buildings are reused where possible but where new buildings are necessary, these are well-related to existing buildings, appropriate to the number of horses to be kept and the amount of land available. The scale and design of the development is appropriate to the character of the locality;</li> <li>Adequate provision can be made to meet access, servicing and parking</li> </ol>	Hythe Town Council supports this policy.	This support is welcomed.	No change proposed	Following a series of internal discussion it was decided to amend the policy  NE4 Equestrian Development  Planning applications for equestrian-related development, including the change of use of land, will be permitted where: 1. There would be no detrimental impact on the character or appearance of the rural landscape, especially within the Kent Downs Area of Outstanding Natural Beauty, the Special Landscape Areas and Local Landscape Areas; 2. Existing buildings are reused wherever possible. Where new buildings are necessary, these should be well-related visually and locationally to existing buildings, appropriate to the number of horses to be kept and the amount of land available. The scale and design of the development is appropriate to the character of the locality; 3. Adequate provision can be made to meet access, servicing and parking requirements without detriment to the visual and
	Supports. The inclusion of point 9 to protect and link to the existing bridleway network is welcomed.	Noted.	No change proposed	

<p>27. Suitable provision can be made to deal with foul and surface water drainage and soiled bedding requirements without detriment to the visual and other amenities of the locality and it will not generate traffic of a volume and type inappropriate to the locality;</p> <p>4. Applicants can demonstrate that sufficient land is available for grazing and exercise to ensure the safety and comfort of horses and avoid excessive erosion of soil and vegetation;</p> <p>5. Development does not unacceptably affect local amenity by virtue of smell, noise, lighting or road safety;</p> <p>6. Any jumps or other related equipment should be well designed and maintained and, removed when not in frequent use.</p> <p>7. It does not result in the irreversible loss of the best and most versatile agricultural land;</p> <p>8. The proposal does not lead to the need for additional housing on site; and</p> <p>9. The proposal is well related to or has improved links to the existing bridleway network, with no impact on the bridleway capacity to accommodate the growth.</p> <p>10. Suitable provision can be made to deal with foul and surface water drainage and soiled bedding materials.</p> <p>Planning permission granted for buildings related to horse keeping activities will be subject to a condition that structures are temporary and are removed when the use of the land for such purposes ceases. Particular consideration will be given to the cumulative effects of proposals on the local area and the wider landscape and environment.</p>	<p>Floodlighting associated with equestrian activities (and maneges in particular) can have a significant impact on the countryside. The control of lighting should be given more emphasis in this policy.</p>	<p>The policy should be seen in conjunction with Policy NES: Light Pollution and External Illumination.</p>	<p>No change proposed</p>	<p>Suitable provision can be made to deal with foul and surface water drainage and soiled bedding requirements without detriment to the visual and other amenities of the locality and proposals will not generate traffic of a volume and type inappropriate to the locality;</p> <p>4.Sufficient land is available for grazing and exercise to ensure the safety of horses and avoid excessive erosion of soil and vegetation in accordance with the British Horse Society Standards;</p> <p>5.Development does not unacceptably affect local amenity by virtue of smell, noise, lighting or road safety;</p> <p>6.Any jumps or other related equipment are well designed and maintained and removed when not in frequent use;</p> <p>7.There is no irreversible loss of the best and most versatile agricultural land;</p> <p>8.The proposal is well related to, or has improved links to, the existing bridleway network, with no impact on the bridleway capacity to accommodate the growth; and</p> <p>9.Suitable provision is made to deal with foul and surface water drainage and soiled bedding materials.</p> <p>Planning permission granted for buildings related to horse keeping activities will be subject to a condition that structures are temporary and are removed when the use of the land for such purposes ceases. Particular consideration will be given to the cumulative effects of proposals on the local area and the wider landscape and environment.</p> <p>Proposals for additional accommodation in relation to equestrian development will be judged against Policy HB7: Dwellings to Support a Rural-based Enterprise.</p>
<p><b>Policy NES</b> <b>Light pollution and external illumination</b> Applications for major development, and development including significant external lighting, will be approved if: The proposal does not materially alter light levels outside the development site and/or has the potential to adversely affect the use or enjoyment of nearby buildings or open spaces An existing neighbouring light source makes the site unsuitable for a particular use (e.g. hospital) The proposed lighting scheme accords with the best practise guidance provided by the Institution of Lighting Professionals (2011) relevant to the particular Environmental Zone (see table below). Applications should include a lighting assessment with details of the following: where the light shines; when the light shines; how much light shines; and possible ecological impact <b>Table 13.1 : Obtrusive Light Limitations for External Lighting Installations</b></p>	<p>We welcome this policy Hythe Town Council supports this policy.</p> <p>47. The new Policy NES5 in the Preferred Options, relating to light pollution and external illumination, is too restrictive. The policy does not provide room for mitigation measures to address potential lighting in developments. In many cases, external lighting is essential for well-being and health and safety. For example, in the case of LAA, the policy is too restrictive to allow for the airport to continue functioning with the safety for others in mind. 48. Developers and operators are unlikely to install external lighting that is not required as it is costly to install, run and maintain. In short, there is no justification to restrict external lighting and not to consider mitigation methods. This is not sound and therefore does not accord with paragraph 182 of the NPPF.</p> <p>The policy should be amended to ensure that its objectives are clear. For example it should clearly seek to ensure that there are no significant adverse effects (whether individually or cumulatively) to the character of the area, or the amenity of residents. The policy should also refer to ensuring that outdoor lighting does not disturb the feeding, roosting and breeding activities or the diurnal activities of biodiversity assets. Lighting should also be managed and minimised close to river margins, where it can also affect seasonal migration of fish. Biodiversity would benefit from lighting as near to red spectrum lighting as possible.</p> <p>The supporting justification should be improved to explain the impacts of lighting on biodiversity in more detail. Artificial light considerably disrupts natural patterns of night and day, disrupting invertebrate feeding, breeding and activity resulting in reducing and fragmenting populations. For example, moths are attracted to artificial lights at night and many of these insects will die because of exhaustion. Furthermore, birds that have their sleep deprived due to artificial light and thus continual lack of sleep are likely to suffer from disruption to the long-term circadian rhythm that dictates the onset of the breeding seasons. Many species of bird and fish migrate at night. The foraging of bats at night is also affected as their food source, often moths and midges, congregate around a light source. This can have a number of effects such as decimating the moth population, causing collisions and overcrowding of certain species to the detriment of another, therefore interrupting the natural balance of foraging behaviour. Opting as near to red spectrum lighting as possible, which is invisible to wildlife would be beneficial.</p> <p>The concern about the impact of light pollution on wildlife needs to extend to water courses as well as other habitats.</p>	<p>This support is welcomed. This support is welcomed.</p> <p>Planning Practice Guidance recognises the benefits of light, but it can be a source of annoyance, harmful to wildlife and undermine enjoyment of the countryside and night sky.</p> <p>Ecological impact is mentioned in the policy; it is not considered that more detail is appropriate.</p> <p>Noted. The impacts of intrusive light on watercourses is mentioned in the text.</p>	<p>No change proposed</p> <p>No proposed changes</p>	<p>Proposed policy with changes: NES Light Pollution and External Illumination</p> <p>Applications for major development, and development including significant external lighting, will be approved if: 1.The proposal does not materially alter light levels outside the development site; 2.The proposal does not adversely affect the use or enjoyment of nearby buildings or open spaces; and 3.The proposed lighting scheme accords with the best practice guidance provided by the Institution of Lighting Professionals (ILP) (2011) relevant to the particular Environmental Zone (see table below).</p> <p>For proposals involving sensitive uses (such as hospitals or residential institutions) the Council will have regard to whether an existing neighbouring light source would make the proposed used unsuitable for the site.</p> <p>Applications should include a lighting assessment with details of the following: •Where the light shines; •When the light shines; •How much light shines; and •Possible ecological impact.</p> <p>Table 14.1 : Obtrusive Light Limitations for External Lighting Installations insert table</p>
<p><b>Policy NE6</b> <b>Land Stability</b> Planning permission will be granted for development within the area defined on the Policies Map if investigation and analysis is undertaken by a competent accredited authority which clearly demonstrates that the site can be safely developed. This analysis should also demonstrate that the proposed development will not have an adverse effect on the slip area in part or as a whole. Where proposals affect land where instability is suspected, any planning application must be accompanied by a land stability or slope stability risk assessment report which: 1. Identifies and assesses the degree of instability; 2. Identifies the measures required to mitigate against any risk identified in 1 (above); 3. Specifies routine monitoring (as appropriate); and 4. Addresses the need for formal environmental assessment arising from any stabilisation works. The Council will look favourably on schemes that can bring unstable land back into use, subject to other planning considerations.</p>	<p>• Prince's Parade is definitely a site that accords with Policy NE6, as its previous use as a landfill site makes it highly likely to suffer from instability, subsidence, pollution and need continual monitoring for these if it is allowed to be developed. • The nature of materials likely to have been landfilled there, as it was done before regulation of landfill sites, increases the risk of dangerous contaminants causing problems and environmental pollution for a long time to come, if it is disturbed (Ref 466)</p> <p>• Hythe Town Council supports this policy (Ref 882)</p> <p>• In relation to land stability, contamination and pollution, the inclusion of new policies; NE6 (Land Stability) and NE7 (Contaminated Land) is noted. • Approach A in Option 32/33 needs to recognise that the impact of the future expansion of LAA is a material consideration in assessing the development proposals and allocations in the vicinity of the airport. • Approach E should relate to contamination as well as stability • Approaches A and E are supported with these inclusions as they are in line with Paragraph 20 of the NPPF and will ensure the developer will not be over burdened by regulation. • There is concern with Policies NE6 and NE7 as currently worded which is seen as burdensome and over prescriptive and, therefore, not positively prepared as required in paragraph 182 of the NPPF • Request the removal of Policy NE7 for the special protection of birds as the protection of the SPA and Ramsar site is adequately addressed in national legislation (Ref 1689)</p>	<p>Please see response to Princes Parade UA18</p> <p>This support is welcomed.</p> <p>It is considered that the policy meets the requirements of National Planning Practice Guidance, the National Planning Policy Framework and also would encourage efficient use of land.</p>	<p>No proposed changes</p> <p>No changes proposed</p>	<p>No proposed changes Land Stability</p> <p>Planning permission will be granted for development within the area defined on the Policies Map, or as identified by the British Geological Survey, only if investigation and analysis is undertaken by a competent accredited authority which clearly demonstrates that the site can be safely developed. This analysis should also demonstrate that the proposed development will not have an adverse effect on the slip area in part or as a whole.</p> <p>Where proposals affect land where instability is suspected, any planning application must be accompanied by a Phase 1 desktop land stability or slope stability risk assessment report which: 1.Identifies and assesses the degree of instability; 2.Identifies the measures required to mitigate against any risk identified in point 1 (above); 3.Specifies routine monitoring (as appropriate); and 4.Addresses the need for formal environmental assessment arising from any stabilisation works.</p> <p>The Council will look favourably on schemes that can bring unstable land back into use, subject to other planning and viability considerations.</p>
<p><b>Policy NE7</b> <b>Contaminated Land</b> When development is proposed on or near a site that has been used for the purpose of waste disposal, is known to be contaminated, or there is good reason to believe that contamination may exist, the applicant will be required to carry out a site assessment and submit a report of the findings in order to establish the nature and extent of the contamination. Development will be permitted subject to the identification of and commitment to implementation of practicable and efficient measures taken to treat, contain and/or control any contamination so as to: 1. Protect the occupiers of the development and neighbouring land users, including in the case of housing the users of gardens, from unacceptable risk. 2. Ensure the structural integrity of any building built or to be built on or adjoining the site. 3. Prevent contamination of any watercourse, water body or aquifer. 4. Prevent the contamination of adjoining land or halt existing contamination. Any permission for development will require that the remedial measures agreed with the Authority must be completed as the first step in the carrying out of the development.</p>	<p>• It is not possible for investigations into contamination on old landfill sites to be entirely accurate or reliable due to the fact that it is impossible to know what has been deposited there as no records were kept at the time. • Spot checks could result in a declaration of no pollution problems/safety but there could be pockets of serious contamination between the areas checked. • Allowing development on old landfill sites should be an absolute last resort if the need for dwellings is so great, there are no alternative sites to meet that need and the site in question can be safely and thoroughly de-contaminated. • This is not the case for Prince's Parade, therefore it should not be developed (Ref 468)</p> <p>• Suggest add "Any remedial measures must ensure no damage to adjacent historic artefacts" (Ref 883)</p> <p>• In relation to land stability, contamination and pollution, the inclusion of new policies; NE6 (Land Stability) and NE7 (Contaminated Land) is noted. • Approach A in Option 32/33 needs to recognise that the impact of the future expansion of LAA is a material consideration in assessing the development proposals and allocations in the vicinity of the airport. • Approach E should relate to contamination as well as stability • Approaches A and E are supported with these inclusions as they are in line with Paragraph 20 of the NPPF and will ensure the developer will not be over burdened by regulation. • There is concern with Policies NE6 and NE7 as currently worded which is seen as burdensome and over prescriptive and, therefore, not positively prepared as required in paragraph 182 of the NPPF • Request the removal of Policy NE7 for the special protection of birds as the protection of the SPA and Ramsar site is adequately addressed in national legislation (Ref 1690)</p>	<p>Please see response to Princes Parade UA18</p> <p>Noted; this is covered by other policies and legislation.</p> <p>See NE6 response above.</p>	<p>No change proposed</p> <p>No proposed changes</p> <p>No proposed changes</p>	<p>Proposed policy with changes (resulting from internal discussions): NE7 Contaminated Land</p> <p>When development is proposed on or near a site that has been used for the purpose of waste disposal, is known to be contaminated, or where there is reason to believe that contamination may exist, the applicant will be required to carry out a site assessment and submit a report of the findings in order to establish the nature and extent of the contamination. The assessment should be phased, starting with a Phase 1 Investigation (or Desk Study) the results of which will determine the requirement for a Phase 2 Investigation (intrusive investigation), which will in turn determine any requirement for a Remediation Strategy and Verification Report. Assessment should be carried out in accordance with Environment Agency CLR11 Guidance Model Procedures for the Management of Land Contamination.</p> <p>Development will be permitted subject to the identification, and commitment to the implementation of, practicable and efficient measures to treat, contain and/or control any contamination so as to: 1.Protect the occupiers of the development and neighbouring land users, including in the case of housing the users of gardens, from unacceptable risk; 2.Ensure the structural integrity of any existing or proposed structure on or adjoining the site; 3.Prevent contamination of any watercourse, water body or aquifer; 4.Prevent the contamination of adjoining land or halt existing contamination; and 5.Ensure that any remedial measures do not damage adjacent historic artifacts.</p> <p>Any permission for development will require that the remedial measures agreed with the Council must be completed as the first step in the carrying out of the development.</p>

	<ul style="list-style-type: none"> <li>The Environment Agency may require potential contamination risks to be addressed through the planning process, and may request appropriate conditions on any planning permission granted.</li> <li>In areas where public foul sewers are not present, alternative foul disposal methods will be necessary. All foul drainage options must comply with the Environmental Permitting Regulations – in certain circumstances this may mean applying for an Environmental Permit (Ref 1787)</li> </ul>	Noted.	No proposed changes	
<p><b>Policy NE8</b> <b>Integrated Coastal Zone Management</b></p> <p>Development in coastal areas should pay regard to the aims and objectives of the Shoreline Management Plan and the emerging Marine Plan. The District Council will promote with partners 'Integrated Coastal Zone Management', including the preparation of a comprehensive management plan for the coast. Proposals and initiatives will be supported that promote the following general objectives:</p> <ol style="list-style-type: none"> <li>Facilitate the economic, environmental and social wellbeing of the area;</li> <li>Address proposals for the coastline and coastal communities set out in Coastal Defence Strategies and Shoreline Management Plans;</li> <li>Contribute to greater safeguarding of property from flooding or erosion and/or enable the area and pattern of development to adapt to change, including the relocation of current settlement areas, and vulnerable facilities and infrastructure that might be directly affected by the consequences of climate change;</li> <li>Provide resources to improve the process of harbour and coastal management, incorporating and integrating social, recreational, economic, physical and environmental issues and actions;</li> <li>Improve infrastructure to support sustainable modes of transport, especially cycleways, bridleways and footpaths, including the National Coastal Footpath</li> </ol>	<ul style="list-style-type: none"> <li>A standard response to policy NE8 has been received from the Marine Management Organisation (MMO) (Ref 1752)</li> <li>SDC should welcome and support the initiative to create the Cinque Ports Cycleway which will give a unique opportunity for cyclists and people using disability transport to enjoy our coast (Ref 436)</li> <li>Air Pollution should be added to the list of protections as there is a significant amount of pollution from passing ships brought ashore by onshore winds, which are frequent</li> <li>This needs to be monitored for health and environmental reasons (Ref 469)</li> <li>The references to marine planning in the context of integrated coastal zone management are noted and Rother District Council (RDC) would welcome further dialogue on this matter as our respective plans progress (Ref 1751)</li> </ul>	Noted.	No proposed changes	Proposed policy with changes: NE8
		Please refer to Health and Wellbeing chapter.	No proposed changes	Integrated Coastal Zone Management
		The local planning authority does not have jurisdiction beyond the low tide mark; this issue can be investigated further with the Marine Management Organisation. Air quality is covered by other legislation.	No changes proposed	Development in coastal areas should complement the aims and objectives of the Shoreline Management Plan and the emerging Marine Plan. The Council will promote with partners Integrated Coastal Zone Management, including the preparation of a comprehensive management plan for the coast.
		Noted.	No changes proposed	Proposals and initiatives will be supported that promote the following general objectives: 1.Facilitate the economic, environmental and social wellbeing of the area, including the proper consideration of marine wildlife; 2.Address proposals for the coastline and coastal communities set out in Coastal Defence Strategies and Shoreline Management Plans; 3.Contribute to greater safeguarding of property from flooding or erosion and/or enable the area and pattern of development to adapt to change, including the relocation of current settlement areas, and vulnerable facilities and infrastructure that might be directly affected by the consequences of climate change;
	It should be noted that many of Shepway's most important heritage assets are located along the coast and could be harmed by decisions or works undertaken to protect the coast from flooding (it is noted that in the South Foreland to Beachy Head Shoreline Management Plan there are areas of managed realignment proposed for Hythe Ranges and Lydd Ranges). Any flood-prevention works should only be carried out after a formal desk-based assessment has been made of the impact on the heritage. PROW: Support with required amendment. Welcome and note the inclusion of point 5 to enhance infrastructure for cycleways and public rights of way including the England Coast Path. On a technical issue the "coastal path" should be referenced as the "England Coast Path National Trail".	Noted; minor amendment	Add reference to the 'England Coast Path National Trail' in the fifth bullet point of Policy NE8: Integrated Coastal Zone Management:  '5. Improve infrastructure to support sustainable modes of transport, especially cycleways, bridleways and footpaths, including the England Coast Path National Trail.'	4.Provide resources to improve the process of harbour and coastal management, incorporating and integrating social, recreational, economic, physical and environmental issues and actions; and 5.Improve infrastructure to support sustainable modes of transport, especially cycleways, bridleways and footpaths, including the England Coast Path National Trail.
		In the absence of the Marine Plan, the Environment Agency give qualified support to this policy but emphasise the need for marine wildlife – the environmental wellbeing mentioned in (1) – to be properly considered (Ref 1785)	Add reference to marine wildlife to first bullet point of Policy NE8: Integrated Coastal Zone Management:  1. Facilitate the economic, environmental and social wellbeing of the area, including the proper consideration of marine wildlife;	
<p><b>Policy NE9</b> <b>Development around the coast</b></p> <p>The District Planning Authority will give long term protection to the Folkestone and Dover Heritage Coast and to the areas of undeveloped coast shown on the Policies Map. Within these areas development will not be permitted unless proposals preserve and enhance natural beauty, landscape, heritage, scientific and nature conservation value (consistent with any agreed management plan).Planning permission will be granted for development in the coastal area, outside of Settlement Boundaries, where it can be demonstrated that all the following criteria have been considered:</p> <ol style="list-style-type: none"> <li>There are no harmful effects on or net loss of nature conservation or areas of geological importance</li> <li>The development provides recreational opportunities that do not adversely affect the character, environment and appearance of the coast</li> <li>Regard has been shown to the high quality and inclusive design of new buildings in coastal locations in accordance with other relevant design and historic environment policies;</li> <li>There are measures for mitigation of any detrimental effects including where appropriate the improvement of existing landscapes relating to the proposal;</li> <li>Where appropriate, opportunities have been taken to upgrade existing footpaths and cyclepaths, enhance and protect the National Coastal Footpath and ensure that public access is retained and provided to connect existing paths along the waterfront;</li> <li>The development would not be detrimental to infrastructure for, and quality of, water-based recreation, or be detrimental to the safety of navigation.</li> <li>Development should be informed by and complement the distinctive characteristics of theSeascape character areas and types identified in the Kent Seascape Character Assessment.</li> </ol> <p>The Council will seek to safeguard a minimum of a 15 metre strip of land immediately behind the landward edge of the existing or proposed sea defence or coast protection works to facilitate access for plant and materials used in connection with their maintenance or repair. The Council will seek to safeguard a minimum of a 25 metre strip of land, measured from the landward edge of the existing or proposed sea defence or coast protection works in harsh marine environment areas in order to prevent storm damage to buildings. Planning permission will be granted for a replacement dwelling unless there is past evidence that the existing or demolished property has been damaged as a result of the harsh marine environment. Repeat applications for replacement dwellings will be refused unless the applicant can demonstrate no future harm.</p> <p>Heritage coast site shown on the Policies Map: - Folkestone/Dover Other undeveloped coast sites shown on the Policies Map: - West Hythe - Dymchurch - St Mary's Bay - Dungeness</p>	<ul style="list-style-type: none"> <li>Development of Prince's Parade would contravene points 1, 2, 4, 7 of this policy (Ref 470)</li> <li>Hythe Town Council supports this policy (Ref 885)</li> <li>Where the Council is successful in safeguarding "a minimum of a 25 metre strip of land, measured from the landward edge of the existing or proposed sea defence" (7), they might also consider the ecological benefits conferred by this land and so add it to its inventory of Green Infrastructure (Ref 1786)</li> </ul>	Please see response to Prince's Parade UA18	No changes proposed	No proposed changes resulting from consultation comments NE9 Development Around The Coast
		This support is welcomed.		The Council will give long term protection to the Folkestone and Dover Heritage Coast and to the areas of undeveloped coast shown on the Policies Map. Within these areas development will not be permitted unless proposals preserve and enhance natural beauty, landscape, heritage, scientific and nature conservation value (consistent with any agreed management plan).
		Agreed; this is a matter that can be considered in the Green Infrastructure Plan.	No changes proposed	Planning permission will be granted for development in the coastal area, outside of settlement boundaries, where it can be demonstrated that all the following criteria have been met: 1. There are no harmful effects on or net loss of nature conservation or areas of geological importance; 2. The development provides recreational opportunities that do not adversely affect the character, environment and appearance of the coast; 3. Regard has been shown to the high quality and inclusive design of new buildings in coastal locations in accordance with other relevant design and historic environment policies; 4. There are measures for mitigation of any detrimental effects including, where appropriate, the improvement of existing landscapes relating to the proposal; 5. Where appropriate, opportunities have been taken to upgrade existing footpaths and cyclepaths, enhance and protect the England Coast Path National Trail and ensure that public access is retained and provided to connect existing paths along the waterfront; 6. The development would not be detrimental to infrastructure for, and quality of, water-based recreation, or be detrimental to the safety of navigation; and 7. Development should be informed by and complement the distinctive characteristics of the Seascape Character Areas and types identified in the Kent Seascape Character Assessment.
		Noted; amend policy accordingly.		The Council will safeguard a minimum of a 15m strip of land immediately behind the landward edge of the existing or proposed sea defence or coast protection works to facilitate access for plant and materials used in connection with their maintenance or repair.
	KCC welcomes this policy in support of Heritage Coast designations. Supports, with required and requested amendments to point 5. As above the "coastal path" should be referenced as the "England Coast Path National Trail".  Suggested amended text. 5. Where appropriate, opportunities have been taken to upgrade existing footpaths and cyclepaths, enhance and protect the England Coast Path and ensure that direct public access and connectivity to the coast is retained or enhanced.			The Council will safeguard a minimum of a 25m strip of land, measured from the landward edge of the existing or proposed sea defence or coast protection works, in harsh marine environment areas in order to prevent storm damage to buildings. Planning permission will be granted for a replacement dwelling unless there is past evidence that the existing or demolished property has been damaged as a result of the harsh marine environment. Repeat applications for replacement dwellings will be refused unless the applicant can demonstrate that no future harm will occur.
	SFRA recommends all proposals within 50m of landward crest of seawall should be accompanied by an FRA specifically focusses on the risks associated with wave overtopping	Agreed; include reference in the supporting text.	Include reference to 50m from th coast in supporting text.	The following Heritage Coast is shown on the Policies Map: •Folkestone/Dover  Other undeveloped coast sites are shown on the Policies Map: •West Hythe; •Dymchurch; •St Mary's Bay; and •Dungeness.

<p><b>Light Pollution</b></p>	<ul style="list-style-type: none"> <li>Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN) in England. The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</li> <li>Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case with particular reference to the M20, A259(part), A2070(part) and A20(part).</li> <li>Having examined the above document we offer the following comments: 13.34 "The Council will require the applicant to assess the need for the lighting scheme proposed, taking into consideration whether the development could proceed without lighting, whether the benefits of lighting outweigh any drawbacks and if there are any alternative measures that may be taken. No lighting is ultimately the best solution in the most sensitive locations and therefore the Council will ensure that only lighting schemes that are strictly necessary are approved in these locations. The Council will also take account of the requirements of the Highway Authority (KCC or Highways Agency) with regard to proposals relating to highway safety to secure the most appropriate solution with least light pollution."</li> <li>Reference should be made to Highways England, rather than Highways Agency (Ref 1915)</li> </ul>	<p>Noted. Amend reference to 'Highways England'.</p>	<p>Change references to highways Agency to 'Highways England'</p>	<p>Change references to Highways Agency to '<b>Highways England</b>'</p>
<p><b>Natural Environment - alternative options</b></p>	<ul style="list-style-type: none"> <li>Option 35 - Princes Parade should be added to the list for protection due to its relationship to the seafront and Military Canal, which is the only example of the two features in proximity – therefore worthy of protection (Ref 471)</li> <li>Hythe Town Council supports this policy (Ref 884)</li> <li>Option 31 includes Policy C4 and Approach B is supported</li> <li>The Council should avoid regulating development unless it is absolutely necessary</li> <li>A generic design policy is adopted to assess the balance between permitting appropriate use of the countryside and protecting natural resources (Ref 1687)</li> </ul>	<p>Please see response to Princes Parade UA18</p>	<p>No proposed changes</p>	
		<p>This support is welcomed.</p>	<p>No proposed changes</p>	
		<p>As the Sustainability Appraisal concluded B would have a negligible effect, the Preferred Option is the most effective approach.</p>	<p>No proposed changes</p>	



Preferred Options Policy	Comments Received	Response from the Council	Action by the Council	Revised Draft Policy/Text
<b>Climate Change - general comments</b>	<ul style="list-style-type: none"> <li>Statement 5 – asserted that Prince's Parade is a "diverse and special environment" therefore should be protected due to its unique position between the seafront and the Royal Military Canal, Ancient Monument (Ref 472)</li> </ul>	Please see response to Princes Parade UA18.	No change	
<b>Policy CC1</b> <b>Reducing carbon emissions</b> 1. Proposals for all new build dwellings and new non-residential buildings of 1,000 m2 or more will be required to reduce carbon emissions (over the requirements set by Building Regulations) by a minimum of 10% through the use of on-site renewable energy technologies demonstrated via an appropriate assessment. 2. This could be provided through the installation of an integrated system or site wide solutions involving the installation of a system that is not integrated within the new building. For a site wide solution, evidence must be submitted demonstrating that the installation is technically feasible and is capable of being installed. 3. For growth areas and substantial new development, site wide renewable and low carbon energy solutions that maximise on-site generation from these sources will be sought, such as renewable and low carbon district heating systems or combined heat and power networks.	<ul style="list-style-type: none"> <li>Why is the target only 10%?</li> <li>Given the very large numbers of new homes being proposed the council needs to be much more ambitious in setting targets for reducing carbon emissions (Ref 210)</li> </ul>	This is a percentage that follows best practice from other Local Plans.	No change	<b>Amend Policy to read:</b>  <b>CC1</b> <b>Reducing Carbon Emissions</b>  <b>Planning applications for all major new build housing developments and new non-residential buildings of 1,000sqm or more gross floorspace will be required to reduce carbon emissions by a minimum of 10 per cent above the Target Emission Rate, as defined in the Building Regulations for England approved document L1A: Conservation of Fuel and Power in Dwellings. Building Regulations L1A</b>  <b>This should be through the use of on-site renewable and low-carbon energy technologies which could include an integrated system or site-wide solution involving the installation of a system that is not integrated within the new building.</b>
	<ul style="list-style-type: none"> <li>Option 36 - This option makes sensible suggestions about providing facilities such as compost bins etc but these ideas have not been included in any of the climate change policies (Ref 261)</li> </ul>	Agreed, but include in Policy CC2: Sustainable Design and Construction.	No change	
	<ul style="list-style-type: none"> <li>The AONB Unit support policy CC1, and is particularly supportive of planning policies intended to actively encourage new markets for sustainable produced woodland products, particularly wood fuels.</li> <li>Such an approach is in compliance with policy WT9 of the AONB Management Plan (Ref 282)</li> </ul>	Noted.	No change	
	<ul style="list-style-type: none"> <li>Hythe Town Council supports this policy (Ref 886)</li> </ul>	Noted.	No change	
	<ul style="list-style-type: none"> <li>Policy wording should be clarified to confirm that dwellings of any size</li> <li>Reduce the threshold for compliance with CC1 to 500m2 (non-residential)</li> <li>Increase the target for CO2 reduction to a minimum % of at least 50% - this is an easily achievable policy through modern construction and heating methods and is a far more ambitious level (Ref 1015)</li> </ul>	It is considered that the wording is sufficiently clear. It is considered that 500m2 would be too small a threshold for new development. This is a percentage that follows best practice elsewhere.	No change	
	<ul style="list-style-type: none"> <li>Policy CC1 (option 36) in the Preferred Options document is in line with Approaches A and B as detailed in Option 36 of the Preferred Options.</li> <li>Considered that Approach C is the best option as there is no need to burden development with policy requirements over and above those set out in national guidance and building regulations.</li> <li>The policy requirements included could adversely affect investment in Shepway which may affect the future prosperity of the District (Ref 1692)</li> </ul>	Approach C would have negligible effect.	No change	
CPRE Kent broadly supports this policy, but would like to make the following comments. 1. The supporting text to the policy should refer to the energy hierarchy as the primary means by which minimise energy use and CO2 emissions i.e. (in summary) to use energy efficiently; supply energy efficiently and finally to use renewable energy. In this way buildings will prioritise lower cost passive design measures rather than the more expensive renewable energy technologies. This hierarchy should be reflected in the policy. 2. The use of decentralised energy, given its importance to efficient supply of energy (the second stage in the energy hierarchy), should be considered before renewable energy. This should be reflected in the policy. 3. The Council should consider whether the threshold for reducing carbon emissions could be lower. Furthermore, it is noted that a 10% reduction in carbon emissions through renewable energy technologies is quite conservative (Ref 1575)	Amendment to reflect comments relating to the energy hierarchy and decentralised energy. This is a percentage that follows best practice elsewhere.	Amendment to reflect comments relating to the energy hierarchy and decentralised energy.		
<ul style="list-style-type: none"> <li>The draft policy is contrary to national policy by requiring applicants for residential development to reduce carbon emissions over the requirements of the Building Regulations by 10%. The Government announced through its productivity plan ( Fixing the Foundations ) that it has decided not to proceed with zero carbon and has kept the Building Regulations at the level of Part L 2013. The Council may specify how the current Part L is achieved by requiring 10% of the energy needs of the scheme to be provided for by on-site technologies, but it cannot require applicants to go further than the current Part L. The Council's comments regarding the 'negligible effect' on reducing emissions of adhering to the current Part L is not a view shared by the Government.</li> <li>Part 2 of the policy is unsound. It is the responsibility of the Council to demonstrate that the provision on-site renewable technologies is technically feasible. The applicant should not be required to demonstrate the feasibility of the Council's requirements. However, we assume that the Council has assessed this and is now confident that this can be achieved on all its residential schemes. Therefore Part 2 of the policy is superfluous and should be removed (Ref 1602)</li> </ul>	Can apply to energy sources rather than dwelling	Amend to require proposals demonstrate (2) is not possible and/or viable		
Sustainable Business & Communities:  The key issue is welcomed, but more emphasis is needed on energy efficiency. On point 1, it is suggested that the percentage be increased to 20%, which is similar to Manchester, Woking and Leeds. It is suggested that, for major schemes of 100 or more units, an Energy Statement should be required. A number of councils are using the seven golden rules, to successfully integrate sustainable energy in new development: Start to plan at the outset how you will address these requirements. Factors such as site layout, building design and orientation all impact on energy efficiency and generating renewable energy. If these are addressed early on, there will be a wider range of options that are viable and the solution is likely to be more cost effective. Aim to achieve the highest possible standards of energy efficiency. The greater the energy efficiency, the lower the energy consumption. This will reduce the target level of renewable energy that will need to be generated within the development. Think carefully about how energy will be consumed. For example, a development of one and two-bed apartments will have a very different pattern of hot water consumption than a sheltered housing development, and solar hot water heating may not be the most effective means of generating renewable energy in both cases. This is because the quantity of energy generated by a solar hot water panel may fall short of the amount claimed by its suppliers if the occupiers of a development do not consume hot water at a rate equivalent to its production. One size does not fit all. Just as with many other aspects of Planning, every development will bring its own circumstances. For example, the solar resource (amount of sunlight available to generate renewable energy) will differ from site to site depending on overshadowing by other buildings and trees.	Noted.	No change		

	<p>Seek advice from energy experts. Modelling the energy consumption of a development and designing to achieve high energy efficiency and integrated renewable energy generation requires particular skills. Early involvement of the right expertise can help to achieve a successful solution and avoid delays during Planning. Advice for house builders is provided by the Energy Saving Trust and for commercial development by the Carbon Trust .</p> <p>An energy efficient development is not a 'niche' development. Whilst some examples of energy efficient development are conspicuous by their leading edge design, very high standards can be achieved in more 'conventional-looking' developments. Energy efficiency and renewable energy generation does not need to be at the expense of quality architecture. Many measures (such as wide cavities, insulation, ground source heat pumps) have no visual impact. New products such as solar tiles are also becoming available that have very low visual impact.</p> <p>Do not always assume energy efficiency and renewable energy are very costly. Sometimes higher standards can be met such as Passivhaus by taking out services such as air conditioning. Then again, not all energy efficiency measures carry a net cost. For example, designing to capture passive solar energy. The growth in the market for high specification materials and micro renewable energy and higher volumes of production means increasingly competitive prices. In addition, as energy prices rise and environmental awareness increases, consumer demand for energy efficient homes can be reflected in the marketing of new development. Financial incentives such as the Renewable Heat Incentive, Feed-in-Tariff and enhanced capital allowances can also reduce the net cost.</p>							
	<ul style="list-style-type: none"> <li>Policy CC1 requires proposals for all new build dwellings to reduce carbon emissions over the requirements set by Building Regulations by a minimum of 10% through the use of on-site renewable energy. The Policy does not distinguish whether it is applicable to applications for Reserved Matters (following the grant of Outline planning permission) and those applications for Full planning permission. The provision of on-site renewable technology and carbon reduction measures could have a significant impact upon development design and viability and therefore should form part of the master planning phase of development and not be applicable to Reserved Matters applications where the principles of development have already been established together with all of the infrastructure requirements. The addition of such policy requirements could threaten the viability and deliverability of developments such as that at Shorncliffe Garrison which was subject to a viability assessment at the Outline stage and made no provision for such a requirement.</li> <li>To ensure the Policy 'Positively Prepared' and therefore 'Sound' we suggest the wording of the policy is amended as follows:</li> <li>Planning applications Proposals for all new build dwellings... (Ref 1911)</li> </ul>	Agreed.	Amend Policy CC1: Reducing Carbon Emissions to reflect this.					
	<p>Sustainable Business &amp; Communities:</p> <p>In respect of CC1, KCC agrees that both options A and B are fine, although agrees that B may constrain.</p> <p>In respect of CC5, option A is supported and KCC would offer to work with SDC to produce a Renewable Energy Strategy.</p>	Noted.	No changes proposed.					
<p><b>Policy CC2</b> <b>Sustainable Construction</b></p> <p>For all new dwellings or for new non-domestic buildings, evidence will be required by the developer to demonstrate that all of the following criteria have been considered (proportionate to the scale of development):</p> <ol style="list-style-type: none"> <li>How the proposal aims to protect and enhance the environment, both built and natural. Where this is not possible, how any harm will be mitigated;</li> <li>The proposal achieves a minimum of 110 litres per person per day including external water use;</li> <li>New development should ensure it is accessible to all, flexible towards future adaptation in response to changing life needs, easily accessible to facilities and services; and takes into account the need for on-site waste reduction and recycling;</li> <li>Developers are encouraged to apply sound sustainable design, good environmental practices, sustainable building techniques and technology, including the use of materials that reduce the embodied carbon of construction and the use of re-used or recycled materials;</li> <li>Developments will be encouraged to minimise the consumption of energy through energy conservation, including the use of passive solar design principles where possible, and energy efficiency, whilst maximising the amount of energy supplied from renewable resources;</li> <li>The proposals include measures to adapt to climate change, such as the provision of green infrastructure, sustainable urban drainage systems, suitable shading of pedestrian routes and open spaces and drought resistant planting/landscaping;</li> <li>The historic and built environment, open space, and landscape character will be protected and enhanced;</li> <li>The natural environment and biodiversity will be protected and/or where appropriate provision will be made for improvements to biodiversity areas and green infrastructure and</li> <li>The reduction of the impacts associated with traffic or pollution (including air, water, noise and light pollution) will be achieved, including but not limited to the promotion of car clubs and facilities for charging electric vehicles.</li> <li>All new non-residential developments over 1,000 square metres (gross floor space) will be expected to achieve the BREEM 'Very Good' standard and developers will be</li> </ol>	<ul style="list-style-type: none"> <li>Concern expressed that the "flexibility" paragraph will give developers too much scope to wriggle out of their responsibilities (Ref 19)</li> <li>Much of this policy is commendable but on 4. remove the words 'Where appropriate' so that it reads: 'The proposals apply sound sustainable design, good environmental practices, sustainable building techniques and technology...'</li> <li>And remove all of the last paragraph of the policy that starts: 'The standards achieved and detailed above may be a matter for negotiation at the time of the planning application...' This constitutes an unnecessary watering down of a strong policy (Ref 379)</li> <li>Criteria 2 requires clarification. Should this be 'maximum'? (Ref 887)</li> <li>In relation to Policy CC2 of the Preferred Options, we note the policy includes a hybrid of Policies CC6, CC7 and CC9 of the Issues and Options document.</li> <li>a policy to require specific transport measures such as car clubs and charging points not to be necessary.</li> <li>the removal of the waste recycling policy detail (previous CC7) is welcomed.</li> <li>Encourage the Council to reconsider Policy CC2.2 in the provision of a limit on water use that is over and above building regulations (Ref 1693)</li> </ul>	Noted.	Noted.	Agreed. Amend to 'maximum'.	Noted.	Amend to point 2 to 'maximum'.	The Council is not able to require more than is set out in the policy.	<p><b>Amend Policy to read:</b> <b>CC2</b></p> <p><b>Sustainable Design and Construction</b></p> <p>Proposals for all new dwellings or for new non-domestic buildings will be permitted where:</p> <ol style="list-style-type: none"> <li>All new build housing is built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations so as to achieve a maximum use of 110 litres per person per day including external water use where technically feasible and viable. Proposals should demonstrate that water efficiency and water re-use measures have been maximised;</li> <li>For non-residential development, the development achieves BREEM 'Very Good' standard including addressing maximum water efficiencies under the mandatory water credits, where technically feasible and viable;</li> <li>The development minimises energy demand through passive design and layout and landscape mitigation measures with an aspiration for new major residential developments to achieve zero carbon homes;</li> <li>The development is accessible to all and is designed to be flexible towards future adaptation in response to changing life needs;</li> <li>The development includes measures to adapt to climate change, such as the provision of green infrastructure, sustainable drainage systems (SuDS) in accordance with Policy CC3, suitable shading of pedestrian routes and open spaces and drought resistant landscaping; and</li> <li>The development provides discretely designed and accessible storage for waste, recycling and composting.</li> </ol>

<p>standards) will be expected to deliver the benefits. Very good standards and developers will be expected to specify the level to be targeted at the planning application stage, followed by the evidence of certification at the design and construction stages.</p> <p><b>Flexibility</b> The standards achieved as detailed above may be a matter for negotiation at the time of the planning application, having regard to abnormal costs, economic viability, the feasibility of meeting the standards on a specific site and other requirements associated with the development. This should be based on quantitative financial evidence. Planning applications for extensions to commercial buildings should include sustainable design measures when applicants apply for planning permission, unless the improvements are not viable</p>	<p>CPRE Kent is pleased to see the Council recognises the importance of sustainable construction and has carefully sought to introduce measures that are not contrary to the Governments Written Ministerial Statement of March 25 2015.</p> <p>It is suggested that the policy might usefully be divided into two sections, so that essential site layout, orientation and infrastructure requirements (green infrastructure, pedestrian cycle routes, SuDS etc) are discernible from measures associated with building construction, materials and technology.</p> <p>The first paragraph of the policy should 'require' development to be resilient to climate change and encourage all developments to meet the highest standards that are financially viable.</p> <p>The policy should make clear whether the information sought by the policy should be included as a section of the design and access statement, or as a separate statement.</p> <p>Check wording of part 2 of the policy – maximum water use.</p> <p>Some measures in the policy should be framed more positively. For example all developments should demonstrate how they have incorporated passive solar design principles into design and landscaping.</p> <p>Water efficiency measures should be included in the policy. A criteria should be inserted which sets out requirements for rainwater collection and grey water recycling. Simple measures, such as water butts (for example) should be incorporated in the design of new dwellings (Ref 1576)</p>	<p>Policy CC2: Sustainable Design and Construction should be read in conjunction with other policies in the chapter and elsewhere in the plan.</p>	<p>minor amendment, or include in supporting text</p>
	<ul style="list-style-type: none"> <li>This is a very baggy policy. It requires many things and in very vague terms.</li> <li>The Council then evades responsibility for the implications of the various and numerous requirements of this policy by saying that the standards proposed (which are unclear) will be a matter for negotiation.</li> <li>The Council could delete the policy and rely on specific policies elsewhere in the Plan that address specific technical standards or requirements such as external space and open space (Ref 1603)</li> </ul>	<p>The Council does not consider that the policy is vague, and believes that it is in accordance with paragraphs 94-99 of the National Planning Policy Framework. However amendments will be made to make the policy more specific.</p>	<p>Amend to make policy more specific.</p>
	<p>Supporting text (paragraph 14.7) - • Shepway is one of the driest districts in England, and this is only likely to increase given the ongoing impacts of Climate Change. The region is under severe water stress.</p> <ul style="list-style-type: none"> <li>I fail to see how 12,000 new homes at Otterpool can be supplied with water in addition to all those outlined in this consultation. Veolia Water concluded in their Water Resources Management Plan September 2009 that there would be a supply shortfall in 2035 when 7,000 approx extra homes were constructed as per Shepway's housing development projections.</li> <li>The local water company needs to be asked to provide an up to date review of water supplies, based upon the revised levels of housing being suggested in the SHLAA/Local Plan.</li> <li>This is a water scarcity area and Shepway Council appear to have forgotten what the 2009 Veolia report said (Ref 1253)</li> </ul>	<p>Otterpool Park is outside the scope of the Places and Policies Local Plan. The Council works closely with water companies during the preparation of its development plans and their comments are reflected in the plan's policies.</p>	<p>No change</p>
	<ul style="list-style-type: none"> <li>The south east of Kent is an area of water scarcity and it appears that it is the duty of the water company to provide sufficient water to meet the anticipated demand. Why is not water a restricting factor on development? To satisfy the demand for water all consumers, existing and new, will have to pay for the capital schemes necessary to meet the demand.</li> <li>HCS supports criterion 2 in policy CC2 but suggests that the criterion needs to be strengthened by the imposition of storage on site for "grey water/runoff" and for that "grey water/runoff" to be reused appropriately within new developments (Ref 1306)</li> </ul>	<p>The Council works closely with water companies during the preparation of its development plans and their comments are reflected in the plan's policies. Agree with second point; amend text to include reference to provision of water storage on site.</p>	<p>Include reference in supporting text to provision of water storage on site.</p>
	<ul style="list-style-type: none"> <li>There is confusion over the optional higher standard for water efficiency. Paragraph 9.47 and policy CC9 quote 105 litres per person per day, while paragraph 14.2 and policy CC2 say 110 litres. The standard referred to in <a href="https://www.gov.uk/government/publications/sanitation-hot-water-safety-and-water-efficiency-approved-document-g">https://www.gov.uk/government/publications/sanitation-hot-water-safety-and-water-efficiency-approved-document-g</a> is 110 litres, which includes an allowance of 5 litres for external use (Ref 1779)</li> </ul>	<p>Agree; amend standard to refer to 110 litres per person per day to reflect Building Regulations.</p>	<p>Amend to 110 litres per person per day to reflect Building Regulations.</p>
<p><b>Heritage:</b></p> <p>KCC welcomes the requirement in this policy that "The historic and built environment, open space, and landscape character will be protected and enhanced."</p> <p><b>Sustainable Business &amp; Communities:</b></p> <p>Criterion 3 should incorporate Climate Change Risk Assessments, and adaptation – to cover shading, SuDS, heat and insulation.</p>		<p>Agree; amend Policy CC2: Sustainable Design and Construction to refer to shading and Sustainable Drainage Systems (SuDS).</p>	<p>Agree; amend Policy CC2: Sustainable Design and Construction to refer to shading and Sustainable Drainage Systems (SuDS).</p>
<p><b>Policy CC3</b> <b>SuDS</b> Development will be permitted provided that:</p> <ol style="list-style-type: none"> <li>Surface water is managed close to its source and on the surface where reasonably practicable to do so;</li> <li>Priority is given to the use of "ecosystem services" as defined in the NPPF (2);</li> <li>Water is seen as a resource and is reused where practicable, offsetting potable water demand, and that a water sensitive approach is taken to the design of the development;</li> <li>The features that manage surface water are commensurate with the design of the development in terms of size, form and materials and make an active contribution to placemaking;</li> <li>Surface water management features are multi-functional wherever possible in their land use;</li> <li>There is no discharge from the developed site for rainfall depths up to 5mm of any rainfall event;</li> <li>The run-off from all hard surfaces shall receive an appropriate level of treatment in accordance with Sustainable Drainage Systems guidelines, SuDS Manual (CIRIA C753), to minimise the risk of pollution;</li> <li>Major development accords with Kent County Council SuDS policy;</li> </ol>	<ul style="list-style-type: none"> <li>support the principle of sustainable construction in relation to new development and do not object to points 1, 2, 6, 7, 8 and 10 of Policy CC2.</li> <li>also welcome the flexibility of the standards as being a matter of negotiation at the time of a planning application. However, the remaining points (i.e. points 3, 4, 5 and 9) set generic targets for development to minimise the consumption of energy and carbon and achieving adaptability of dwellings.</li> <li>The NPPF (para 154) advises that Local Plan policies must be 'clear'. These criteria result in a significant element of uncertainty as to the design requirements for new dwellings and the need for additional measures such as renewable energy provision for individual dwellings which could have significant implications for development. Although flexibility has been inbuilt to the policy, without specific details outlined within the Policy it would not be possible to assess the implications upon viability.</li> <li>The approach set out in the policy has not been 'justified' and it not 'Consistent with National Guidance' and should therefore be removed (Ref 1912)</li> </ul>	<p>amend 3,4,5 and 9</p>	<p>Amend policy to read:  CC3 Sustainable Drainage Systems (SuDS)  Development will be permitted where: 1.Surface water is managed close to its source and on the surface where reasonably practicable to do so; 2.Priority is given to the use of 'ecosystem services' as defined in the National Planning Policy Framework; (3) 3.Water is seen as a resource and is reused where practicable, offsetting potable water demand, and that a water sensitive approach is taken to the design of the development; 4.The features that manage surface water are commensurate with the design of the development in terms of size, form and materials and make an active contribution to place-making; 5.Surface water management features are multi-functional wherever possible in their land use; 6.There is no discharge from the developed site for rainfall depths up to 5mm of any rainfall event; 7.The run-off from all hard surfaces receives an appropriate level of treatment in accordance with</p>

<p>9. Development adjacent to a water body actively seeks to enhance the water body in terms of its hydromorphology, biodiversity potential and setting; and</p> <p>10. All hard surfaces are permeable surfaces where reasonably practicable. Shepway is one of the driest districts in England, and this is only likely to increase given the ongoing impacts of Climate Change. Mechanisms to ensure the effective collection and reuse of water should be designed in to any surface water drainage system.</p>	<ul style="list-style-type: none"> <li>Development on Prince's Parade would contravene item 9 of Policy CC3 (Ref 473).</li> </ul>	<p>Please see response to Princes Parade UA18</p>	<p>No change.</p>	<p>Sustainable Drainage Systems guidelines, SuDS Manual (CIRIA C753), to minimise the risk of pollution;</p>
	<ul style="list-style-type: none"> <li>Hythe Town Council supports this policy (Ref 888)</li> </ul>	<p>This support is welcomed.</p>	<p>No change.</p>	<p>8.Major development accords with Kent County Council's Drainage and Planning Policy Statement 2017 or successor document;</p>
	<ul style="list-style-type: none"> <li>Increased use of underground capture systems for rainwater for toilet flushing could be introduced through this policy and could reduce the risk of surface water runoff whilst improving water efficiency</li> <li>In residential developments, all driveways must be permeable (Ref 1016)</li> </ul>	<p>Noted. Policy CC3: Sustainable Drainage Systems contains a requirement for permeable surfaces where practical.</p>	<p>No change.</p>	<p>9.Development adjacent to a water body actively seeks to enhance the water body in terms of its hydromorphology, biodiversity potential and setting; and</p> <p>10.All hard surfaces are permeable surfaces where reasonably practicable.</p>
	<ul style="list-style-type: none"> <li>Policy CC3 relating to SuDs is welcomed</li> <li>Agreement with Approach A as detailed in Option 38 as it would be very difficult to calculate the cumulative effects of development downstream.</li> <li>The removal of Policy CC8 as in the Issues and Options document is welcomed as there is no need to regulate over and above building regulations (Ref 1695)</li> </ul>	<p>Noted.</p>	<p>No change.</p>	<p>Shepway is one of the driest districts in England, and this is only likely to increase given the likely impacts of climate change. Mechanisms to ensure the effective collection and reuse of water should be designed into any surface water drainage system. Any development should also ensure the drainage design is resilient to these future changes.</p>
	<p>The supporting text to the policy should be reordered so that the SuDS measures sought clearly encourage a hierarchical approach to SuDS methods. For example rainwater storage for reuse, followed by use of infiltration techniques, attenuation for gradual release, followed by attenuation in sealed features for future release.</p> <p>CPRE is pleased to see references to 'ecological services' and the multi-functional use of surface water management features. The potential value to ecological networks should be mentioned (Ref 1577)</p>	<p>Agree with the hierarchical approach to Sustainable Drainage Systems methods.</p>	<p>Amend to reflect hierarchy.</p>	
<p><b>Policy CC4</b> <b>Wind Turbine Development</b> The creation of wind turbines at a community and commercial scale will be supported where proposals demonstrate that the development site is in an area allocated for wind energy development in an adopted Neighbourhood Plan.</p>	<ul style="list-style-type: none"> <li>In order to demonstrate compliance with S85 of the CrOw Act 2000 and paragraphs 115 and 116 of the NPPF the AONB Unit would like to see a presumption against large scale wind turbine development within the AONB and its setting, included in this policy, as per the wording put forward as Option B in the Issues and Options consultation (Ref 283)</li> </ul>	<p>Amendment to include link to CC2. Heritage issue is covered by other policies and legislation; see Chapter 17: Heritage.</p>	<p>Include link to CC2.</p>	<p>CC4</p> <p>Wind Turbine Development</p> <p>The creation of wind turbines at a community and commercial scale will be supported where proposals demonstrate that the development site is in an area allocated for wind energy development in an adopted Neighbourhood Plan.</p>
	<ul style="list-style-type: none"> <li>The policy, by specifying that proposals will be supported only if the site has been allocated for wind energy development 'in an adopted Neighbourhood Plan' should, as per government policy, read (and paragraph 13.29) 'in a Local or Neighbourhood Plan' (by no means all of the district is covered by Neighbourhood Plans) (Ref 380)</li> <li>Hythe Town Council supports this policy (Ref 889)</li> </ul>	<p>Reference to the Kent Downs AONB Unit's Renewable Energy Position Statement is provided in the text; it is not considered that further reference is needed in the policy.</p>	<p>No change.</p>	
	<p>Policy CC4 precludes the installation of wind turbines in areas that do not have the benefit of Neighbourhood Plans - the policy should not be so restrictive (Ref 1017)</p>	<p>Allocation in a neighbourhood plan demonstrates community support.</p>	<p>No change.</p>	
	<ul style="list-style-type: none"> <li>Concerning Policy CC4 of the Preferred Options document, it is suggested that the impact of wind turbines on aircraft navigation systems and LAA's function is taken into account.</li> <li>This is not currently included in the preferred options and we urge the council to reconsider this to ensure the future operations of the LAA (Ref 1694)</li> </ul>	<p>This support is welcomed.</p>	<p>No change.</p>	
		<p>Sites must demonstrate community support: an allocation through a Neighbourhood Plan would demonstrate that.</p>	<p>No change.</p>	
		<p>Effects would have to be taken into account in allocating sites in Neighbourhood Plans, which would themselves be subject to consultation and examination, should proposals for wind turbine development come forward.</p>	<p>No change.</p>	

	<ul style="list-style-type: none"> <li>CPRE agrees that designation of land suitable for wind energy development in a neighbourhood plan is an appropriate way to demonstrate that impacts have been assessed and the proposal has community backing. We further note the Council has commissioned more detailed research on wind energy, but it is not clear what information this will provide and how it will be used. It is, however, accepted that neighbourhood plans are the most appropriate place to consider land allocation for renewable energy. The plan, however, should recognise the importance of consultation beyond the neighbourhood plan boundary to determine impacts on landscapes, biodiversity and communities not located in the neighbourhood plan area.</li> <li>The plan should also be clear how a proposal will be considered if an application is submitted without the benefit of a neighbourhood plan allocation. It is not clear whether the Council is simply proposing to rely on the Ministerial Statement.</li> <li>There is a potential policy gap here, if the council cannot refuse an application for windfarm development on the basis it does not benefit from neighbourhood plan allocation, then a detailed policy is necessary. This should set out how issues related to agricultural land quality, biodiversity, landscape character, visual impact, heritage, geology, flood risk, residential amenity, safety, tranquility, cumulative impacts, community involvement etc will be considered.</li> <li>There should be a presumption against large scale wind turbine development in the AONB and on best and most versatile agricultural land (Ref 1578)</li> </ul>	<p>This should be read against other policies in the plan, particularly Policy NE3: Protecting the District's Landscapes and Countryside. Applications would be unlikely to be granted permission if not for an allocated site taken forward through the Neighbourhood Plan process.</p>	<p>No change.</p>	
	<p>Biggest potential is for onshore</p>	<p>Noted.</p>	<p>No change.</p>	
<p><b>Policy CC5</b> <b>Domestic wind turbines and existing residential development</b> Wind turbines to provide energy for existing residential dwellings will only be acceptable where proposals meet the following criteria: A single turbine is proposed for an existing dwelling; The scale of the turbine is not overwhelming in relation to the height of nearby dwellings; There is no adverse impact on the setting of a listed building, a conservation area or other heritage asset; The turbine does not cause any adverse impact on the amenity of a nearby dwelling(s) by way of obstructed outlook, noise or flicker; The turbine does not have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty or other sensitive local landscapes; There are no adverse ecology impacts arising from the development; The turbine is finished in an appropriate colour to minimise its visual impact; The turbine is removed when no longer operational.</p>	<ul style="list-style-type: none"> <li>While the AONB Unit supports the intention behind this policy, it is considered that the policy wording should be amended to include a requirement for landscape character to be protected in addition to a proposal not having any adverse visual impact. This is required in order to be compliant with the NPPF paragraph 115 which confirms that great weight should be given to conserving both landscape and scenic beauty in AONBs.</li> <li>"1. The turbines does not ADVERSLY IMPACT ON THE LANDSCAPE CHARACTER OR have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty....." (Ref 284)</li> </ul>	<p>Agreed.</p>	<p>Amend policy as proposed through reference to landscape character.</p>	<p><b>CC5</b> <b>Small Scale Wind Turbines and Existing Development</b>  Small scale wind turbines to provide energy for existing buildings will only be acceptable where proposals meet the following criteria: <b>1.A single turbine is proposed for an existing building;</b> <b>2.The scale of the turbine is not overwhelming in relation to the height of nearby buildings;</b> <b>3.There is no adverse impact on the setting of a Listed Building, a Conservation Area or other heritage asset;</b> <b>4.It is demonstrated that the turbine will not cause any adverse impact on the amenity of a nearby building(s) by way of obstructed outlook, noise or flicker;</b> <b>5.The turbine does not have an adverse impact on the landscape character or have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty or other sensitive local landscapes;</b> <b>6.There are no adverse ecology impacts arising from the development;</b> <b>7.The turbine is finished in an appropriate colour to minimise its visual impact; and</b> <b>8.The turbine is removed when no longer operational; this will be the subject of a condition.</b></p>
	<ul style="list-style-type: none"> <li>Hythe Town Council would like SDC to consider the impact on electrical and communication systems too (Ref 890)</li> </ul>	<p>Noted.</p>	<p>No change.</p>	
	<p>Impact on heritage assets considered</p>	<p>Noted.</p>	<p>No change.</p>	
<p><b>Policy CC6</b> <b>Solar Farms</b> The development of new solar farms or the extension of existing solar farms will only be acceptable where- 1. The proposed solar farm does not have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty, other sensitive local landscapes or heritage assets; 2. The proposed solar farm does not result in the direct loss of amenity to nearby residential properties by virtue of glare or other disturbance; 3. Any necessary ancillary building works are minimised so as not to adversely impact on the character of the surrounding area; 4. There are no adverse ecology impacts arising from the development; 5. A suitable landscaping and screening strategy is included with the application 6. The solar panels and supporting frames are finished in an appropriate colour to minimise visual impact; 7. The solar panels are removed when no longer operational. 8. The consideration of the need for and impact of, security measures such as lights and fencing are included in the application; 9. The proposal clearly indicates the installed capacity (MW) of the proposed facility. 10. The solar farm will not result in the loss of the best and most versatile agricultural land.</p>	<ul style="list-style-type: none"> <li>While the AONB Unit supports the intention behind this policy, it is considered that criterion 1 should be amended to include a requirement for landscape character to be protected in addition to proposals not having any adverse visual impact. This is required in order to be compliant with the NPPF paragraph 115 which confirms that great weight should be given to conserving both landscape and scenic beauty in AONBs. Suggested amended wording</li> <li>"1. The proposed solar farm does not ADVERSLY IMPACT ON THE LANDSCAPE CHARACTER OR have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty....."</li> <li>We would also welcome reference either in the policy wording or the supporting text to ensure that sufficient funds are available at the end of the life of the scheme to ensure the removal of the panels and the restoration of the site to its former condition. We would urge the Council to explore the use of bonds to secure this (Ref 285)</li> </ul>	<p>Agreed; amend policy to refer to landscape character.</p>	<p>Amend policy to refer to landscape character.</p>	<p><b>CC6</b> <b>Solar Farms</b>  The development of new solar farms, or the extension of existing solar farms, will only be acceptable where: 1.The proposal does not have an adverse impact on the landscape character or have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty, other sensitive local landscapes or heritage assets; 2.The proposal does not result in the direct loss of amenity to nearby residential properties by virtue of glare or other disturbance; 3.Any necessary ancillary building works are minimised so as not to adversely impact on the character of the surrounding area; 4.There are no adverse ecology impacts arising from the development; 5.A suitable landscaping and screening strategy is included with the application; 6.The solar panels and supporting frames are finished in an appropriate colour to minimise visual impact; 7.The solar panels are removed when no longer operational; 8.The consideration of the need for and impact of, security measures such as lights and fencing, are included in the application; 9.The proposal clearly indicates the installed capacity (MW) of the proposed facility; and 10.The solar farm will not result in the loss of the best and most versatile agricultural land.</p>
	<ul style="list-style-type: none"> <li>Hythe Town Council has no view on this policy, as it does not seem to affect Hythe (Ref 891)</li> </ul>	<p>Noted.</p>	<p>No change.</p>	
	<ul style="list-style-type: none"> <li>This policy would be improved by welcoming community-owned solar farms. These can provide significant benefits for local communities such as access to cheaper energy, local investment opportunities, educational and biodiversity improvement opportunities and significant surplus profits to support local community organisations while safeguarding the natural environment.</li> <li>In addition, it would give greater flexibility for solar farms to deliver community benefit if item 3 was rephrased to permit associated building works which while potentially not "necessary" may be desirable to support, for example, educational or biodiversity benefits on the site.</li> <li>I chair Orchard Community Energy which owns a 5MW solar farm near Iwade in Swale which is projected to deliver up to £3m of grants to local community projects over its 25 year life. I am also associated with a project which, with the support of the Welsh government, is piloting a local energy market offering significantly reduced energy bills to local consumers for using energy from a shared local renewable source rather than from the grid. This approach is enabled by the introduction of smart metering. I hope that Shepway will support and encourage the delivery of community benefit through enabling these types of approaches (Ref 996)</li> </ul>	<p>Noted; amend supporting text to refer to community energy generation.</p>	<p>Amend supporting text to refer to community-led energy generation schemes.</p>	

<p>CPRE Kent would like to make the following comments on this policy:</p> <ol style="list-style-type: none"> <li>1. Part 1 should also refer to the setting of heritage assets and 'valued' landscapes. Impact on landscape character should be mentioned. There should be a presumption against large scale wind turbine development in the AONB.</li> <li>2. It is unclear what value the word 'direct' has in this policy.</li> <li>3. Part 3 should refer to the sensitive siting of ancillary building works.</li> <li>4. Ecological enhancements, such as pollinator habitat should also be sought.</li> <li>5. The reference to best and most versatile agricultural land is supported.</li> <li>6. The policy should refer to prioritising previously developed land and buildings (Ref 1579)</li> </ol>	<p>Agree with first point. The policy should be read in the context of other policies.</p>	<p>Amend Policy CC6: Solar Farms to refer to landscape character.</p>
<p>Solar farms have the potential to intrude significantly on the setting of heritage assets. Recent planning decisions, including appeals to the Secretary of State, have highlighted that solar farms should not be permitted where they reduce the significance of the heritage asset</p>	<p>Noted.</p>	<p>No change.</p>
<p>Option 41- KCC agrees, but suggests that in respect of Option B, solar farms can be removed, so loss of the best and most versatile agricultural land can be temporary.</p>	<p>Noted.</p>	<p>No change.</p>
<ul style="list-style-type: none"> <li>• Option 37 of Policy CC6 - Paragraph 9.47, referring to policies SS6 and SS7, refers to a more stringent water efficiency requirement of 90 litres per person per day (presumably internal). This is mentioned again in paragraph 14.9 Option 37 CC9. We have not met this option from any other local authority. The web based planning guidance to which paragraph 14.11 refers (the hyperlink above) only ever refers to a higher standard of 110 (including external use) e.g. 2.3. The estimated consumption of wholesome water of a new dwelling should be no more than 125 litres/person/day or 110 litres/person/day where the optional requirement applies. This includes a fixed factor of water for outdoor use of 5 litres/ person/day.</li> <li>• Other authorities have interpreted this to mean these are the only 2 options available. However we are aware that in the specific case where a development has attempted to achieve water neutrality, a higher standard has been required in the past. The FAQ to the hyperlinked document may offer scope for a higher requirement through "Do I have to follow Approved Document G? No. The Approved Documents provide guidance about compliance with specific aspects of the Building Regulations in some of the more common building situations. There is no obligation to adopt any particular solution contained in the Approved Document if you prefer to meet the relevant requirement in some other way (Ref 1777)</li> </ul>	<p>Agreed.</p>	<p>Amend as proposed</p>

Preferred Options Policy	Comments received	Response from the Council	Action by the Council	Revised Draft Policy
<p>Promoting healthier food environments</p> <p>The Council will grant planning permission for new hot food take-away shops that do not fall within 400 metres of the boundary of a primary or secondary school (the exclusion zone).</p> <p>The Council will only consider granting planning permission for new hot food take-away shops outside of the exclusion zone where:</p> <p>a. the percentage of hot food take-away shops in Town and District Centres does not exceed 5% and in Local Centres does not exceed 10%</p> <p>b. the location and design is acceptable and the proposed use does not detrimentally affect the vitality of the shopping area</p> <p>c. there is no harm or loss of amenity to the living conditions of nearby residents, including that created by noise and disturbance from other users and their vehicles, smell, litter and unneighbourly opening hours and</p> <p>d. parking and traffic generation is not a danger to other road users, public transport operators or pedestrians.</p> <p>In addition, applicants will be expected to provide acceptable arrangements for:</p> <p>a. the efficient and hygienic discharge of fumes and smells, including the siting of ducts, which should be unobtrusive</p> <p>b. the collection, storage and disposal of bulk refuse and customer litter</p> <p>c. sound proofing, especially if living accommodation is above or adjacent and</p> <p>d. other appropriate mitigation measures in relation to the impact on neighbours of the proposed opening hours.</p>	<p>Protection of the % of A1 Retail uses in all Town Centres should be developed to prevent A3 uses, whether take away or not, undermining the viability and vitality of our Town Centres</p> <p>Point a is not clear. 5% and 10% of what? Retail? All premises? Residential?</p> <p>Supported, IF it can be adhered to.</p> <ul style="list-style-type: none"> <li>How is this to be enforced?</li> <li>Recently PP was given for a take-away in a residential area of Hythe which is highly congested with traffic and where there is no off street parking, and it immediately went against sections (c),(d) and additionally part two (a) of this policy despite objections from residents. Within a short distance there was also another take-away (Ref 957)</li> </ul> <p>The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a primary or secondary school as zero, but does so without evidence of either a link between the incidence of childhood obesity and the proximity of hot food takeaways to schools or of any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed.</p> <ul style="list-style-type: none"> <li>Kentucky Fried Chicken (Great Britain) Limited considers that inclusion of Policy HW1 renders the draft LP unsound and so OBJECTS to Policy HW1 of the draft LP on the above grounds.</li> <li>The amendment sought by Kentucky Fried Chicken (Great Britain) Limited, and the only change to the draft LP that would render it sound, is the deletion of Policy HW1 of the draft LP (Ref 1269)</li> </ul>	<p>A new chapter has been prepared dealing with town centres (Chapter 11: Retail and Leisure).</p> <p>The policy will be enforced through the planning process; however, the policy has not yet been adopted, therefore decisions are not being made in accordance with it.</p> <p>Local health authority evidence identifies obesity linked illnesses such as diabetes as an issue in Shepway. There is evidence from around the country demonstrating a link to hot food takeaways.</p>	<p>No change</p>	<p>HW1</p> <p>Promoting Healthier Food Environments</p> <p>The Council will refuse planning permission for new hot food takeaway shops that fall within 400 metres of the boundary of a primary or secondary school (the exclusion zone).</p> <p>The Council will only consider granting planning permission for new hot food takeaway shops outside the exclusion zone where:</p> <ol style="list-style-type: none"> <li>The percentage of hot food take-away shops in Town and District Centres does not exceed 5 per cent and in Local Centres does not exceed 10 per cent of retail units and the proposal complies with Policies RL2 to RL7 of this plan;</li> <li>There is no harm or loss of amenity to the living conditions of nearby residents, including that created by noise and disturbance from other users and their vehicles, smell, litter and unneighbourly opening hours;</li> <li>Parking and traffic generation is not a danger to other road users, public transport operators or pedestrians including where appropriate the provision of parking for delivery vehicles; and</li> <li>Adequate provision is made for: <ul style="list-style-type: none"> <li>The collection, storage and disposal of bulk refuse and customer litter;</li> <li>Sound proofing, especially if the proposal would be below or adjacent to living accommodation and other mitigation as appropriate in relation to the impact on neighbours of the proposed opening and delivery hours; and</li> <li>The efficient and hygienic discharge of fumes and smells, including the siting of ducts. These should be unobtrusive and not cause an adverse impact on a Listed Building, Conservation Area or</li> </ul> </li> </ol>
<p><b>Policy HW2</b></p> <p><b>Improving the health and wellbeing of the local population and reducing health inequalities.</b></p> <p>For residential development of 100 or more units and non-residential development in excess of 1,000 sq. m a Health Impact Assessment will be required, which will measure wider impact upon healthy living and the demands that are placed upon health services and facilities arising from the development.</p> <p>Where significant impacts are identified, measures to address the health requirements of the development should be provided and/or secured by planning obligations or planning conditions as appropriate.</p> <p>A Health Impact Assessment for smaller forms of development may also be required where the proposal is likely to give rise to a significant impact on health.</p>	<p>Monitoring coastal air pollution would contribute to the enhanced wellbeing of the community.</p> <p>Hythe Town Council supports this policy.</p> <ul style="list-style-type: none"> <li>It is not sufficient to require Health Assessments for developments of over 100 alone. A number of small developments will also contribute cumulatively to the current strain on the local Health Services - which cannot meet the existing demand.</li> <li>A&amp;E at William Harvey Hospital, in Ashford has a maximum waiting time of 4 hours (which in practice means that you are probably seen within 3.59 hours), and one can wait even longer at peak times. This is not the fault of the medical staff who are constantly busy; they are just swamped. Many people who go to A&amp;E are going for trivial reasons (e.g. demand for a blood test at 11pm on a Sunday night because it was more convenient for the patient!). Often people are going to A&amp;E instead of to their GP as doctors surgeries are often unable to give an appointment on the day, unless it is for an emergency, as they just have too many patients. Non emergency appointments can sometimes have a waiting time of weeks rather than days.</li> <li>Too much development also = too much traffic on the road, and this makes it difficult for emergency services to get rapidly to any callout. At weekends the sirens along the A259 can frequently be heard trying to clear the road ahead (Ref 966)</li> </ul> <p>Air quality monitoring will need to play an important part in the development of the whole of Shepway. With more vehicle movements, especially around the just commenced Martello Lakes development, the proposed Otterpool Park development and the Government's imposed lorry park at junction 11 of the M20 air, noise and light pollution will be an issue.</p> <p>Minimising these issues need to be incorporated into Policy HW2 or another policy created.</p>	<p>Air quality is already monitored. The main source of air pollution in the district is road traffic emissions from major roads, notably the M20, A20, A259, A260 and A2034. There are no Air Quality Management Areas (AQMAs) in the district.</p> <p>No exceedences of the annual mean objective for NO2 have been recorded in Shepway at any time. In 2015, the majority of monitoring sites recorded a decrease in the annual mean NO2 concentration compared to 2014.</p> <p>The policy does allow for smaller developments to require Health Impact Assessments.</p> <p>The Clinical Commissioning Groups are consulted regarding developments and any requirements for health infrastructure improvements.</p>	<p>With regard to Health Impact Assessments include reference to cumulative effects in Policy HW2: Improving the Health and Wellbeing of the Local Population and Reducing Health Inequalities.</p>	<p>Amended Policy to read:</p> <p>HW2</p> <p>Improving the Health and Wellbeing of the Local Population and Reducing Health Inequalities.</p> <p>For residential development of 100 or more units and non-residential development in excess of 1,000sqm a Health Impact Assessment will be required, which will measure the wider impact of the development on healthy living and the demands that may be placed on health services and facilities arising from the development.</p> <p>Where significant impacts are identified, measures to address the health requirements of the development should be provided and/or secured by planning obligations or planning conditions as appropriate.</p> <p>A Health Impact Assessment for smaller forms of development may also be required where the proposal is likely to give rise to a significant impact on health, for example, the cumulative impacts of a number of developments might necessitate the need for new health or social infrastructure.</p>
<p><b>Policy HW3</b></p> <p><b>Development that supports healthy, fulfilling and active lifestyles</b></p> <p>To increase, create and safeguard opportunities for healthy, fulfilling and active lifestyles, and the creation of healthy neighbourhoods in Shepway and to reduce the environmental impact of importing food, development proposals should:</p> <p>A: Incorporate food growing in the design and layout of buildings and landscaping of all major developments;</p> <p>B: Not result in the net loss of existing allotments; and</p> <p>C: Not result in the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) unless there is a compelling and overriding planning reason to do so and mitigation is provided through the provision of an allotment where there is the demand</p>	<p>That although the Town Council understands the need to find areas for residential housing, the allotments at Park Farm Road and Tile Kiln Lane must remain and protected as such. These Allotments are, at present, well utilised and the long waiting list of over 60 people, with only 130 plots reflects this.</p> <p>Hythe Town Council supports this policy.</p> <p>Does this document overall comply with this policy? The increase in housing reduces land available for agriculture, also the lorry park is against this policy</p> <p>Air quality monitoring will need to play an important part in the development of the whole of Shepway. With more vehicle movements, especially around the just commenced Martello Lakes development, the proposed Otterpool Park development and the Government's imposed lorry park at junction 11 of the M20 air, noise and light pollution will be an issue.</p> <p>Minimising these issues need to be incorporated into Policy HW2 or another policy created.</p> <p>Plea for allotments to be mentioned as good things that should be maintained, and in the medium term considered for expansion. The Affinity Water site was close by Tile Kiln allotments.</p> <p>Allotments should be mentioned as viable and well used facilities that should be maintained, and in the medium term considered for expansion. There is a Folkestone Town Council waiting list for both Tile Kiln Lane and Park Farm Road. Obviously if, as proposed, the town got larger and gardens in new dwellings smaller, then this demand for allotments should increase. Tile Kiln Lane allotments are very near to the Shearway Road allocation and might be improved or extended with CIL funding.</p>	<p>The allocations in the Places and Policies Local Plan will not affect allotments which are afforded legal protection as well as in planning policy.</p> <p>When the Council is allocating land for housing and other land uses, agricultural land classification is considered.</p> <p>With regard to air quality see above comments.</p>	<p>No change</p>	<p>Following a series of internal discussion it was decided to slightly amend the policy</p> <p>HW3</p> <p>Development That Supports Healthy, Fulfilling and Active Lifestyles</p> <p>To increase, create and safeguard opportunities for healthy, fulfilling and active lifestyles and to reduce the environmental impact of importing food, development proposals should:</p> <ol style="list-style-type: none"> <li>Incorporate productive landscapes in the design and layout of buildings and landscaping of all major developments;</li> <li>Not result in the net loss of existing allotments; and</li> <li>Not result in the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) unless there is a compelling and overriding planning reason to do so and mitigation is provided through the provision of productive landscapes on-site or in the locality.</li> </ol>

<p><b>Policy HW4</b>  <b>Protecting and enhancing rights of way</b>  Planning permission will be granted for development likely to give rise to increased travel demands, where the site has (or will attain) sufficient integration and accessibility by walking and cycling including:  1. Provision of new cycle and walking routes that connect to existing networks, including the wider Rights of Way network, to strengthen connections between villages, principal towns, market towns, and the wider countryside;  2. Protection and improvement of existing cycle and walking routes, including the Rights of Way network, to ensure the effectiveness and amenity of these routes is maintained, including through maintenance, crossings, signposting and waymarking, and, where appropriate, widening and lighting  3. Provision of safe, direct routes within permeable layouts that facilitate and encourage short distance trips by walking and cycling between home and nearby centres of attraction, and to bus stops or railway stations, to provide real travel choice for some or all of the journey  The Council will support the delivery of the Kent Active Travel Strategy including routes and proposals for improvements contained in integrated network maps.</p>	<p>Please incorporate the Council's approved Cycle Plan, with its proposals for improved cycle tracks and cycle parking in Folkestone and Hythe.</p> <p>SDC has received significant benefits through the joint delivery of KCC's Countryside Access Improvement Plan and the omission of reference to this strategic plan would potentially result in significant loss of access to additional funding and opportunities. KCC urges the SDC to ensure that reference to the Countryside Access Improvement Plan is included, to enable the successful joint partnership working to continue to deliver improvements to the Public Rights of Way network in the district</p> <p>It should be noted that many public rights of way are historic routeways through the countryside and form key elements in the historic landscape. As such they can be heritage assets in their own right and thus require the same consideration as other heritage assets. Programmes of rights of way enhancement need to be designed such that they do not impact on historic earthworks or embankments – particularly for designated assets such as the Royal Military Canal but also for non-designated assets.</p> <p><b>PROW:</b></p> <p>Supports. The inclusion of the direct reference to rights of way will enable the authority to maximise opportunities to encourage active travel and recreation amenity.</p> <p>Along with the Active Transport Strategy this policy should reference and support the delivery of the statutory "Countryside and Coastal Access Improvement Plan" as a material consideration.</p> <p>Hythe Town Council supports this policy</p> <p>There is an over emphasis on cycling in folkestone, the topography in East Folkestone is not conducive to cycling and this should be recognised</p>	<p>Add reference to the Cycle Plan and Countryside Access Improvement Plan to the supporting text.  Heritage assets are covered by policies in the Historic Environment chapter.</p>	<p>No change</p>	<p>Following a series of internal discussion it was decided to slightly amend the policy</p> <p>HW4  Promoting Active Travel</p> <p>Planning permission will be granted for development likely to give rise to increased travel demands, where the site has (or will attain) sufficient integration and accessibility by walking and cycling including, where appropriate, through:  1.The provision of new cycle and walking routes that connect to existing networks, including the wider public rights of way network, to strengthen connections between settlements and the wider countryside;  2.The protection and improvement of existing cycle and walking routes, including the public rights of way network, to ensure the effectiveness and amenity of these routes is maintained, including through maintenance, crossings, signposting and way-marking, and, where appropriate, widening and lighting;  3.The provision of safe, direct routes within permeable layouts that facilitate and encourage short distance trips by walking and cycling between home and nearby centres of attraction, and to bus stops or railway stations, to provide real travel choice for some or all of the journey; and  4.The provision of, or contributions towards, new cycle and walking routes identified in adopted strategic documents.</p>
<p>Supporting Text</p>	<p>15.1 Will there be increased capacity for the existing Doctors Surgeries that are already under strain with massive patient lists ? There are a considerable number of new dwellinga proposed to be built and no mention of Primary care facilities</p>	<p>The Clinical Commissioning Groups are consulted with regard to housing development and health care facilities requirements and requirements for new health facilities are included in the relevant policies, where these have been identified (see for example Policy RM5: Land Adjoining the Marsh Academy, Station Road, New Romney).</p>	<p>No change</p>	
	<p>15.17 support this policy, which should encourage healthier lifestyles and a reduction in CO2 from traffic emissions</p>	<p>This support is welcomed.</p>		
<p>General</p>	<p><b>Heritage:</b></p>			
	<p>Most of the text in the document concerns physical health and wellbeing and none of the policies actually mention mental health. Mental health is, however, equally important and the historic environment has a part to play in this. People may feel more involved in a community with which they are familiar and which retains landmarks that they have known their whole lives. The ability to relate their stories and memories similarly helps others to understand their lives and perspectives and this is easier if places and structures that illustrate those lives still exist.</p>	<p>The supporting text for Policy HW2: Improving the Health and Wellbeing of the Local Population and Reducing Health Inequalities makes it clear that mental and physical health are included.</p>	<p>No change</p>	
	<p>Similarly, researching into Shepway's history and heritage provides opportunities for mental health benefits. The Heritage Lottery fund has published information on a range of these.</p>	<p>Noted.</p>	<p>No change</p>	
	<p><a href="https://www.hlf.org.uk/about-us/news-features/heritage-and-positive-mental-health">https://www.hlf.org.uk/about-us/news-features/heritage-and-positive-mental-health</a> The Heritage Strategy will set out the way in which the Historic Environment plays a role in Health and Wellbeing in Shepway and opportunities for realising further benefits.</p>			
<p><b>PROW:</b></p>				
	<p>The inclusion of a Rights of Way policy within this section is unusual, but not unsupported</p>	<p>Noted.</p>	<p>No change</p>	



Preferred Options Policy	Comments received	Response from the Council	Action by the Council	Revised Draft Policy
Introduction	More emphasis on the historic environment of Folkestone is required.	Agreed.	New paragraph in the Folkestone chapter to be added, highlighting the historic development of Folkestone.	Please see Urban Character Area responses
	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	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.	
	Historic England would contend that the historic environment is more than just important to sustainable development, but that it is part of the environmental dimension as one of the three components that the NPPF uses to define sustainable development.	Agreed.	Paragraph to be redrafted (now numbered paragraph 17.4).	The National Planning Policy Framework (NPPF) sets out three dimensions to define sustainable development, economic, social and environmental. The historic environment forms part of the environmental dimension. The Guidance also states that local planning authorities should set out in their local plans a positive strategy for the conservation and enjoyment of the historic environment. It requires local planning authorities to recognise that heritage assets are irreplaceable resource and should be conserved in a manner appropriate to their significance, taking into account of:
	It should be noted that the primary purpose of the Heritage Strategy is to identify and understand Shepway's heritage and set out a positive strategy to realise the benefits that its conservation will bring. Part of the method is to group the heritage assets by Theme but the grouping is not the purpose of the Strategy (KCC).	Agreed.	Paragraphs relating to the Shepway Heritage Strategy to be redrafted.	To identify and understand Shepway's heritage, the District Council commissioned Kent County Council to produce the Shepway Heritage Strategy. This provides positive strategy to ensure that heritage of the District plays a clear role in shaping any future regeneration, development and management decisions. In particular the strategy is intended to inform the development of its Places and Policies Local Plan and provide an evidence base that ensures a positive approach to heritage acts as a golden thread within the final local plan. In addition to addressing the planning needs, the Strategy explains the real value that conservation of the historic environment and heritage assets, their recognition and use can bring to the District. While the primary purpose of the Shepway Heritage Strategy is to address local planning needs, the policy context of which is described below, it is designed to address much more than that. It has been written to explain the substantial benefits and real value that conservation of the historic environment and heritage assets, their recognition and use can bring to the District. The Heritage Strategy will:  <ul style="list-style-type: none"> <li>•Ensure that heritage plays a positive role in all areas of strategic planning – place shaping, economic, tourism, health and wellbeing and education;</li> <li>•Enable and inform regeneration and growth, building places and communities with a stronger sense of place, pride and interest in their surroundings. Heritage-led regeneration and development provides additional economic value to an area, providing a quality environment that attracts new businesses;</li> <li>•Contribute to Shepway's visitor experience and tourism economy;</li> <li>•Increase wider understanding of the district's heritage and the ways in which the community can engage with and experience their heritage;</li> <li>•Provide strong social and health benefits through improving quality of life and activities that encourage physical and mental health and well being, and reduce social exclusion and crime; and</li> <li>•Provide a valuable educational resource that can contribute context to curricula at all stages for local schools and colleges.</li> </ul> The Council will produce an action plan to set out how the recommendations in the Heritage Strategy will be taken forward, including: <ul style="list-style-type: none"> <li>•How and when conservation areas will be reviewed;</li> <li>•How local communities can help identify or review heritage assets; and</li> <li>•What further studies will be undertaken and by whom.</li> </ul>
	At 16.6 'Napoleonic Infrastructure' is an odd description for the rich defence heritage of this part of Kent. Historic England would suggest something simpler like 'historic defences and fortifications'.	Agreed.	Delete 'Napoleonic infrastructure' and replace with 'historic defences and fortifications'.	
	Sandgate is suffering from piecemeal destruction of the Conservation Area.	It is not clear what changes are being referred to or how the Places and Policies Local Plan could be amended to address this.	No changes proposed.	
	Figure 16.1 is selective in the types of heritage assets that it chooses to illustrate. Acoustic mirrors are rare but a particular feature of this district but inclusion of military museums seem odd. There is no reference in the text at 16.6 or Fig 16.1 to scheduled monuments. The key to Fig 16.1 describes the Royal Military Canal using wrong terminology - it should be scheduled monument not national ancient monument.	Noted, the diagram only illustrated a few of the historic assets in the district to illustrate that the district's heritage assets are widespread.	Delete diagram.	Delete diagram

	figure 16.1 may be developed further following completion of the Heritage Strategy to identify further key heritage assets that emerge (KCC)	Noted	Delete diagram.	
<b>Policy HE1 Heritage Assets</b> The District Council will grant permission for proposals which promote an appropriate and viable use of heritage assets, consistent with their protection and conservation, particularly where these bring redundant or under-used buildings and areas back into use or improve public accessibility to the asset.	Shorncliffe Garrison and the proposed Princes Parade development are not an 'appropriate and viable use of heritage assets, consistent with their protection and conservation	It is not clear how the Places and Policies Local Plan could be amended to address this point.	No changes proposed.	
	Hythe Town Council support	This support is welcomed.	No changes proposed.	
	Policy HE1 is welcome in its intent but could be sharpened in its wording. The policy needs to acknowledge that some heritage assets are worthy of conservation for their significance alone and that many may be incapable of re-use or being made viable. It need not say 'protection and conservation' as conservation alone is sufficient (based on the NPPF definition). Rather than refer to 'redundant or under used buildings and areas', 'at risk' might be a better term, and 'heritage assets' would be more inclusive as some assets will be monuments not buildings or areas (HE).	Agree with changes, but it is proposed to retain the phrase 'under used' as this includes properties that are not at risk.  Add additional text highlighting that some assets will not be able to be put to a use due to their significance and conservation.	Amend policy as suggested.	Amend supporting text to read: <b>'While the District Council will consider proposals affecting heritage assets positively, some heritage assets are worthy of conservation for their significance alone and some may be incapable of re-use or being made viable'.</b>  Amend policy to read: <b>'The Council will grant permission for proposals which promote an appropriate and viable use of heritage assets, consistent with their conservation and their significance, particularly where these bring at risk or under-used heritage assets back into use or improve public accessibility to the asset.'</b>
	It is the significance of the heritage asset which is the quality that needs to be conserved during development control processes (see NPPF). I would suggest that the text be modified to: The District Council will grant permission for proposals which promote an appropriate and viable use of heritage assets, consistent with the protection and conservation of their significance, particularly where these bring redundant or under-used buildings and areas back into use or improve public accessibility to the asset (KCC).	Agree to add additional wording '...of their significance'		
<b>Consideration of Heritage Assets in Planning and Listed Building Applications</b>	Understands the need not to repeat Government legislation but there should be guidance on: - consideration of "setting", 'significance'; - consideration of cumulative change; - assessment of substantial harm; - an explanation that significance is not solely defined by a list description.	Representation noted. Issue of setting and significance will be set out in the Heritage Strategy, but text is to be rewritten to reflect this. Cross references to the general design policy (to be amended) will also be added (plan is to be read as a whole).	Amend text to include references to the emerging Heritage Strategy and how this is to be used in the consideration of planning applications.  Delete legislation text (refer to only as a reference).	Amend supporting text: <b>The Core Strategy sets out the broad approach to the historic environment, the enhancement of local identity and includes an express requirement to have regard to local context and the impact of development on heritage assets.</b>  <b>Legislation and Guidance Governing Heritage Assets</b> As set out in the Introduction to Part One, the purpose of the Local Plan is to add detail to national legislation, policy and guidance only where necessary.  <b>The consideration of heritage assets (including Scheduled Ancient Monuments and Historic Parks and Gardens) in the planning process is clearly set out in Government legislation and guidance. The Council will consider planning applications in light of these requirements. Relevant considerations include:</b> - The Planning (Listed Buildings and Conservation Areas) Act 1990; - The NPPF; - Planning Practice Guidance; and - Statements from government departments.  <b>Section 66 of the Act (1990) ensures that proposals for Listed Buildings preserve or enhance the building or its setting and Section 72 ensures that proposals in conservation areas pay special attention of preserving or enhancing the character or appearance of that area. The National Planning Policy Framework sets out what should be considered for proposals that affect heritage assets, including:</b> - What considerations should be taken into account (such as a viable use); -The significance of the heritage asset; -The level of harm; and -What the public benefits of the proposal would be if there is harm.  <b>To help determine applications against this legislation and to assist applicants with Heritage Statements, the Shepway Heritage Strategy provides information on the heritage assets in the district. The Strategy has set out thirteen heritage themes (including 'Defence', 'Coastal Heritage Harbours and Ports' and 'Farming and Farmsteads') and provides an initial assessment of their 'significance'.</b>  <b>The Strategy also sets out how heritage assets can play a positive role in all areas of planning through:</b> -Creating a sense of place; -Re-use of heritage assets; -Adding value to new development; -Attracting business and commercial activities; -Creating employment; -Durability of regeneration; and -Reducing social exclusion.  <b>Applications should also consider the design policies in Chapter 9 of this plan to ensure that issues such as setting, scale, materials and local character are also considered.</b>
	It should include sign-posting to relevant guidance and the Historic Environment Record.	Agree		
	A policy could usefully assist protecting heritage assets from inappropriate renewable energy proposals, ensuring heritage features/patterns in landscapes are understood in decisions, or set out the information needed to accompany planning applications in the Shepway district.	Disagree, the legislation (the Planning (Listed Building and Conservation Areas) Act and the NPPF) together with other policies in the Plan (to be read as a whole) would safeguard such issues		
	At para 16.9 why be so selective in quoting paras 126 and 141 in the NPPF? All of S12 of the NPPF is essential to proper consideration of planning and LBC applications. We note the word 'starting with' in reference to paras 126 and 141 and the content of Box 10 but could not this entire section be reduced to a commitment to apply the legislation and the available guidance (NPPF, PPG and DCMS policy statement and local sources e.g. the heritage strategy) when determining applications. The Council needs to acknowledge that the NPPF policies they have chosen to quote apply equally to scheduled monuments and parks and gardens and not just out listed buildings or Conservation Areas (HE)	Agree, delete legislation and include other references		
	A Heritage Strategy is being prepared and the final draft's recommendations are taken into account. The text needs to state how it intends to incorporate this into the Council's planning strategies. KCC recommends that it is adopted as a SPD. This will also help offset some absences from the current Preferred Options text (section 16.9, in attached schedule). These absences stem from the outcome of the Sustainability Appraisal (especially sections 16.16 to 16.26), in which the text states that the various clauses of the NPPF and existing legislation provide enough policy underpinnings for most aspects of the historic environment. It asserts that developing additional heritage policies would impose an unacceptable financial burden on developers. This does, however, result in the Local Plan being inconsistent with the NPPF, in that it does not contain 'positive strategy for the conservation and enjoyment of the historic environment'. KCC welcomes the inclusion historical information, which helps to set the sites in context. KCC would welcome the opportunity to discuss sites with SDC. Opportunity should be sought to enhance both the nature and heritage interest in the site and for the benefit of both new and existing residents.	Agree, amend text to encapsulate the objectives of the Heritage Strategy. Disagree, however, that it should be a SPD at this stage. The Strategy will become a Council wide strategy. Other SPD's may be drafted in the future to cover specific elements of the Strategy.  Support welcome		

	<p>At present the text simply states that Conservation Areas will be managed in line with the NPPF. It does not explain how Conservation Areas will be designated, amended or removed or how they will be enhanced or used in the future life of the District. It also does not review the approach to be taken to Conservation Area Appraisals and whether Shepway District Council will have a programme to carry these out. The NPPF, however, states (para 126) that 'Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment.' It is clearly not enough, therefore, to simply say that the Historic Environment will be provided for solely by the NPPF. The Local Plan must set out how it will deliver the goals of the NPPF.</p> <p>As the NPPF says: 'In developing this strategy, local planning authorities should take into account:</p> <ul style="list-style-type: none"> <li>• the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;</li> <li>• the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;</li> <li>• the desirability of new development making a positive contribution to local character and distinctiveness; and</li> <li>• opportunities to draw on the contribution made by the historic environment to the character of a place.'</li> </ul> <p>It may be that it is intended that the forthcoming Heritage Strategy will describe all this but if so then this needs to be made explicit here. If it is not intended that the Heritage Strategy will do this then additional text is needed to ensure that the Local Plan meets the needs of the NPPF.</p>	<p>Agree, the text will reflect the recommendations of the Heritage Strategy, including the issues relating to the conservation areas.</p>		
<p><b>Policy HE2 Archaeology</b></p> <p>Important archaeological sites, together with their settings, will be protected and, where possible, enhanced. Development which would adversely affect them will not be permitted.</p> <p>In areas where there is known archaeological interest, the District Council will require appropriate desk based assessment of the asset has been provided as part of the planning application. In addition, where important or potentially significant archaeological heritage assets may exist, developers will be required to arrange for field evaluations to be carried out in advance of the determination of planning applications.</p> <p>Where the case for development affecting a heritage asset of archaeological interest is accepted, the archaeological remains should be preserved in situ as the preferred approach. Where this is not possible or justified, appropriate provision for preservation by record may be an acceptable alternative. Any archaeological recording should be by an approved archaeological body and take place in accordance with a specification and programme of work to be submitted to and approved by the District Council in advance of development commencing.</p>	<p>para 16.10 the reference to the Kent Historic Towns Survey must be addressed. This covered just one aspect of the archaeological significance of the district, i.e. the urban component. There are numerous other strands to the archaeological significance of Shepway which the heritage strategy will define and explain e.g. coastal, rural, defence related or place specific such as Dungeness. The towns' reports are not up to date and I think reference to them could be replaced by 'in areas of known or suspected archaeological potential as identified using available information, including the Kent Historic Environment Record, there will be a reasonable...'. As the text currently reads it suggests that developers may only be required to consider archaeology in places covered by the towns' reporting. (HE)</p>	<p>Agree with comment.</p>	<p>Text to be amended as suggested.</p>	<p>Amend supporting text to read:</p> <p><b>'In areas of known or suspected archaeological potential as identified using available information, including the Kent Historic Environment Record and Areas of Archaeological Potential, there will be a reasonable possibility that archaeological remains exist and therefore the potential impact of any proposed development on archaeological remains will need to be considered. This could be by an appropriate desk-based assessment and, where necessary, a field evaluation.'</b></p>
	<p>The reference to 'large scale developments' in the final sentence (para 16.10) is rather loose. What makes a development 'large scale'; in some locations even modest development could create issues? If Shepway DC is trying to suggest that very large developments may require archaeological assessment even if no confirmed archaeological remains are known, we would support this, but there must be grounds for seeking assessment/evaluation based on judgement of the potential for such remains not just size of site. (HE)</p>	<p>Agree with comment.</p>	<p>Delete sentence beginning with 'Large scale development...' and replace with text that reflects paragraph 128 of the National Planning Policy Framework.</p>	
	<p>There are very many areas of archaeological potential outside these towns and very large numbers of heritage assets. Following the NPPF (para 128) the planning authority should require applicants to describe the significance of any heritage assets affected by the proposals (whether in a historic town or not), including any contribution to their setting. As a minimum the Historic Environment Record (KCC) should be consulted.</p>	<p>Agree with comment.</p>		
	<p>Princes Parade development will contravene this Policy as it will destroy the unique relationship of The Royal Military Canal, an important "Heritage Asset", to the seafront.</p>	<p>This comment comments on a particular site that has been described as a heritage asset but does not comment on the issue the Policy is dealing with (archaeology). Any development at Princes Parade will, if there is archaeological potential, have to undertake appropriate desk-based assessment or, if necessary, a field evaluation in line with policy.</p>	<p>No action required.</p>	
	<p>Hythe Town Council supports this policy.</p>	<p>This support is welcomed.</p>	<p>No action required.</p>	
	<p>KCC generally welcomes this policy. Please note that the wording in paragraph 2, first sentence of this policy is confused. KCC would suggest it be replaced with 'Proposals for new development should include an appropriate description of the significance of any heritage assets that may be affected including the contribution of their setting. The impact of the development proposals on the significance of the heritage assets should be sufficiently assessed using appropriate expertise where necessary. Desk-based assessment, archaeological field evaluation and historic building assessment may be required as appropriate to the case'. In third paragraph of Policy HE2 amend final sentence to: 'Any archaeological investigation and recording should be undertaken in accordance with a specification and programme of work (including details of a suitable archaeological body to carry out the work) to be submitted to and approved by the District Council in advance of development commencing'.</p>	<p>Agree with suggested change, but with the addition of 'and/or' as it is not know whether all or only one of these methods will need to be used as part of the assessment.</p>	<p>Amend the policy as described</p>	<p>Amend second paragraph in Policy to read:</p> <p><b>'Proposals for new development should include an appropriate description of the significance of any heritage assets that may be affected including the contribution of their setting. The impact of the development proposals on the significance of the heritage assets should be sufficiently assessed using appropriate expertise where necessary. Desk-based assessment, archaeological field evaluation and/or historic building assessment may be required as appropriate to the case.'</b></p> <p>Amend last sentence in third paragraph to read:</p> <p><b>Any archaeological investigation and recording should be undertaken in accordance with a specification and programme of work (including details of a suitable archaeological body to carry out the work) to be submitted to and approved by the District Council in advance of development commencing'</b></p>

<p><b>Policy HE3</b>  <b>Local list of Buildings and Sites of Architectural or Historic Interest</b>  Proposals for development affecting buildings or sites identified on the Local List of Buildings of Architectural or Historic Interest, or would meet the criteria, will be permitted where the particular characteristics that account for the designation are protected and conserved.</p>	<p>We (HEART Forum) support the creation of Local Lists, and the reuse of Historic Buildings (whether designated or not), before proposals to demolish them are entertained</p>	<p>This support is welcomed.</p>	<p>No action required.</p>	<p>Amend title to read <b>'Local List of Historic Assets'</b>   Add supporting text to reflect non-designated assets:   <b>It is also important to note that the NPPF also states that for non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Ancient Monuments, these should be considered subject to the policies for designated heritage assets (paragraph 139).</b></p>
	<p>Shouldn't the public be permitted to add properties to a register of local heritage assets? The community would be the best at deciding what these assets were. The council could then establish whether the public-identified buildings and sites were already formally designated. The list needs to be readily available and well-advertised, particularly to Civic groups and history societies, schools and clubs.</p>	<p>Noted. It is the Council's intention that sites should be put forward by the public, civic groups, etc and these will be assessed against the criteria in Statement 6.</p>	<p>Amend text to reflect this.</p>	<p>Add additional criteria for Landscapes:   <b>'Landscape Character. This can include:</b>  <b>Historic hedgerows;</b>  <b>-Paths or lanes;</b>  <b>-Historic landscape features of particular memory such as named features; or</b>  <b>-Locally designated landscape features, such as veteran trees.'</b></p>
	<p>Para 16.12 this needs to be amending to cover the instance of undesignated archaeological assets and the advice at NPPF para 139 that those of demonstrable equal significance should be treated as per the policies for designated heritage assets. An addition to para 16.13 might cover this. (HE)</p>	<p>Agreed. The National Planning Policy Framework does state (paragraph 139) that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.</p> <p>The Shepway Heritage Strategy will set out criteria for the consideration of non-designated heritage assets in a 'Local List'.</p>	<p>Amend text to reflect this.</p>	
	<p>KCC welcome the intention to establish a Local List and, as the text says, we are preparing criteria for designation as part of the Heritage Strategy project.</p>			
	<p>At present this paragraph (16.12) suggests that only assets that are either designated or on a formally adopted list will be protected by the LPA. In fact assets of similar significance to designated assets should be protected (para 139). Assets that are not designated, nor on a local list, can also be protected, however, and so I would suggest this paragraph is re-phrased to reflect this. (KCC)</p>			
	<p>Would it not have been more meaningful, and transparent, to have the Heritage Strategy in place before this Plan went to consultation?</p>	<p>Noted, but work which has been carried out on the emerging Heritage Strategy has already informed the Places and Policies Local Plan.</p>	<p>No changes proposed.</p>	
	<p>Policy HE3 sets criteria against which Locally Listed Buildings will be identified and seeks to subsequently control development that would affect such Locally Listed Buildings. Paragraph 16.13 advises that the District Council is currently undertaking a Heritage Strategy which will identify heritage themes and set out criteria for including buildings on a 'local list'. The NPPF para 129 requires Local Planning Authorities to assess the significance of any heritage asset that may be affected by a proposal taking account of the available evidence and any necessary expertise. This policy and the criteria for local listing therefore pre-empt the Heritage Strategy evidence base which is identified as informing the policy. This Policy is therefore 'Unjustified Inconsistent with National Policy and 'Unsound' and should be deleted.</p>	<p>Disagree. The policy reflects the requirements of the National Planning Policy Framework. The criteria set out in the statement box below the policy have been drafted with Kent County Council Heritage (who are undertaking the Heritage Strategy) and using existing examples. The Preferred Options was a consultation document.</p>	<p>No changes proposed.</p>	
	<p>This policy should relate to a 'Local List of Heritage Assets' not just buildings or sites of architectural or historic interest. We support the general intention of this policy but would suggest the text needs to describe the assets in terms of their significance rather than their characteristics. I would suggest the text be amended to: 'Proposals for development affecting buildings or sites identified on the Local List of Buildings of Architectural or Historic Interest, or would meet the criteria, will be permitted where the particular characteristics that account for the designation are protected and conserved'. We would further suggest that the Council develop a register of heritage assets at risk so that resources can be focused on those assets most in need of care.</p> <p>KCC welcome the detailed criteria presented and this will help the community to play a full role in conserving their heritage. Operating a Local List can require a considerable amount of resource, however, and it will be important to come up with a clear method that as far as possible places the responsibility for gathering the required information on the applicant rather than the Council.</p> <p>There will also need to be a clear and robust decision-making process for deciding whether to register assets on the Local List or not. We would suggest that detailed guidance should be developed on this subject and perhaps adopted by the Council as supplementary planning guidance in the same manner as Tunbridge Wells Borough Council has.</p> <p>At present the list of criteria is missing one category: Landscape Character. It is possible that there will be features of the historic landscape of Shepway that the community wants to designate on the Local List. We would suggest the following be added:</p> <p>'Landscape Character: This can include: Historic landscape features of particular significance such as historic hedgerows, paths or lanes Historic landscape features of particular memory such as named features Locally designated landscape features e.g. veteran trees</p> <p>The heading 'Historic Interest: association with a figure or event of significant local or national importance' should cover a range of site types. Among these will be sites of the two World Wars.</p>	<p>Agree with the suggested change in title.</p> <p>Agree to add historic landscapes to the list.</p> <p>The other points are noted, but these would be a consideration for the Heritage Strategy and any action plan that came from it.</p>	<p>Amend text to reflect this.</p>	

<p><b>Policy HE4</b>  <b>Communal Gardens</b>  The District Planning Authority will not grant planning permission for proposals for the development of the gardens, identified below and defined on the Policies Map, which form part of the comprehensive layout of the west end of Folkestone.</p> <ol style="list-style-type: none"> <li>1. Augusta Gardens</li> <li>2. Balfour Gardens</li> <li>3. Clifton Crescent</li> <li>4. Clifton Gardens</li> <li>5. Grimston Gardens</li> </ol>	<p>Most are protected as they are under the management of the Estate, but Westbourne Gardens should be considered as a 'special' case, as it is in the wrong ownership. In our opinion, it should be CPOed by the LPA, and handed to a Community Group, with agreed terms that would turn it into a Community Asset (HEART).</p> <p>See KCC's comment on 11.44 above for an approach to understanding and managing these important Green Spaces.</p> <p>Those gardens as listed in Policy HE3, and as owned by the Trustees are privately owned. The term 'communal' would suggest that they are open to the public which they are not.</p> <p>See KCC's comment on 11.44 above for an approach to understanding and managing these important Green Spaces.</p> <p>Those gardens as listed in Policy HE3, and as owned by the Trustees are privately owned. The term 'communal' would suggest that they are open to the public which they are not.</p>	<p>Noted; it is considered that many of the gardens are protected through open space policy (including open space policy in the National Planning Policy Framework) and through Policy HE1: Heritage Assets.</p> <p>Noted.</p> <p>Amend title. 'Communal' was referring to the historic relationship of the properties around a square.</p>	<p>Amend title and add additional text about Gardens in general.</p> <p>No changes proposed.</p>	<p>Change title to <b>Folkestone's Historic Gardens</b>.</p> <p>Add additional text regarding other types of garden and parks in the District:</p> <p><b>Shepway District contains a rich natural heritage and has a number of valuable parks and gardens. While the current estates are smaller parts of once much larger landholdings, the heritage of these surviving parklands and their associated buildings and gardens often have significant historical associations and demonstrate the distinctive manorial and agricultural experience of Kent. Two of the parks in Shepway are listed on the Register of Parks and Gardens of Special Historic Interest in England (Port Lympne is Grade II* and Sandling Park is Grade II), and there are many more that, while not listed, are in excellent condition and continue to be integral to the identity of the district. The Kent Gardens Compendium Volume One identifies these and includes:</b></p> <ul style="list-style-type: none"> <li>-Acrise Place, Acrise;</li> <li>-Beachborough Park, Folkestone;</li> <li>--Radnor Park, Folkestone;</li> <li>-Brockhill Country Park, Hythe;</li> <li>-Horton Priory, Monks Horton;</li> <li>-Lympne Castle, Lympne; and</li> <li>-Saltwood Castle.</li> </ul> <p>In addition, there are Memorial Gardens and Cemeteries that are important asset as part of the parks and gardens of Shepway District. The Shepway Heritage Strategy suggests that, overall, the district's parks and gardens should be considered to be of considerable significance not only to the local character but also to its residents and visitors. These heritage assets are protected through Policy H1 above.</p> <p>Parks and gardens within the urban areas of the district are also important heritage assets that act as natural oases for people and wildlife. While they are not listed, they are integral to the identity and sense of place and also contribute to the better wellbeing of local residents, visitors and wildlife.</p>
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