

Folkestone

Hythe & Romney Marsh
Shepway District Council



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Places and Policies Local Plan - Submission Draft Consultation Statement



July 2018

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1. Introduction

1.1 The National Planning Policy Framework 2012 (NPPF) recommends that each local planning authority produce a local plan for its area that contributes to sustainable development while reflecting the vision and aspirations of local communities. Furthermore, the Localism Act 2011 aims to make the planning system clearer, more democratic and more effective.

1.2 This Consultation Statement sets out how Folkestone & Hythe District Council (F&HDC)¹ undertook consultation between 2015 and 2018 to inform the Places and Policies Local Plan Submission Draft document.

1.3 F&HDC undertook two Town and Country Planning (Local Development) (England) Regulations 2012 (hereafter referred to as the Regulations) consultations under Regulation 18 and Regulation 19, as detailed below:

- The first consultation was undertaken on the Places and Policies Local Plan (Issues and Options) document between 29 January and 11 March 2015.
- The second consultation was undertaken on the Places and Policies Local Plan (Preferred Options) document between 7 October and 18 November 2016.
- The third consultation was undertaken on the Places and Policies Local Plan (Submission draft) document between 5 February and 19 March 2018.

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

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

1.5 The Consultation Statement will assist the Inspector at the Examination in determining whether the District's Places and Policies Local Plan complies with the requirements for public participation and government guidance.

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

¹ As of 1st April Shepway District Council became Folkestone & Hythe District Council

1.7 Together with the adopted Core Strategy Local Plan (2013), the Places and Policies Local Plan will become the statutory Development Plan for the District. Once completed, these development plan documents will set out the Council's long term planning strategy for the area up to 2031.

2. Regulation 18 Places and Policies Local Plan - Issues and Options document

2.1 On 18 June 2014 Cabinet approved the Local Development Scheme (ref C/14/10) that committed the Council to producing a further Local Plan covering land allocations and new development management policies.

2.2 On 21 January 2015 Cabinet approved the Shepway Places and Policies Local Plan - Issues and Options for consultation (ref. C/14/69) along with an early stage sustainability appraisal and a revised Statement of Community Involvement (SCI) that set out the Council's strategy for consultation in relation to planning policy documents and planning applications.

2.3 The consultation document consisted of two parts:

- Key issues for the plan addressing – housing distribution, creating jobs and meeting the needs of business, town centres and retail and leisure provision, gypsy and traveller provision, infrastructure, local green space and heritage.
- Development Management Policy Options covering a wide range of themes.

2.4 The first public consultation on the Issues and Options stage of the plan took place between 29 January 2015 and 11 March 2015, over a six week period. This consultation also included a 'call for sites' exercise as a key component of the Strategic Housing Land Availability Assessment (SHLAA) and the opportunity to comment on a revised Statement of Community Involvement.

Key Consultation Methods and Analysis

Promotion of the consultation period

2.5 The Places and Policies Local Plan Issues and Options consultation was advertised through a wide variety of means. A Public Notice was placed in the Kentish Express and KM Folkestone, it was also promoted through the Council's website, social media (twitter feeds and Facebook) and Radio Interview (Academy FM); as well as at Key Stakeholder Meetings and workshops in the lead up period.

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

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

Consultation Events

2.7 The consultation documents and an executive summary were made available to view in the Council Offices at Folkestone, One Stop Service in New Romney and all public libraries (Appendix 5) within the district during opening hours. Representation Forms were available at all the venues, from the Planning Policy website or on request from the Planning Policy Team.

2.8 During the six week consultation period a series of public consultation events where held across the district as follows:

Date	Venue	Time
09.02.15	Folkestone Town Hall	2-4pm and 6-8pm
10.02.15	Hythe Town Hall	2-4pm and 6-8pm
11.02.15	The Assembly Rooms, New Romney	2-4pm and 6-8pm
12.02.15	Sellindge Village Hall	2-4pm and 6-8pm
13.02.15	Committee Room Hawkinge Community Centre	2-4pm and 6-8pm
16.02.15	The Guildhall, Lydd	2-4pm and 6-8pm
28.02.15	Lympne Village Hall	11-2pm

Table 1: Venues, dates and timings of public consultation events for the Places and Policies Local Plan - Issues and Options document

2.9 The public events consisted of a number of information boards to facilitate discussions with council officers. Copies of the draft consultation documents were available to view and leaflets/ flyers explaining the consultation and encouraging people to make an online representation were distributed.

2.10 In addition to the public exhibitions, a number of highly useful area/topic based meetings were carried out with key stakeholders. Whilst resource intensive this approach proved to be highly useful as it allowed specific local knowledge to be fed into the plan making process at the consultation stage. These meetings included a Heritage Workshop which was held on 27 February 2015 and attended by 40 people, including organisations such as:

- Shepway District Council
- English Heritage
- KCC Archaeology
- Canterbury Christchurch
- Princes Parade
- Folkestone Townscape Heritage Initiative
- Remembrance Line
- Leas Lift

- Hythe St Leonards

2.11 Town Centre based events involving local traders and businesses in Folkestone, Hythe and Lydd were carried out. The Folkestone Town Centre Workshop was held on 4 February 2015 and attended by 35 people including representatives from:

- Folkestone Town Council
- Shepway District Council
- Folkestone Town Team
- Folkestone Town Centre Management
- Folkestone Academy
- Creative Foundation
- Folkestone Independent Traders Association
- Shepway HEART Forum
- Shepway Cycle Forum

2.12 In order to get the views of Town and Parish Councils and to make sure they were aware of what was happening in their area, three area-specific cluster meetings were organised across the district. These meetings were held to introduce the document, help raise awareness of the consultation and encourage participation:

- Romney Marsh Character Area 4 February 2015, 10-12 noon, St Marys Bay Village Hall,
- North Downs Character Area, 6 February, 14.30-16.30pm, Hawkinge Community Centre,
- Urban Character Area, 6 February, 10-12 noon, Hythe Town Council Offices.

2.13 Separate meetings were also held with all neighbouring authorities (Rother, Canterbury, Dover and Ashford) to encourage participation in the process and with the Shepway Business Advisory Board.

Feedback

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

- In writing to: Planning Policy, Shepway District Council, Civic Centre, Castle Hill Avenue, Folkestone Kent CT20 2QY; or
- E-mailed to: planning.policy@shepway.gov.uk; or
- Faxed to 01303 853502.

2.15 In addition, the Executive Summary (available both online and in hard copy versions) posed a series of questions focusing on the key issues set out in the first part of the document.

2.16 The six week consultation resulted in the submission of over 300 representations from a range of interest groups including local residents, landowners and their agents, statutory undertakers and other stakeholders, Town and Parish Councils and neighbouring local authorities.

2.17 A brief summary of the key issues to emerge from the consultation is set out below and was reported to Cabinet on 16 September 2015 (ref. C/15/19).

Policy C9 Proposals for Princes Parade Hythe

2.18 The main concerns raised in relation to this policy were the effects of development on the setting of the Royal Military Canal, the loss of open space, the issue of contamination, flood risk, there were alternative sites, accessibility, the potential impacts on wildlife, and setting a precedent leading to development on the golf course.

Affordable Housing

2.19 Most respondents considered affordable housing as vital to the district and were concerned that residents' needs, particularly in rural areas, would not be met.

Provision of Housing

2.20 Whilst there was broad support for the proposed housing distribution people were unclear on how it had been reached and wanted it to be more evidence based, with more recognition of the characteristics of the district's towns and villages and utilising brownfield land. Representations were split as to whether housing numbers should be reduced or increased. Concerns were also raised about the existing infrastructure's ability to cope with more housing particularly in Hythe and Romney Marsh.

Office Development

2.21 Respondents preferred office development to be based in town, making the most of its transport links to London and France. Comments relating to development at the motorway gave preference to Junction 13. It was also felt that economic development should not only be centred on industrial and office development, but looked at holistically, with heritage & arts tourism being a key driver towards economic wellbeing.

Other issues

2.22 Overall it was felt that Folkestone was not making the best of what assets it had, factors such as an improved night time economy, more varied retail offer and legibility of the town would help this. Residents value both the historic and natural environment, and were in favour of having local plan policies that would both protect

and enhance these. Developers tended to object to such policies, preferring the Council to rely on the provisions in the National Planning Policy Framework.

2.23 A detailed summary of representations received to the Places and Policies Local Plan – Issues and Options document can be seen in Appendix 2.

3. Regulation 18 Places and Policies Local Plan – Preferred Options document

3.1 On 16 September 2015 Cabinet agreed the recommendations set out in report C/15/19, which included suggestions on future community and stakeholder engagement.

3.2 Furthermore, on 30 June 2016 Cabinet approved the formal structure of the preferred options document, the range of proposed policies and the consultation strategy set out in report C/16/13. Cabinet also then approved the draft Places and Policies Preferred Options document, along with the supporting sustainability appraisal and habitat regulations appraisal, for consultation on 14 September 2016 as set out in report C/16/35.

3.3 The preferred options document was divided into two main sections:

- Places, which allocates specific sites for development; and
- Policies, which contains general development management policies relating to all development proposals, including the allocated sites and any other relevant planning applications that may come forward in the district.

3.4 The second public consultation on the preferred options stage of the plan took place between 7 October and 18 November 2016 over a six week period.

Key Consultation Methods and Analysis

Promotion of the consultation period

3.5 Prior to the start of the consultation period, cluster briefing sessions were held with Town and Parish Councils over the summer of 2016. These events were to inform Parish and Town Councils of the policy making process to date and the forthcoming Places and Policies Preferred Options Local Plan consultation arrangements.

3.6 In the lead up and during the consultation, Officers worked closely with the Council's Communications Team to provide a targeted approach to the social media consultation campaign to increase the overall participation and specifically the number of online public consultees. The approach involved actively trying to engage residents by providing local interest, through information on specific sites and local consultation events.

3.7 The consultation was advertised through a wide variety of means. A Public Notice was placed in the Kentish Express and KM Folkestone on 6 October 2016 (Appendix 6). The consultation was also promoted through the Council's website (Latest News), social media (Twitter, YouTube, Facebook), emails and letters to specific and general consultees, Parish and Town Councils and those who had

responded to the earlier round of consultation or requested to be on our consultee database.

Consultation Events

3.8 The public were able to view the consultation documents including a summary online and hard copies were available to view in the local libraries (Appendix 5) and Council Offices. Representation Forms were available at all the venues, from the Planning Policy website or on request from the Planning Policy Team. Hard copies of the consultation documents were also sent to each of the Town and Parish Councils.

3.9 During the six week consultation period a series of public exhibitions were held across the district, as follows:

Date	Venue	Time
11.10.16	Hythe Town Hall	3-8pm
12.10.16	Lydd Town Hall	3-8pm
13.10.16	Sellindge Village Hall	3-8pm
20.10.16	New Romney Assembly Rooms	3-8pm
25.10.16	Hawkinge Community Centre	3-8pm
27.10.16	The Folkestone Academy	3-8pm

Table 2: Venues, dates and timings of public exhibitions for the Places and Policies Local Plan - Preferred Options document

3.10 The public events consisted of a number of information boards setting out the context, development requirements for the district and maps of individual site allocations to facilitate discussions with Council Officers. Copies of the draft consultation documents were available to view.

Feedback

3.11 Representations could be made on the Preferred Options document online via the Councils Consultation Portal, in writing, or by e-mail.

3.12 The Council had a positive response and received over 2,000 representations from more than 600 individuals, community groups and organisations. There was a marked increase from the Issues and Options consultation (2015) in both the numbers of people responding and those responding using electronic means as shown in the table below produced by the F&HDC Communications Team.

Measure	Issues and Options ¹	Preferred Options ²	% change
Number of respondents	234	616	+163%
Number of online respondents	98 ^{***}	436 [*]	+345%
Number of email respondents	123 ^{***}	106 [*]	-14%
Number of respondents by letter	22 ^{***}	86 [*]	+290%
Number of individual private respondents	147	510	+247%
Number of individual respondents representing an organisation	49	39	-20%
Number of respondents on behalf of others (agents)	38	67	+76%
Number of private individuals online	78 ^{****}	405 ^{**}	+419%
Number of private individuals by email	56 ^{****}	53 ^{**}	-5%
Number of private individuals by letter	18 ^{****}	58 ^{**}	+222%

Table 3: Comparison of respondents and method of response between the Issues and Options and Preferred Options consultations

(1) Places and Policies Local Plan: Issues and Options consultation 2015

(2) Places and Policies Local Plan: Preferred Options consultation 2016

* 11 respondents used two or more response methods.

** 6 respondents used two or more response methods.

*** 7 respondents used two or more response methods.

**** 4 respondents used two or more response methods.

3.13 A summary report of the main issues raised against each chapter and policy and Council response can be seen in Appendix 3.

3.14 The results of the consultation and a summary of the representations with proposed amendments were reported back to Cabinet on 19 July 2017, report reference C/17/27.

3.15 Overall, the 'Places' section of the Plan received the majority of the representations when compared with the 'Policies' section. However this is to be expected given that members of the public are likely to have more interest in specific development sites, particularly where they are close to where they live.

3.16 While all allocations in the 'Places' section received comments, the allocations that received the most representations were:

- Princes Parade, Hythe (approx. 500 comments);
- The Battle of Britain Museum, Hawkinge (50 comments);
- Greatstone Car Park (26 comments); and
- Land to the south of New Romney (21 comments).

3.17 A number of other sites, such as Duck Street, Elham, Sellindge sites and Lympne Airfield also received around 20 comments each.

3.18 The 'Policies' section of the Plan received fewer representations in total, with the Transport chapter receiving the most (representations largely highlighted concerns relating to infrastructure and development).

3.19 In addition to the comments relating to the proposed sites and development management policies, a number of comments were received promoting new sites, either in addition to, or substituting for, the proposed allocations. In total 31 new sites were submitted.

3.21 Officers assessed the representations and made proposed amendments to the document. While opportunities have been taken to respond to consultation comments where possible, it should be recognised that the majority of the site allocations received objections. The purpose of the Plan is to meet the outstanding development requirements of the 2013 Core Strategy and the Plan must therefore allocate sites for development to meet these requirements. Sites submitted in addition to, or in substitution for, the allocations in the Preferred Options document have been assessed using the same methodology as the existing allocations.

3.22 Since the conclusion of the Places and Policies Local Plan Preferred Options Draft consultation, Council Officers have met with statutory consultees and interested parties to discuss key issues, including Kent County Council (education & transport); Environment Agency (flood risk); Natural England (biodiversity and SSSI); and NHS Trusts (future health requirements). Further information on these meetings can be found in the Council's Duty to Cooperate Statement.

4. Regulation 19 Places and Policies Local Plan- Submission Draft document

4.1 On 19th July 2017 Cabinet agreed the recommendations set out in report C/17/27, and subsequently the plan was approved for its third public consultation.

Key Consultation Methods and Analysis

4.2 The Places and Policies Local Plan Submission Draft, a document illustrating changes to the Policies Map, the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) were published for consultation between 5 February and 19 March 2018, over a six week period.

Promotion of the consultation period

4.3 The consultation was advertised through a Public Notice placed in the Kentish Express and KM Folkestone on 4 February 2018 (Appendix 7) as well as social media (Twitter, Facebook) and the Council's website. The consultation featured on the Council's home page, under the Latest News section throughout the consultation period, with reminders of the consultation period posted on the Council's social media sites.

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

4.5 Hard copies of the Plan, the Changes to the Policies Map, the HRA, a Non-Technical Summary of the SA and representation forms were made available to view at local libraries and Council Offices during the normal opening hours. All documents were available to view on the Council's web site.

4.6 Hard copies of the consultation documents were sent to each of the Parish and Town Councils. In addition, all Parish and Town Councils were emailed and offered an informal meeting with Council Officers to assist them with any questions they may have from their parishioners on this consultation. As a result Officers attended a meeting at Folkestone Town Council on 8 March 2018 to brief members on the consultation. In addition Officers also briefed the Town and Parish User Group on 6 February 2018.

4.7 Public exhibitions were not carried out as essentially, at this stage in the plan-making process, the District Council were presenting the final draft of the Plan. The purpose of the consultation is, therefore, not to shape the Plan but to ensure that the Council has followed the correct processes and to provide an opportunity for any outstanding concerns to be presented to the Inspector.

Feedback

4.8 A total of 831 representations were received to the Places and Policies Local Plan Submission Draft from 330 respondents (different individuals and organisations).

4.9 The representations have been broken down by chapter as shown in Table 4.

Chapter		Number of comments	Sub-totals
Places and Policies Local Plan as a whole		16	30
1	Policy Index	1	
2	Foreword	1	
3	Introduction – Places and Policies Local Plan	12	572
4	Introduction - Places	8	
5	Urban Character Area	384	
6	Romney Marsh Character Area	70	
7	North Downs Character Area	110	
8	Introduction – Development Management Policies	0	
9	Housing and the Built Environment	43	
10	Economy	21	229
11	Retail and Leisure	19	
12	Community	28	
13	Transport	19	
14	Natural Environment	40	
15	Climate Change	14	
16	Health and Wellbeing	9	
17	Historic Environment	36	
18	Monitoring	0	0
Glossary		0	
Appendix 1: Nationally Described Space Standards		0	
Appendix 2: Schedule of Policies to be Deleted		0	
Total number of comments			831

Table 4: Breakdown of comments by chapter

4.10 In addition to comments on the local plan, eight comments were received on the accompanying documents shown in Table 5.

Title	Number of comments
Policies Map	6
Places and Policies Local Plan Sustainability Appraisal	2
Places and Policies Local Plan Habitats Regulations Assessment	0
Total number of comments	8

Table 5: Places and Policies Local Plan Accompanying Documents

4.11 Policy UA18: Princes Parade, Hythe received the most responses (236 comments). This represents approximately 28 per cent of all the comments received on the Plan. The remaining site allocations and the development management policies attracted far fewer comments.

4.12 Policies receiving more than 10 comments are set out in Table 6.

Title	Number of comments
Policy UA18: Princes Parade, Hythe	236
Policy UA19: Hythe Swimming Pool, Hythe	34
Policy ND6: Former Lympne Airfield	32
Policy ND4: Land east of Broad Street, Lyminge	19
Policy RM2: Land off Victoria Road West, Littlestone	17
Policy RM11: Car Park, Coast Drive, Greatstone	16
Policy ND5: General Sellindge Policy	15
Policy UA2: Rotunda and Marine Parade Car Parks, Lower Sandgate Road, Folkestone	14
Policy UA11: Affinity Water, Shearway Road, Cheriton	11
Policy ND9: Etchinghill Nursery, Etchinghill	11

Table 6: Local Plan policies receiving more than 10 comments

4.13 11 policies received no comments. These are set out in Table 7.

Policy RM8: Station Yard, Station Road, Lydd
Policy RM10: Land rear of Varne Boat Club, Coast Drive, Greatstone
Policy HB13: Houses in Multiple Occupation (HMOs)
Policy E4: Hotels and Guest Houses
Policy RL3: Hythe Town Centre
Policy RL4: New Romney Town Centre
Policy RL6: Sandgate Local Centre

Policy RL7: Other District and Local Centres
Policy RL9: Design, Location and Illumination of Advertisements
Policy RL10: Shop Fronts, Blinds and Security Shutters
Policy NE6: Land Stability

Table 7: Local Plan policies receiving no comments

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

5. Duty to Cooperate

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

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

Appendix 1 – Local Plan Consultees

The 2012 Regulations (Reg. 18) require us to consult:

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

Specific Consultation Bodies

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

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

General Consultees

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

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

Appendix 2 – Summary of Representations received to the Places and Policies Local Plan – Issues and Options Consultation

Places and Policies Local Plan Section	Summary of Responses
Introduction	<ul style="list-style-type: none"> • Comments on indicators from Core strategy • Clarification of Plan period 2006-31? • Lack of identity for Folkestone, should be more youth focussed
Question 1 Housing distribution	<ul style="list-style-type: none"> • 5 year land supply was questioned (promoting site) • Housing shortfall elsewhere eg London unable to accommodate its own housing need, other neighbouring councils with housing shortfall and Ashford likely to provide only for its OAN. Shepway should consider addressing those shortfalls • Should say exactly how many houses in each town. • Planned development for Hythe contradicted by previous inspector • Too much housing and infrastructure unable to cope. • Housing should be on brownfield sites. • Build housing where it is needed with the services that go with it. Affordable housing especially needed • Redevelopment in Folkestone rather than development in smaller surrounding settlements. • Ensure 106 agreements for affordable housing are fully met. • Make reference to an allowance for minor extensions to the settlement boundaries in these instances as lack of SHLAA and brownfield sites • Emphasis on truly affordable houses, social housing and other models of shared ownership and self-build. A priority, regeneration of Folkestone, and conversion of long-standing unused retail and office sites. Distribution theoretical rather than evidence based • Better match of homes to jobs. • Should attract London commuters • Lack of infrastructure in Hythe for development and concern about flooding. • Relaxation of house building policy in areas of outstanding natural beauty to allow a limited number of small low cost housing • Policy should also include for and recognised the potential of additional supply being made in areas outside the defined tiers. Development of high speed broadband evolves the nature of home and workplaces is in a particular state of flux

	<ul style="list-style-type: none"> • Economic strategy is only 5 years but this is 15 years so could be subject to unforeseen activities/development • Sellindge should get respite given development taken place • Housing provisionally allocated for these areas are appropriate will depend very much upon the evidence of need in Shepway plus consideration of whether it will be necessary to assist Rother and Hastings. • <i>DCLG 2012 Household Projections</i> indicate that between 2011 and 2031 some 9,000 households may form. This would result in an annual rate of household formation of 450 households per annum. Shepway should consider a new plan with its HMA partners as soon as possible to respond to the new evidence of need indicated by the DCLG projections and the Further Alterations to the London Plan. • Clarity is needed on how the total number of dwellings to be accommodated on new allocations has been determined having regard to all existing sources of supply • Policy 1 mirrors the settlement hierarchy of the Core Strategy, unclear as to how the housing distribution has been arrived at, in particular, the degree to which the use of brownfield land has minimised the reliance upon greenfield sites and the potential levels of development within the AONB and its setting. To inform the setting question and the allocation of sites (should this prove necessary), we would be supportive of the Council undertaking further landscape characterisation • Some circumstances achieving this target figure may be inappropriate, and in others that it may be acceptable to exceed it if the nature of the place allows for it. • It disregards the key principle of identifying housing sites on the most appropriate sites taking into account issues such as sustainability, environmental constraints, availability of infrastructure, and the character and form of settlements • The AONB and Romney marshes should not be a focus for expansion, on environmental grounds. • Additional school capacity may be required in Folkestone, Hythe and New Romney over and above what KCC had previously identified at the Core Strategy stage. • There is not enough support within the document to protect AONB outside of a few designated areas there should be more protection afforded to the Etchinghill escarpment and the downs. • The basis appears sound. Why has the allocation for New Romney apparently gone up to 480 from the 300+ broad brush allocation? • If at all possible, consider the 'garden village' concept as an alternative to some rural area expansion • Based on the information provided within the Issues and
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	<p>Options Consultation, it is unclear exactly how the residual housing target of 3,355 new homes has been derived.</p> <ul style="list-style-type: none"> • It is preferable given 'place shaping' needs that major residential development is generally delivered alongside some commercial activities and infrastructure, wherever feasible. This objective is applicable regardless of the scale of the settlement. With specific regard to the settlement of Lympne, the suitability and availability of land at Link Park provides the scope to deliver a significantly greater housing number than the suggested average of 30 units for a Primary Village
<p>Question 2 Call for sites</p>	<ul style="list-style-type: none"> • GSE confirms that the current improvement of the hotel and associated housing development are proceeding in line with the programme and Plan's evidence base. • Westenhanger/Stanford should be looked at as a new community. • Southern edge of West Park Farm, notably around the dated Bookers site and Barnfield Road would be better as residential land than commercial. • Shepway needs a more aggressive policy with regard to empty and derelict buildings • There should be more interspersal of residential uses in the town centre and that this would help keep it viable , providing there was enough parking for both residents and shops , Guildhall Street is poor for shopping and could be a lot more residential • Outside and on the fringes of the town centre Shepway should be realistic about the number of shops required • The council has sufficient land allocated for housing for the next five years; any additional land required for housing should be allocated on brownfield land. Infrastructure should match housing development and the unique environments of the Romney March and the North Downs be protected. • The social problems of this area will be magnified if there is an oversupply of housing if it is used to facilitate London councils' policies to move less affluent citizens to country locations. • Housing should be affordable. Increasing supply is not the only way of achieving this, 50% of new housing development should only be available to local people, and this should be in perpetuity • additional land around Sellindge could be considered. • More use should be made of Brownfield Sites or where there have been historic land uses for dwellings, these are more expensive to develop but it does prevent urban sprawl, the District Council should not allow developers costs be the guiding factor in housing generation. • Phides Estates seek to promote the future development of

	land to the south and east of Link Park as a future housing site
Question 3 Employment uses in Folkestone, around motorway junctions, start up units	<ul style="list-style-type: none"> • Concerned about an increase in employment use around motorway junctions as this would take trade and perhaps employment away from town centres, increase travel by car when surely we should be encouraging environmentally sustainable alternatives • Too much development at junction 11 could damage the countryside • support employment uses around both motorway junctions in cases where heavy duty traffic is involved in the course of business • Council may wish to consider whether its adopted Core Strategy gives it sufficient basis upon which to potentially allocate land within this DPD at Junction 11. • Businesses in town centres are a good thing for connectivity and for shops as economically active people are co-located with retail offer. Problem is always parking • Existing buildings can be converted alongside smaller developments, improve the night life in Folkestone making it an attractive place to spend time in the evening. • Investment needs to take place in Guildford Streets and other where shops are empty maybe connecting them to the creative quarter • strength Folkestone has in terms of office development, is its fast rail connection to Central London, any office development must be within easy walking distance on the railway station and very quick and easy access to France should be an advantage • Incubator units should be encouraged in villages - may be as extra income to farmers • In the interests of sustainable tourism and economic opportunity far more should be done to promote and advertise the intrinsic, unspoiled beauty of Shepway's coastline and its varied and unique historical heritage as a designation for walkers and cyclists • With focus and support Cheriton has the potential to become a visitor asset and a cultural destination • Rural areas such as Romney Marsh cannot sustain further employment sites in and around small villages • Infrastructure that is wanting - good health, education and fast broadband services • Area is not short of employment sites as the low take up testifies • Much greater emphasis needs to be put on making employment sites more aesthetically acceptable in country areas. • Mention should be made of the contribution made by its outstanding environment (inc. of course the AONB) to both

	<p>the quality of life and the economic attractiveness of the Borough</p> <ul style="list-style-type: none"> • Preference for existing developed areas to come forward in order to avoid or reduce the release of fresh sites in locations that could impact more upon the AONB • Potentially sensitive locations in heritage terms, e.g. Civic Centre site and Creative Quarter, should be highlighted to ensure that development is appropriate to the scale and character of the location. • No evidence that supports the view that more modern office space is required in and around Folkestone Town Centre especially around Folkestone Central Station.
<p>Question 4 Reallocation of employment sites</p>	<ul style="list-style-type: none"> • Support reallocate sites that have no reasonable prospect of coming forward. • Economic Development should not only be centred on Industrial Estate sites, but looked at holistically (Heritage & Arts Tourism is a key driver towards economic wellbeing) • ‘no reasonable prospect for employment uses’ needs to be further defined • Hythe needs all the business/employment sites it currently has and none should be re-allocated as jobs are needed for the younger generation • Growth in tourism would lead to many more being employed in those areas with corresponding changes in the distribution eg A centre parks type village • Reallocation should not however be seen as a simple change to residential use. • Sites that are clearly more attractive for residential than commercial should be re-allocated. This probably DOES now include the southern edge of Park Farm around ageing Bookers and Barnfield Road • Have no issues with the change of use, other than at New Romney. This town is the major centre for Romney Marsh – a town that is being allocated considerably more new housing. • We do not agree that the Link Park element of the Lympe industrial estate should be excluded from consideration for change of use. • Perhaps shorter-term issues and an unwillingness to explore all options are not allowed to lead to release of potentially sensitive sites relative to the AONB. We would therefore wish to understand how the sites have been assessed • Policy makers should calculate a reduction in the district housing needs expectation in direct proportion to the [lost] employment [opportunities] which might have been provided by the site. • In light of the recent adoption of the Core Strategy and measures set out within the draft EDS, we consider that it

	<p>would be premature to de-allocate or re-allocate any existing strategic employment allocations unless there were strong site specific circumstances.</p> <ul style="list-style-type: none"> • Phides Estates support the retention of the strategic allocation at Link Park for future employment growth and agree that there is no need for a policy change for this site
<p>Question 5 Town and district centres assessment</p>	<ul style="list-style-type: none"> • In Folkestone there is an increasing evening economy of restaurants in the harbour and creative quarter. Who are town centres for and what market do they serve these days. Room for retraction and change to residential perhaps. • The main shopping street does not appear to be thriving and the number of vacant shops appears to have increased, presumably as a result of reduced footfall. There are few high-quality shops. • Too few entrances for vehicles to allow easy access to potentially key points in the shopping area • Hythe town area currently succeeds due to it having a good range of facilities in the town to encourage people into the high street • Nightlife in Folkestone is a major issue and it's absence is a major pitfall in trying to attract encourage young professionals living in the area who would provide much needed income to the town centres. • Guildford Street needs investment to prevent the decline there. That the creative quarter needs to be more integrated into the Town as a whole. • The Town Centre is a tolerable destination for local residents but uninviting for visitors • Confusing access (by car or train), and unclear pedestrian routes to the different amenities spoils the visitor experience • The centre has to be seen in context of what the town as a whole has to offer - which is a great deal. • Folkestone will continue to struggle. It is perhaps time to recognise this and consider more radical residential use of Town centre with flats, cafes and boutiques style shops throughout pedestrian area leading into creative quarter • Need to be radical and innovative - in the same way that Ashford took advantage of the opportunities offered by the Tunnel, and HS1 • All of Folkestone's top tourist attractions currently mean travelling via the deprived East End which severely diminishes their view of the Town. • Consideration should be given to converting some upper floors of shops that are currently vacant into living accommodation. Could empty or charity shops be used and considered for ground floor accommodation? • Legibility of Folkestone there are actually three centres in the town, the harbour, the current main retail centre and

	<p>West Folkestone.</p> <ul style="list-style-type: none"> • Allow shops change of use to housing in areas such as Guildhall Street. This would mean more people living in the town centre, which may well add to the evening economy. • Sandgate is not recognized on the map and does not figure in the table
Question 6 Folkestone retail offer	<ul style="list-style-type: none"> • Folkestone should exploit new strengths of restaurants, novelty and creative. The environment in Sandgate Road is not conducive - it appears so down at heel • More should be done to exploit Folkestone's unique attractions and establish a thriving leisure industry here rather than struggle to compete with larger retail centres elsewhere • The retail units currently do not attract high spenders and neither does the towns image • It will be better to make the provision by the amalgamation of smaller shops. This would help maintain the history of the area • Site amalgamation may be key to regeneration of areas such as Guildhall Street, which area could also be encompassed in the café quarter • Folkestone's poor performance is its lack of high end retail. Clothes and home goods are especially restricted, but that has long been the case, and will only change if more wealthy people move here. • Substantial redevelopment opportunities incorporating retail uses should be prioritised within Folkestone Town Centre in accordance with its position at the top of the settlement hierarchy. Lower order centres should seek smaller scale improvements that respect their size and function, with a view to consolidating their position as secondary town or District Centres.
Question 7 Cheriton, Hawkinge and Lydd retail	<ul style="list-style-type: none"> • Hawkinge - no real need for additional.- there are now two divided retail areas in hawking • A new anchor store in Cheriton, may well help the shops that are already there. However there is a serious problem with parking in Cheriton. • Enhanced retail provision at Hawkinge should help town. • Another retail store in Lydd, will help make Lydd a more sustainable town. • Cheriton, its close proximity to the outlets in Folkestone could mean there is no economic need for any larger store , as it could impact on its smaller retailers . • Anchor store in Cheriton would be a way to attract footfall, any improvement to Cheriton must be after Folkestone town is stabilised, once Cheriton is stabilised develop Hawkinge
Question 8 Leisure Offer	<ul style="list-style-type: none"> • How the Council can influence this? • Protecting an historic site such as the Leas Club

	<ul style="list-style-type: none"> • revitalisation of cultural facilities such as theatres should be used as a catalyst for wider regeneration within your town centres • Any town centre policy needs to acknowledge that cultural facilities are an important town centre uses • Folkestone does have quality to offer but in some cases the accessibility is poor • Rethinking the road system is long overdue • Also what would benefit the whole district would be a permanent Ice Rink. Gillingham has the county's only permanent ice rink. Having 1 at Folkestone would bring people from all East Kent. • Folkestone fairs particularly poorly. Types of leisure missing that would attract an evening economy are a cinema and competition size swimming pool in Hythe • Very poor leisure offer, lack of family entertainment and leisure in the heart of the town centre meaning local spend is leaked to Ashford (Cineworld and Bowling). Distinct lack of family friendly restaurants, hotels. Coastal Park is great but only satisfies fair weather and younger children in the main. • Small-scale development and repair, restoration and reuse of historic buildings and sites could be the platform for growth in this sector. The council should consider preparing a tourism/visitor strategy or link this theme to a heritage strategy to identify the full potential of this opportunity • District has its unique coastline and topography which has resulted in its heritage and industries, and the problem is not the lack of leisure but a failure to adequately capitalise on what exists and promote local pride as well as the amenities. • Multiplex cinema would be nice, but not a collection of poor quality chain restaurants that usually accompanies a cinema, as these would compete with Folkestone's good choice of independent restaurants and the Creative Quarter. • The tram road car park is well used and with the harbour redevelopment is likely to be even more popular in the future. The redevelopment of this site should only be considered if it was for the re-creation of the Old Town (mainly housing) to link the Old High Street with the Fishmarket • The current harbour regeneration should be earmarked for the lead in this role. • Support the suggestion of a cinema but any provision, whether a small cinema or a larger multiplex, must be in town and not out of town in a business park. • No requirement for further theatre provision" and we would add the proviso that we do not lose any provision either.
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	<ul style="list-style-type: none"> • Would like to see a reference in the plan to encouraging hotels, primarily for business and leisure purposes and secondarily for tourism to a seaside resort. The aim must be to benefit residents and local businesses in the first instance.
<p>Question 9 Town centre viability</p>	<ul style="list-style-type: none"> • The potential site allocations tend to shift the centre of gravity to the seafront, harbour and old town. This plays to strengths of the seaside location. Guildhall St and think this might be better as residential area to feed the centre. • The loss of Tram Road car park will have a significant impact on the other businesses in the area • Folkestone will continue to struggle. It is perhaps time to recognise this and consider more radical residential use of Town centre with flats, cafes and boutiques style shops throughout pedestrian area leading into creative quarter • Shepway owns land adjacent Romney Marsh Visitor Centre which could be developed similar to lower Leas Coastal park attracting visitors from Ashford , Marsh, Hythe and Folkestone catchments. • Support is given to the identification of the Folkestone Seafront Site as a site of investment opportunity that could accommodate retail and leisure facilities which will support the growth needs of the District • The need for better connectivity between the Seafront and the Town Centre is possible and was identified as part of the Core Strategy • Folkestone needed to support the existing or boost the new representation of firms like Debenhams , Next , Marks , Prezzo , Zizzi etc by encouraging new , high quality commercial AND residential development in the town generally • The Cultural Quarter but also Rendezvous Street, Church Street and all the old areas up to the Town Hall are a big bonus to Folkestone compared with say Ashford or Dover. • The local highway authority wishes to make the point that the timing of a potential redevelopment of The Tram Rod car park should be in accordance with a review of the parking strategy, to include the implementation of a town-wide Variable Messaging System to direct car users that wish to make use of town centre car parks. • Lydd , the area around the Church ,which is a major tourist attraction , could be enhanced as part of it is lacking in attractiveness. • A constraint in respects to development and indeed the incentive to develop is the issue of managing business rates. Could the council explore the possibility of applying for ENTERPRISE ZONE status to either existing areas or indeed new developments. A strong town centre management (comprised of many partners working

	<p>together), with an appropriate budget and resources</p> <ul style="list-style-type: none"> • The co-location of retail / leisure uses on sites within close proximity and well linked / integrated with Bouverie Place (given that it is fully let and performing well) would maximise the benefits associated large scale town centre redevelopment. For this reason the redevelopment of Folkestone Bus Station is supported. • Any plans to knock down Bouverie Place Shopping Centre (now a bigger eyesore than the Burstin • Folkestone High Street, Tontine and Rendezvous Streets, The Old High Street and the top end of Sandgate Road represent a disjointed retail area for Folkestone. It would be good to see all the retailers centralized in the pedestrian area which extends down through the Old High Street. The Sandgate Road area could then be converted to high quality residential units • The map on page 15 of the draft Plan shows distinct zoning of the town centre, the Creative Quarter and the proposed café quarter. Whilst we understand this as a device for prioritising areas of need, it adds to the perceived separateness of these areas.
<p>Question 10 Gypsy and traveller accommodation</p>	<ul style="list-style-type: none"> • Dover District Council supports paragraph 6.3 that has identified the SDC will meet its own Gypsy and Traveller needs. In line with the requirements of the of Duty to Co-operate Officers would like to be kept informed • best solution would be to enlarge existing facilities rather than set up new sites elsewhere. • No to new or extended sites • People settling in areas and then those places being given authorised status should be strictly avoided. This unauthorised living is commonly outside the normal conurbations and leads to unsightly development • First preference should be to extend existing sites where this is feasible. The second preference should be to consider which, if any, of the unauthorised sites could be formalised. The third preference should be to consider providing pitches as part of the larger development sites, considered on a site-by-site basis. Only after these three opportunities have been explored should consideration be given to new sites, and the selection of these should be considered in accordance with the criteria that are included in proposed Policy H4
<p>Question 11 Infrastructure</p>	<ul style="list-style-type: none"> • Regeneration will inevitably increase traffic levels, congestion and car parking difficulties. To help alleviate existing and on-going problems far more should be done to encourage cycling. Safe routes to schools, railway stations, town centres etc are set out in the Shepway Cycling Plan but there has been no progress in implementing any of these

	<ul style="list-style-type: none"> • There is scope in the district to increase rail use, reopen stations and encourage rail travel • Closer proximity of jobs and homes. The 1000 homes Nickolls Lake development is not near many jobs or a rail link or a motorway without a big negative impact on Hythe and Lympne • Bigger cheaper, wildlife friendly car parks for the commuters. • Port Lympne must attract at least 100,000 visitors a year - a major tourist attraction. Yet visitors have to drive up urine strewn Otterpool Lane. Litter thrown by lorries going to the Industrial Park. This is the type of business that should be next to a motorway junction. • Before any further new development takes place there should be a proper traffic audit and investigation into the existing problems of access to and from Hythe • Areas of Folkestone are rendered virtually inaccessible by a roads system designed when we had ferries • Rother District Council notes SDC's similar progress in relation to adoption of a CIL and asks that dialogue continue in relation to our respective Infrastructure Delivery Plans. Maximise the contribution of the greatest assets such as Westenhanger Station. Coordinate this with other transport modes and not just cars. • A bypass was proposed which would have alleviated this menace, however it was rejected by local councils , Shepway and adjacent councils should review this and pressurise government to resurrect it. • Enhanced connectivity between the strategic Seafront site, Folkestone Town Centre and the public transport network remains a key component of the Development Plan's regeneration strategy. • Improvements required to the A259. There needs to be a West Hythe relief road. Horn Street requires a new road. • With the very large Nikcolls development in Hythe, a major road infrastructure will be needed, to avoid daily grid-lock of Hythe. Perhaps the escarpment plans need re-visiting. • Acknowledgement is made of the role of HS1 but there is nothing in this plan relating to how the local transport infrastructure will be enhanced • High priority should be given to the delivery of fast broadband as this will help to attract businesses particularly software developers to the area. • Lack of road access into the large housing area that exists between the Marsh Academy school , down Station Road, Littlestone Road, along the coast road to the WEST and hence to Lydd. • There should be provision for a cemetery on the Marsh. Hawkinge is a prohibitive distance to travel for people
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	<p>without their own transport as public transport is poor</p> <ul style="list-style-type: none"> • More effort is needed to ensure the recent new development of retail and residential is integrated with the older established Hawkinge. Adequate infrastructure such as local services such as doctors surgeries need to be provided to deal with the large number of people living in the community to save them having to travel into Folkestone. • Agree with the Zones . However disagree with the % differentiation re the Parish & Town Council Neighbourhood Fund ,between those that have a Neighbourhood Plan and those that don't . • Shepway District Council should work with NHS commissioners to plan for healthcare facilities • New and improved wastewater infrastructure will be required to serve the development proposed in Shepway's adopted Core Strategy, or to meet stricter quality standards in the treatment of wastewater. • Lympe is poorly served for footpaths and this could be improved. • Welcome the references to Green Infrastructure in this section, although it is not strongly apparent in the remainder of the document as to how the strategy for GI from the Core Strategy is to be taken forward. • Sport England recommends that this section includes the need for indoor and outdoor sports facilities. Reference should also be made to a robust and up to date evidence base for playing pitches and indoor sports facilities. • Additional primary school infrastructure may have to be identified for Folkestone, Hythe and New Romney to accommodate forecast pupil demands.
<p>Question12 Local Green Space – national policy, proximity, size</p>	<ul style="list-style-type: none"> • The rules laid down in the NPPF are sufficient and there is no need for Shepway to add additional local rules/definitions. • Within the urban areas: Folkestone Hythe etc, our green spaces should be fully protected. If possible more green spaces should be created. Living in Seabrook, Princes Parade is the only significant green space and the whole area of Princes Parade should be fully preserved, managed and maintained as an open green space. • Smaller, less obviously significant, green 'oases' within the built environment can also be precious and of value to local residents and these should be protected too. • We would wish to see ancient woodland protected from development in this plan. Shepway exhibits below average access to woodland in both categories. • Most of the Airfield in Lympe should be designated Green Space to create a barrier between the village and the industrial estate.

	<ul style="list-style-type: none"> • Government policy on Local Green Space designation is only partially quoted in this section. Paragraph 76 of the NPPF should also be taken into account. It defines the appropriate scope for consideration of such designations. In terms of the Princes Parade area as a whole and the golf course specifically, this designation would be inappropriate as most current and potential future visitors are from a wider than local area, reflecting its wider functions and significance • The phrase 'close proximity' should not be defined as a precise definition may not cover all circumstances appertaining to green/open spaces Local Green Spaces should be within the settlement boundary or adjacent too. • A local factor that should apply, is the views of the North Downs, or in certain aspects the views over Romney March. Do not think a size should be stipulated. • Important to recognise the value of local green spaces as visual elements. • Not clear as to the appropriateness of this approach for local landscape designations. It is our clear preference for such areas to be designated as landscape designations in accordance with para. 113 of the NPPF. • it is important to ensure that the nature of the green space is considered. If it is simply an open area, then there is little or no need to consider thresholds • Important for wildlife - or have the potential to be, to bring people closer to nature. Close proximity 500m as the majority can easily walk this distance • Green and open spaces which include allotments, village greens, ponds and streams as well as recreation grounds, heritage sites, the sea fronts, the Leas, golf courses, footpaths etc benefit from good maintenance and attract many visitors • The consultation will presumably clarify the definition of green space and the designations.
<p>Question 13 Local Green Space assessment methodology</p>	<ul style="list-style-type: none"> • The proposed approach fails to address the consideration of: sustainability, complementary investment in homes and jobs, and capability of enduring beyond the end of the plan period. • Specific policy requirement that relevant green areas should be local in character and not be extensive. • How is a 'pleasant calm environment' measured? This matrix does not allow for the views of the community to be taken into account, the matrix should allow consideration of views and vistas • Need to ensure that at the consultation participants are not lead to think they are comparing between areas of green space. i.e. each site has to be marked on its own merits • Agree with the proposed methodology. although the 1-5

	<p>scoring needs some clarification</p> <ul style="list-style-type: none"> • Railway margins are significant green spaces for wildlife • Every site could have totally different values, so should be treated separately . It should take into consideration its economic value • The matrix appears to rely more on existing designations than seeking to really assess local importance to the community as intended • The value of the local green space - in terms of their role in wider networks of landscape and habitat - should be considered. • CPRE Kent does not agree with the approach proposed. The value of local green space is intrinsically a subjective one • Few sites will achieve the required score of 17 to be considered Local Green Space • No. A local green space, and its value to people is mostly to do with accessibility (proximity/access points/openness) and literally how green it is • In order to properly identify historic parks and gardens and other historic green spaces a programme of assessment and appraisal is needed • Protection should be given to all sites that meet the national criteria. Criteria should also be added to quantify the distance to the next nearest area of protected green space accessible to communities. Use of Natural England’s ANGST criteria could be used. • In relying on existing designations and policy designations (which may or may not be carried forward in the Local Plan), the listed sources of information do not adequately cover all the factors which make a green space of special significance.
<p>Question14 Local Green Space</p>	<ul style="list-style-type: none"> • add sites currently covered by LR12 school playing fields and also any sites put forward by members of the public even if not covered by the designations specified in paras 7.6 and 7.7 • additional open space policy to cover any sites that are currently protected under the saved policies but which may not qualify as Local Green Spaces as defined by the NPPF, should include the green buffers between communities and school playing fields • add areas where green space land is becoming a public and accessible area, such as land being freed from Military use and open areas of historical importance • The proposed method is not appropriate in terms of Government policy - specifically that relating to the identification process in paragraph 76 of the NPPF • We are not sure that the existing sources of information cited, or the policies mentioned (all of which should be

	<p>carried forward), cover all the criteria for a green area being 'special to the local community' or holding 'a particular local significance'.</p> <ul style="list-style-type: none"> • Concerned that under the current NPPF criteria scoring certain facilities and assets would not fall under the Local Green Space categorisation. • It should not be prescriptive and policy should respond positively to and give weight to local opinion. • Needs to be extended to sites which have already been allocated as wild life repositories by builders - which they provided in order to get planning permission for housing developments. • Council needs to have an open mind when considering potential designations and should not find itself in a position of having to reject a proposal simply because it may not comprise a category of green space included on a predetermined list. • Preference for such areas to be designated as landscape designations in accordance with para. 113 of the NPPF. • Kent Wildlife Trust strongly supports the inclusion of Local Wildlife Sites within the “Local Green Space” designation, provided that they are protected in a way that is consistent with the NPPF, in that “they should be capable of enduring beyond the end of the plan period”. • Encompass those non-designated parks and gardens included on the Kent Parks and Gardens survey(Kent Gardens Trust). • No, accessibility - distance from a set number of homes; proportion green with vegetation. Any large areas of Tarmac or buildings reduces the score; recreational value: the range of activities that people can do; current or potential value for wildlife. • The County Council suggests that ‘ Village Greens ’ and ‘ Common Land ’ should be added. • Yes – provided it protects New Romney’s existing green spaces
<p>Question 15 Heritage</p>	<ul style="list-style-type: none"> • The Roman Villa should be included as should the Tram Shelter on Princes Parade. Most importantly the setting of the Royal Military Canal and the historic vistas along the canal and from the canal towards the seafront should be protected by not allowing any development at all between the canal and the seafront from the Imperial Hotel to the end of the canal at Seabrook ie the land at Princes Parade and the Imperial Golf course should remain open space • Shepway is rich in heritage assets and this should be supported as high on the Council's priorities • It is important to preserve the setting of individual assets to ensure that the significance of 'place' is not lost. The re-use of heritage properties should be dealt with on a case-by-

	<p>case basis and include public consultation.</p> <ul style="list-style-type: none"> • The Leas Club in Folkestone, tram shelter on Prince's Parade, harbour bridge, signal box and station in Folkestone, Leas Lift and former officers' mess land at Hawkinge should all be protected. There should also be full protection of the Royal Military Canal, in its entirety, including Prince's Parade and the Hythe Imperial golf course. • Leas Lift in Folkestone, the Tram Shelter on Princes Parade and the Martello Towers should be included in the Heritage Strategy. • Shorncliffe Garrison is a site under threat of losing its heritage identity, the second largest military camp at one time, with a long history stretching back beyond Tudor times, • Opportunities to secure the enhancement and maintenance of heritage assets should not be prejudiced by unnecessarily restrictive policies • Greater local government support of community archaeological and historical projects in Shepway. We would also wish to see the potential impact of proposed developments on heritage assets made more visible through public consultation and on the Shepway DC website. • Should be a presumption in favour of the preservation of heritage assets but we support the sensitive alteration and adaption of built heritage assets only after full public consultation • Move away from the relentless emphasis on coastline and instead stress the liminality of Folkestone that is a landscape between Downland and Sea, an ancient place of movement and settlement. • The Heritage Strategy is needed before we proceed further with this plan. The Plan then needs to align with the Strategy. • St Eanswythe is a top attraction to the town but it isn't worthy of a mention in the overall document. • Hythe has the overall "package" of history which has been lost over the years by many other areas. This would also include musket sight-lines along the Royal Military Canal, cannon sight lines between the Martello Towers and the Medieval views from the hillside out to sea. Hythe benefits from tourism and will carry on doing so in the future with preservation of this valuable resource • Emphasise the need for the continued preservation and enhancement of: Tontine Street and its environs, The Old High Street and Creative Quarter, The Central Railway Station and its Environs. • The Plan should continue to support the Folkestone
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	<p>Townscape Heritage Initiative</p> <ul style="list-style-type: none"> • Former Crown Post Office in Bouverie could be residential or residential/commercial with the existing uses moved to smaller premises nearby . • Flexible policies for the viable re-use of heritage assets in order to secure their long term retention but those should be considered on a case by case basis. • Conservation areas are heritage assets and should be strictly maintained in accord with the objectives that were prescribed at the time of their designation . • The areas historic churches and military/war heritage – for example the Martello Towers, listening ears, pill boxes (concrete shelters for soldiers – littered along the coast and now falling into disrepair), Mulberry Harbour, war graves and Brenzett War Museum - should be highlighted as especially significant • Local heritage listing as recommended by English Heritage - Good Practice Guide for Local Heritage Listing • Support the re-use of heritage assets where this would allow retention, subject to an re-use being sensitive to the original use and scale • Short list of heritage themes would be: Roman, Medieval, Military, Maritime and Cinque Ports, Agriculture and associated drainage and land reclamation, Railway era (Victorian/Edwardian) including tramways. • We would wish to ensure that such a strategy also consider the relevance of the Kent Downs as an historic landscape. • While English Heritage welcomes the inclusion of this theme we suggest that more detail is included in relation to the nature of the historic environment, the positive role it plays in the district and the aims and objectives of the plan in relation to it. English Heritage will support the preparation of a heritage strategy for Shepway in any way appropriate to our role and purpose. The strategy should also inform the identification of areas where development might need to be limited in order to conserve heritage assets or would be inappropriate due to its impact upon the historic environment • The council should aim to use compulsory purchase powers more often to preserve listed buildings when they are abandoned by owners. • Each year a number of archaeological fieldwork projects take place in Shepway as part of the development control process. Each produces a small archive of archaeological materials that needs to be retained for future research. Normally this would be deposited in a local museum but Shepway currently lacks these facilities, • KCC has carried out studies of several of Kent’s districts to identify survivals from the 20th century’s military and civil
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	<p>defence heritage so that they can be conserved for the future and used for a range of community and educational purposes. Shepway has never had such a study and KCC would encourage SDC to support a survey</p> <ul style="list-style-type: none"> • Heritage assets are vulnerable to decline through crime and neglect. They can attract direct criminal action e.g. metal theft, illegal metal-detecting, or they can be the scene of anti-social activity due to their often remote or secluded nature • The Town Centre Conservation area needs to be expanded across the Folkestone area to give a presumption for an archaeological survey prior to any new developments. Watching brief during or excavations prior to any new developments. • Support the new museum, and what will likely be a need for expansion. • Support the idea of rebuilding the old barn beside the Coach and Horses pub in Lyminge as a museum for the recent nationally important finds on the village green. • Support the idea of a 'history park' across East Cliff – Iron Age / Roman Villas Martello Towers 1 – 3, former cold war bunker, Copt beach point (port area) and WW1 / 2 history of East Cliff. Also the associated Roman / Saxon sites at Warren Road etc. • Archaeology is also likely off shore along our coastlines. The proposed marine sites below East Cliff especially should have a presumption in favour of careful excavation to ascertain ancient usages. • Just because the buildings are not actually listed does not mean that they are without architectural merit and developers should be encouraged to work with them wherever possible
<p>Question 16 General development management policy options</p>	<ul style="list-style-type: none"> • Locally distinct design criteria, particular concerns about recent decisions in Hythe. • Developer concern about policies being onerous e.g. require flood mitigation downstream (residents support this) Policies should go further to require new drainage systems to reduce the risk of flooding elsewhere where appropriate, develop a SUDS strategy. • Relevant surveys are performed at the time of making the planning application to ensure that those deciding the application have as much information as possible to make their decision and also to ensure that the necessary work can be achieved - before permission is granted other when principle of development secured. • Design for rubbish disposal needs to be given higher priority in new developments. The multiplicity of recycling types , together with declining standards of littering mean

	<p>that more space and thought on standards and remedies need to be given to this subject.</p> <ul style="list-style-type: none"> • There may be situations where it is appropriate to retain local distinctiveness and times where radical news designs are equally appropriate. • Council will need to prepare an up-to-date local plan viability assessment if it wishes to introduce this as a policy. (GD2 B). • GD5 Incorporating public art in new development is no longer appropriate given the commentary in the PPG on planning obligations (paragraph 4) • All policies and text should reflect the presumption in favour of sustainable development set out in the NPPF. The policies must be drafted in a positive light.
<p>Question 17 Housing policy options</p>	<ul style="list-style-type: none"> • Lack of truly affordable housing for local people so wrong to set a target that half of all new homes should be 3 bedroom or larger - far better to look at the situation on a site by site basis. • For the elderly and other vulnerable residents I think it is important to have a mix of accommodation options to give a true choice. Shepway already seems well provisioned with residential homes so it would be good if the policy covered other options especially community living. • Although converting existing buildings to flats may cause some problems (eg parking) , this is good way to create more housing while maintaining the character of the area. • Work with care providers and support services so people can stay in their homes as long as possible. • The policy approach should be to support the redevelopment of previously developed land with the appropriate density and design being informed by the site location, characteristics and context. • Developer concern at certain options being too onerous. • Stelling Minnis Parish Council has considered the consultation and would wish to see some relaxation of house building policy in areas of outstanding natural beauty to allow a limited number of small low cost housing. • H1 A - we should be encouraging families to live here, not retirement flats. Developers prefer flats/smaller households because they reap higher profits per hectare. However we should be looking at the longer term consequences for the economy of encouraging households with greater spending powers to settle in the area. • A 2% level for self-build provision is next to meaningless except on major development sites. Design of any self-build property is an integral part of any self-builders motivation. To limit this by additional design frameworks is unnecessary and unhelpful. Not all self-builders are eco-warriors.

	<ul style="list-style-type: none"> • Objections to development on Princes Parade. • The Council proposes a policy whereby ‘at least half’ of all new homes will have 3 bedrooms or more. This is very prescriptive. The Council will need to justify this policy. It would need to prepare a new SHMA to demonstrate that this degree of prescription is justified. The proposal is also likely to have a significant influence on the viability of the local plan and the ability to secure affordable housing in line with the Government’s recent change of policy in relation to securing affordable housing obligations from schemes of 10 units or less. The Council should consider this in preparing its viability assessment to support this local plan. • The Council is considering a policy for Lifetime Homes. The Council will need to reflect the implications of this in the local plan viability assessment that it will need to produce to support this local plan. • The approach should be to set a district-wide policy on the mix of dwelling sizes, reflecting the needs identified – though we accept that the SHMA may suggest that the mix may vary for place to place so perhaps consideration should be given to variations in the mix for each of the three district character areas as defined in the Core Strategy. Sites, either individually or collectively, should therefore be planned on the basis of the mix defined either for the district or the character area in which it sits. • Folkestone and Sandgate suffer from disproportionate conversion of large character dwellings into cheap flats. The landlords show minimal regard to maintenance and some of our best buildings are crumbling as a result. We would like to see conditions set which ensure greater responsibility and accountability expected of landlords and quotas set for different areas. • H4-best approach to meeting the needs of gypsies and travellers is to identify sites, it will be prudent to include a general policy against which applications can be considered. Of the two options presented, we would favour Option B. • H4 - A is preferable as B will lead to urban sprawl and there is more opportunity to monitor and police anti-social behaviour. Also travellers etc should have access to services. Isolated camps will lead to increased isolation and resentment.
<p>Question 18 Economy policy options</p>	<ul style="list-style-type: none"> • There needs to be an audit of skills that people have and skills needed. Work with partners such as Kent County Council, skills providers and neighbouring authorities to promote and deliver improved education facilities and increased education opportunities. • Tourism plays an important part in the economy of Hythe. There should be policies which support and protect tourist

	<p>facilities and assets. A policy to protect the character of the Hythe seafront as a major tourist asset is required.</p> <ul style="list-style-type: none"> • Need to retain employment sites for long-term benefit to community i.e. jobs rather than short-term benefit to a select group of housing developers. • Should be more interspersal of residential uses in the town centre and that this would help keep it viable , providing there was enough parking for both residents and shops and no long dead frontages. • There should be a presumption against the provision and expansion of static caravan and chalet sites as the density of these sites is already high on Romney Marsh .They are unsightly and degrade the character of an area .If the balance is too much in their favour it adversely affects the development of other forms of tourism which rely on having a favourable visual environment . Existing caravan parks should be permitted to upgrade their services and build structures. • Agriculture is a major contributor to the economy of Romney Marsh and the North Downs yet there is no policy protecting high quality agricultural land from development . • Apart from hotels and caravans there are no policy options to support or protect tourism facilities or assets. Tourism is an important part of the local economy and there is support for further enhancement to encourage more visitors to the town. This could include recognition of, and integration within development proposals, of the need to support tourism. • Economic development may be proposed outside existing allocated areas, we do not think this should be encouraged, and therefore wish to ensure that the Plan (i.e. Policies E4, E5) steers such development toward existing developed areas and that it reflects AONB principles, including for those areas in its setting. • Folkestone and Shepway lack a strong Higher Education presence and a campus life, and this needs to be mentioned in the Plan. • Policy E3, Business and Climate Change – This policy should be deleted. In areas such as Shepway where there are viability issues with economic development, it is unhelpful to potentially burden developers with unnecessary and unhelpful regulations. • Policy E3 supported by others e.g. favour Option A. In particular the policy should seek to ensure that new economic development incorporates proposals for renewable energy, for example by way of roof top solar panels. • The Council should recognise the value of LAA to tourism in Shepway, and the economic value of tourism generally.
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	<p>There should be a policy that confirms that proposals for tourism related facilities and development which encourages tourism will be supported. The Plan must support economic development and recognise that a balance must be reached between the economic needs of the District and environmental considerations. Unless the adverse impacts would significantly and demonstrably outweigh the benefits, policies should support economic development. The proposals for the expansion of LAA confirm that economic development is acceptable in sensitive locations.</p> <ul style="list-style-type: none"> • The NPPF attaches significant weight to supporting economic growth through the planning system, noting that investment should not be overburdened by the combined requirements of planning policy expectations and that centres should be resilient to anticipated future economic changes.
<p>Question19 Community policy options</p>	<ul style="list-style-type: none"> • C7:Local Green Space should be afforded the same level of protection as Green Belt. • C1: Supports the inclusion of a policy to protect existing community facilities, as well as to encourage the provision of new ones, however, it is not clear what is meant by 'community facility', nor does the proposed wording fully reflect Item 70 of the NPPF. • Welcome the intentions within Policy C4 to develop policy on recreation development. Increased populations in and around the AONB will present challenges, the management of which can be assisted with appropriate planning policies. • C8 : CPRE Kent agrees that a policy on Public Rights of Way (PROW) should be included in the plan. • C9 The reasons for objections to any building on Princes Parade are: Loss of open space that is valuable to the community. Loss of the open landscape character of the seafront. Loss of landscape setting of the Royal Military Canal that is unique to Hythe Instability of the land that was previously a rubbish tip. Contamination of the land as a consequence of it being used as a rubbish tip. Any buildings will dominate the landscape and intrude on the open nature of the site. Creation of a precedent for other major development applications – such as Hotel Imperial golf course for residential. There is an existing site for the proposed school already in the ownership of KCC and with planning consent. There is an allocated site with planning consent at Nicholls Quarry that is free to SDC for a leisure centre/swimming pool. • Support the proposals for a new pool and school on Princes Parade. The current pool serves public from Folkestone

	<p>right down to Lydd, therefore is too small and in a very poor condition.</p> <ul style="list-style-type: none"> • Sport England advocates that new developments should contribute to the sporting and recreational needs of the locality made necessary by their development. Sport England is not aware of a robust evidence base for indoor sports facilities for Shepway. It is not clear how this lack of evidence base has been/will be taken into account to develop this document.
<p>Question 20 Transport policy options</p>	<ul style="list-style-type: none"> • T7: strategic lorry park would cause far too much environmental damage/loss of countryside/loss of agricultural land and is only a knee jerk reaction to the occasional (although not insignificant) problems caused by Operation Stack). • Policy T7: strongly support as there is a clearly an urgent need to examine and deliver solutions to the problems that Dover and the rest of East Kent frequently endures. • Get more freight transported on trains • The logic of attempting to develop a busy commercial airport in a rural area with no rail links and very poor road links and which is 3 miles from a nuclear power station still eludes me. • T6. It's impossible to enlarge the commercial airport at Lydd without doing significant damage to 'the internationally important wildlife communities in the Lydd/Dungeness area. • The Shepway Cycling Plan. This was adopted by SDC and Kent Highway Services in 2011 since when nothing has been done to develop any part of it • Reduce parking standards, look into car-free developments where possible, extend pedestrian-friendly areas, with shared surfaces. • Overnight lorry parking is not the same problem as Operation Stack. • Cable car proposal stretching from Folkestone Central Station to the Harbour would be viable and practical as a tourist attraction. • T1 produce new Shepway adopted parking standards based on local circumstances which should include providing parking wherever possible in new developments. • T3 : CPRE Kent considers that the policy should include all three options. We consider that all developments of over 10 dwellings or over 1000sq metres gross of commercial floor space should incorporate facilities for charging plug in vehicles and encourage use of ultra-low emission vehicle. • T6 : favour the continuation of Policy TR15. There is no basis for a new policy because nothing has changed apart from the airport being able to operate larger aircraft when the runway is extended. The airport itself has said in the past the airport land would only be for aviation activity.

	<ul style="list-style-type: none"> • T6 in considering options regarding Lydd airport, we request that full consideration be given to the position in respect of Manston Airport, given the current discussions regarding its future operation. • T2 New development should cater for its own parking demand through on-plot provision, which in the case of residential development can be a combination of on-plot provision for the occupiers and kerbside parking for visitors. • T7 KCC does not consider that either development management policy meets the tests of soundness as prescribed in the NPPF. By stating that prospective lorry parking proposals will only be approved if <u>no</u> impact on environmental designations and local communities can be demonstrated, the policy options cannot reasonably be considered to meet the ‘positively prepared’ test. • Policy T6, LAA – Approach B. The planning consent for LAA and the willingness of its owners to invest in Shepway should be fully supported and encouraged. The Council should work with LAA to draft a suitable policy which encourages the Airport’s continued expansion over the plan period and provides a clear presumption in favour of development there. Unless it can be demonstrated that development will damage the integrity of nationally and internationally designated sites as a whole, it should be supported.
<p>Question 21 Natural Environment policy options</p>	<ul style="list-style-type: none"> • Support the commissioning of a landscape appraisal that looks at areas in addition to those already identified as AONBs. • NE2 - prefer the second choice with GI corridors. Wildlife needs to link up through the urban area. I cannot see how offsetting can work in Shepway where existing shingle habitats have taken hundreds of years to develop with plants, invertebrates etc. • NE7 Set out criteria based policy to protect sites in international nature conservation importance,. This should take into account the zone of influence around the sites. • NE1 We would support a policy that seeks to ensure greater accessibility for pedestrians and cyclists both within the urban areas between open spaces and also from the urban areas into the countryside. • NE4 : CPRE Kent considers that to ensure the protection of important habitats and biodiversity generally a comprehensive policy approach is needed that embraces all levels of nature conservation importance. To this end all three options should be pursued. • The need to retain tranquillity should be specifically recognised as an issue in the plan. • The importance of ‘dark skies’ should be acknowledged in the plan and we would urge the Council to work towards

	<p>developing a dark skies policy along similar lines to that adopted by Ashford Borough Council.</p> <ul style="list-style-type: none"> • Whilst our preference is for a stand-alone AONB policy, it will be for the Council to consider how these matters are best addressed within the format adopted for the plan. E.g. 1. Weight given to AONB in decision making in terms of national planning policy and its original primary purpose: Policies should ensure that AONBs have the highest status of protection in relation to landscape and scenic beauty. It should set out the exceptional circumstances where major development would be permitted. • Policies NE6-7 consider recreational disturbance on European Habitats. Whilst issues affecting Dungeness will no doubt be important, Policy NE6 currently indicates this as the only area of concern. We consider that regard will also need to be given to those other European designated habitats within the AONB, including the Folkestone to Etchinghill SAC. • Policy NE2 suggests two policy approaches to biodiversity offsetting. Kent Wildlife Trust would suggest that these two approaches are not mutually exclusive and can be used in combination to achieve net gain for biodiversity, in accordance with national policy in the NPPF. However, the Trust would emphasise the importance of using biodiversity offsetting as an approach to compensation for biodiversity loss as a last resort. We would suggest that this would need to be preceded by an evaluation of current and potential sites, their condition, current management and opportunities for enhancement- possibly through a Green Infrastructure Plan or Local Green Space study. • A policy should include reference to protection for groundwater. • Comments from developers indicate they would prefer the Council to rely on the provisions in the NPPF. Comments from the public indicate that they want policies to protect their environment.
<p>Question 22 Coast policy options</p>	<ul style="list-style-type: none"> • Maintaining policies for protecting the undeveloped Folkestone and Dover Heritage Coast • Develop Heritage Coast, work with White Cliffs in designating a World Heritage Site in the Channel • We support the acknowledgement that development can be permitted where it can be demonstrated that there will be no increased risk to life, nor any significant increased risk to property. The areas within which such a policy will apply will be determined through the forthcoming Review of the Strategic Flood Risk Assessment and the identification of locations of possible Coastal Change Management Areas • Rother DC would wish to be engaged with SDC and the Environment Agency in relation to any proposals affecting

	<p>the coastal zone east of Jury's Gap and covering the Lydd Ranges in the context of the Shoreline Management Plan.</p> <ul style="list-style-type: none"> • Policy CP1 considers options that either seeks to integrate the aims and objectives of shoreline management plans and marine plans with the Local Plan or looks to establish Coastal Change Management Areas (CCMA). We are a little unclear as to the relationship between this approach and Policy CP2
<p>Question 23 Climate Change policy options</p>	<ul style="list-style-type: none"> • Text currently neglects to provide any commentary regarding the need for standalone renewable energy generating equipment such as wind farms and solar farms. • CC2 We are concerned that the more supportive policy set out in the current Saved Policy U14 of the 2006 District Local Plan for the Romney Marsh/Dungeness area would not be continued in the options set out above. • Include reference to local neighbourhood plans in policy CC2, CC4 • There is a general attitude of negativity in the proposals regarding wind farms and solar panels. • Much of Romney Marsh and our coastal areas are likely to be very vulnerable to rises in sea levels and extreme weather yet there is still no will to make the changes to our energy production and consumption that are needed. • The erection of further wind turbines in any setting whether rural, urban or residential should not be pursued. • Stricter requirements e.g. No Wind Turbines or Solar Farms will be permitted on the best and most versatile agricultural land – specifically agricultural land classified as Grade 1, 2 and 3a • All policies in this section should support the maximum provision of renewable energy sources across all communities, option A in CC1-4. Community energy schemes should specifically be mentioned with a presumption in favour of their approval. Use of electric vehicles should be encouraged therefore the provision of charging points should be a requirement . • The Council proposes the provision of a suite of energy efficiency, water efficiency and sustainable design measures in new housing. It then goes on to suggest what this might entail. This would not be in accordance with the Government's <i>Housing Standards Review</i> report, September 2014, or its <i>Next Steps to Zero Carbon Homes - Allowable Solutions</i> , July 2014. The Council cannot prescribe how developers meet the energy efficiency targets of Part L of the Building Regulations. The Council should not develop policies in this area. • CC9 Efficient and sustainable water use : The Council should have regard to the Government's <i>Housing Standards Review</i> in respect to introducing the optional

	<p>standard for water (105 litres per person per day). It may do so as long as it satisfies the relevant tests. The Council will need to prepare an up-to-date local plan viability assessment if it wishes to introduce this as a policy.</p> <ul style="list-style-type: none"> • CC9: Agree with option B. The water stress status of this area means the policy should include water efficiency standards as least as good as that already required for the strategic developments • Rely on building regulations for water use • A policy to support solar panels on residential and non residential buildings as a valuable tool in reducing the use of non renewable energy, which recognises that the design should reduce any adverse impact in views or on heritage assets, in sensitive areas such as conservation areas • CPRE Kent considers that in accordance with Option B the Council should carry out a study to identify those parts of the district that could be suitable for wind turbine development. This will narrow the area of search for potential applicants and avoid speculative applications in unacceptable locations. With regard to proposals in the AONB we consider that there should be a presumption against the development of any wind turbines unless it can be clearly demonstrated that they would not undermine scenic beauty and the purpose of the AONB. • Developers of medium and large scale renewable energy schemes should be required to explicitly set out the impact of their proposals on the special qualities of the AONB and how these would impact on the AONB • Council should include a new policy that requires non residential developments to achieve BREEAM “Excellent” for water consumption.
<p>Question 24 Health and Wellbeing policy options</p>	<ul style="list-style-type: none"> • Would be good if the existing saved policy LR11 could be carried forward and strengthened so that as well as protecting existing allotments, new provision (with a water supply and composting facilities) should be made on or near all major developments • Of respondents who commented on HW1 only one rejected any form of control on takeaway outlets. We consider that limiting the number and location of hot food takeaways would be unsound. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people's dietary choices. No direct link should be made between "access to healthier food" and hot food takeaways. • Royal Victoria Hospital - Folkestone would benefit from improved medical facilities, ideally through the provision of a cottage hospital. This might be achieved through the development of the site for mixed use with some of the returns being put back into on site healthcare.

	<ul style="list-style-type: none"> • Primary and secondary health care in Shepway is already overstretched so new or expanded communities need new provision. This will require work with the local Clinical Commissioning group. • Need to protect grade 1, 2 and 3a agricultural land should be a standalone policy as it is key to food security in the UK and a key contributor to the local economy. • Ensure that recreational and leisure space is maintained to give people access to opportunities to increase their levels of physical activity, whilst also creating spaces where people can meet, and reduce their social isolation. • We should not be building new houses close to next to motorways or “A” roads
<p>Question 25 Historic Environment policy options</p>	<ul style="list-style-type: none"> • Welcome heritage strategy, investment in historical environment can bring economic benefits. Hope the definition of heritage environment goes beyond narrow concept of ‘material culture’ • The built environment should reflect the times we live in except perhaps conservation areas. Lets preserve the quality old, but by using and enjoying it. • The design of new development in Conservation Areas should always take account of CA Appraisals, be well designed, draw inspiration from local patterns • Whilst recognizing the need for change and adaptation of built heritage assets we believe that the emphasis should be on the preservation of the character and setting of these assets. We have reservations about the concept of areas of archaeological potential because these may inadvertently exclude areas of unknown local archaeological importance. We believe that all built and buried heritage assets are of potential importance and interest. • Keep all the current HE policies in the Local Plan, and include a policy to restrict development and heights of buildings in specific areas (especially Hythe’s seafront) as buildings which obstruct or impact on the vista from the sea to the hinterland of Hythe will destroy this historic environment. • Promote good design. Good design responds to locality and context. This might produce 'Contemporary' designs or 'vernacular' designs. Either can be innovative. • There is no reason if handled sensitively that new build cannot sit alongside older buildings and structures, as long as conservation and protection are implemented and adhered to. The Shorncliffe Garrison site should be a flagship site for this policy. • The historic environment is not solely composed of the built development; it can also include open space and landscape elements, and roads, gathering spaces and the character and appearance of the street scene as seen in long and

	<p>short views. Infill development which obstruct views or create an overbearing intrusion into spaces can have very significant harmful effects.</p> <ul style="list-style-type: none"> English Heritage sees the historic environment and the present-day environment as a continuum, with the latter drawing inspiration from the former. An appropriate approach to conserving and enhancing the historic environment would embrace both appropriate repair, restoration and reinstatement of character and appearance and the promotion of good new design where suitable. We suggest therefore that Policy HE1 embraces both option A and option B, and that option C recognises the possibility of accommodating good quality modern design also.
Additional Comments	<ul style="list-style-type: none"> Whereas “heritage” and to a degree “culture” have specific policies, focus on sport (both physical assets and the district mentality) needs to form a greater part of this wider process. The local highway authority advises that it would welcome involvement in the progression of Neighbourhood Plans. Policy LR9 - in terms of ‘loss of Open Space’ - should not be rolled forward into the New Local Plan. Sandgate is not named on the document maps; it is not recognized as a town or village; its commercial hub bears no mention. Heritage Conservation. The discussion of the landscape of Shepway seems to regard the landscape as a natural or semi-natural space and makes no mention of its historic aspect. As explained in the Kent County Council (KCC) response to Question 15 2), the historic aspect of the landscape needs to be understood so that it can be conserved and enhanced where appropriate.

**Appendix 3 – Summary of Representations received to the Places
and Policies Local Plan – Preferred Options Consultation and
Council Responses**

INTRODUCTION

1. Introduction (Chapter 3)

Summary of consultation comments

- 1.1 The Introduction to the PPLP sets out the general context provided by the Core Strategy and outlines national planning policy and the requirements of the plan-making process.
- 1.2 A total of 31 comments have been received to this chapter and the policy index. Comments generally raise points about the level of growth in the plan or the planning process in general.
- 1.3 Two comments raise presentational points about the indexing of the plan and legibility of maps. One comment queries the relationship between the quantities of development set out in the Core Strategy and the PPLP.
- 1.4 11 comments raise concerns about the level of development set out in the plan, citing impacts on infrastructure, traffic, services, water supply, agricultural land and landscape. One comments states that Romney Marsh is allocated too much development. One comment states that there is not enough development allowed for in the plan and that more should be allocated.
- 1.5 The Introduction states that the Council will engage with local communities in the preparation of Neighbourhood Plans for their areas and five comments support this commitment. One comment expresses disappointment that the PPLP has not been shaped more by Neighbourhood Plans. One comment states that the Council needs to undertake further work to identify Local Green Spaces.
- 1.6 Four comments have been submitted by Historic England; these seek references in the Introduction to the Heritage Strategy that the Council is preparing and state that the Council is required to *enhance* as well as maintain the district's built heritage.
- 1.7 Kent County Council (KCC) expresses support for joint working with the Council. Rother District Council supports the approach Shepway District Council has taken to working with other authorities. Southern Water has submitted a neutral comment; more detailed responses are given in relation to specific sites. National Grid has submitted a response stating that it has no comments to make.

PART ONE - PLACES

2. Introduction (Chapter 4)

Summary of consultation comments

- 2.1 This chapter introduces the chapters that follow which set out site allocations for the three character areas of the district. Tables set out quantities of development and the hierarchy of settlements.
- 2.2 19 comments have been submitted to this chapter. Comments raise general points, some of which repeat those given for the general Introduction (see above).
- 2.3 One comment supports the general level of development in the plan. Two comments state that more development is needed. One comment states that there is too much development and that more housing will only attract people who will commute out of the district to work elsewhere. One comment states that the relationship between the level of development set out in the Core Strategy and the PPLP is unclear. Highways England states that more evidence is needed on the impacts of development on the highways network.
- 2.4 Regarding the settlement hierarchy, two comments state that there is too much development allocated to Hythe, given its historic character and the capacity of its infrastructure. One comment states that too much development is allocated to Romney Marsh. One comment supports the identification of Etchinghill as a secondary village in the hierarchy.
- 2.5 Two comments state that the historic character of Folkestone needs to be acknowledged in the plan. One comment states that there is insufficient recognition of the role of tourism to the district.
- 2.6 Two comments state that developers too often provide insufficient affordable housing, using viability as a reason to avoid provision. One comment states that a greater proportion of self-build housing needs to be provided in the policies.
- 2.7 One comment makes a general point about the submission of habitat surveys. Southern Water has submitted a general comment about the planning process and infrastructure provision (additional comments have been provided to site allocations where Southern Water highlights specific requirements).
- 2.8 KCC states that many of the infrastructure projects identified in the Core Strategy have now been implemented and that a new policy is needed to ensure that infrastructure is secured and delivered. The County Council requests that where education provision is not provided through Section 106 agreements, schemes are identified on the Community Infrastructure Levy (CIL) Regulation 123 list. The response also states that more capacity will be required for waste management and highlights the importance of KCC's Minerals and Waste Local Plan.

3. Urban Character Area (Chapter 5)

Summary of consultation comments

- 3.1 This chapter allocates sites for development in Folkestone and Hythe and also contains policies for town centres, specifying what uses will be allowed within the town centre boundaries. 907 comments have been submitted to this chapter.

Folkestone

- 3.2 17 comments have been made to the introductory text for the Folkestone section of the Urban Character Area, raising a number of points:
- It is not clear how much of the development required by the Core Strategy has already been delivered and how much still needs to be planned for;
 - Hythe should not be included in this area as it is physically separate from Folkestone and unsuitable for significant development;
 - The water, road, health and education infrastructure cannot cope with more development;
 - Princes Parade provides an open vista between Hythe and Folkestone and should not be developed;
 - A new swimming pool is desperately needed in Hythe;
 - The HS1 rail service should serve Sandling or Westenhanger to enable residents of Hythe to use it;
 - Hythe Neighbourhood Plan Group states that the older demographic profile of Hythe means that parking provision is more important for the town; and
 - KCC refers to its historic town surveys for Elham, Folkestone, Hythe, Lydd and New Romney.

Policy UA1: Folkestone Town Centre

- 3.3 Policy UA1 seeks to manage development to protect the vitality of Folkestone town centre. The policy contains criteria governing development in Primary and Secondary Shopping Frontages and proposals for larger retail developments. 29 comments have been made to the policy and supporting text.
- 3.4 14 comments have been made to the supporting text raising a number of points:
- Folkestone cannot aim to compete with Ashford and Canterbury for comparison goods;
 - Folkestone should be developed as a sub-regional office centre;
 - Guildhall Street should be reopened to traffic;
 - Connections between the town, seafront and station need to be reappraised urgently;
 - Dilapidated shops should be restored using the Council's enforcement powers;
 - The evening economy needs to be encouraged;
 - Folkestone Town Council states that a more integrated approach is needed to Guildhall Street;

- Ellandi LLP states that the shopping frontages have not been defined in line with national planning policy;
 - KCC states that the area is rich in heritage assets; and
 - Other amendments to the supporting text are suggested.
- 3.5 Two comments to the policy state that:
- Environmental improvements and a more mainstream retail offer are needed to revitalise the town centre; and
 - The policy should allow for the fast-changing nature of the retail sector, particularly the impact of online shopping.
- 3.6 Ellandi LLP generally supports the policy, but proposes a number of changes and clarifications.
- 3.7 Folkestone Town Council questions whether the designation of the entire town centre under the policy, in addition to Folkestone Harbour and sites at Park Farm, is viable, and that the town's heritage should be emphasised. Shepway HEART Forum refers to proposals for redevelopment of the bus station. Go Folkestone Action Group wishes to see space above shops refurbished for residential use and states that the policy should give more recognition to the historic character of Folkestone; the Group also highlights problems of vacancies in Guildhall Street.
- 3.8 Stagecoach in East Kent highlights that a suitable alternative site is needed if the bus station is to be redeveloped.
- 3.9 KCC supports the policy but considers that it should include mention of the historic character of the town centre. Historic England states that an up-to-date character appraisal and management plan for the Conservation Area should be used to guide development proposals. Shepway District Council Strategic Projects states that the policy should be revised to reflect the positive contribution that residential uses can make to the town centre.

Policy UA2: Cheriton Local Centre

- 3.10 Policy UA2 seeks to manage development to protect the vitality of Cheriton Local Centre. Two comments have been made to this policy.
- 3.11 Comments state that the proliferation of betting shops should be restricted and that there are no longer any banks in Cheriton.

Policy UA3: Sandgate Local Centre

- 3.12 Policy UA3 seeks to manage development to protect the vitality of Sandgate Local Centre. Two comments have been made to this policy.
- 3.13 Sandgate Parish Council supports the policy. The Sandgate Society stresses the importance of retaining a commercial hub in the centre of the village.

Policy UA4: Silver Spring Site, Park Farm

- 3.14 Policy UA4 allocates the site for mixed-use development incorporating business (B1), leisure (D), retail (A1) and hotel (C1) uses. Criteria require a comprehensive approach to development, suitable access to the highway network, transport improvements, mitigation of contamination, an assessment of impacts on the vitality of Folkestone town centre and an investigation of archaeological potential. 16 comments have been made to this policy.
- 3.15 Five comments state that:
- The proposed uses would be suitable;
 - Traffic is at unacceptable levels and a clear policy for the site is needed;
 - The requirement for cycling and walking infrastructure is supported;
 - Walking between the existing units should be made easier; and
 - The policy would encourage out-of-town retail development to the detriment of the town centre.
- 3.16 Stagecoach in East Kent states that it would expect contributions towards extending bus services later in the day (as was provided by the B&Q development). The Kent Downs AONB Unit states that the design should respond to the site's location within the setting of the Area of Outstanding Natural Beauty (AONB).
- 3.17 AECOM, acting on behalf of Ravensbourne, welcomes the policy but objects to: requirements for a comprehensive approach to site development, stating it would unnecessarily restrict development; and access, stating this is unclear. AECOM also: proposes changes to supporting text, including the description of the site; emphasises the need to make best use of previously developed land; states that Park Farm is not suitable for quality office development; supports the need for cross-site access; and strongly objects to restrictions on residential development on the site.
- 3.18 Ellandi LLP objects to the policy, stating that there is no justification for additional retail and leisure uses at Park Farm and this will damage the health of the town centre. The Trustees of Viscount Folkestone object to the inclusion of hotel development in the policy.
- 3.19 KCC suggests that the policy refers to the Shepway Cycle Strategy and contributes to the completion of the Park Farm Road and Kingsmead cycle paths.

Policy UA5: Former Harbour Railway Line

- 3.20 Policy UA5 protects the line of the former railway for a cycling and pedestrian route. Nine comments have been made to this policy.
- 3.21 Three comments state that:

- Further work should be undertaken to explore connectivity to other areas of the town;
 - The Remembrance Line's Tramway system could run alongside the pedestrian and cycle route; and
 - The route should be used for vehicular traffic.
- 3.22 Four comments support the policy.
- 3.23 Shepway HEART Forum states that options should be explored to provide a low carbon transportation system on existing rail infrastructure.
- 3.24 KCC supports the policy and states that the Tram Road Link Walkway and Cycleway is an identified scheme in the Local Transport Plan.

Policy UA6: East Station Goods Yard, Folkestone

- 3.25 Policy UA6 allocates the site for 40 dwellings and 1,000sqm commercial floorspace (B1/B8). Criteria cover: the provision of commercial floorspace; the comprehensive development of the site; access; contamination; archaeological potential; noise and vibration from the railway; and contributions towards play facilities on Folly Road. (Planning permission 14/0928/SH was granted on this site for a mixed use development of 41 dwellings and 1,000sqm of commercial space.) 15 comments have been made to this policy.
- 3.26 12 comments state that:
- East Folkestone Railway Station should be reinstated;
 - The site should be used for a park-and-ride tramway; reference is made to the Remembrance Line Association's proposals;
 - Pedestrian and highway safety is a key concern and improvements are needed; and
 - The accompanying plan is difficult to read.
- 3.27 Shepway Green Party states that instead of allocating the site for development, the Council should lobby for the reopening of Folkestone East station.
- 3.28 KCC suggests amendments to wording relating to archaeological potential. Southern Water states that masterplanning should take account of the nearby Folkestone Junction Wastewater Pumping Station and that access to underground sewerage infrastructure is required for maintenance purposes.

Policy UA7: Rotunda and Marine Parade Car Parks, Lower Sandgate Road

- 3.29 Policy UA7 allocates the sites for a total of 165 dwellings: 100 dwellings at The Rotunda Car Park and 65 at the Marine Car and Coach Park. Criteria cover: improvements to cliff paths; access; the character and setting of heritage assets; archaeological potential; flood risk; contamination;

contributions to improved connectivity; and open space. 20 comments have been made to this policy.

3.30 10 comments state that:

- The car parks are poor quality;
- Public car parking should be retained, particularly given loss of the Harbour Arm car park;
- Cycling should be encouraged and good signage provided;
- There is no point in promoting cycling access between town and harbour as it will not be used;
- The Remembrance Line Tramway system could be extended from a terminus at the Leas Lift to the Coastal Park;
- Lower Leas Park is a top attraction and parking needs to be provided to ensure that visitors can access the park;
- Redevelopment of Folkestone Harbour should not be delayed any longer; and
- The policy would lead to piecemeal development; the sites should be considered alongside the wider harbour development.

3.31 The Trustees of Viscount Folkestone support the policy but state that the requirement for specific linkages to be improved is too prescriptive.

3.32 Shepway HEART Forum states that the sites should be developed for a landmark tourist attraction. Southern Water requires access to sewerage infrastructure for maintenance. Natural England states that the sites may contain deciduous woodland priority habitat.

3.33 KCC suggests amendments to wording relating to archaeological potential. Historic England states that direct reference should be made to the Grade II* Leas Lift and the role it could play in connecting the seafront and town centre.

Policy UA8: The Royal Victoria Hospital, Radnor Park Avenue

3.34 Policy UA8 allocates the site for 42 dwellings: 16 through conversion of the existing Victorian building and 26 through new build. Criteria cover: the conversion and new build elements; parking; traffic management; archaeological potential; contributions to play and open space at Radnor Park; and contamination. 10 comments have been made to this policy.

3.35 Six comments state that:

- The Victorian building should be retained;
- Medical facilities should be developed to replace those lost at St Saviour's Hospital in Hythe;
- The site should be used for offices and small business start-up units;
- Parking should be provided for the Minor Injuries Unit; and
- The cycleway to the rear of the site should be retained to allow access to Radnor Park.

3.36 Shepway HEART Forum states that options should be explored for a private health company to operate services from the site. Go Folkestone Action Group considers that the loss of the entire site for housing is shortsighted and that some allowance should be made for the provision of medical facilities and social care.

3.37 KCC seeks amendments to wording relating to archaeological potential. Southern Water requires access to underground sewerage infrastructure for maintenance.

Policy UA9: 3-5 Shorncliffe Road, Folkestone

3.38 Policy UA9 allocates the site for 20 apartments. Criteria cover design, impacts on the Conservation Area and archaeological potential. Two comments have been submitted to this policy.

3.39 Folkestone Town Council highlights the need for drainage and infrastructure improvements. KCC suggests amendments to wording related to archaeology.

Policy UA10: Ingles Manor, Castle Hill Avenue

3.40 Policy UA10 allocates the site for 46 dwellings and commercial floorspace (B1). Criteria cover: impacts on the Conservation Area and heritage assets; the provision of 1,400sqm commercial space; retention of the existing barns; and archaeological potential. 12 comments have been made to this policy.

3.41 Two comments object to the loss of open space and protected trees.

3.42 Folkestone Town Council states that the loss of the garden centre and café is unfortunate, but that the garden cottage and barns should be preserved, as should the protected trees. The Town Council also highlights the need for infrastructure and drainage improvements. Shepway HEART Forum wishes to see a replacement garden centre and commercial space. Go Folkestone Action Group considers that the site is exceptional and development should be at low density; the Group also highlights infrastructure and drainage problems.

3.43 The Trustees of Viscount Folkestone do not object to the policy but seek the deletion of requirements for office accommodation and retention of the barns. Murston Construction supports the policy but seeks the division of the site between commercial and residential elements to allow them to come forward independently.

3.44 KCC suggests amendments to wording related to archaeology. Southern Water requires a connection to the local sewerage system.

Policy UA11: Shepway Close, Folkestone

3.45 Policy UA11 allocates the site for 24 dwellings and public open space. Criteria cover the provision of public open space, ecology, surface water

management and archaeological potential. Five comments have been submitted to this policy.

- 3.46 An objecting comment states that the space should be protected and opened up for public access.
- 3.47 Shepway Developments Ltd supports the allocation, but states that contributions should be provided for open space elsewhere rather than providing this on site. Go Folkestone Action Group states that dense low rise development would be appropriate for the site.
- 3.48 KCC suggests amendments to wording relating to archaeology; it also proposes that the adjacent public footpath is opened up and integrated with new public space provision. Southern Water states that access will be needed to underground sewerage infrastructure for maintenance.

Policy UA12: Former Gas Works, Ship Street

- 3.49 Policy UA12 allocates the site for 100 dwellings. Criteria cover: ecology; archaeological potential; improvements to Radnor Park; health contributions; the setting of heritage assets; contamination; the provision of amenity space; and the provision of self- and custom-build plots. Five comments have been made to this policy.
- 3.50 Shepway District Council Strategic Development supports the policy, but states that health provision should be made through CIL and suggests amendments to wording related to amenity space and descriptions in the supporting text.
- 3.51 Shepway Green Party states that the site could be pivotal for economic regeneration and providing space for new businesses. Go Folkestone Action Group suggests that dense, low rise housing would be appropriate.
- 3.52 The Environment Agency emphasises the presence of historic contamination. KCC suggests amendments to wording relating to archaeological potential.

Policy UA13: Highview School, Moat Farm Road

- 3.53 Policy UA13 allocates the site for 27 dwellings. Criteria cover density, pedestrian links, contributions to education and archaeological potential. Seven comments have been submitted to this policy.
- 3.54 Three objecting comments state:
- There are problems of antisocial behaviour from people using the alleyway adjacent to the site; the route should be shut to public access;
 - The privacy of the adjoining houses needs to be protected; and
 - There are more appropriate sites for development.
- 3.55 A comment seeks to correct the descriptive text.

- 3.56 KCC suggests amendments to wording related to archaeology. Southern Water requires access to underground sewerage infrastructure. Shepway District Council Strategic Projects supports the policy but states that education provision should be made through CIL.

Policy UA14: Brockman Family Centre, Cheriton

- 3.57 Policy UA14 allocates the site for 26 houses or 50 apartments. Criteria cover: ecology; trees and hedgerows; and archaeological potential. Two comments have been submitted to the policy.

- 3.58 One comment suggests improvements to the road network. KCC suggests amendments to wording related to archaeology.

Policy UA15: The Cherry Pickers Public House, Cheriton

- 3.59 Policy UA15 allocates the site for 10 houses or 20 apartments. Criteria highlight highway mitigation and archaeological potential. Four comments have been submitted to this policy.

- 3.60 A comment states that adequate parking needs to be provided; another comment suggested amendments to local bus routes.

- 3.61 KCC suggests amendments relating to archaeology. Southern Water states that access to underground sewerage infrastructure will be required.

Policy UA16: Affinity Water, Shearway Road, Cheriton

- 3.62 Policy UA16 allocates the site for 70 dwellings and open space. A masterplan is required; criteria cover pedestrian links, protected trees, public open space, the provision of self- and custom-build plots and archaeological potential. 13 comments have been submitted to this policy.

- 3.63 Affinity Water Ltd supports the policy but states that 70 dwellings would fail to make full use of the site's potential; an amendment is sought to provide 120 dwellings.

- 3.64 Two comments raise concerns regarding inadequate sewerage infrastructure and flood risk. Some amendments to bus routes in the area are suggested. A comment raises points about the site description, stating that protected trees have been lost to development.

- 3.65 Folkestone Town Council highlights flooding problems with the Pent Stream and seeks protection for the mature trees on the site; these concerns are shared by Go Folkestone Action Group.

- 3.66 KCC suggests amendments to wording related to archaeology and states that public rights of way need to be retained and enhanced. Southern Water requires a connection to the local sewerage system and access to underground sewerage infrastructure for maintenance. The Environment

Agency highlights that the site lies within a protection zone for groundwater; contamination should therefore be controlled.

Policy UA17: The Shepway Resource Centre, Military Road

- 3.67 Policy UA17 allocates the site for 41 dwellings. Criteria cover: design; impact on the setting of heritage assets; trees and hedgerows; and archaeological potential. (Planning permission 16/0463/SH has been granted for the development of 23 dwellings and 18 flats on the site.) Four comments have been submitted to this policy.
- 3.68 Shepway Green Party states that the site would be ideal for social housing. Shepway HEART Forum objects, citing problems of traffic congestion and loss of open spaces.
- 3.69 KCC suggests amendments to the wording related to archaeology. Shepway District Council Strategic Projects supports the policy.

Policy UA18: Land East of Coolinge Lane, Folkestone

- 3.70 Policy UA18 allocates the site for 60 dwellings. Criteria cover: loss of open space; design; the setting of heritage assets; the provision of self- and custom-build plots; trees and hedgerows; ecology; and archaeology. 20 comments have been made to this policy.
- 3.71 Seven objecting comments state that:
- The area is heavily congested, especially around school drop-off and pick-up times;
 - Infrastructure is inadequate and schools are oversubscribed;
 - There is no justification for the loss of playing pitches; and
 - The development would impact on biodiversity.
- 3.72 Two comments express qualified support, provided that enhanced pedestrian and cycle routes are created and publicly accessible open space is provided.
- 3.73 Shepway HEART Forum and Go Folkestone Action Group object, citing loss of open space, traffic problems and inadequate drainage and infrastructure capacity. The Sandgate Society objects, stating that the 60 dwellings is too much development, the area is heavily congested and the schools are oversubscribed; the space should be used for public recreation. Sandgate Parish Council shares these concerns. Folkestone Town Council states that the site should be treated sensitively and deliver high quality development and a large area of open space. Shepway Green Party claims that a commitment was given that the playing fields would not be sold.
- 3.74 Sport England objects stating that there is no up-to-date Playing Pitch Strategy to justify development of the playing fields. KCC suggests amendments to wording related to archaeology. Southern Water requires a connection to the local sewerage system.

Policy UA19: Encombe House, Sandgate

- 3.75 Policy UA19 allocates the site for 36 homes (following planning permissions 11/0122/SH and 15/1154/SH for the building of 36 two- and three-bedroom flats). Criteria cover: protected trees and ecology; the setting of heritage assets; archaeological potential; and land stability. Six comments have been submitted to this policy.
- 3.76 Shepway Green Party states that the land is highly unstable. The Sandgate Society maintains that development would dominate the skyline and threaten the stability of neighbouring properties. Another comment states that the area is at high risk of land slip and tree protection has been disregarded in the past.
- 3.77 KCC suggests amendments to wording related to archaeology. Historic England states that the design should minimise impacts on setting of the scheduled Martello Tower 7. Southern Water requires a connection to the local sewerage system.

Hythe

- 3.78 Supporting paragraphs in this section of the chapter set the context for proposals in Hythe. A plan (Picture 5.22) illustrates key routes and proposed allocations.
- 3.79 22 comments have been made to the supporting text and plan stating:
- There is too much development planned for Hythe; the Core Strategy Inspector did not approve any major development for the town other than at Nickolls Quarry;
 - Development needs to be sympathetic to the character of the town and protect its green spaces; modern flatted developments are inappropriate;
 - Space above shops should be used for housing;
 - There should be no development at Princes Parade, Hythe;
 - The setting of the Royal Military Canal and seafront should be preserved;
 - Hythe should be separated from Folkestone by an area of undeveloped land;
 - There is too much traffic in the town; Scanlon's Bridge has been upgraded but there has been no difference to the traffic queues;
 - More pedestrian crossing points are needed;
 - Education and health facilities are inadequate;
 - There is a need to encourage a younger population to live in and visit Hythe;
 - Picture 5.22 needs to be updated to include significant recent developments;
 - Nickolls Quarry will add approximately 1,000 homes to the area; and
 - The Pennypot Estate and Riverside Estate need to be added to the employment sites identified in the text (Nickolls Quarry and Link Park).

3.80 In addition to these comments:

- Historic England states that a better understanding of the town's historic character is needed;
- Hythe Neighbourhood Plan Group state that the Core Strategy Inspector did not support major development in Hythe beyond the strategic development at Nickolls Quarry; apartment blocks are changing the character of the town and family homes need to be provided; and
- Hythe Town Council supports the protection of employment land in Hythe through policy E1.

Policy UA20: Hythe Town Centre

3.81 Policy UA20 seeks to manage changes of use in Hythe Town Centre to protect the town's vitality. 15 comments have been submitted to this policy.

3.82 Two comments have been made to the map defining the town centre boundary, stating that the northern boundary should be drawn along Malthouse Hill, Bartholomew Street and Dental Street.

3.83 Seven comments make points including:

- Hythe now has a preponderance of non-retail uses in the centre: these should be monitored and the policy should set a minimum percentage of retail uses;
- There needs to be a greater focus on employment as employment sites, such as Smiths Medical, are being lost;
- Any development should protect the character of the town; and
- Temporary 'pop up' shops and a Hythe market could help revitalise the town.

3.84 Hythe Civic Society seeks the provision of sufficient parking within development proposals in town centres. Hythe Neighbourhood Plan Group supports the policy but requests further criteria related to the historic character of the High Street. Shepway Green Party considers that the policy should specify a percentage of retail (A1) uses in the frontage.

3.85 KCC asks for reference to be made to special historic character of the town centre and the Hythe, High Street and Vicinity Conservation Area. Historic England seeks reference to archaeological potential within the town centre.

Policy UA21: Smiths Medical Campus, Hythe

3.86 Policy UA21 allocates the site for 80 dwellings and employment use (B1/B8). Criteria cover: design and layout; the provision of self- and custom-build plots; retention of employment; archaeological potential; contamination; and ecology. (Pre-application discussions have taken place regarding this site.) 25 comments have been made to this policy.

- 3.87 10 objecting comments state that: the site should be developed for a leisure centre in preference to Princes Parade; education and health facilities are inadequate; and the area is already congested with traffic.
- 3.88 Eight comments give qualified support, subject to: the retention of employment land; the provision of affordable housing; surface water management; the protection of trees and wildlife areas on the site; a low density of development; adequate car parking; and traffic calming measures. Shepway Green Party states that a full transport assessment should be provided, habitats should be protected and there should be a buffer to the eastern boundary.
- 3.89 Hythe Town Council supports the policy. Hythe Neighbourhood Plan Group states that more housing could be provided on the site so that the allocation at Princes Parade could be deleted. Hythe Civic Society states that the leisure centre should be provided on this site rather than Princes Parade.
- 3.90 KCC suggests amendments to wording related to archaeology. Historic England states that the site once encompassed part of the Royal School of Musketry firing ranges, but that archeological potential is likely to be low. Southern Water requires that the development is informed by an odour assessment to take account of the Hythe Waste Water Treatment Works.

Policy UA22: Land at Station Road, Hythe

- 3.91 Policy UA22 allocates the site for 40 dwellings. Criteria deal with: impact on the AONB; ecology and trees; archaeology; and flood risk. 21 comments have been submitted to this policy.
- 3.92 Hythe Town Council supports the policy. Hythe Neighbourhood Plan Group objects to the policy, stating that it is an attractive green space.
- 3.93 A comment supports the allocation, provided some employment land is retained, highway capacity is taken into account and other design principles are met. Ten objections are made to the policy citing issues of: lack of school places; traffic congestion; flood risk and increased surface water run-off; archaeological impacts; loss of greenspace; and impacts on landscape and views of Saltwood Castle. Shepway Green Party objects, raising concerns of landscape impact and highway safety.
- 3.94 Cayman National Bank supports the policy, stating that the site can provide homes in a sustainable location.
- 3.95 KCC states that an appropriate pedestrian crossing will need to be provided; amendments are also suggested to wording dealing with archaeology. Natural England states that, although the site is relatively well contained, it forms part of the setting of the AONB. The Kent Downs AONB Unit also highlights that the site is close to the AONB and development could impact on its setting.

Policy UA23: Land at Saltwood Care Centre, Hythe

- 3.96 Policy UA23 allocates the site for extra-care housing. Criteria cover: accessibility; care provision; landscape character; access; and archaeological potential. (The site is subject to planning permission 15/0720/SH for 84 extra-care homes.) 20 comments have been submitted to this policy.
- 3.97 Kent Planning Ltd seeks more flexibility in the wording of the policy. Two supporting comments state that the site is suitable for assisted living and that improved pedestrian crossings should be provided.
- 3.98 Hythe Town Council supports the policy. Hythe Neighbourhood Plan Group would support extra care housing for local people, but not for older people moving into the area.
- 3.99 Eight objecting comments state that: the site would not be suitable for non-care related housing; a maximum number of units should be specified; the area is heavily congested; the site is liable to flooding; and development would be harmful to the setting of the AONB and views towards Saltwood Castle. Shepway Green Party states that the site is outside the settlement boundary, in a designated local landscape area and at risk of landslip.
- 3.100 KCC suggests amendments relating to archaeology and reference to the regulator of care services. Southern Water requires connection to the local sewerage system. Natural England states that the site may contain traditional orchard habitat and highlights proximity to the Kent Downs AONB. The Kent Downs AONB Unit also highlights proximity to the AONB and states that development would impact on its setting.

Policy UA24: Foxwood School and St Saviour's Hospital, Seabrook Road, Hythe

- 3.101 Policy UA24 allocates Foxwood School for 150 dwellings and St Saviour's Hospital for 35 dwellings. Criteria cover: design and landscape; heritage assets; access; archaeological potential; ecology and protected trees; open space and children's play space; and the provision of self- and custom-build plots. (Planning application 16/0794/SH has been submitted on the St Saviour's Hospital site and this is currently being considered.) 22 comments have been submitted to this policy.
- 3.102 Three objecting comments highlight lack of transport links, slope instability, poor access and inadequate education and health provision. A comment raises a number of issues with the developer's pre-application proposals for the Foxwood School site.
- 3.103 A comment supports the policy, but highlights the importance of retaining historic buildings such as the Seabrook Lodge School House at Foxwood. Nine comments do not raise objections, but state that consideration needs to be given to surrounding residential character, traffic management, parking provision, surface water drainage, slope stability and preserving

existing trees; the requirement that access should not be from Cliff Road is supported.

- 3.104 Hythe Town Council supports the policy. Hythe Neighbourhood Plan Group supports the policy, but questions the proposed density on Foxwood School: the Group states that this should be increased to allow the Princes Parade allocation to be deleted. Shepway HEART Forum states that St Saviour's Hospital should be retained as a locally listed building.
- 3.105 Sport England objects to the policy stating that the Council's Playing Pitch Strategy is out-of-date and there is no evidence justifying loss of playing pitches on the site. Natural England states that Foxwood School may contain priority deciduous woodland habitat.
- 3.106 KCC highlights a number of highways and pedestrian improvements that will be required; amendments are also suggested to wording related to archaeology. Southern Water requires connection to the local sewerage system.

Policy UA25: Princes Parade, Hythe

- 3.107 Policy UA25 allocates the site for 150 dwellings. The policy requires the delivery of a masterplan setting out the provision of a replacement for Hythe Swimming Pool, public open space and a mix of homes including accommodation for the elderly, affordable housing and self- and custom-build. Other criteria cover: the setting of the Royal Military Canal, potential contamination and the protection of the Royal Military Canal Local Wildlife Site. 512 comments have been submitted to this policy and the supporting text. (Comments relating to Princes Parade have also been made against other chapters of the PPLP and these are highlighted in the relevant sections of this Appendix.)
- 3.108 494 comments of objection have been made raising a number of issues. Objections state that the development would: amount to overdevelopment; lead to the erosion of the separation between Hythe and Sandgate; set a precedent for other sites; provide second homes rather than homes for local people; impact negatively on the Royal Military Canal Scheduled Ancient Monument; impact negatively on the Local Wildlife Site and ecology; and impact negatively on views, landscape and local character. In addition comments state that the development would be at high risk of flooding and increase contamination and light pollution. It is stated that infrastructure would be unable to cope, particularly the road network, public transport, health, education, sewerage, water and electricity. It is stated that the proposed leisure centre would be in the wrong place to satisfy demand and the development would have a negative impact on tourism and local businesses. Among those objecting are: the Hythe Neighbourhood Plan Group; Shepway Green Party; Shepway HEART Forum; Sandgate Parish Council; Monks Horton Parish; and Monks Horton Parish and Sellindge and District Residents' Association.

- 3.109 Hythe Town Council supports the requirement for an appropriate mix of well-designed homes, but states that any self-build homes must conform to a masterplan to ensure a good visual appearance.
- 3.110 Historic England objects to the allocation, stating that the site should not be allocated for significant development based on the likely impact on the Royal Military Canal. KCC states that it has substantial concerns about the allocation and cannot see a way in which the development could proceed while ensuring that the Canal's setting is also preserved and enhanced.
- 3.111 15 comments support the allocation, stating that it represents a good opportunity to provide an enhanced facility and that it would deal with an unkempt area. Among those supporting the policy are the Hythe Aqua Swimming Club and Shepway District Council Strategic Projects.

Policy UA26: Hythe Swimming Pool, Hythe

- 3.112 Policy UA26 allocates the site for 50 dwellings. Criteria require: the provision of a replacement facility; the retention of the café, public toilets and beach huts; contributions to play and open space at South Road Recreation Ground; and the assessment of archaeological potential. 56 comments have been submitted to this policy and supporting text. (Many respondents relate their comments to proposals for Princes Parade, see above.)
- 3.113 44 objecting comments to the policy state that the site should be redeveloped for an improved swimming pool, the Council has not demonstrated that the current location of Hythe Swimming Pool is inadequate for a new facility and the development of Princes Parade should not proceed. Hythe Neighbourhood Plan Group objects to the density and states that there is a need to preserve views. Hythe Town Council and two respondents state that the policy needs to be strengthened so that development cannot proceed until the replacement pool is irretrievably committed.
- 3.114 Six comments support the policy, provided that proposals include the retention of the public toilets, café and beach huts. Shepway District Council Strategic Projects states that the policy should be amended to state that the public toilets and beach huts should be retained or replaced locally. Southern Water comments that it will require access to sewerage infrastructure.

4. Romney Marsh Character Area (Chapter 6)

Summary of consultation comments

- 4.1 This chapter sets out a number of policies for the Romney Marsh Area, including for New Romney Town Centre and sites for housing and other developments.
- 4.2 A number of comments have been submitted to the supporting text:

- A comment welcomes the settlement hierarchy and the fact that housing was not allocated in every village;
- London Ashford Airport states that insufficient recognition is given to the airport as a major employer and economic driver;
- CPRE Shepway states that the housing allocated to the Romney Marsh area exceeds the target set out in the Core Strategy;
- Objections highlight: overprovision against Core Strategy targets; high flood risk; a lack of infrastructure, particularly health and education; struggling shops in New Romney town centre; poor design of recent housing; loss of the rural character of the towns and villages; loss of bungalows to create high density housing; loss of green spaces and impacts on the tourist economy; lack of employment opportunities; and traffic congestion;
- A comment objects to the proposed new link road at New Romney; and
- A comment states that Dungeness needs protecting and that older buildings are being replaced with modern creations.

Policy RM1: New Romney Town Centre

- 4.3 Policy RM1 seeks to protect the viability of New Romney Town Centre by managing changes of use for retail and town centre developments. Seven comments have been submitted to this policy.
- 4.4 Three objecting comments state that St Martin's Field should be excluded from the area designated by the policy.
- 4.5 New Romney Town Council states that the policy should: include reference to the historic character of the town; seek to reduce the impact of car parking; exclude St Martin's Field from the designated area; and protect St Martin's Field and Fairfield Road Recreation Ground as green open spaces.
- 4.6 KCC recommends that the policy includes reference to the special historic character of the town centre.

Policy RM2: Land off Victoria Road West, Littlestone

- 4.7 Policy RM2 is allocated for 70 dwellings. Criteria cover: vehicle access; the provision of self- and custom-build plots; surface water drainage; archaeological potential; the provision of open and play space; impacts on biodiversity; and contributions to medical facilities. 17 comments have been submitted to this policy.
- 4.8 CPRE Shepway objects to the allocation stating that the need for housing has not been demonstrated, it would lead to the loss of agricultural land, there would be impacts on species and habitats, the area is liable to flooding and there is insufficient capacity in local services.
- 4.9 12 objecting comments raise concerns regarding: flood risk and the high water table; loss of agricultural land and green spaces; loss of views; impacts on wildlife; poor access and traffic congestion; poor pedestrian

routes; lack of capacity in health and education facilities; and lack of employment opportunities.

- 4.10 Furnival Farming Partnership supports the policy with some amendments to the wording.
- 4.11 KCC states that it would not support the allocation as emergency access could not be provided. If the allocation is to remain, KCC requests amendments to the wording relating to archaeology. Southern Water states that masterplanning should take account of the nearby Queen's Road New Romney Pumping Station. Natural England highlights links between the drainage network and designated biodiversity sites.

Policy RM3: Land rear of the Old School House, Church Lane, New Romney

- 4.12 Policy RM3 allocates the site for 20 dwellings. Criteria cover: vehicle and pedestrian access; surface water drainage; archaeological potential; the setting of the nearby Listed Buildings and Scheduled Ancient Monument; landscape; ecology; and contributions to medical facilities. (Planning permission 15/0235/SH has recently been granted on this site for 14 dwellings.) 12 comments have been submitted to this policy.
- 4.13 Eight objections raise issues including: overprovision of housing against Core Strategy targets; lack of infrastructure; overstretched education and health facilities; traffic and parking problems; poor, unlit footpaths; drainage problems; and the loss of green spaces. It is stated that the site is more appropriate for extra-care housing for the elderly or medical facilities.
- 4.14 CPRE Shepway objects to the policy, citing impacts on protected species.
- 4.15 One supporting comment states that it is an ideal site for smaller dwellings.
- 4.16 KCC suggests amendments relating to archaeology and the nearby Conservation Area.

Policy RM4: Land west of Ashford Road, New Romney

- 4.17 Policy RM4 allocates the site for 60 dwellings. A number of requirements cover: vehicle and pedestrian access; the provision of self- and custom-build plots; surface water drainage; landscaping; archaeological potential; impacts on heritage assets; provision of open and play space; ecological impacts; contributions to medical facilities; and access to the Ashford Road New Romney Pumping Station. 14 comments have been submitted to this policy.
- 4.18 11 objections raise issues of: overprovision of housing against Core Strategy targets; lack of infrastructure; poor access, parking provision and highways capacity; overstretched education and health facilities; lack of

employment opportunities; loss of grazing land and green spaces; flood risk; and loss of an important gateway to the town.

- 4.19 Kent Planning Ltd supports the policy and states that the land is not liable to flooding.
- 4.20 KCC suggests amendments relating to archaeology and public rights of way. Southern Water states that the masterplan should require consideration of odour and vibration given proximity to the pumping station.

Policy RM5: Land to the south of New Romney

- 4.21 RM5 allocates the site for up to 400 dwellings, health care and community facilities, open space, transport and access improvements. A comprehensive masterplan should be provided, and the policy sets out requirements for access, landscape, sustainable drainage and surface water management and other considerations. 29 comments have been submitted to this policy.
- 4.22 Icen Projects supports the allocation, maintaining that the site provides a sustainable location and will provide a new link road and medical facilities. Shepway District Council Strategic Development supports the allocation subject to new vehicular access to the Mountfield Road Industrial Estate.
- 4.23 22 comments raise objections related to: over provision of housing within the Romney Marsh area and incompatibility with Core Strategy policies; flood risk; the high water table; highways and access constraints; lack of employment opportunities; lack of medical facilities; impacts on wildlife; loss of green space and important views; loss of archeological assets; loss of agricultural land; and impacts on the character of the town.
- 4.24 CPRE Shepway objects to the policy citing: traffic impacts; loss of agricultural land; harm to the historic landscape; flood risk; impacts on wildlife and historic assets; and lack of local facilities.
- 4.25 Natural England objects, stating that the land forms a Biodiversity Opportunity Area that could provide compensatory habitat; alternative sites should be reassessed in preference to the site. Southern Water states that connections should be provided to the local sewerage system and that masterplanning should take account of proximity to the waste water treatment works and pumping station.
- 4.26 KCC states that the development would have an adverse impact on the historic landscape; if the policy is to remain requirements are set out for access and the new link road.

Policy RM6: Land adjoining The Marsh Academy, Station Road, New Romney

- 4.27 Policy RM6 allocates the site for 29 dwellings. Criteria cover: the provision of medical facilities; surface water drainage; landscaping; the provision of

community facilities; and archaeological potential. 12 comments have been submitted to this policy.

- 4.28 The Marsh Academy objects to the allocation, stating that the land is needed for educational purposes; the Academy also states that it has rights of access over the site that it would not be willing to give up. A Governor of the Academy adds that the development would increase dangers to children; the Youth Centre on the site would need to be relocated, as would the electricity and water sub-stations. New Romney Town Council maintains that the allocation should be reduced in size to take account of restrictive covenants.
- 4.29 Six objections state that: the land is needed for expansion of education facilities and green space; the road network is inadequate; car parking is at capacity; health and education facilities are overstretched; and the land should be protected as a community asset.
- 4.30 KCC suggests amendments to wording related to archaeology. Southern Water states that a connection is needed to the local sewerage system.

Policy RM7: Development at North Lydd

- 4.31 Policy RM7 allocates four sites in North Lydd for a total of 65 dwellings: Kitewell Lane, rear of Ambulance Station (eight dwellings); Land south of Kitewell Lane (nine dwellings); Station Yard, Station Road (30 dwellings); and Peak Welders (18 dwellings). A masterplan is required for the four sites and the policy sets out a number of criteria that development should meet. Ten comments have been submitted to this policy.
- 4.32 In relation to the Kitewell Lane site, KCC states that Kitewell Lane will be required to be widened to 4.1m width with a 1.2m footpath. John Paine Farms supports the allocation but states that the requirement for a masterplan would be an obstacle to housing delivery.
- 4.33 In relation to the South of Kitewell Lane site, Southern Water states that access to underground infrastructure will be required for maintenance purposes. Two comments state that access is inadequate, there is no capacity in the sewerage system and education and health facilities are overstretched.
- 4.34 In relation to the Peak Welders site, KCC objects to the allocation on the grounds that there is no potential for a footpath to be provided to access the site.
- 4.35 In general comments to policy RM7, KCC suggests amendments to wording relating to archaeology. Natural England states that, given proximity to protected sites, connection to sewerage drainage should be provided and sufficient capacity at local treatment works should be confirmed. Kent Wildlife Trust states that the sites are close to a Local Wildlife Site and there should be no increase in recreational pressure or disturbance. The Environment Agency highlights proximity to a historic landfill site and states that contamination may need to be addressed. A

comment supports the allocation of brownfield sites in Lydd in preference to development along the coast, if infrastructure is provided.

- 4.36 Shepway District Council Strategic Development states that the requirement for a masterplan for all four sites would unnecessarily constrain development; amended wording is suggested.

Policy RM8: Former Sands Motel, Land adjoining pumping station, Dymchurch Road, St Mary's Bay

- 4.37 Policy RM8 allocates the site for 85 dwellings. Criteria cover: highway improvements; access; public transport; pedestrian movement; parking spaces; flood risk; play areas; impacts on protected wildlife sites; and archaeological potential. (Planning permission 07/1566/SH has been granted for 85 dwellings.)

- 4.38 An objecting comment raises issues of lack of affordable housing, poor design of recent developments and lack of health facilities. Another comment states that, while the allocated site has been granted planning permission, the adjacent land - the former Rugby Club campsite - should be protected for future leisure and community use.

- 4.39 KCC suggests amendments to wording related to archaeology. Southern Water requires connection to the local sewerage system. Natural England states that, given the proximity to protected sites, connection to the sewerage drainage system should be provided and sufficient capacity at local treatment works should be confirmed.

Policy RM9: Land rear of Varne Boat Club, Coast Drive, Greatstone

- 4.40 Policy RM9 allocates the site for five dwellings. Criteria cover flood risk, the existing river culvert, design, biodiversity and archaeology. Four comments have been submitted to this policy.

- 4.41 Shepway District Council Strategic Development supports the policy and states that it is a previously developed site in a sustainable location.

- 4.42 Two objecting comments state that there is insufficient health or education infrastructure and that development along the coast should be resisted.

- 4.43 Natural England states that, given the proximity to protected sites, connection to the sewerage drainage system should be provided and sufficient capacity at local treatment works should be confirmed.

Policy RM10: Car park, Coast Drive, Greatstone

- 4.44 Policy RM10 allocates the site for 16 dwellings. Criteria require a traffic assessment, surface water drainage strategy, biodiversity enhancements and consideration of archaeological potential. 32 comments have been submitted to this policy.

- 4.45 Shepway District Council Strategic Development supports the allocation and states that the site could comfortably accommodate 20 dwellings.
- 4.46 New Romney Town Council objects to the policy and states that it should be removed from the plan. CPRE Shepway objects on the grounds that: there is significant local opposition; it is a well-used car park, the loss of which would damage local businesses; the site is prone to flooding; and drainage is inadequate.
- 4.47 26 objecting comments have been submitted raising issues including: flooding; loss of the car park with resultant impacts on the tourist economy, local businesses and disabled access; additional traffic on already congested roads; inadequate vehicle access; lack of health and education facilities; impacts on local wildlife and the adjacent Site of Special Scientific Interest (SSSI); increased light pollution; and unexploded ordnance.
- 4.48 Westward Planning Ltd has submitted comments on behalf of The Campaign Against the Development of Coast Drive Car Park and ten named objectors raising objections on the grounds that: the allocation is outside the settlement boundary and contrary to Core Strategy policies; the site is at high risk of flooding; it would have harmful impacts on the adjacent SSSI; and development would be detrimental to the amenity of local residents.
- 4.49 The Environment Agency (EA) has submitted an objection, due to the proximity of the proposal to the seafront and the reliance the development would have on the continued maintenance of the beach. The EA states that it wishes to see the site deleted from the plan and refers to its objections to the planning application (16/1017/SH).
- 4.50 KCC states that the car park provides valuable access and that any development should protect the route of the England Coast Path and retain some public parking. Natural England states that, given the proximity to protected sites, connection to the sewerage drainage system should be provided and sufficient capacity at local treatment works should be confirmed.

Policy RM11: The Old Slaughterhouse, 'Rosemary Corner', Brookland

- 4.51 Policy RM11 allocates the site for five dwellings. Criteria cover: design and layout; the character and setting of the Brookland Conservation Area and Listed Buildings; landscape; ecology; and archaeological potential. Five comments have been submitted to this policy.
- 4.52 The landowner supports the policy. Invicta Self and Custom Build Ltd has no objection, but suggests additional land that could be allocated. A supporting comment states that the site is suitable, with good road links.
- 4.53 An objector states that the site lies outside the settlement boundary.
- 4.54 KCC suggests amendments to the wording related to archaeology.

Policy RM12: Lands north and south of Rye Road, Brookland

- 4.55 Policy RM12 allocates two sites for a total of 25 dwellings: 15 dwellings at land to the north of Rye Road; and 10 dwellings at land to the south. Criteria require: a masterplan; landscaping; a surface water drainage strategy; and open and play space. Impacts on archaeology, the setting of Listed Buildings and the Conservation Area and protected species should also be addressed. Nine comments have been submitted to this policy.
- 4.56 The Crown Estate supports the policy. Invicta Self and Custom Build Ltd also supports the policy; it intends to develop the land to the south for self-build housing and states that the site could accommodate as many as 16 dwellings. A supporting comment states that the sites are suitable for development with good road links but will need screening from the A259.
- 4.57 CPRE Shepway objects to the allocation, maintaining that the site is too prominent and that there are problems of drainage, safe access and harm to the historic environment; the loss of agricultural land is also highlighted. Two objecting comments state that the site lies outside the settlement boundary and within a protected Local Landscape Area.
- 4.58 KCC suggests amendments to wording related to archaeology and states that the 30mph speed restriction would need to be extended. Southern Water states that it will require access to existing underground sewerage infrastructure for maintenance. Historic England states that the setting of the Grade I Church will need particular care in the design of any new development.

Policy RM13: Land adjacent to Moore Close, Brenzett

- 4.59 Policy RM13 allocates the site for 20 dwellings. Criteria cover: vehicle access; landscape; watercourses and drainage; protected species; archeological potential; and the setting of nearby Listed Buildings. Four comments have been submitted to this policy.
- 4.60 KCC suggests amendments to wording relating to archaeology. Southern Water states that an odour assessment is needed, given proximity of the site to a waste water treatment works.
- 4.61 MF and L Ltd supports the policy but seek amendments to wording. Another comment states that it is a suitable site for development.

5. North Downs Character Area (Chapter 7)

Summary of consultation comments

- 5.1 This chapter sets out 13 site allocations for the North Downs Area. A number of comments have been made against the supporting text:
- The Kent Downs AONB Unit states that: the Council should have regard to the purpose of conserving and enhancing the Kent Downs AONB in exercising its functions; recognition should be given to

countryside to the south of the AONB, which forms part of its setting; and proposals for major development should be referenced as should the AONB Management Plan;

- E Charlier and Sons Ltd states that the AONB Management Plan does not form part of the development plan for the district and that the chapter should explain the site selection process the Council has undertaken to minimise impacts on the AONB;
- CPRE Shepway states that there is insufficient information to judge the need for housing within the AONB; it must therefore object to the allocations in the plan. It also maintains that infrastructure has not kept pace with development, particularly in Hawkinge;
- A comment states that Hawkinge has been ruined by modern development;
- A comment states that Sellindge has suffered from too much development and there is always gridlock in the village when there is an accident on the M20;
- Comments express objection to development proposals at the former Folkestone Racecourse and the lorry park; and
- Some detailed wording changes are suggested by the Kent Downs AONB Unit and Historic England.

Policy ND2: Former Officers' Mess, Aerodrome Road, Hawkinge¹

- 5.2 Policy ND2 allocates the site for 70 dwellings. Criteria cover: impacts on the AONB; landscape; open space; archaeological potential; and pollution to groundwater. (Planning permission 15/0030/SH has been granted on this site.) Seven comments have been submitted to this policy.
- 5.3 Four comments object to the loss of World War II heritage. The Lowestoft Aviation Society states that the Kent Battle of Britain Museum should be allowed the chance to further develop their site.
- 5.4 KCC suggests an amendment to wording relating to archaeology. Southern Water states that a connection to the local sewerage system should be provided.

Policy ND3: Mill Lane rear of Mill Farm, Hawkinge

- 5.5 Policy ND3 allocates the site for 14 dwellings. Criteria cover: impacts on the AONB; landscape; vehicle access; public rights of way; archaeological potential; and pollution to groundwater. (Outline planning permission 15/0741/SH has been granted for residential development on this site.)
- 5.6 KCC has submitted a comment suggesting amendments to the wording regarding archaeology; the clause relating to public rights of way is supported.

¹ The numbering of policies in this chapter of the Preferred Options PPLP started at ND2 rather than ND1 and as a consequence successive policies were wrongly numbered – all chapters have been renumbered for the Submission Draft PPLP.

Policy ND4: Land adjacent Kent Battle of Britain Museum, Aerodrome Road, Hawkinge

- 5.7 Policy ND4 allocates the site for 100 dwellings. Criteria cover: impacts on the AONB; design and street layout; open spaces; landscape; vehicle access; contamination; archaeology and heritage assets; and pollution prevention. 56 comments have been submitted to this policy.
- 5.8 50 comments raise objections regarding: impact on the adjacent Kent Battle of Britain Museum; the loss of the nation's historic wartime sites; loss to the tourist industry and local economy; unexploded ordnance; heavy contamination; and inadequate facilities at Hawkinge.
- 5.9 The Kent Battle of Britain Museum charity requests that the allocation is withdrawn and the land be made available for the Museum to buy; it states that it has funds to purchase the site which it has been raising over the last decade.
- 5.10 The Trustees of Hawkinge Activity and Adventure Centre Ltd support the allocation, stating that the site provides an opportunity to provide homes in a sustainable location. The Trustees state that attempts to enter into discussion with the Museum Trustees have not had a response.
- 5.11 The Kent Downs AONB Unit states that development should not extend to the south western part of the site to keep a buffer between new housing and Gibraltar Lane and respect the existing settlement pattern of Hawkinge.
- 5.12 KCC suggests that the wording of the policy be amended to ensure that the character of the new development is informed by its wartime history; amendments are also sought to wording related to archaeology. Southern Water states that a connection should be provided to the local sewerage system.

Policy ND5: Land at Duck Street, Elham

- 5.13 Policy ND5 allocates the site for five dwellings. Criteria highlight: impacts on the AONB; landscape; access; and archaeological potential. 21 comments have been submitted to this policy.
- 5.14 A supporting comment states that the site would integrate well into the area, if developed sensitively. The landowner supports the allocation and maintains that adequate visibility splays can be achieved.
- 5.15 Elham Parish Council objects to the site on the grounds of unsafe access, flood risk and inadequate sewerage infrastructure. CPRE Shepway objects to the site, saying that access, highway safety, sewerage capacity and surface water runoff present problems that will be difficult to resolve. 16 objecting comments raise concerns about: flooding; highway safety; ecological and landscape impacts; and sewerage and health infrastructure.

- 5.16 KCC objects to the policy, stating that adequate visibility splays cannot be provided; an amendment to the wording on archaeological potential is sought if the policy is to be retained.

Policy ND6: Land south of Canterbury Road, Lyminge

- 5.17 Policy ND6 allocates the site for 30 dwellings. Criteria cover: impact on the AONB and nearby heritage assets; the provision of self- and custom-build plots; trees and hedgerows; landscape; open space; access; traffic calming; enhancing public rights of way; archaeological potential; and pollution prevention. 13 comments have been submitted to this policy.
- 5.18 Kent Planning Ltd objects, stating that Land adjacent to Lyndon Hall, Lyminge is preferable, being better screened and closer to village facilities. CPRE Shepway objects to the policy, stating that there is insufficient information on housing provision to judge whether the allocation is necessary. Four objections raise concerns about: loss of greenfield land within the AONB; design of the development; traffic impacts; and adequacy of sewerage and health infrastructure.
- 5.19 Two supporting comments argue that the site would be ideal for starter homes, provided a footpath, health facilities and an extension to the surgery car park are delivered. Sellwood Planning supports the allocation. Lyminge Parish Council supports the allocation, provided that the development preserves the rural character of the site and a footpath is provided; the Parish Council considers that the site could also be considered for extra-care sheltered accommodation.
- 5.20 KCC comments that traffic calming measures will need to be introduced. The County Council suggests amended wording related to buried archaeological remains and highlights the potential to create a new public access route along the old railway line between Lyminge and Penne. Southern Water requests that a connection is provided to the local sewerage system.
- 5.21 Natural England states that the site represents a significant extension of the existing settlement in the AONB. The Kent Downs AONB Unit states that development here would be contrary to national policy relating to major development in the AONB.

Policy ND7: General Sellindge policy

- 5.22 Policy ND7 allocates five sites in Sellindge for a total of 54 dwellings: The Piggeries, Main Road (eight dwellings); Land West of Jubilee Cottage, Swan Lane (15 dwellings); Land to the rear of Brook Lane Cottages, Brook Lane (11 dwellings); Land at Barrow Hill (15 dwellings); and Silver Spray (five dwellings). 20 comments have been submitted to this policy.
- 5.23 Two general objections state that Sellindge does not have sufficient health and education facilities. Comments from the Kent Downs AONB Unit add that mitigation of impacts on the setting of the AONB would be

- necessary for the Swan Lane sites. Other comments state that road safety is a key concern for local people.
- 5.24 Southern Water states that connections to the local sewerage system will be required. KCC proposes amendments to wording regarding archaeological potential of the sites.
- 5.25 In relation to The Piggeries, KCC also states that access is only acceptable for five dwellings and it would object to eight dwellings on the site.
- 5.26 In relation to Land West of Jubilee Cottage, two objections state that the land is liable to flooding. The Environment Agency highlights that the allocation is adjacent to a historic landfill site and the contamination may need to be addressed.
- 5.27 In relation to Land rear of Brook Lane Cottages, an objection states that access is dangerous. Natural England highlights that the site is adjacent to the Gibbin's Brook SSSI; pollution prevention measures would therefore be needed. KCC states that it objects, as suitable access cannot be provided for 11 dwellings.
- 5.28 In relation to Land at Barrow Hill, three objectors state that development will destroy the character of the area and bring in more traffic and create an unwanted access onto the A20. CPRE Shepway states that the site is remote from services and not sustainably located and could impact on a Bronze Age burial mound.
- 5.29 A supporting comment states that the Barrow Hill site is well located to existing housing and accessible to local facilities.

Policy ND8: Former Lymgne Airfield

- 5.30 ND8 allocates the site for 125 dwellings. Criteria cover: trees and hedgerows; open spaces; the provision of self- and custom-build plots; junction improvements; footpaths; vehicle access; waste water infrastructure; contamination; and heritage assets. (Pre-application discussions are being held relating to this site.) 21 comments have been submitted to this policy.
- 5.31 Ten objecting comments have been submitted which raise issues of: previous refusals and appeals on the site and Inspectors' comments about the impacts of rejected schemes; the lack of reference to Otterpool Park; loss of a buffer between the village and the employment park; impact on the setting of the AONB; impact on the compact nature of the village; and impacts on sewerage, traffic and school places.
- 5.32 Shepway Green Party objects to the allocation, citing previous refusals on the site. Lymgne Parish Council is strongly opposed, and states that the land would be the only buffer between Lymgne village and the proposed development at Otterpool Park. CPRE Shepway also objects, stating that there is insufficient information on housing provision to know whether a

development of this scale is needed in the North Downs area. Shepway Environment and Community Network states that the proposal is bitterly opposed by the large majority of residents and cites loss of the airfield's military heritage.

- 5.33 Phides strongly supports the policy but seeks an amendment to the requirement for self-build plots to allow greater flexibility. A comment of qualified support has also been submitted.
- 5.34 Historic England states that there will be some archaeological potential to take into account. Natural England states that the allocation represents a significant extension of the western boundary of the village that may be visible from the AONB. The Kent Downs AONB Unit states that development would fail to conserve and enhance the AONB's setting.
- 5.35 Southern Water states that a connection to the local sewerage system will be required. KCC requires the provision of emergency access and suggests amendments to reflect the site's World War II heritage.

Policy ND9: Land rear of Barnstormers, Stone Street, Stanford

- 5.36 Policy ND9 allocates the site for five dwellings. Criteria in the policy relate to: design; trees and hedgerows; impact on the setting of Stanford Windmill; landscape; and archaeology. 11 comments have been submitted relating to this policy.
- 5.37 Two objections state that this allocation makes no sense when considering plans for the lorry park. Shepway HEART Forum states that the allocation needs to be looked at carefully in relation to proposals for Otterpool Park. Six comments object to the allocation, citing impacts on the setting of the windmill, landscape impacts, poor access, reduced residential amenity and inadequate sewerage infrastructure.
- 5.38 Historic England states that the policy reads appropriately in relation to the windmill. KCC states that access onto Stone Street will need to be widened, but given that there are no facilities in Stanford, the site is not sustainable. Amendments to wording relating to archaeology are suggested.

Policy ND10: Land at Folkestone Racecourse

- 5.39 Policy ND10 allocates the site for 11 dwellings. Criteria relate to: design; trees and hedgerows; open spaces; parking and street design; impacts on water quality; archaeological potential; and impacts on the setting of Westenhanger Castle. Nine comments have been submitted relating to this policy.
- 5.40 Two objections state that the allocation does not make sense in the context of proposals for Otterpool Park and that the development would impact on footpaths linking to the station. CPRE Shepway objects, arguing that it is not possible to determine the impact on the AONB with such a loosely defined allocation.

- 5.41 Historic England highlights the importance of other heritage assets in addition to the castle, such as military artifacts and racecourse buildings. Southern Water states that a connection needs to be provided to the local sewerage system. KCC states that footpath links should be provided to the station; amended wording is also suggested relating to impacts on Westenhanger Castle and archaeological potential.
- 5.42 The Arena Racing Company Ltd, while supporting the allocation, states that it is unlikely to come forward as anticipated given the Government's support for Otterpool Park.
- 5.43 The Kent Downs AONB Unit has submitted two comments supporting the low density nature of the allocation and the requirement for a frontage onto Stone Street.

Policy ND11: Camping and Caravan Site, Stelling Minnis

- 5.44 Policy ND11 allocates the site for 11 dwellings. Criteria cover: residential amenity; trees and hedgerows; impact on the AONB; open space; biodiversity; street design; vehicle access; car parking; and archeological potential. Seven comments have been submitted to this policy.
- 5.45 Two comments support the allocation, if it is developed sensitively and addresses highway safety. Another supporting comment states that the vitality of the village depends on growth.
- 5.46 Shepway HEART Forum states that the allocation needs to be looked at in the context of proposals for Otterpool Park.
- 5.47 Stelling Minnis Parish Council gives its qualified support, subject to the provision of affordable housing, adequate parking and the relocation of the bus shelter. KCC suggests amendments to the wording related to archaeology.

Policy ND12: Land adjoining 385 Canterbury Road, Densole

- 5.48 Policy ND12 allocates the site for 25 dwellings and an area of allotments. Criteria cover: impacts on the AONB; trees and hedgerows; open spaces; village character; access; footpaths; archaeology; and pollution to groundwater. Seven comments have been submitted to this policy.
- 5.49 Two objecting comments, one from the Kent Downs AONB Unit, state that a development of this size would be contrary to national policy on the AONB, access is dangerous and there is no safe crossing for pedestrians.
- 5.50 Natural England objects, stating that the development would be a significant extension to the settlement and visible from the North Downs Way National Trail. Swingfield Parish Council objects on the grounds of poor vehicular access and severance of footpaths. CPRE Shepway objects, stating that there is insufficient information on housing supply in the North Downs area and that it has concerns over highway safety, access to services and impacts on the AONB.

- 5.51 Southern Water states that a connection to the local sewerage system is needed. KCC suggests amendments to the wording related to archaeology.

Policy ND13: Etchinghill Nursery, Etchinghill

- 5.52 Policy ND13 allocates the site for 30 dwellings. Criteria cover: impacts on the AONB; landscape; access; footpaths; archaeology; design; and effects on the nearby SSSI. 14 comments have been submitted to this policy.
- 5.53 E Charlier and Sons Ltd supports the policy. Lyminge Parish Council supports the policy, highlighting criteria relating to open space and footpaths.
- 5.54 Southern Water seeks inclusion of a requirement for connection to the local sewerage system. KCC suggests amendments to the point related to archaeology.
- 5.55 Five objections, including one from the Kent Downs AONB Unit, state that development of this size would be contrary to national AONB policy. Other objections maintain that access onto Canterbury Road is dangerous and flood risk would be increased. CPRE Shepway objects to the allocation, stating that without information on housing supply in the North Downs Area it is not possible to demonstrate a need for the development. Natural England objects to the allocation, stating that it would represent a significant extension to the settlement and be visible from the North Downs Way National Trail.
- 5.56 Three comments argue that any development needs to reinstate a buffer to the countryside and protect views from existing houses. Two comments highlight the need for traffic calming in the village and to keep existing trees on the site. A further comment calls for a high standard of development to preserve Etchinghill's character.

Policy ND14: Land adjacent to the Golf Course, Etchinghill

- 5.57 Policy ND14 allocates the site for 11 dwellings and includes criteria relating to archaeology, landscape impacts and the Kent Downs AONB. Seven comments have been submitted to this policy.
- 5.58 Pentland Homes Ltd supports the policy. Lyminge Parish Council supports the policy and wishes to see enhanced green spaces and planting within the site, and for the site to form an appropriate entrance to the village.
- 5.59 Southern Water states that it requires access to underground sewerage infrastructure for maintenance. KCC suggests amended wording relating to archaeology.

- 5.60 Two objections have been received citing impacts on the AONB and precedent for future development on the golf course. A comment highlights the need for traffic management in the village.

PART TWO – DEVELOPMENT MANAGEMENT POLICIES

6. Introduction (Chapter 8)

Summary of consultation comments

- 6.1 The Introduction to Part Two – Development Management Policies stresses that the policies provide a basis for considering planning applications for development within the whole plan area. The text emphasises that the PPLP should be read as a whole, with reference to all relevant policies. Two comments have been submitted to the Introduction.
- 6.2 Hythe Civic Society states that the plan gives insufficient attention to infrastructure needs and inadequate infrastructure will be compounded by the level of new development. London Ashford Airport states that it is imperative that policies should be supportive of new development and not be unduly prescriptive.

7. Housing and Built Environment (Chapter 9)

Summary of consultation comments

- 7.1 This chapter sets out 11 development management policies relating to: design; development affecting residential gardens; alterations and extensions; space standards; and gypsy and traveller accommodation.
- 7.2 Four general comments state that:
- A new policy is needed to ensure that a mix of housing types, tenures and sizes is provided;
 - Policy requirements will mean that lengthy negotiation will be needed on proposed schemes;
 - There is a need for a policy to protect residential amenity; and
 - The expansion of London Ashford Airport and its potential impacts needs to be taken into account when considering amenity.
- 7.3 Five comments have been made in relation to the supporting text, Accessible Dwellings and Water Efficiency (paragraphs 9.46-9.49). Rother District Council states that it is also seeking higher levels of water efficiency. The Home Builders Federation states that the policy is contrary to national policy. CPRE Shepway states that the policy needs clarifying. The Environment Agency provides detailed comments on the standards proposed. A comment states that the requirement is unclear and likely to be contrary to national policy. (Some of these comments are repeated in responses to policy CC2: Sustainable Construction – see below.)

- 7.4 The Kent Downs AONB Unit has submitted a comment in relation to the supporting text, Affordable Housing and Starter Homes (paragraphs 9.50-9.54). This states that the Council should be seeking to retain a lower site size threshold for the provision of affordable housing on sites within the AONB.

Policy HB1: Quality places through design

- 7.5 Policy HB1 sets out a number of general design criteria to guide developments. 19 comments have been made to this policy.
- 7.6 Comments raise a number of issues including the need for accurate drawings on submission of planning applications and for development to sit well with neighbouring properties; Hythe is highlighted. Comments state that high quality materials are essential and that maintenance should be considered at the outset; the Bayeuxfields development in Hawkinge is mentioned in this regard.
- 7.7 A comments state that traffic impacts have been ignored, while another comment states that cycling is emphasised to the detriment of other forms of transport.
- 7.8 CPRE Shepway states that greater emphasis should be given to local distinctiveness and issues such as light pollution and tranquillity.
- 7.9 A comment highlights the increasing demand for retirement accommodation.
- 7.10 Sandgate Parish Council welcomes reference to the Sandgate Design Statement in supporting text. Hythe Town Council supports the policy, while New Romney Town Council considers it could be improved by reference to Town and Village Design Statements and Neighbourhood Plans. A comment states that it would be helpful if a general design guide were in place for Shepway District.
- 7.11 A comment states that Village Design Statements and Neighbourhood Plans should supplement the policy rather than seek to inform it. A respondent objects to the statement that single aspect north-facing dwellings should be avoided, claiming that this is not justified by any evidence.

Policy HB2: Cohesive design

- 7.12 Policy HB2 sets out more detailed design considerations based on Building for Life 12 standards. Six comments have been made regarding this policy.
- 7.13 KCC states that greater emphasis should be given to the role of heritage assets. CPRE Shepway states that the policy should highlight the need for new developments to respond to landscape character and that more sustainable forms of travel should be promoted. A comment states that public transport is unsuitable for some groups, such as the elderly, and

another respondent maintains that too much emphasis is placed on cycling in the PPLP. A comment adds that amenity space needs to accommodate areas for outdoor facilities to dry clothes naturally.

- 7.14 Hythe Town Council supports the policy.

Policy HB3: Development of residential gardens

- 7.15 Policy HB3 sets out criteria to judge proposals for the development of residential garden land. Six comments have been submitted relating to this policy.

- 7.16 The Sandgate Society states that the starting point of the policy should be that development proposals are not permissible in residential gardens. The Kent Downs AONB Unit argues that proposals should only be considered if they are within an existing town or village, rather than dwellings in the open countryside.

- 7.17 KCC states that greater emphasis should be given to the role of heritage assets.

- 7.18 Hythe Town Council strongly supports the policy; however, Sandgate Parish Council and CPRE Shepway object, stating that it is too permissive and would allow development in isolated, unsustainable locations.

Policy HB4: Alterations and extensions to existing buildings

- 7.19 Policy HB4 sets out criteria for judging proposals to alter or extend existing buildings, covering overshadowing, the design and scale of the extension, loft conversions, the location of garages and other considerations. Four comments have been submitted to this policy.

- 7.20 KCC maintains that the policy should take account of the historic environment in altering and converting buildings, and that garages should be set back at least six metres from the edge of the highway boundary.

- 7.21 Hythe Town Council supports the policy and Rother District Council notes that it is generally consistent with its own emerging Local Plan policy.

Policy HB5: Internal and external space standards

- 7.22 This policy requires that development meets or exceeds nationally described internal space standards. Four comments have been submitted to this policy.

- 7.23 Hythe Town Council states that the needs of people suffering from dementia need to be considered in the design of new communities. Rother District Council notes that the policy is generally consistent with its own emerging Local Plan policy.

- 7.24 The Home Builders Federation objects, stating that developers cannot be required to exceed national space standards. The Federation states that no justification for the policy is given and that it should be deleted.

Policy HB6: Self- and custom-build development

- 7.25 Policy HB6 requires that developers provide a percentage of dwelling plots for self- or custom-builders as part of new developments. Different thresholds are given for different areas of the district. Five comments have been made relating to this policy.
- 7.26 Two comments state that it is too prescriptive and should be made more flexible. A comment states that the provision of self-build plots is not a statutory requirement and no justification for the policy has been provided.
- 7.27 Invicta Self and Custom Build Ltd objects, stating that the policy would make the provision of self- and custom-build properties too dependent on the control of volume housebuilders and that the development of smaller sites should be encouraged instead.

Policy HB7: Local housing needs in rural areas

- 7.28 Policy HB7 sets out criteria for assessing proposals for local needs affordable housing in rural areas, as an exception to policies restricting development. Criteria in the policy cover: local needs; the scale of development; siting; and the control of occupancy, so that the homes remain available to meet local need. Four comments have been submitted to this policy.
- 7.29 The Kent Downs AONB Unit and Hythe Town Council support the policy. KCC states that reference should be added to the historic environment. CPRE Shepway makes several comments, stating that reference should be made to *Rural Homes: Supporting Kent's Rural Communities*, that Parish Council support should be required and that some element of cross-subsidy may be appropriate.

Policy HB8: Residential development in the countryside

- 7.30 Policy HB8 sets out criteria for proposals for replacement dwellings in the countryside. Three comments have been submitted to this policy.
- 7.31 KCC maintains that development between villages and among farm buildings may sometimes be consistent with the historic character of the area, and reference should be made to the Kent Farmsteads Guidance produced by Historic England, KCC and the Kent Downs AONB Unit. CPRE Shepway states that policies need to be developed to cover proposals for rural workers' dwellings, the reuse of redundant buildings and the development of buildings of exceptional quality. Hythe Town Council supports the policy.

Policy HB9: Conversion and reconfiguration of residential care homes and institutions

- 7.32 Policy HB9 sets out a number of criteria relating to the conversion of residential care homes (C2 use) to residential (C3), hotel (C1) or non-residential institutional use (D1).

7.33 One supporting comment has been received from Hythe Town Council.

Policy HB10: Development of new or extended residential institutions (C2 use)

7.34 Policy HB10 sets out a number of criteria relating to the development of new residential institutions or the conversion of existing properties to residential institutional use.

7.35 One supporting comment has been received from Hythe Town Council.

Policy HB11: Accommodation for Gypsies and Travellers

7.36 Policy HB11 sets out general criteria that will be used to judge proposals for Gypsy and Traveller accommodation relating to design, location of proposed sites and amenity. Four comments have been received to this policy.

7.37 Hythe Town Council supports the policy. One comment states that there is a need for transit pitches that is not addressed in the policy. One comment states that sites should be allocated to address the need for traveller accommodation, rather than relying on a general development management policy. Southern Water supports requirements relating to flood risk and foul water.

8. Economy (Chapter 10)

Summary of consultation comments

8.1 This chapter sets out eight policies covering a range of issues including the protection of existing employment sites, tourism development, hotels and guest houses, caravan sites, farm diversification, farm shops, the reuse of rural buildings and the provision of broadband services.

8.2 A number of general points have been made to the supporting text of the chapter:

- KCC has submitted a number of comments stressing the value of the district's heritage assets to tourism, highlighting Folkestone Harbour, the Martello Towers and the Royal Military Canal (at the east end), Romney Marsh and historic villages; the value of rural buildings and historic farmsteads is also emphasised;
- London Ashford Airport states that the economic importance of the airport is not recognised and it needs a specific allocation;
- A comment states that not enough consideration has been given to agriculture and that the loss of agricultural land for proposals such as the lorry park is short-sighted;
- A comment regrets lack of support for the business plans of the Shorncliffe Trust; and
- A comment states that reference is needed to the Council's 2016 Employment Land Review.

- 8.3 At the end of the chapter seven options are given, which were presented in the Issues and Options PPLP and informed the development of the Preferred Options plan. London Ashford Airport has submitted comments on this section which argue that:
- Economic development proposals outside town centres, particularly innovative and knowledge-based developments, should not be restricted;
 - Businesses should not be burdened with environmental regulations as viability is marginal in the district; and
 - A flexible approach is needed to secure investment, particularly for small- and medium-sized businesses.

Policy E1: Employment sites

- 8.4 Policy E1 identifies a number of sites in Folkestone, Hawkinge, Hythe, New Romney and Lydd to be protected for business use. Six comments have been submitted to this policy.
- 8.5 One comment objects, stating that the policy only protects sites and does not set out a positive vision of economic growth. Shepway Green Party states that unless the Council can produce a more meaningful employment strategy increased housing development will not be sustainable. An objector states that the planning permission at Ingles Manor will see the closure of two successful businesses and up to 20 jobs lost.
- 8.6 London Ashford Airport objects, stating that the role of the airport is not recognised; it is a significant employer and has potential for the whole district.
- 8.7 Phides supports the policy, particularly the allocation of Link Park (Phases 1 and 2). Hythe Town Council states that Smiths Medical should be added to the sites identified in the policy.

Policy E2: Tourism

- 8.8 Policy E2 contains criteria relating to development for hotels, guesthouses, bed and breakfast, self catering accommodation and new visitor attractions. Seven comments have been submitted to this policy.
- 8.9 A comment from the Kent Downs AONB Unit states that the policy needs to consider proposals for sustainable tourism in the AONB but that any proposals should conserve and enhance the landscape and scenic beauty of the AONB. Hythe Town Council states that the 'five stars' in Hythe need to be integrated (the beach, the canal, the Romney Hythe and Dymchurch Railway, the High Street and St Leonard's Church).
- 8.10 CPRE Sheway strongly objects, arguing that the policy does not provide sufficient safeguards to ensure that development is sustainably located. London Ashford Airport also objects, maintaining that the airport should be identified in this section as an important business within the district.

8.11 A comment expresses disappointment at a perceived lack of support for tourism within the district; an unwillingness to support the business plans of the Shorncliffe Trust is highlighted. Comments of Shepway HEART Forum also raise the efforts of the Shorncliffe Trust and state that developers have been permitted to dictate the form of development at the Garrison.

8.12 KCC maintains that the district's heritage is one of its strongest attractions and this should be recognised in the policy.

Policy E3: Hotels and guest houses

8.13 Policy E3 applies to changes of use which would result in the loss of visitor accommodation and considers the type of accommodation and its location in relation to areas of tourist activity. Two comments have been received to this policy.

8.14 Hythe Town Council supports the policy. London Ashford Airport states that new visitor accommodation should be supported but there should be no presumption in favour of retaining existing uses, so that the best use can be made of previously developed land.

Policy E4: Touring and static caravan sites

8.15 Policy E4 sets out a number of criteria to manage the upgrading of existing caravan sites and changes of use to residential. Three comments have been submitted to this policy.

8.16 Hythe Town Council supports the policy. A supporting comment from the Kent Downs AONB Unit suggests amended wording to protect landscape character. CPRE Shepway objects, stating that owners of caravan sites proposing a change to residential use should have to demonstrate that they have marketed the site appropriately before permission would be granted.

Policy E5: Farm diversification

8.17 Policy E5 sets out a number of criteria to manage proposals for farm diversification, such as landscape character, access, parking and viability of the farm unit. Two comments have been submitted to this policy.

8.18 Hythe Town Council supports the policy. CPRE Shepway objects, stating that the policy needs to reference the impact of traffic on rural lanes and historic assets and their setting.

Policy E6: Farm shops

8.19 Policy E6 sets out criteria to assess proposals for retail use on farms to protect existing town and village centres. The only response is from Hythe Town Council, stating that it has no view on the policy.

Policy E7: Reuse of rural buildings

- 8.20 Policy E7 sets out a number of criteria to manage the reuse of rural buildings, covering their character, access, the significance of the farmstead and other considerations. Four comments have been submitted to this policy.
- 8.21 Hythe Town Council states that it does not have a view on the policy. CPRE Shepway argues that additional points should be added to protect rural lanes from increased traffic and in relation to protected species, such as bats.
- 8.22 Rother District Council supports the policy, stating that its 'business first' approach is consistent with its own policies. A comment states that the policy is unduly restrictive, as national policy allows for residential reuse in certain circumstances.

Policy E8: Broadband provision

- 8.23 Policy E8 seeks provision of highest speed broadband infrastructure as part of new developments. Two comments have been submitted to this policy.
- 8.24 Hythe Town Council supports this policy. KCC states that the policy's wording would miss opportunities to significantly improve infrastructure; the County Council highlights Ashford Borough Council's broadband policy as a good example to follow.

9. Community (Chapter 11)

Summary of consultation comments

- 9.1 This chapter sets out five policies covering: public art; the protection of community facilities; the provision of open space; the provision of formal play space; and Local Green Spaces.
- 9.2 A number of comments have been made to the supporting text of the chapter:
- Sport England highlights that the Council's existing Playing Pitch Strategy dates from 2011 and warns that it is likely to object to any local plan that comes forward without a robust evidence base;
 - London Ashford Airport states that the Council should not regulate development unless absolutely necessary;
 - KCC states that it is undertaking work with other districts and the Kent Garden Trust to identify Local Green Spaces and would like to work with Shepway District Council on the survey. The County Council also states that the historic environment is vital in creating a sense of place;
 - A comment nominates the former Rugby Club grounds at Dymchurch Road, St Mary's Bay as a Local Green Space;
 - Two comments state that the Open Space Study needs to be completed before the Council allocates sites for development, and a

comment states that the space at Princes Parade is vital for local people;

- A comment states that the Council is delaying the identification of Local Green Spaces as planning applications are made on them; and
- A comment objects to reference to sports facilities at Princes Parade, stating that it is an excellent natural open space.

9.3 The Community chapter includes a number of options presented in the Issues and Options PPLP which informed the development of the Preferred Options plan. Six respondents having commented on Option 24, relating to Hythe, to express their objections to proposals for Princes Parade.

Policy C1: Creating a sense of place

9.4 Policy C1 sets out requirements for major developments to contribute towards creating a sense of place through landscaping, public art, water features or lighting. Three comments have been submitted to this policy.

9.5 Hythe Town Council supports the policy. The Home Builders Federation objects, stating that there is duplication with the Community Infrastructure Levy (CIL) Regulation 123 list, which also seeks contributions to public realm improvements. These objections are echoed by London Ashford Airport. Taylor Wimpey suggests wording changes to bring the policy into line with national policy, which allows for other ways to create a sense of place, and to stress links with applicants' Design and Access Statements.

Policy C2: Safeguarding community facilities

9.6 Policy C2 seeks to prevent the loss of community facilities and requires that they have been marketed at an appropriate price and that alternative facilities are provided.

9.7 One comment of support, from Hythe Town Council, has been submitted to the policy.

Policy C3: Provision of open space

9.8 Policy C3 requires the provision of open space as part of new developments of five or more dwellings, in accordance with Fields in Trust guidance. Three comments have been submitted to this policy.

9.9 Shepway Green Party objects, stating that meaningful consultation on the policy cannot be undertaken without the updated requirements from the latest open space study. Hythe Town Council considers that the statement allowing transfer of spaces to Town or Parish Councils "*in certain cases*" needs clarification. The Home Builders Federation states that the policy is unsound because it would not meet the tests of necessity in the NPPF; it notes that the CIL Regulation 123 list already requires contributions to open space.

Policy C4: Formal play space provision

- 9.10 Policy C4 seeks the provision of formal play space provision as part of new developments. A table sets out where contributions will be required and the minimum sizes of facilities. Two comments have been submitted to this policy.
- 9.11 Hythe Town Council states that facilities for 'adult play' need to be added; fitness facilities in Oaklands Park are given as an example. The Home Builders Federation objects to the policy, stating that it would not meet the tests of necessity in the NPPF; it notes that the CIL Regulation 123 list already requires contributions to open space.

Policy C5: Local Green Spaces

- 9.12 Policy C5 sets out that Local Green Spaces will be protected from development other than in certain limited circumstances. Seven comments have been submitted to this policy.
- 9.13 A comment states that the policy should be stricter and no development should be allowed on the spaces. A comment states that proposals for Princes Parade (policy UA25) would be inconsistent with this policy.
- 9.14 Hythe Town Council considers that the point relating to loss of ecological habitats is too strict and that the policy should allow for compensatory habitat to be provided elsewhere. Hythe Neighbourhood Plan Group states that the Green Infrastructure Strategy needs to be completed before Local Green Spaces can be identified.
- 9.15 Southern Water objects to the policy, arguing that it would restrict the delivery of essential infrastructure. KCC seeks inclusion of heritage assets and their setting within the policy.

10. Transport (Chapter 12)

Summary of consultation comments

- 10.1 This chapter sets out five policies covering topics including street layout, residential parking, residential garages, lorry parking and cycle parking.
- 10.2 33 comments are made relating to the general text of the chapter, including a number of detailed points regarding traffic and parking problems in Hythe.
- 10.3 Other comments argue that:
- Proposals to encourage more sustainable transport must be put into practice at an early stage in every development;
 - Developments should provide open 'car port' structures rather than garages, street furniture should be dealt with through reserved matters to avoid clutter, bin stores should be provided and developers should be required to upgrade bus stops where these fall below standard;
 - There is an over-emphasis on cycling, as the topography of the district does not support cycling;

- Parking guidance is inadequate and standards should encourage more spaces serving larger dwellings to deter on-street parking;
- The importance of London Ashford Airport needs to be recognised and supported in policy; and
- Reference should be made to *Rural Streets and Lanes: A Design Handbook* (Kent Downs AONB Unit).

Policy T1: Street hierarchy and site layout

- 10.4 Policy T1 sets out a number of criteria relating to the design of streets in new developments. Five comments have been submitted to this policy.
- 10.5 CPRE Kent supports the policy. Cycle Shepway expresses support for the aim to make streets safer for walkers and cyclists. A comment states that there is a need to improve cycling infrastructure across the district.
- 10.6 A comment states that the policy should consider the option of 'play streets' for new residential areas to encourage children to play outside.
- 10.7 A comment states that the plan should avoid being unnecessarily restrictive and that road layouts should be considered on a site-by-site basis.

Policy T2: Residential parking

- 10.8 Policy T2 sets out criteria governing residential parking relating to layout, parking structures, charging points for electric vehicles and covered cycling parking. Five comments have been made relating to this policy.
- 10.9 Hythe Town Council strongly supports the policy. A respondent states that the policy needs to define what is meant by 'sufficient' parking for residents and visitors. A comment states that enforcement is essential if people are to be deterred from parking on-street. A comment states that tandem on-plot parking for homes should not be encouraged.
- 10.10 A respondent argues that it is unclear what parking standards are being applied: the supporting text states that KCC's Interim Guidance Note 3 (IGN3) provides "*an appropriate foundation*" but that this is indicative and "*there is scope for adaption*", while the policy itself does not refer to IGN3. The comment also challenges criteria relating to the size of spaces, the requirement for electric charging points and for Transport Assessments for all applications regardless of size.

Policy T3: Residential garages

- 10.11 Policy T3 requires that residential garages are not included in the number of parking spaces and that they are of sufficient size to allow for car use and storage. Two comments have been received relating to this policy.
- 10.12 Hythe Town Council supports the policy. Another comment states that garages are typically too small to accommodate parking and storage, and that conversion of garages to habitable rooms should be resisted.

Policy T4: Lorry parking

- 10.13 Policy T4 sets out criteria for assessing applications for lorry parking including site access, noise mitigation, screening, lighting and site layout. Five comments have been submitted to this policy.
- 10.14 Hythe Town Council supports the policy. Shepway Green Party states that the policy needs to include criteria relating to air pollution and another comment states that local residents should not be subject to harmful levels of toxins from exhaust fumes.
- 10.15 The Kent Downs AONB Unit states that reference needs to be made to impacts on the AONB. Another comment states that policies should ensure that the public highway is not used inappropriately by Heavy Goods Vehicles.

Policy T5: Cycle parking

- 10.16 Policy T5 sets out standards for the provision of cycle parking as part of new developments. Four comments have been submitted to this policy.
- 10.17 Two comments support the policy, although one maintains that retail developments also need to provide cycle parking.
- 10.18 A comment states that covered cycle parking needs to be provided in town centres, particularly Hythe. One comment states that requirements relating to the design of cycle parking facilities and the size of garages are overly prescriptive.

11. Natural Environment (Chapter 13)

Summary of consultation comments

- 11.1 This chapter contains nine policies dealing with a range of topics including: managing access to the natural environment; biodiversity; landscape; equestrian development; light pollution; land stability; contamination; and coastal management.
- 11.2 A number of general comments have been made in relation to the supporting text of this chapter:
- Natural England states that a number of sites proposed in the plan could impact on local biodiversity and considers that greater importance should be given to Green Infrastructure;
 - CPRE Kent states that an additional policy is needed to ensure that development is only permitted if there is no adverse impact on internationally designated sites and that a coordinated approach is needed to marine planning;
 - Kent Wildlife Trust considers that greater clarity is needed regarding the management of access to Dungeness;
 - The Environment Agency suggests a number of detailed amendments to the supporting text;

- KCC stresses that landscape character is the result of thousands of years of interaction between the natural environment and human action;
- A respondent states that Princes Parade should be added to the list of coastal sites given protection in the plan;
- The Kent Downs AONB Unit states that text relating to dark skies should include reference to the AONB; and
- London Ashford Airport states that the Council should avoid regulating development unless it is absolutely necessary.

Policy NE1: Enhancing and managing access to the natural environment

- 11.3 Policy NE1 highlights opportunities to improve access to the natural environment as part of new developments. 11 comments have been submitted to this policy.
- 11.4 Hythe Town Council supports the policy. Another supporting comment draws attention to the Cinque Ports Cycleway. The Environment Agency supports the policy, as does KCC, which wishes to see reference to its Countryside and Coastal Access Plan added. Kent Wildlife Trust supports the policy and proposes amended wording to add clarity. Rother District Council supports reference to the Sustainable Access Strategy for the Dungeness Complex. Natural England welcomes the policy and believes that it will also relieve pressures on other designated sites, such as the Folkestone to Etchinghill Escarpment Special Area of Conservation.
- 11.5 Other comments state that management of spaces cannot be achieved through the planning system and the policy therefore serves little purpose. CPRE Kent objects, stating that it considers that there is insufficient evidence to show that development will not have an adverse effect on internationally designated sites. Another comment states that not enough priority is given to protecting natural open space.

Policy NE2: Biodiversity

- 11.6 Policy NE2 sets out criteria that development must meet to safeguard and enhance biodiversity assets. 13 comments have been submitted to this policy.
- 11.7 The Environment Agency supports the policy but highlights other documents, such as the River Basin Management Plan, that could be referenced. Natural England supports the wide ranging considerations that the policy references.
- 11.8 KCC considers that the policy should be redrafted to be more specific and begin *“Planning permission will not be permitted unless ...”* rather than *“Planning permission will be granted ... where it can be demonstrated ...”* Rother District Council supports reference to the joint Sustainable Access Strategy work for the Dungeness Complex. Kent Wildlife Trust welcomes the policy and suggests detailed changes to wording. A comment supports the requirement to create new pollinator habitats.

- 11.9 Hythe Town Council considers that the policy should explain in what circumstances the benefits of development could outweigh adverse impacts on biodiversity. Two comments reference Princes Parade and state that development on that site would be ruled out by the policy. CPRE Kent states that the policy needs to provide more detailed guidance and additional references, for example to ancient woodland.
- 11.10 London Ashford Airport states that biodiversity analysis can only work on a case-by-case basis. The Home Builders Federation argues that the policy does not meet national guidance and is too broadly drawn, encompassing all development proposals regardless of impact.

Policy NE3: To protect the District's landscapes and countryside

- 11.11 Policy NE3 sets out criteria relating to development affecting the Area of Outstanding Natural Beauty, Special Landscape Areas and Local Landscape Areas. Nine comments have been submitted to this policy.
- 11.12 The Kent Downs AONB Unit supports the policy and suggests amendments, including the addition of reference to tranquillity. CPRE Kent also seeks reference to tranquillity in the policy and states that an up-to-date landscape assessment is needed for the whole district. Natural England supports the policy and states that it should be strengthened by reference to the tests in the National Planning Policy Framework related to major developments in the AONB. Hythe Town Council puts forward an amendment for clarity. KCC considers that a Historic Landscape Characterisation Assessment is needed.
- 11.13 Two comments state that Princes Parade should be included as a Local Landscape Area. Other respondents put forward areas for protection, including the Mill Lease Valley (incorporating the proposed allocation UA22: Land at Station Road, Hythe) and Saltwood Care Centre, Hythe (proposed allocation UA23). London Ashford Airport states that there is no requirement to develop policies relating to landscape areas outside the AONB.

Policy NE4: Equestrian development

- 11.14 Policy NE4 puts forward a number of criteria to assess proposals for equestrian development, including landscape and local amenity impacts, links to the existing bridleway network and other considerations. Three comments have been submitted relating to this policy.
- 11.15 Hythe Town Council and KCC support the policy. CPRE Kent objects to the policy, stating that control of lighting should be given more emphasis.

Policy NE5: Light pollution and external illumination

- 11.16 Policy NE5 applies to applications for major development incorporating significant external lighting. The policy requires that applications include a lighting assessment and sets out a table of different zones where different

lighting levels would be appropriate. Five comments have been submitted to this policy.

- 11.17 Shepway Green Party and Hythe Town Council support the policy. The Environment Agency states that the policy needs to refer to water courses as well as other habitats. CPRE Kent states that the policy should be amended to refer to local character, the amenity of residents and wildlife habitats for feeding, roosting and breeding. London Ashford Airport considers that the policy is too restrictive and would impact on the airport's operations. Highways England comments on supporting text and expresses concerns that restrictions will impact on the safe and efficient operation of the strategic road network.

Policy NE6: Land stability

- 11.18 Policy NE6 sets out requirements relating to development proposals in areas of land instability. In these circumstances a land stability or slope stability risk assessment is necessary. Three comments have been submitted in relation to this policy.
- 11.19 Hythe Town Council supports the policy. A comment states that development at Princes Parade would not conform to the policy. London Ashford Airport states that the policy is too prescriptive.

Policy NE7: Contaminated land

- 11.20 Policy NE7 requires applicants to undertake a site assessment where there is good reason to suspect that contamination may exist. Mitigation measures are also outlined. Four comments have been submitted relating to this policy.
- 11.21 One comment states that the criteria could not be met for Princes Parade and therefore the site should not be developed. Hythe Town Council suggests that the policy should require that mitigation measures should not damage historic artifacts. The Environment Agency states that it may require appropriate conditions on any planning application.
- 11.22 London Ashford Airport considers that the policy is too prescriptive.

Policy NE8: Integrated Coastal Zone Management

- 11.23 Policy NE8 sets out general objectives relating to development in coastal areas, and promotes Integrated Coastal Zone Management with partner organisations. Six comments have been submitted regarding this policy.
- 11.24 The Marine Management Organisation has submitted a standard response, referring to its work producing Marine Plans. Rother District Council welcomes the policy. KCC seeks reference to the English Coast Path National Trail in the wording and states that flood mitigation measures need to take account of heritage assets as many of Shepway's most important assets are located along the coast. The Environment

Agency gives its qualified support but emphasises that marine wildlife needs to be considered.

- 11.25 Other comments give support to the Cinque Ports Cycleway and state that air pollution from shipping needs to be considered in the policy.

Policy NE9: Development around the coast

- 11.26 Policy NE9 sets out more detailed criteria covering coastal development on the Folkestone and Dover Heritage Coast and other areas of undeveloped coast. Criteria cover landscape, nature conservation and areas of geological interest. Safeguarding zones are set out to allow for maintenance of sea defences. Four comments have been submitted to this policy.
- 11.27 Hythe Town Council supports the policy. The Environment Agency states that the proposed safeguarding zones could also be considered for their ecological potential. KCC welcomes the policy's support for the Heritage Coast designation but seeks an amendment to refer to the 'English Coast Path National Trail' rather than the 'National Coastal Footpath'. A respondent states that the development of Princes Parade would be contrary to this policy.

12. Climate Change (Chapter 14)

Summary of consultation comments

- 12.1 This chapter sets out six policies dealing with topics such as reducing carbon emissions, sustainable construction, Sustainable Drainage Systems (SuDS) and wind turbines.

Policy CC1: Reducing carbon emissions

- 12.2 Policy CC1 sets out requirements for new build dwellings to reduce carbon emissions through the use of renewable energy technologies. 11 comments have been made relating to this policy.
- 12.3 Hythe Town Council and the Kent Downs AONB Unit support the policy. CPRE Kent states that reference should be made to the energy hierarchy and decentralised energy and that the targets should be more ambitious. Two comments state that the policy should be more ambitious and another maintains that more emphasis is needed on energy efficiency. One comment states that facilities for composting need to be provided. KCC states that it wishes to work with the Council to produce a Renewable Energy Strategy.
- 12.4 The Home Builders Federation and London Ashford Airport state that the policy is too prescriptive and goes beyond what can be required by national guidance.
- 12.5 A comment states that it is unclear whether the policy is applicable to Reserved Matters following the granting of outline permission.

Policy CC2: Sustainable construction

- 12.6 Policy CC2 sets out a number of criteria relating to: sustainable construction including water usage; adaption to the changing needs of the occupants; use of recycled materials in construction; passive solar design; climate change adaption; and other factors. 10 comments have been made relating to this policy.
- 12.7 Shepway Green Party and Hythe Town Council consider that the policy gives too much flexibility to developers.
- 12.8 The Home Builders Federation considers that the policy's water efficiency requirements go beyond what is required by Building Regulations and that the policy is too vague; the Federation calls for it to be deleted.
- 12.9 CPRE Kent makes suggestions for clarifying and strengthening the policy and proposes that requirements for rainwater collection are added. Hythe Civic Society stresses that Shepway is one of the driest places in the country and it does not see how the water needs of additional housing at Otterpool Park can be provided for. The Society adds that facilities for the storage of grey water run-off need to be added as a requirement of policy.
- 12.10 The Environment Agency states that there is confusion over the standards for water use specified in the policy. KCC welcomes reference to the historic and built environment in the policy and states that Climate Change Risk Assessments are needed for new developments.

Policy CC3: Sustainable Drainage Systems (SuDS)

- 12.11 Policy CC3 sets out criteria relating to the provision of Sustainable Drainage Systems (SuDS) as part of new developments. Reference is made to CIRIA (the Construction Industry Research and Information Association) guidelines and KCC's policies on sustainable drainage. Seven comments have been received regarding this policy.
- 12.12 Hythe Town Council supports the policy. KCC also welcomes that policy, stating that it supports the County Council's role as Lead Local Flood Authority. A supporting comment states that there is no requirement to regulate above what is required in Building Regulations.
- 12.13 A comment states that the policy could introduce requirements relating to the capture of rainwater and the use of permeable surfaces. CPRE Kent states that the policy could be reordered to encourage a hierarchical approach to SuDS provision. An objecting comment states that the policy is unclear and should be deleted.
- 12.14 A comment states that development on Princes Parade would conflict with point nine of the policy, relating to development adjacent to a water body.

Policy CC4: Wind turbine development

- 12.15 Policy CC4 states that the creation of wind turbine developments at community scale will be supported where sites are allocated in Neighbourhood Plans. Seven comments have been made relating to this policy.
- 12.16 The Kent Downs AONB Unit states that there should be a presumption against large scale wind turbine development in the AONB and other land affecting the setting of the AONB.
- 12.17 Hythe Town Council supports the policy, but stresses that the district is not covered by Neighbourhood Plans. Other respondents state that the policy should not be so restrictive, as Neighbourhood Plan coverage is not comprehensive. CPRE Kent states that there is a policy gap if applications are submitted in areas without Neighbourhood Plans.
- 12.18 London Ashford Airport states that the policy needs to take account of aircraft navigation and the operation of the airport.

Policy CC5: Domestic wind turbines and existing residential development

- 12.19 Policy CC5 sets out criteria for development involving wind turbines to serve existing dwellings, including impacts on nearby dwellings, heritage assets, the AONB and other considerations. Three comments have been submitted to this policy.
- 12.20 The Kent Downs AONB Unit supports the policy and suggests wording changes to reference landscape character. Hythe Town Council considers that the policy should take into account impacts on electrical and communications systems. CPRE Kent objects to the policy stating that it is unclear.

Policy CC6: Solar farms

- 12.21 Policy CC6 sets out criteria for the development of new solar farms or extensions to existing installations. Criteria include impact on amenity, the AONB and ecology. Four comments have been submitted to this policy.
- 12.22 The Kent Downs AONB Unit supports the policy and suggests wording changes to reference landscape character; it adds that the Council should explore the use of bonds to ensure that installations are removed when no longer operational.
- 12.23 A comment states that the policy could be improved by encouraging community-owned solar farms (Orchard Community Energy's solar farm near Swale is given as an example). CPRE Kent put forward a number of amendments that seek to prioritise previously-developed land for solar development and include reference to heritage assets and valued landscapes.

13. Health and Wellbeing (Chapter 15)

Summary of consultation comments

- 13.1 This chapter introduces four policies covering proposals for new hot food take-away shops, a requirement for Health Impact Assessments as part of larger developments, food growing and public rights of way.
- 13.2 Some general comments have been submitted to this chapter, highlighting pressures on doctors' waiting lists and primary health care facilities.

Policy HW1: Promoting healthier food environments

- 13.3 Policy HW1 sets out requirements covering the development of hot food takeaways near primary and secondary schools. Other criteria cover impacts on town centres, amenity, parking, fumes and refuse disposal. Four comments have been received relating to this policy.
- 13.4 Hythe Town Council makes a number of comments questioning how the policy would be applied. Kentucky Fried Chicken objects to the policy stating that it is not justified and there is no evidence for the exclusion distance that the policy seeks to enforce (400 metres from school premises).

Policy HW2: Improving the health and wellbeing of the local population and reducing health inequalities

- 13.5 Policy HW2 requires that residential developments of 100 or more dwellings or non-residential developments in excess of 1,000sqm will require a Health Impact Assessment. Four comments have been received relating to this policy.
- 13.6 Hythe Town Council supports the policy. A comment states that smaller developments cumulatively contribute to pressure on services, such as hospital capacity, and these developments also need to be considered. Other comments state that air quality needs to be monitored to protect residents' well being.

Policy HW3: Development that supports healthy, fulfilling and active lifestyles

- 13.7 Policy HW3 seeks to provide for and protect areas for food growing, such as allotments and the best and most versatile agricultural land. Five comments have been submitted to this policy.
- 13.8 Folkestone Town Council seeks the protection of Park Farm Road and Tile Kiln Lane allotments. Hythe Town Council supports the policy. Other comments state that demand for allotments will increase with an increasing population and that proposals such as the lorry park run counter to the intention to protect agricultural land.

Policy HW4: Protecting and enhancing rights of way

- 13.9 Policy HW4 seeks the provision of new cycling and walking routes as part of new development and aims to protect existing routes. Three comments have been submitted to this policy.
- 13.10 Hythe Town Council supports the policy. One comment suggests that reference should be made to the Council's approved Cycle Plan. An objector states that there is an over-emphasis on cycling in the plan.

14. Historic Environment (Chapter 16)

Summary of consultation comments

- 14.1 This chapter contains four policies which deal with: heritage assets; archaeology; the Local List of buildings and sites of architectural or historic interest; and communal gardens.
- 14.2 A number of general comments have been made against the supporting text of this chapter:
- CPRE Kent considers that more guidance is needed on the consideration of setting in decision making, significance of the asset, cumulative change and substantial harm;
 - Go Folkestone Action Group states that insufficient attention is given to the heritage of Folkestone;
 - Historic England makes a number of points including that: the historic environment is a part of the environmental dimension of sustainable development; more reference needs to be made in diagrams and text to scheduled monuments; the Kent Historic Towns Surveys mentioned in the text are not comprehensive and up-to-date; detail wording changes are also suggested;
 - KCC and Historic England state that undesignated archaeological assets need to be taken into account and also have protection;
 - KCC makes a number of points relating to the Heritage Strategy and Local List guidance and urges the Council to adopt these documents as Supplementary Planning Documents (Tunbridge Wells Borough Council's Local List document is cited as a good example);
 - Other comments state that heritage considerations have not been given weight in decisions on Shorncliffe Garrison or proposals for Princes Parade and Sandgate is suffering from piecemeal destruction of its Conservation Area; and
 - Respondents argue that the public should be involved in determining which assets are included on the Local List and that it would be more meaningful to have the Heritage Strategy in place before consultation on the PPLP.

Policy HE1: Heritage Assets

- 14.3 Policy HE1 encourages the reuse of heritage assets to prevent damage through neglect. Seven comments have been submitted to this policy.

- 14.4 Two comments state that the development of Princes Parade will not meet the requirement of the policy to protect and conserve heritage assets. Another comment states that the principles behind the policy have not been observed in the development of Shorncliffe Garrison or proposals for Princes Parade.
- 14.5 Hythe Town Council supports the policy. Historic England states that the wording needs to be tightened to state that some assets need to be conserved for their significance alone rather than their potential for reuse. KCC states that the policy should be modified to emphasise that it is the *significance* of the heritage asset which needs to be considered in decision-making. Shepway HEART Forum states that it supports the creation of Local Lists and argues that the re-use of historic buildings should be fully explored before proposals for demolition are considered.

Policy HE2: Archaeology

- 14.6 Policy HE2 requires assessment of archaeological assets, field evaluations and the preservation of archaeological remains, where appropriate. Six comments have been submitted to this policy.
- 14.7 A comment states that the development of Princes Parade would not be in accordance with this policy.
- 14.8 Hythe Town Council supports the policy. Historic England states that the policy is acceptable. Kent County Council welcomes the policy, but suggests detailed wording changes to stress that it is the *significance* of the archaeological asset that needs to be considered. Shepway HEART Forum states that it supports the creation of Local Lists and the re-use of historic buildings before proposals for demolition are considered.

Policy HE3: Local List of Buildings and Sites of Architectural or Historic Interest

- 14.9 Policy HE3 seeks to protect and conserve the particular characteristics of buildings or sites on the Local List. Three comments have been submitted to this policy.
- 14.10 Shepway HEART Forum states that it supports the creation of Local Lists. KCC states that the policy should relate to a 'Local List of Heritage Assets' as the list may cover more than buildings and sites of architectural or historic interest, and the policy should stress 'significance' rather than 'characteristics'.
- 14.11 Taylor Wimpey states that HE3 is unjustified and incompatible with national policy in that the policy preempts the Heritage Strategy evidence base that will support it.

Policy HE4: Communal Gardens

- 14.12 Policy HE4 seeks to preserve historic gardens in the west end of Folkestone and highlights eight gardens that will be protected under the policy. Two comments have been submitted to this policy.
- 14.13 Shepway HEART Forum states that most of the gardens would be protected as they are under estate ownership; however, it is stated that Westbourne Gardens should be considered as a special case and that the Council should compulsory purchase the gardens and transfer ownership to a community group. The Trustees of Viscount Folkestone states that the term 'communal' is misleading as the gardens are owned by the Trustees and so are private.

**Appendix 4 – Summary of Representations received to the Places
and Policies Local Plan – Submission Draft Consultation**



FOLKESTONE & HYTHE DISTRICT PLACES AND POLICIES LOCAL PLAN SUBMISSION DRAFT

Summary of Main Issues

JULY 2018

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1. Introduction

- 1.1. The Places and Policies Local Plan Submission Draft was published for consultation on 6 February 2018. The consultation was open for comments for a period of six weeks, closing on 19 March 2018.
- 1.2. This report provides a summary of the main issues arising from the consultation process, in compliance with Regulation 22 (c) (v) of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.3. On 1 April 2018, shortly after the close of the consultation, the local planning authority changed its name from Shepway District Council to Folkestone & Hythe District Council. References to 'Shepway' are kept in this report where they relate to documents produced before 1 April 2018.

2. Summary of Main Issues

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

Breakdown of comments by chapter

- 2.2. A total of **831 representations** were received to the Places and Policies Local Plan from **330 respondents** (different individuals and organisations).
- 2.3. The representations were broken down by chapter as shown in Table 1.

Chapter		Number of comments	Sub-totals
Places and Policies Local Plan as a whole		16	30
1	Policy Index	1	
2	Foreword	1	
3	Introduction – Places and Policies Local Plan	12	
4	Introduction - Places	8	572
5	Urban Character Area	384	
6	Romney Marsh Character Area	70	
7	North Downs Character Area	110	
8	Introduction – Development Management Policies	0	
9	Housing and the Built Environment	43	229
10	Economy	21	
11	Retail and Leisure	19	
12	Community	28	
13	Transport	19	
14	Natural Environment	40	
15	Climate Change	14	
16	Health and Wellbeing	9	
17	Historic Environment	36	
18	Monitoring	0	
Glossary		0	0
Appendix 1: Nationally Described Space Standards		0	
Appendix 2: Schedule of Policies to be Deleted		0	
Total number of comments			831

Comments on accompanying documents

- 2.4. In addition to comments on the local plan, eight comments were received on the accompanying documents shown in Table 2.

Title	Number of comments
Policies Map	6
Places and Policies Local Plan Sustainability Appraisal	2
Places and Policies Local Plan Habitats Regulations Assessment	0
Total number of comments	8

Comments by policy

- 2.5. Policy UA18: Princes Parade, Hythe received the most responses (236 comments). This represents approximately 28 per cent of all the comments received on the plan. The remaining site allocations and the development management policies attracted far fewer comments.
- 2.6. Policies receiving more than 10 comments are set out in Table 3.

Title	Number of comments
Policy UA18: Princes Parade, Hythe	236
Policy UA19: Hythe Swimming Pool, Hythe	34
Policy ND6: Former Lympne Airfield	32
Policy ND4: Land east of Broad Street, Lympne	19
Policy RM2: Land off Victoria Road West, Littlestone	17
Policy RM11: Car Park, Coast Drive, Greatstone	16
Policy ND5: General Sellindge Policy	15
Policy UA2: Rotunda and Marine Parade Car Parks, Lower Sandgate Road, Folkestone	14
Policy UA11: Affinity Water, Shearway Road, Cheriton	11
Policy ND9: Etchinghill Nursery, Etchinghill	11

Policies receiving no comments

- 2.7. 11 policies received **no comments**. These are set out in Table 4.

Table 4: Local Plan policies receiving no comments
Policy RM8: Station Yard, Station Road, Lydd
Policy RM10: Land rear of Varne Boat Club, Coast Drive, Greatstone
Policy HB13: Houses in Multiple Occupation (HMOs)
Policy E4: Hotels and Guest Houses
Policy RL3: Hythe Town Centre
Policy RL4: New Romney Town Centre
Policy RL6: Sandgate Local Centre
Policy RL7: Other District and Local Centres
Policy RL9: Design, Location and Illumination of Advertisements
Policy RL10: Shop Fronts, Blinds and Security Shutters
Policy NE6: Land Stability

- 2.8. The main issues arising from the representations are outlined on a chapter-by-chapter basis in the sections that follow.
- 2.9. Where comments have been made against paragraphs of supporting text to a particular policy, they are summarised under the policies they relate to. Where comments do not directly relate to a policy, but make general points or relate to a particular place, they are summarised separately at the relevant part of the chapter.

3. Comments on the Local Plan as a Whole

3.1. 16 comments were received on the Places and Policies Local Plan as a whole. These raised a number of issues, some general and others relating to specific areas or sites:

- The website is inadequate, crucial documents are missing and there has been insufficient communication with the public;
- Concern at the level of development proposed in the plan - over-development far in excess of local requirements - and the lack of affordable housing;
- Resistance of local people to large scale housing developments;
- Lack of water resources in the district to serve a new town (Monks Horton Parish Meeting);
- Lack of confidence in the planning process and reference made to a recent court case (Little Densole Farm case);
- No justification for further building in Brenzett, given recent developments and the risk of flooding and lack of infrastructure (Brenzett Parish Council);
- There is a need for the plan to address the decommissioning and remediation of the Dungeness 'A' site;
- Housing growth will place additional pressure on social infrastructure, such as education facilities, and education contributions from developers must be sufficient to deliver additional school places (Education & Skills Funding Agency);
- The local plan fails to provide infrastructure in line with Core Strategy Policy SS5¹;
- The local plan has not been prepared in line with the Statement of Community Involvement;
- There is a lack of vision for what the district should be, how economic development can be achieved through heritage tourism;
- Folkestone's road system must be re-examined;
- The impact of development in the Folkestone and Cheriton area has not taken account of existing infrastructure;
- The housing numbers do not reflect the availability of brownfield sites or empty properties;
- The plan does not meet requirements of the Equality Act 2010 and the public sector equality duty;
- There are no strategic issues of cross-boundary importance (Dover District Council); and
- Land adjacent to The Willows, adjoining A20, Lympne should be included as an allocation for residential development. It lies within Newingreen and would not be visually intrusive. The land is available and deliverable and forms part of the area proposed for the new garden town of Otterpool Park.²

¹ See Shepway Core Strategy Local Plan 2013, Policy SS5: District Infrastructure Planning

² See Core Strategy Review – Consultation Draft, Regulation 18 Version (March 2018), Policies SS6-SS9.

4. Policy Index

- 4.1. One comment was received against the policy index. This was to clarify the reference number used for comments submitted by Shepway HEART Forum (Heritage and Arts Tourism).

5. Foreword

- 5.1. One comment was received against the foreword by the Cabinet Member for the District Economy. This stated that the development proposed on Princes Parade³ would result in serious and unjustified harm to the Royal Military Canal scheduled monument.

6. Chapter 3: Introduction - Places and Policies Local Plan

- 6.1. 12 representations were received relating to Chapter 3 and raised the following issues:

General

- The plan does not set out strategic priorities;
- The Core Strategy should be reviewed first as this deals with the larger issues, such as the Garden Town⁴, which could meet all the housing numbers;
- There is a need to address tourism and retail expectations for the next 30 years;
- The council's planning processes has been criticised as it has refused to hold a public consultation meeting about major changes to the proposed Folkestone seafront development; and
- There have been failures in the Duty to Cooperate, especially with Ashford Borough Council (Ashford could take some need and they need to be included in Otterpool).

Housing

- Housing allocations do not conform to the Core Strategy requirement in terms of the numbers for each character area;
- Inability to deliver affordable housing due to 'viability';
- No account has been taken in the housing numbers for the Otterpool Park garden town;
- The target of 8,000 homes should be a minimum – the council should not rely on the Core Strategy Review or garden town as both are still at early stages; and
- Historic England's comments have not been addressed in Policy UA18: Princes Parade.

Garden Town (Otterpool Park)

- Object to the development at Otterpool Park due to lack of potable water, air pollution from vehicles, impact on the Kent Downs Area of Outstanding Natural Beauty (AONB), and the loss of quality of life for thousands of residents.

Infrastructure

- The Infrastructure Delivery Plan (IDP) has not been updated. The existing IDP contains little on education and any review should include capacity, average costs

³ See Places and Policies Local Plan, Policy UA18: Princes Parade, Hythe

⁴ See Core Strategy Review – Consultation Draft, Regulation 18 Version (March 2018), Policies SS6-SS9.

- of expanding schools, educational needs associated with planned homes and proportion of children with special educational needs (ESFA);
- The plan does not take into account pressures on local infrastructure; GP surgeries, mental health services and other health services. The Royal Victoria Hospital site is being lost as an opportunity for a health facility; and
 - There is a need to address the traffic requirements as development increases.

Evidence Base Documents

- Supporting documents have not been published (Heritage Strategy, Destination Management Plan, Economic Strategy, Viability report); and
- There is a need to demonstrate that the plan meets the public sector equality duty and complies with the Equality Act 2010.

Part One – Places

7. Chapter 4: Introduction - Places

7.1. Eight representations were received relating to Chapter 4. The representations raised the following issues:

- The identification of housing sites based on proportionality is illogical and contrary to proper plan-making principles;
- The plan identifies sites well in excess of the Core Strategy target. This is excessive given the environmental, infrastructure and market constraints in the area;
- The target of 8,000 homes should be a minimum as the need has increased – the council should not rely on the Core Strategy Review or garden town as both are still at an early stage;
- The housing numbers don't reflect the potential to bring empty properties back into use;
- Support for the inclusion of Etchinghill as a secondary village;
- Land off Horn Street, Folkestone should be allocated; and
- Table 4.2 does not include Otterpool Park or the identified development sites in Ashford Borough or Dover District.

8. Chapter 5: Urban Character Area

8.1. 384 representations were received relating to Chapter 5.

8.2. Nine representations related to the chapter in general and raised the following issues:

- It is not possible to prepare a local plan until an updated Core Strategy is produced;
- The development of Otterpool Garden Town will affect the entire balance of the district. It is difficult to consider the plan without giving due consideration to the effects of Otterpool;
- The availability of the Otterpool strategic site should have been taken into account when assessing sites that have been included in the plan;
- The Core Strategy set out a requirement that approximately 75 per cent of all new residential development should be in the Urban Area – this is not demonstrated;
- Support the fact that the Coolinge Lane allocation has been deleted since the Preferred Options draft consultation document;
- There is no reference to Fisherman’s Beach, Hythe. It is registered as a ‘Town Green’ and is now being seriously damaged by development - object to any further building on the land adjacent to the beach;
- The plan omits potential allocation sites (i.e. Biggins Wood); and
- The definition of the Urban Character Area excludes ‘Seabrook’.

Folkestone Town

8.3. Five representations were received relating to Folkestone Town. These raised the following issues:

- Support for Section 106 contributions towards the expansion of Oaklands Health Centre⁵ but question how GPs can be recruited and retained;
- Folkestone’s heritage should be emphasised more in the document as something to be protected and promoted;
- Some form of transportation hub would regenerate and serve Folkestone; and
- There is little evidence that the requirements of the Core Strategy have influenced this plan.

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

Policy UA1: East Station Goods Yard, Folkestone

8.5. Four representations were received relating to Policy UA1. These raised the following issues:

- The site should be used as a car park or park-and-ride facility to serve the Folkestone Seafront development⁶, possibly linking with the old train line to the harbour (Policy RL12);
- Access to the platforms at Folkestone East should be created/retained in the event that the station is reintroduced; and
- Criterion 6 should be modified to read: “A 15 metre gap between the pumping station and any sensitive development (such as housing) should be taken into consideration in the site layout” (Southern Water).

⁵ See Policies UA13, UA14, UA15 and UA16

⁶ See Planning application reference Y12/0897/SH

Policy UA2: Rotunda and Marine Parade Car Parks, Lower Sandgate Road, Folkestone

- 8.6. 14 representations were received relating to Policy UA2. These raised the following issues:
- The effective use of both sites is constrained by the 'estimated capacities'. Of relevance is the recent application⁷ which proposed to amend the maximum height parameters of the consented Seafront development⁸;
 - There will be a shortage of places to park once the seafront development is complete. These sites would better serve the area as car parks;
 - With the Folkestone Seafront development, these sites would constitute an overdevelopment of the area. The existing infrastructure is insufficient;
 - Development should be in keeping with the surrounding conservation areas, listed buildings (especially the Leas Lift) and the seafront development;
 - Consideration should be given to walking and cycle access to provide links to adjacent routes (Kent County Council);
 - Development must ensure that the England Coastal Path is not adversely affected;
 - Marine Parade Car Park was previously a gas works, was contaminated and had a stipulation that it was never to be developed; and
 - No account has been taken of Policy FTC8⁹.

Policy UA3: The Royal Victoria Hospital, Radnor Park Avenue, Folkestone

- 8.7. Eight representations were received relating to Policy UA3. These raised the following issues:
- There is a severe lack of medical facilities in Folkestone, including GP surgeries, and hospital facilities. The building should remain a medical centre;
 - There is one-way traffic flow and limited highway capacity on Radnor Park Avenue. Adequate parking should be provided on-site as any on-street parking restrictions would displace parking to neighbouring residential areas;
 - The policy should include details of walking and cycling links to routes to the north, Radnor Park to the west and south; and
 - There is a lack of respect for the history of the building.

Policy UA4: 3-5 Shorncliffe Road, Folkestone

- 8.8. One representation was received relating to Policy UA4. This stated that planning permission has been granted for the site¹⁰.

Policy UA5: Ingles Manor, Castle Hill Avenue, Folkestone

- 8.9. Six representations were received relating to Policy UA5. These raised the following issues:
- The site would have been ideal for a business growth hub, given its proximity Folkestone Central station;

⁷ Planning application reference Y17/1099/SH

⁸ Planning application reference Y12/0897/SH

⁹ 2006 Shepway Local Plan Review Policy FTC8: The Overcliff (formerly Leas Lift car park).

¹⁰ Planning application reference Y17/0019/PA

- If the redevelopment of the 'commercial phase' can consider retail and other commercial services, then criterion 5 needs to be adjusted to reflect the explanatory text;
- Control should be exercised to ensure that replacement planting is good, and that the remaining green areas are integrated into public space; and
- The following criterion should be added: "*A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider*" (Southern Water).

Policy UA6: Shepway Close, Folkestone

8.10. Three representations were received relating to Policy UA6. These raised the following issues:

- Criterion 1 should be amended to make sure open space is accessible from the public footpath and along the western edge of any development. The site is bordered by a public footpath (HBX16). It is important that the path is opened up and runs alongside the open space (Kent County Council); and
- The following criterion should be added: "*A 15 metre gap between the pumping station and any sensitive development (such as housing) should be taken into consideration in the site layout*" (Southern Water).

Policy UA7: Former Gas Works, Ship Street, Folkestone

8.11. Three representations were received relating to Policy UA7. These raised the following issues:

- Concern about developing houses on contaminated land, given its former use;
- There is a severe lack of medical facilities in Folkestone. A small parcel of land should be set aside for the building of a new doctor's surgery, to replace the overcrowded one in Guildhall Street North; and
- Remains of the gasworks buildings should be incorporated into the scheme, and the Triennial Artwork retained as an asset to the town.

Policy UA8: Highview School, Moat Farm Road, Folkestone

8.12. Four representations were received relating to Policy UA8. These stated that the area suffers severe flooding; drainage will either have to be into the Downs Road sewer, which already has insufficient capacity, or sent towards Blackbull Road. Proposals to give relief to Downs Road by opening up access to Blackbull Road sewer system have been refused by Southern Water.

Policy UA9: Brockman Family Centre, Cheriton

8.13. Two representations were received relating to Policy UA9. These stated that the development should include appropriate links to the local footpath network and footpath HF55, which provides access to the wider countryside (Kent County Council).

Policy UA10: The Cherry Pickers Public House, Cheriton

8.14. Two representations were received relating to Policy UA10. These stated that appropriate and proportionate contributions should be made to improve the adjacent Public Rights of Way network (Kent County Council).

Policy UA11: Affinity Water, Shearway Road, Cheriton

8.15. 11 representations were received relating to Policy UA11. These raised the following issues:

- The allocation should include land north of Shearway Road which is available for commercial development and could provide in excess of 3,500 sq ft B1 space;
- Flatted residential accommodation would be out of keeping with the surrounding character;
- Flooding problems have been underestimated - the Pent Stream causes flooding of gardens and the surface water sewerage system is not able to deal with rainwater. Possibly the stream would benefit from landscaping, as in parts of Broadmead Village, or it could be used as highway surface water storage;
- Proposals for office space will increase the risk of people parking on Cherry Garden Avenue. A suitably-sized car park should be provided;
- Concern about highway capacity at peak times - the junction with Shearway Road would need to be assessed;
- The Morehall Recreation Ground and children's play area is in a very poor condition and requires replacing. Any development should include the requirement to improve the park and play area;
- Proposals might provide an opportunity to extend the Tile Kiln Lane allotments;
- The presence of many mature trees should also be stated as they are exceptional;
- Sport England strongly resist development that would either involve the loss of playing field or prejudice the use of the playing field;
- The following should be added to the policy: "*There is a high quality of design that responds to the site's location within the setting of the Kent Downs AONB, paying particular regard to material, massing, roofscape and landscaping*" (Kent Downs AONB Unit); and
- The following should be added to the policy: "*A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider*" (Southern Water).

Policy UA12: Encombe House, Sandgate

8.16. Three representations were received relating to Policy UA12. These raised the following issues:

- The policy should include appropriate and proportionate contributions to improve the adjacent footpath (HF56 and HF58) (Kent County Council); and
- The following should be added to the policy: "*A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider*" (Southern Water).

Hythe Town

8.17. One representation was received relating to Hythe Town. This stated that the Core Strategy requires that significant development must be consistent with maintaining the viability of higher-order tourism. However, proposals to develop Princes Parade contradict this by causing irreparable harm to the two finest tourist attractions in Hythe (the eastern extent of Prince Parade and the Royal Military Canal).

Policy UA13: Smiths Medical Campus, Hythe

8.18. Eight representations were received relating to Policy UA13. These raised the following issues:

- The site should be used for the proposed new leisure centre for Hythe. It is better placed to serve the town and the Romney Marsh than the current preferred site at Princes Parade¹¹;
- The access and capacity of the highways has not been adequately considered; and
- The policy should include appropriate and proportionate contributions to improve the adjacent footpath (HB61 - to Hythe Community School) (Kent County Council).

Policy UA14: Land at Station Road, Hythe

8.19. Seven representations (including two duplicates) were received relating to Policy UA14. These raised the following issues:

- This effective 'green lung' should be retained;
- The policy should include appropriate and proportionate contributions to improve the adjacent footpath (HB22), which links to footpaths HE287 and HB23 providing access to the wider countryside (Kent County Council);
- At the density of 30 dwellings per hectare, the capacity should be listed as 40 dwellings; and
- The following should be added to the policy: "*A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider*" (Southern Water).

Policy UA15: Land at Saltwood Care Centre, Hythe

8.20. Seven representations were received relating to Policy UA15. These raised the following issues:

- The allocation is likely to have an impact on the AONB and its setting; it could be considered as small-scale major development. The policy should highlight the need for a Landscape and Visual Impact Assessment (LVIA) (Natural England);
- The following should be added to the policy: "*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*" (Kent Downs AONB Unit);
- The following should be added to the policy: "*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 policy should include appropriate and proportionate contributions to improve the adjacent footpath (HB23) (Kent County Council); and
- It has been previously demonstrated that no harm arises to the Area of Outstanding Natural Beauty and Special Landscape Area; there is therefore no need to continue to view this site as an exception to policy. Remove the restriction to "Class C2 or C3 Extra Care units".

Policy UA16: St Saviour's Hospital, Seabrook Road, Hythe

8.21. Nine representations were received relating to Policy UA16. These raised the following issues:

- There is a history of land instability and subsidence of the Hythe hillside; question whether this has been adequately considered;
- Concern about the impact of additional traffic on the A259;
- Development will increase surface run-off onto Seabrook Road;

¹¹ See Places and Policies Local Plan Submission Draft, Policy UA18: Princes Parade, Hythe

- Requirements for affordable housing are not stated;
- College Bridge is not a public highway. The policy should be updated accordingly (Kent County Council);
- There is a severe lack of medical facilities, including GP surgeries and hospital facilities. The building should remain a medical centre;
- This site reflects that period of Hythe's history when nuns established nursing orders and hospitals, and should be included in a 'local list'; and
- The following should be added to the policy: *"A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider"* (Southern Water).

Policy UA17: Foxwood School, Seabrook Road, Hythe

8.22. Seven representations were received relating to Policy UA17. These raised the following issues:

- There is a history of land instability and subsidence of the Hythe hillside; question whether this has been adequately considered;
- Requirements for affordable housing are not stated;
- College Bridge is not a public highway. The policy should be updated accordingly. An emergency access will be required as the development exceeds 50 dwellings (Kent County Council);
- Sport England strongly resist development that would either involve the loss of the playing field or prejudice the use of the playing field;
- The following should be added to the policy: *"Access is maintained to the existing underground sewerage infrastructure for maintenance and upsizing purposes"* (Southern Water); and
- The policy should include a requirement for improvements to the GP surgeries in Hythe.

Policy UA18: Princes Parade, Hythe

8.23. 236 representations were received relating to Policy UA18. These raised the following issues:

- Historic England has fundamental concerns regarding the impacts of the proposed development on the Royal Military Canal (RMC);
- NPPF (paragraph 130) states that *"where there is evidence of deliberate neglect of or damage to a heritage asset [setting]; the deteriorated state of the heritage asset should not be taken into account in any decision"*;
- The policy does not follow the most appropriate strategy. There are alternative options available to accommodate the delivery of a new leisure centre for Hythe;
- Development would destroy the only break in the coastal urban ribbon development between Hythe and Folkestone;
- The site was deleted from the draft Local Plan (2006) by the Inspector who described Princes Parade as *"one of the finest vistas in the district"* and agreed with the previous Inspector (1996). Nothing has changed since;
- Prior to the 1960s the site was used for leisure and recreation. While the council has restricted public access following its use as landfill and the silt dumping project (2002), this visual open space has a historic and public amenity value;
- Residents are deficient in access to open space and there is a lack of opportunities for informal recreation;
- The open space is not surplus to requirements as set out in NPPF (paragraph 75) nor would the loss resulting from the proposed development be replaced by equivalent or better provision in terms of quantity and quality in a suitable location;

- Claims that the site has limited recreation value due to past historical uses is the consequence of the deliberate actions by the local authority;
- CPRE does not feel that an alternative level of open space would be provided in the area once the Princes Parade site is developed;
- The site should be designated a Local Green Space according to NPPF (paragraph 77);
- Loss of visual and recreational amenity space. This area is greatly used and valued as an asset by residents and visitors;
- The existing swimming pool in Hythe (South Road) is run down, inefficient and no longer fit-for-purpose - proposals for a new leisure centre are supported;
- Princes Parade should not be diverted alongside the canal. The proposed development will increase traffic on the A259 and air pollution;
- The site is adjacent to a Local Wildlife Site (LWS);
- The site is an important stopping off and departing point for migrating birds and is also important for breeding and wintering birds. It also supports an important habitat for invertebrates;
- The canal path will be more intensively used, having a negative impact on the biodiversity;
- Light and noise pollution associated with the development will have an adverse effect on the LWS;
- Kent Wildlife Trust states that there is insufficient emphasis on the need to protect and enhance the LWS adjacent to the development site, consistent with the NPPF (paragraph 118):
 - The policy should be more explicit with regard to the protection and enhancement of the LWS;
 - An adequate buffer strip should be provided;
 - Additional access management measures should also be included within the LWS;
 - Any ecological survey carried out as part of a planning application process should include the use of the site by invertebrates and overwintering and the passage of breeding birds given its proximity to SPA/SAC sites;
- The site is in Zone 3A of the Environment Agency Flood Hazard Map. NPPF (paragraph 101) states that development should be directed away from areas of highest flood risk. The area relies on a coastal flood protection programme that might not be sustainable for the life of the development;
- The site is heavily contaminated owing to its former use as district municipal dump. There is concern about the disturbance of toxic waste. There is potential for toxins associated with the former landfill to leech into the RMC and LWS. Japanese Knotweed is also known to be present on site;
- Concern about the effect the development will have on utilities, particularly sewerage and drainage;
- Existing health, education and social services are already struggling to cope;
- The proposal is inconsistent with the principle of sustainable development;
- Concern about the design of the scheme¹² and the visual impact on the character of the local area;
- The project is not financially viable once the costs of developing the contaminated land have been factored in;
- Due to the high cost of development there is unlikely to be any significant affordable housing delivered;
- The adjacent golf course could, at a later date, be seen as an “infill site” between the Hythe Imperial and Princes Parade;

¹² See planning application reference Y17/1042/SH

- The policy is contrary to policies NE9¹³ and TM8¹⁴;
- There is a conflict of interest between the council as landowner and planning authority; and
- There is a surplus of homes against the Core Strategy target.

Policy UA19: Hythe Swimming Pool, Hythe

8.24. 34 representations were received relating to Policy UA19. These raised the following issues:

- The swimming pool is run down, inefficient and no longer fit-for-purpose - proposals for a new leisure centre on Princes Parade are supported;
- The council has not justified the preferred site for the relocation of the swimming pool nor provided valid reasons why alternatives are not suitable;
- It is not clear whether the existing swimming pool would be knocked down when a 'decision' on where to build it was taken or when planning permission was given and the funds set aside; and
- There is a requirement for a contribution towards improvements to the GP surgeries in Hythe.

Alternative Site Submissions – Urban Character Area

8.25. There was one alternative site promoted for the urban character area. This was recorded against Chapter 4: Introduction – Places (site at Horn Street, Folkestone – see paragraph 7.1 above).

¹³ Places and Policies Local Plan Submission Draft Policy NE9: Development Around the Coast

¹⁴ 2006 Shepway Local Plan Review Policy TM8: Princes Parade, Hythe

9. Chapter 6: Romney Marsh Character Area

9.1. 70 representations were received relating to Chapter 6.

9.2. Five representations related to the chapter in general and raised the following issues:

- The plan fails to recognise the importance of London Ashford Airport to the local economy - it should include a policy supporting future investment at the airport;
- There is concern about the increased recreational impact of allocated sites on nearby protected sites (Kent Wildlife Trust);
- The policies are not consistent with 2013 Core Strategy Policy SS5¹⁵ and the NPPF as they fail to ensure that infrastructure requirements will be met;
- Romney Marsh is being asked to take a far higher percentage than 10 per cent of development, putting pressure on the infrastructure, open landscape and prime agricultural land of the Romney Marsh (CPRE Kent);
- Drainage is inadequate with frequent back-ups of foul sewers in wet weather (CPRE Kent);
- Concerns about highways capacity of the A259 in the event of a major incident;
- There is no evidence to demonstrate that the road network can cope with additional traffic or that measures will secure a shift towards sustainable transport modes (CPRE Kent);
- There are no proposals for any future medical facilities to be located to the north of New Romney (CPRE Kent);
- Local schools are already nearing capacity (CPRE Kent);
- Development will threaten the unique character of the Marsh; and
- Increased pressure on local services has not been effectively justified.

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

Policy RM1: Land off Cherry Gardens, Littlestone

9.4. Four representations were received relating to Policy RM1. These raised the following issues:

- The site is greenfield with no justification given for development;
- There are concerns about access and highways capacity of the A259 in the event of a major incident; and
- The policy fails to meet Core Strategy Policy SS5.

Policy RM2: Land off Victoria Road West, Littlestone

9.5. 17 representations were received relating to Policy RM2. These raised the following issues:

- The road is too narrow which creates a poor access and highway capacity is inadequate;
- Doctor's surgeries are at capacity and doctors cannot be attracted to the area;
- Primary and secondary schools are already at capacity;
- The site is greenfield, with no justification given for development;
- The site is within a flood risk area;
- There will be a loss of and disturbance to local wildlife and protected species;
- Employment opportunities on the Romney Marsh will be limited following the decommissioning of Dungeness;

¹⁵ Shepway Core Strategy Local Plan 2013, Policy SS5: District Infrastructure Planning

- To bring the plan in line with the NPPF and NPPG, and to ensure sustainable development, criterion 9 should be removed and additional criteria added (Southern Water); and
- Housing is not affordable for local residents.

Policy RM3: Land rear of the Old School House, Church Lane, New Romney

- 9.6. One representation was received relating to Policy RM3. This raised concerns about highways capacity of the A259 in the event of a major incident.

Policy RM4: Land west of Ashford Road, New Romney

- 9.7. Four representations were received relating to Policy RM4. These raised the following issues:

- The site is greenfield, with no justification given for development;
- Concerns about site access and highways capacity of the A259;
- There is an over-concentration of homes to the north of New Romney with existing homes built under Core Strategy Policy CSD8¹⁶;
- Employment opportunities on the Romney Marsh will be limited following the decommissioning of Dungeness;
- The development will be detrimental to local character and visual amenity; and
- Existing infrastructure including roads, schools and doctors surgeries cannot cope.

Policy RM5: Land adjoining the Marsh Academy, Station Road, New Romney

- 9.8. Two representations were received relating to Policy RM5. These raised the following issues:

- The policy fails to meet Core Strategy Policy SS5 as there has been no timely provision of infrastructure;
- There is no evidence to support the need for a medical facility; and
- The site should be safeguarded for educational purposes only to support the expansion of the Marsh Academy.

Policy RM6: Kitewell Lane, rear of the Ambulance Station, Lydd

- 9.9. Two representations were received relating to Policy RM6. These raised the following issues:

- The policy includes the word “integration” of the wildlife site and this is not appropriate (Kent Wildlife Trust);
- The wording should be amended given the sensitive location adjacent to a Local Wildlife Site (Kent Wildlife Trust); and
- Additional land to the west should be incorporated into the allocation to provide a better, alternative access.

Policy RM7: Land South of Kitewell Lane, Lydd

- 9.10. One representation was received relating to Policy RM7. This supported pedestrian permeability throughout and beyond the site, with pedestrian links to Poplar Lane and Kitewell Lane.

¹⁶ See Shepway Core Strategy Local Plan 2013, Policy CSD8: New Romney Strategy

Policy RM8: Station Yard, Station Road, Lydd

9.11. There were no representations were received relating to Policy RM8.

Policy RM9: Former Sands Motel, Land adjoining pumping station, Dymchurch Road, St Mary's Bay

9.12. Three representations were received relating to Policy RM9. These raised the following issues:

- The policy should include appropriate and proportionate contributions to improve the adjacent footpaths HB142 and HB139 (Kent County Council);
- Criterion 3 should be reworded to *"improvements to lengthen and widen the bus stop on the east side of the A259"* (Kent County Council); and
- The toilet block should be maintained in the development and should be open to public use within the coastal park.

Policy RM10: Land rear of Varne Boat Club, Coast Drive, Greatstone

9.13. No representations were received relating to Policy RM10.

Policy RM11: Car Park, Coast Drive, Greatstone

9.14. 16 representations were received relating to Policy RM11. These raised the following issues:

- Building on the car park would harm tourism and the economy;
- The site is in a flood risk area;
- Object to the loss of a community facility;
- The re-provision of 50 car parking spaces is not enough and does not provide coach parking;
- No longer object providing the allocation is justified through the sequential test process (Environment Agency);
- There are other sites in the New Romney area that should be developed instead;
- 55 per cent of the site is within a national Biodiversity Action Plan (BAP) Priority Habitat while 70 per cent of the site falls within a local BAP Priority Habitat; and
- The site is adjacent to protected habitats and conflicts with policy NE2¹⁷.

Policy RM12: The Old Slaughterhouse, 'Rosemary Corner', Brookland

9.15. Two representations were received relating to Policy RM12. These raised the following issues:

- The allocation fails to use previously developed land;
- The allocation fails to use land of lesser value, rather than the most versatile agricultural land in the open countryside;
- There is an alternative site that consists of previously developed land; and
- The site is greenfield and in the open countryside.

¹⁷ See Places and Policies Local Plan Submission Draft, Policy NE2: Biodiversity

Policy RM13: Lands north and south of Rye Road, Brookland

9.16. Five representations were received relating to Policy RM13. These raised the following issues:

- There is no need to produce a masterplan given the separation of the sites;
- Development on the A259 roundabout does not respond appropriately to the historic form and character of the settlement;
- Drainage is inadequate;
- Access onto Rye Road will be restricted and there are highway safety concerns;
- The site is greenfield and the development of this land is not justified;
- Two additional criteria should be added in relation to an odour assessment and a connection to the local sewerage network (Southern Water); and
- The contribution to housing in Brookland does not conform to the settlement hierarchy and is not justified.

Policy RM14: Land adjacent to Moore Close, Brenzett

9.17. Two representations were received relating to Policy RM14. These raised the following issues:

- Revisions to the policy wording are suggested;
- The contribution to housing in Brenzett does not conform to the settlement hierarchy; and
- The site is greenfield and the development of this land is not justified.

Alternative Site Submissions – Romney Marsh Area

9.18. Six representations were received promoting alternative sites in the Romney Marsh Character Area. These representations were as follows:

- Land at Brenzett Nurseries, George Street, Brenzett – promoted for 6-8 dwellings;
- Land at Mulberry Cottage, High Street, Lydd – promoted for 8 dwellings;
- New site policy at Dungeness 'A' site – promoted for decommissioning and remediation, together with employment (B1/B2/B8) uses and development associated with energy generation;
- Pepperland Nurseries, Brookland – promoted for 9 dwellings;
- Land at Jenner's Way, St. Mary's Bay – number of dwellings not specified; and
- Land at Brooker Farm, Newchurch – number of dwellings not specified.

10. Chapter 7: North Downs Character Area

10.1. 110 representations were received relating to Chapter 7.

Introduction

10.2. Four representations were received relating to the introduction and the wider chapter in general and raised the following issues:

- There is insufficient information to understand the housing need context within which new development is proposed within the AONB (CPRE);
- Further explanation is needed in respect of the site selection process and site capacity (CPRE);
- Object to policies ND8 and ND9 (CPRE);
- CPRE may wish to object to policies ND7 and ND10 if development is not needed locally;
- Paragraph 7.4 should explain that the AONB Management Plan does not form part of the development plan;
- Natural England should be consulted in accordance with Impact Risk Zones (IRZs);
- Despite strengthened wording in the Submission Draft, allocations are still likely to have an impact on the AONB and its setting, and can be considered as small-scale major development (including former Lympe Airfield, Etchinghill Nursery and Densole) (Natural England);
- The council will need to ensure that allocations in the AONB satisfy the three tests set out in paragraph 116 of the NPPF. The policies should highlight the need for development proposals to undertake a Landscape and Visual Impact Assessment (LVIA); and
- In relation to development at Westenhanger racecourse/Otterpool Park¹⁸ this will lead to loss of natural amenity and valuable wildlife habitat; despoliation of the setting of the Area of Outstanding Natural Beauty (AONB) and Westenhanger Castle; erosion of the quality of life of existing residents; and pressure on infrastructure.

Hawkinge

10.3. One representation was received (from CPRE) relating to general development in Hawkinge as a whole:

- Ensure sufficient infrastructure is in place, including social infrastructure;
- Greater attention to the roads and highways is required to improve congestion;
- High quality design and landscaping is of particular importance because of the AONB setting; and
- Any historic assets (connected to the Battle of Britain) on the Hawkinge sites should be incorporated into the schemes.

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

¹⁸ Core Strategy Review Consultation Draft (Regulation 18 Version), March 2018, Policies SS6-SS9

Policy ND1: Former Officers' Mess, Aerodrome Road, Hawkinge

- 10.5. One representation was received relating to Policy ND1. This raised the same issues set out above, particularly regarding road and highway infrastructure (exit road onto Spitfire Way is of particular concern).

Policy ND2: Mill Lane to the rear of Mill Farm, Hawkinge

- 10.6. Two representations were received relating to Policy ND2. These raised the following issues:
- Support for criteria 4 and 5 (public rights of way) (Kent County Council);
 - The policy should include appropriate and proportionate contributions to improve footpath HE202 which runs through the development site (Kent County Council); and
 - The same issues as set out above under general points, relating to Hawkinge as a whole.

Policy ND3: Land adjacent Kent Battle of Britain Museum, Aerodrome Road, Hawkinge

- 10.7. Five representations were received relating to Policy ND3. These raised the following issues:
- Support for criterion 4 (pedestrian permeability);
 - Kent Battle of Britain Museum - inaccuracies in consultation summary;
 - Objection to criterion 11 (heritage assets). Suggested new wording: *“Features and structures associated with the site’s former use as a World War II airfield shall be investigated and recorded wherever possible to provide a link with the site’s past”* (site promoter); and
 - The same issues as set out above under general points, relating to Hawkinge as a whole.

Policy ND4: Land east of Broad Street, Lyminge

- 10.8. 19 representations were received relating to Policy ND4. These raised the following issues:
- Infrastructure concerns, including roads, traffic, sewage (Broad Street and into Station Road and Mayfield Road in particular with cases of overflow), water, school, surgeries;
 - A new road junction would be dangerous as cars would be on it before it is visible on a virtually blind bend. Build-outs either side of the exit may help with traffic leaving the village, but would probably make it more hazardous for traffic entering Lyminge;
 - Development should have a road frontage onto Broad Street;
 - Traffic calming measures will require street lighting, which will need to be carefully designed as the site sits within the AONB (Kent County Council Highways);
 - The site is within a Source Protection Zone 2 outer area and any development would contaminate this. A stream crosses the site which is a source for the River Nailbourne;
 - Housing design should fit in with the rural setting;
 - Ensure criterion 12 (contribution to healthcare) is delivered. Would the area immediately behind the building be used for the extended surgery and car park?;

- The New Lyminge Surgery car park is too small now and the entrance to Greenbanks, the doctor's and AGE UK gets extremely congested;
- No affordable housing is being proposed. The density suggests large expensive houses;
- The development would fail to conserve the landscape and scenic beauty of the AONB. It would represent a large incursion into the rural hinterland and be an inappropriate extension of the village. The scale of development constitutes 'major development', contrary to the NPPF and would be in conflict with the draft revised NPPF. The proposed allocation would also be in conflict with the AONB Management Plan (Kent Downs AONB Unit);
- The policy should highlight the need for development proposals to undertake a Landscape and Visual Impact Assessment (LVIA) (CPRE);
- Development here would encourage the coalescence of Lyminge and Etchinghill;
- The site is prominent and clearly visible from the public highway. It is important to retain the rural feel upon entering the village;
- The allocation would involve the loss of a golf course (Sport England);
- This development would reduce the existing amenity of the golf course, which employs a considerable number of people;
- Query regarding what planning permission was granted for the golf course and what conditions were attached;
- The route of the old railway line between Lyminge and Etchinghill does not run for its entire length along land belonging to the Golf Course, so any new public right of way could not follow the old route exactly;
- There are more sustainable areas where the village could be extended;
- Impact of the development on wildlife;
- Criteria 10 and 11, regarding the public right of way and bridleway, are supported (Kent County Council);
- Criterion 1 (design) should be amended by deleting "highest" and substituting "high" - "highest" is prescriptive and leaves no opportunity to consider alternative design solutions (site promoter); and
- Criterion 11 (bridleway) should be amended to recognise that provision should be based on the practicality and viability of delivery, and ensure that the golf course is not adversely affected.

Policy ND5: General Sellindge Policy

10.9. 15 representations were received relating to Policy ND5. These raised the following issues:

- The introduction of small-scale sensitively designed developments is more easily integrated into a village scene;
- The policy is at odds with policies for Otterpool Park;
- Development should support the vitality of the village and its services, while not damaging its characteristics and quality;
- Local infrastructure concerns;
- Clarification is needed on the strategic allocation for approximately 600 homes to the south of Sellindge¹⁹;
- It is prudent to manage patterns of growth in Sellindge over the plan-period;
- The policy should prescribe delivery timescales to avoid conflict;
- The plan does not take account of the latest household projections and objectively assessed needs. It ignores the content of the draft NPPF; and

¹⁹ Core Strategy Review – Consultation Draft, Regulation 18 Version (March 2018), Policy CSD9: Sellindge Strategy

- The doctor's surgery at Sellindge also serves surrounding villages (Sellindge Parish Council).

The Piggeries

- This is a good use of a brownfield site; houses should be no more than two-storey;
- Measures must be put in place to prevent further development onto the surrounding green fields (Sellindge Parish Council); and
- Public footpath HE305 runs through part of the site and footpath HE306 runs adjacent. Kent County Council requests that consideration is given to these routes.

Land West of Jubilee Cottage

- Affordable dwellings should be provided along the boundary with the playing field, with larger dwellings behind the grade II listed Holly Cottage. Perhaps chalet-type dwelling fronting onto Swan Lane (Sellindge Parish Council).

Land at Barrow Hill

- The site is remote from essential services, not a sustainable location (CPRE);
- The proposal is close to an historic asset (bronze age burial mound) without evidence of an understanding of the historic landscape, landscape character and potential archaeology (CPRE);
- The site could have a mix of dwellings with larger dwellings near to the adjoining dwelling 'The Mount' and a mix of more affordable semi-detached and terraced dwellings elsewhere (Sellindge Parish Council);
- There are protected trees on site (TPO 16 – 2016). Criteria on the setting of the AONB are required, as the site is completely open to the AONB;
- The break in the line of buildings along the A20 prevents a completely linear village and allows some natural green space to be retained, preserving the history of the village;
- Access onto the A20 is currently problematic due to the speed and high number of HGVs;
- The public bridleway HE217A runs adjacent to the site boundary. Kent County Council requests that consideration is given to this route;
- This site is within the emerging Otterpool Park Framework Masterplan area. The policy should signpost the development forthcoming at Otterpool Park; and
- There is one goal located in the field at Barrow Hill - the council should consider whether there is some informal sports use (Sport England).

Silverspray

- New wording is needed: *"Access is maintained to the existing underground sewerage infrastructure for maintenance and upsizing purposes"* (Southern Water); and
- Development would need to be informed by the implementation of the existing proposals for 250 homes on the adjoining land.

Policy ND6: Former Lympne Airfield

10.10. 32 representations were received relating to Policy ND6. These raised the following issues:

- No regard is given to Otterpool Park²⁰; decisions do not include the effect that 12,000 homes will have (Lympne Parish Council);
- There is a lack of information and evidence supporting the need to considerably raise the housing number;
- Disagree that Lympne is accessible (Lympne Parish Council);
- There needs to be better public transport and more frequent trains;
- Ensure that section 106 contributions paid for designated improvements are actually used for that purpose (Lympne Parish Council);
- Previous public inquiries have been held over plans to develop housing, all of which have been refused by the Secretary of State;
- Despoliation of the setting of the AONB;
- Loss of green buffer that separates the village and the Industrial Estate;
- Loss of natural wildlife habitat and agricultural land;
- Loss of historical character of Lympne Airfield;
- As part of Otterpool Park, upheaval would arise from extensive infrastructure engineering;
- Infrastructure concerns, including health care, water, schools and roads;
- Air pollution arising from road traffic;
- The policy should include reference to a Landscape and Visual Impact Assessment, street trees and the character and setting of the AONB. Without this the policy would fail to comply with the 2000 Countryside and Rights of Way Act as well as the NPPF and the AONB Management Plan (Kent Downs AONB Unit);
- The site lies in the immediate setting of the AONB, with the boundary of the AONB on the opposite side of Aldington Road. The site is visible from a large section of the Kent Downs scarp and would result in much of the site being visible in views from the AONB. The development would go against the principle that development should avoid ridge tops/skylines (Kent Downs AONB Unit);
- The allocation is likely to have an impact on the AONB and its setting (Natural England);
- Proposals for Otterpool Park and its relationship with the submission document need to be clarified (Kent Wildlife Trust);
- Consultation with the Parish Council, local community and statutory consultees will be critical (CPRE);
- Development is not sensitive to its location, the capacity of local infrastructure and the needs of local people (CPRE);
- Support for criteria 10 and 12 (footpaths). The wording of criterion 10 should be changed to include bridleways as well as footpaths (Kent County Council);
- Concerns regarding the land being purchased by Homes England;
- Places and Policies Local Plan proposals should match those of the Regulation 18 Draft Core Strategy which seeks to move the residential allocation to the west, i.e. from Site 1 to Site 2 (Homes England);
- Lympne airfield is within Otterpool Park Masterplan area, however this policy conflicts with its aspirations and those contained within the emerging Core Strategy Review;
- Housing development of low density is more appropriate at, and adjacent to, the Lympne Industrial estate with a green buffer between the new housing and Lympne village; and
- Planning needs to provide for industrial and commercial businesses to provide employment.

²⁰ See Core Strategy Review – Consultation Draft, Regulation 18 Version (March 2018), Policies SS6-SS9.

Stanford and Westenhanger

- 10.11. One representation was received relating to Stanford and Westenhanger (from Stanford Parish Council). This stated that the parish council considers it is being kept in the dark regarding important services and infrastructure and that the parish council wishes to know why the plot announced for Stanford has been withdrawn and why does it not show up in the withdrawals section.

Policy ND7: Camping and Caravan Site, Stelling Minnis

- 10.12. Two representations were received from the site promoter relating to Policy ND7. These raised the following issues:

- The policy underestimates the site's capacity;
- Criterion 7 (access and pedestrian links) should be amended to: "*A primary vehicle access is provided onto Crown Lane, with pedestrian links to Minnis Lane*"; and
- Criterion 8 (bus shelter) should be deleted as the bus stop relocation is no longer needed.

Policy ND8: Land adjoining 385 Canterbury Road, Densole

- 10.13. Five representations were received relating to Policy ND8. These raised the following issues:

- Canterbury Road is busy and has experienced many accidents over the years;
- There is insufficient information to understand the housing need within which new development is proposed. There are potentially significant harmful impacts on the AONB. The policy wording should highlight the need for a Landscape and Visual Impact Assessment (CPRE);
- The site helps retain a rural character to the village. The field is enclosed by a virtually continuous native species hedgerow (Kent Downs AONB Unit);
- The development would be a large incursion into the rural hinterland, harming both the landscape and scenic qualities of the AONB (Kent Downs AONB Unit); and
- The scale constitutes 'major development' and would be contrary to the NPPF, the draft revised NPPF and the AONB Management Plan (Kent Downs AONB Unit).

Policy ND9: Etchingill Nursery, Etchingill

- 10.14. 11 representations were received relating to Policy ND9. These raised the following issues:

- Paragraph 7.94 should explain that the facilities in Lyminge are within walking distance of the site (site promoter);
- Paragraph 7.95 should explain that it is possible on reaching the road to walk into Lyminge using the existing walkway alongside the road (site promoter);
- Paragraph 7.97 - the two plots with planning permission on Teddars Leas Road have now been developed (site promoter);
- Object to the estimated capacity - it should be 35 units (site promoter);
- Object to criterion 11 (sewerage connection). It should begin: "*If possible a connection ...*" (site promoter);
- Object to criterion 12 (access to sewerage infrastructure). It should begin: "*Current level of access is maintained ...*" (site promoter);

- The allocation needs to satisfy the three tests in paragraph 116 of the NPPF. There is a need to undertake a Landscape and Visual Impact Assessment (CPRE);
- There is insufficient information in the plan to understand the housing need context within which new development is proposed within the AONB (CPRE);
- Support for criteria 6 and 10, regarding new footpaths, crossing points and measures to calm traffic, public right of way and bridleway (Kent County Council);
- Local roads are not capable of taking any additional traffic;
- Local infrastructure concerns (including sewage);
- Retention of existing vegetation along both south eastern and south western boundaries is essential. There should be a requirement for tree planting and for road design to be appropriate to the Kent Downs location. Without these additional safeguards the policy is in conflict with the NPPF and the AONB Management Plan (Kent Downs AONB Unit); and
- Canterbury Road will need to be widened to at least 5.5 metres along the site frontage to accommodate two-way traffic flow (Kent County Council).

Policy ND10: Land adjacent to the Golf Course, Etchinghill

10.15. Eight representations were received relating to Policy ND10. These raised the following issues:

- Local roads are not capable of taking any additional traffic;
- Local infrastructure concerns (including sewage);
- Support for criterion 5 (public bridleway) (Kent County Council);
- Amend criterion 5 (public bridleway) to add: “... *subject to no adverse impact on the existing golf course operations*” (site promoter);
- New criterion is needed: “*Access is maintained to the existing underground sewerage infrastructure for maintenance and upsizing purposes*” (Southern Water);
- Amended site boundary submitted; size amended to 0.73 hectares (site promoter);
- Concern raised by local resident that the site boundary included land they owned;
- The land owner should not develop further golf course land;
- The developer should maintain high quality development standards;
- Developer contributions towards improved byways and footpaths should be provided upfront; and
- Amend criteria 1 and 2 (design and materials) to read “high quality” rather than “highest quality” (site promoter).

Alternative Site Submissions – North Downs Area

10.16. Four representations were received promoting alternative sites in the North Downs Character Area. These representations were:

- Land rear of Lyndon Hall, Lyminge - promoted for residential development;
- Land at Red House Lane, Canterbury Road, Lyminge - promoted for residential development;
- Land north of Ashford Road, Sellindge (between Meadowbank and Orchard End) - promoted for residential development. Two options have been submitted - a larger site (3.16ha) and a smaller frontage development (0.52ha); and
- Land surrounding Grove House, Sellindge²¹.

²¹ Allocated within Core Strategy Review – Consultation Draft, Regulation 18 Version (March 2018), Policy CSD9: Sellindge Strategy

10.17. In addition a comment promoting a site (Land adjacent to The Willows, adjoining A20, Lympe) was recorded against the local plan as a whole (see paragraph 3.1 above).

Part Two – Development Management Policies

11. Chapter 8: Introduction – Development Management Policies

11.1. No representations were received relating to Chapter 8.

12. Chapter 9: Housing and the Built Environment

12.1. 43 representations were received relating to Chapter 9.

12.2. 11 representations related to the chapter in general and raised the following issues:

- The plan does not adequately support delivery of the local sewerage infrastructure;
- The plan does not include provision for council or genuinely affordable housing;
- A new policy should be inserted to ensure that new developments include a mix of housing, types, tenures and sizes (CPRE Kent);
- The statements in paragraphs 9.19 and 9.20 regarding affordable housing are incorrect and inconsistent with the draft proposed changes to the NPPF. Local authorities are able to set their affordable housing thresholds at a different level where justified by local evidence of need and viability;
- There is a strong need for more affordable housing than the minimum; and
- Paragraph 9.27 should be amended to remove reference to part M4(3) of Building Regulations. This is not a requirement of Policy HB3 and is a higher standard than M4(2) and not the same as M4(3), as currently inferred.

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

Policy HB1: Quality Places Through Design

12.4. Three representations were received relating to Policy HB1. The representations raised the following issues:

- Criterion 3 (public open space) should include public rights of way (Kent County Council);
- Reference to Sport England’s Active Design guidance should be added (Sport England); and
- The importance of responding to the context of the site and its surroundings should be emphasised (CPRE Kent).

Policy HB2: Cohesive Design

12.5. Four representations were received relating to Policy HB2. The representations raised the following issues:

- Criterion 1 (surroundings) should refer to the promotion of Active Travel (Kent County Council);
- The Heritage Strategy is important and should be delivered urgently;
- Criterion 4 (mix of house types) should be amended to read: *“For housing development, provides a mix of housing types and tenures that meet local requirements and market demands”*; and
- The policy only applies to major development, complex proposals and sensitive sites but should be relevant to all development (CPRE Kent).

Policy HB3: Internal and External Space Standards

12.6. Five representations were received relating to Policy HB3. The representations raised the following issues:

- There is no evidence or justification for adopting the national space standards;
- The policy should make clear that it is a minimum gross internal floor area and that developments should be designed with a variety of dwelling and garden sizes;
- Paragraph 9.33 is too prescriptive; and
- Paragraph 9.34 calculates the size of communal gardens but this is not referred to in Policy HB3 and it is unclear how this is derived or applied.

Policy HB4: Self-build and Custom Housebuilding Development

12.7. Four representations were received relating to Policy HB4. The representations raised the following issues:

- Otterpool Park should be exempt from a prescriptive “no less than five per cent” target to reflect the need for certainty of delivery;
- The policy should clarify whether or not it applies to future reserved matters applications as it could affect the deliverability and viability of developments which already benefit from outline permission;
- The burden for delivery of self-build plots is placed on house-builders without looking at other delivery mechanisms; and
- Criteria 1 and 2 are not justified or consistent with national policy.

Policy HB5: Replacement Dwellings in the Countryside

12.8. One representation (CPRE Kent) was received relating to Policy HB5. This stated that:

- The policy or supporting text should clarify that the original building should not be of architectural or historic merit; and
- The policy should specify a “modest” increase in size to avoid the loss of smaller and more affordable homes in rural areas.

Policy HB6: Local Housing Needs in Rural Areas

12.9. Three representations were received relating to Policy HB6. The representations raised the following issues:

- The policy is too restrictive, conflicting with national policy for local planning authorities to be ambitious for securing homes; and
- The policy should specify that the tenure mix of affordable homes should reflect the identified need (CPRE Kent).

Policy HB7: Dwellings to Support a Rural-based Enterprise

12.10. One representation was received (CPRE Kent) relating to Policy HB7. This raised the following issues:

- The reference to “in the last year” should be extended to “three years”; and
- Criterion 1 should refer to workers who are primarily employed at the enterprise itself.

Policy HB8: Alterations and Extensions to Residential Buildings

- 12.11. One representation was received relating to Policy HB8. This stated that criterion 3 is too prescriptive and should allow appropriate design solutions, even if two-storey and flat-roofed, provided it can be justified.

Policy HB9: Annexe Accommodation

- 12.12. One representation was received relating to Policy HB9. This stated that it is important that an annex is not capable of being converted to a separate dwelling, that it has a clear dependency on the main dwelling and is subordinate (CPRE Kent).

Policy HB10: Development of Residential Gardens

- 12.13. Four representations were received relating to Policy HB10. The representations raised the following issues:
- The policy is not sufficiently detailed to control new building in gardens;
 - The supporting text should clarify that the policy is not applicable to gardens in the wider countryside (CPRE Kent); and
 - The importance of gardens to wildlife and reducing rainwater run-off should be recognised (CPRE Kent).

Policy HB11: Loss of Residential Care Homes and Institutions

- 12.14. Two representations were received relating to Policy HB11. The representations raised the following issues:
- Paragraph 9.77 fails to identify extra-care housing;
 - The policy is overly restrictive and would harm the NHS's ability to meet local healthcare needs and provide suitable facilities (NHS); and
 - NHS request that criterion 1 be amended to read: *"The applicant has provided a viability report, unless the loss of facilities arises from an NHS Service modernisation strategy following a rationalisation programme, demonstrating that..."*

Policy HB12: Development of New or Extended Residential Institutions (C2 Use)

- 12.15. One representation was received relating to Policy HB12. This stated that:
- The policy suggests that it is only care homes and residential homes that fall within Use Class C2 which is not the case; and
 - The policy should be amended to include extra-care accommodation.

Policy HB13: Houses in Multiple Occupation (HMOs)

- 12.16. No representations were received relating to Policy HB13.

Policy HB14: Accommodation for Gypsies and Travellers

- 12.17. Two representations were received relating to Policy HB14. The representations stated that no specific sites for Romany and Travellers are identified and sites should be specifically allocated to meet travellers' needs.

13. Chapter 10: Economy

13.1. 21 representations were received relating to Chapter 10.

13.2. Four representations related to the chapter in general and raised the following issues:

- The council has not carried forward Policy TR15²² regarding London Ashford Airport (LAA) nor developed a new policy that takes account of the planning permission for expansion. This undermines the importance of LAA and its potential to improve the district's economy; and
- Dungeness 'A' should be afforded a site-specific policy and allocation to facilitate decommissioning and remediation, together with employment (B1/B2/B8) uses and energy generation.

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

Policy E1: New Employment Allocations

13.4. Three representations were received relating to Policy E1. The representations raised the following issues:

- Link Park is located within the Otterpool Park Framework Masterplan area. The long-term aspiration is to deliver primary low-scale and low-density housing, with an element of medium-density housing at Link Park, with an overall ambition to deliver new employment space elsewhere. The masterplan provides dedicated employment space to the north east of the area, which is a more sustainable location close to junction 11 of the M20 and Westenhanger railway station. Policies should enable flexibility to deliver this;
- The following should be added to the policy: *"For sites located within the AONB or its setting, a high quality of design that responds to the site's sensitive location will be required, paying particular regard to materials, massing and roofscape"* (Kent Downs AONB Unit); and
- There is confusion regarding Policies E1 and RL11: Former Silver Spring Site, Park Farm. Policy E1 states *"a proportion of non-business class uses (up to 25 per cent) will be permitted provided it can be demonstrated that ..."* However, Policy RL11 allows more than 25 per cent non-B classes uses. To make the policy effective the first sentence should be reworded to read: *"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 in policy E1 or in other policies within the plan"*.

Policy E2: Existing Employment Allocations

13.5. Two representations were received relating to Policy E2. The representations raised the following issues:

- The six month marketing period is inadequate since it is not unusual for employment sites to remain unlet for a number of years – this reflects the economy and business flexibility, rather than the attractiveness of a site; and
- The long-term protection of all existing employment sites under Policy E2 is not an effective approach. A less prescriptive approach is needed, including B Uses Classes, public and community uses and main town centre uses.

²² 2006 Shepway Local Plan Review Policy TR15: Lydd Airport

Policy E3: Tourism

13.6. Five representations were received relating to Policy E3. The representations raised the following issues:

- Criterion 5 (diversification) is unnecessary as there should be no requirement to have to demonstrate the 'need' for a development. Criterion 6 (new tourist accommodation) should not apply to the expansion of facilities - there is little point in looking for alternative sites if the proposal is to expand an existing facility;
- Tourism development in the countryside should also have to meet criteria 1-5 as it would be inconsistent for these to be applied at the urban edge but not in the countryside; and
- The policy should ensure that development would not have a significant impact in terms of traffic, nocturnal character or tranquillity.

Policy E4: Hotels and Guest Houses

13.7. There were no representations relating to Policy E4.

Policy E5: Touring and Static Caravan, Chalet and Camping Sites

13.8. Three representations were received relating to Policy E5. The representations raised the following issues:

- Redevelopment of caravan parks for residential use should be supported where it can be demonstrated that the accommodation is no longer required or an alternative site can be found and the site is within an area with a high housing requirement;
- The list of tourist accommodation should be amended to read: "*chalet, caravan, cabin, hut, pod, lodges or camping sites*";
- Minor expansions to sites should be screened from public rights of way (Kent County Council); and
- A requirement should be added to demonstrate that the business has been marketed at a reasonable rate and for an appropriate period of time (two to three years).

Policy E6: Farm Diversification

13.9. One representation was received relating to Policy E6. This stated that:

- The supporting text needs to be clear how this policy relates to Policies E3 and E7 in terms of tourism accommodation;
- An additional criterion should be added to ensure that new uses do not increase traffic to the detriment of the character of rural lanes; and
- The policy or the supporting text could usefully make reference to historic assets and their setting.

Policy E7: Reuse of Rural Buildings

13.10. One representation was received relating to Policy E7. This stated that:

- This policy also refers to new rural buildings. The relationship to Policies E3 and E6 is not clear;
- The reference to the vitality and functioning of nearby rural towns and businesses is not clear;

- Criterion 3 (access) should require that development does not increase traffic to the detriment of the character of rural lanes;
- Criterion 4 (AONB) should ensure high quality design that conserves and enhances landscapes or improves the quality and character of an area. It would be sufficient to refer to the AONB policy and the management plan; and
- The final paragraph of the policy is somewhat confusing. More detail is necessary to judge whether sufficient effort has been made to find a business reuse before residential can be considered.

Policy E8: Provision of Fibre to the Premises

13.11. Two representations were received relating to Policy E8. The representations raised the following issues:

- The written Ministerial Statement (25 March 2015) confirms that *“the optional new national technical standard should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has be considered, in accordance with the NPPG”*. It is not considered that the required assessment has been undertaken; and
- Paragraph 10.52 should be updated, as 95 per cent of homes and businesses in Kent now have access to a superfast broadband service of at least 24mbps.

14. Chapter 11: Retail and Leisure

14.1. 19 representations were received relating to Chapter 11.

Policy RL1: Retail Hierarchy

14.2. Two representations were received relating to Policy RL1. The representations raised the following issues:

- The policy sets out a clear hierarchy as to where retail and town centre development should be focused, as well as setting out that development should be of an appropriate scale in accordance with the centre's position in the hierarchy; and
- Support the 'town centre first' approach; however, Otterpool Park should be identified as a potential future town centre in the retail hierarchy.

Policy RL2: Folkestone Major Town Centre

14.3. Three representations were received relating to Policy RL2. The representations raised the following issues:

- Guildhall Street should be de-pedestrianised to revitalise the town centre;
- The policy is incomplete as it fails to identify a primary shopping area, which is required to apply the sequential test;
- The policy should be amended to allow for a continuous frontage of two or more non-A1 (shops) where it can be demonstrated that this would not harm the vitality and viability of the town centre;
- The text within criterion 1, bullet 2 should be amended to only include D1 uses that are not considered to be main town centre uses but which the council would support within the town centre. The reference to C1 hotel use should be removed;
- The text within criterion 2, bullet 2 should be amended to only include B1, D1 and D2 uses that are not considered to be main town centre uses but which the council would support within the town centre. The reference to C1 hotel use should be removed; and
- Consideration should be given to whether the allocation of almost the entire existing town centre for shops and similar uses, plus significant commercial development in Folkestone Harbour and a positive view on shopping development in Park Farm, are all tenable in Folkestone.

Policy RL3: Hythe Town Centre

14.4. There were no representations relating to Policy RL3.

Policy RL4: New Romney Town Centre

14.5. There were no representations relating to Policy RL4.

Policy RL5: Cheriton District Centre

14.6. One representation was received relating to Policy RL5. This objected to the recommendation of the town centre study that additional supermarket space is provided if a suitable site becomes available within the centre (indicatively up to 1,000sqm).

Policy RL6: Sandgate Local Centre

14.7. There were no representations relating to Policy RL6.

Policy RL7: Other District and Local Centres

14.8. There were no representations relating to Policy RL7.

Policy RL8: Development Outside Town, District and Local Centres

14.9. Two representations were received relating to Policy RL8. The representations raised the following issues:

- The current wording of the policy could be misinterpreted to support town centre uses on inappropriate sites. The first sentence should be amended to read: *“planning permission for town centre uses on the edge of and outside the Major Town Centre, Town Centre, District Centres and Local Centres will be permitted provided that...”* and to include an additional criterion to make it clear that these town centres uses will only be acceptable where they do not conflict with any other development plan or national policy;
- Criterion 2 should be amended to read: *“A full assessment is provided of the impact that the proposal would have on the vitality and viability of all centres that are likely to be affected and on existing, committed and planned investment within them, relating to the scale and type of development proposed in accordance with the requirement of the NPPF and PPG”*; and
- The lowering of the retail impact assessment threshold to 500sqm outside of major town centres and 200sqm gross outside of local centres would significantly restrict smaller, specialist entrants to the retail market.

Policy RL9: Design, Location and Illumination of Advertisements

14.10. There were no representations relating to Policy RL9.

Policy RL10: Shop Fronts, Blinds and Security Shutters

14.11. There were no representations relating to Policy RL10.

Policy RL11: Former Silver Spring Site, Park Farm

14.12. Seven representations (including one duplicate comment) were received relating to Policy RL11. The representations raised the following issues:

- The site mix includes provision of a hotel, contrary to the conclusions of the employment land supply evidence;
- The supporting text (paragraph 11.70) which “suggests” other suitable uses in addition to employment, conflicts with the specific policy wording where the site is allocated for a hotel use;
- The policy which advocates retail and leisure uses, subject to an impact assessment, is self-defeating, particularly if impacts are significant. In such cases, uses may be policy compliant and policy non-compliant at the same time;
- The policy, in seeking to safeguard against town centre impacts of leisure uses fails to consider the impact of the hotel use;
- In allocating the hotel use, Policy E3 would carry less weight and could potentially conflict with Policy RL11;

- The provision of a new hotel may result in impacts on the existing hotels and conflict with paragraph 10.33, which seeks to resist the loss of visitor accommodation;
- There is no justification for the inclusion of retail, restaurants and cafes, hotel or leisure uses on this site, and doing so will undermine the 'town centre first' approach. It is also likely to lead to the loss of a well-located and high quality employment site;
- Object to the hotel use being presented in the singular and the mix including the qualification that uses should be 'non-residential'; and
- A contribution should be provided towards aiding the vitality and viability of Folkestone town centre.

Policy RL12: Former Harbour Railway Line

14.13. Four representations were received relating to Policy RL12. The representations raised the following issues:

- Support the positive and flexible approach seeking to connect the exciting proposals at the Seafront and the town centre to the east; and
- A new mode of transport should be provided that services Folkestone East to the Seafront.

15. Chapter 12: Community

- 15.1. 28 representations were received relating to Chapter 12.
- 15.2. Four representations (commenting on Princes Parade, Hythe) related to the chapter in general and stated that: Princes Parade is used by the people of Hythe and Sandgate for recreation; it is full of wildlife and provides access to the beach; it is historic and a tourist attraction; the public are against the development.
- 15.3. Other representations related to specific policies and are summarised below.

Policy C1: Creating A Sense of Place

- 15.4. Three representations were received relating to Policy C1. The representations raised the following issues:
- Older Persons' schemes may be over 10 units in size but are likely to be placed in apartment form on small centrally-located sites where public art provision is neither necessary nor reasonable;
 - The policy is overly restrictive and does not reflect the various ways of creating a sense of place, as detailed in paragraph 58 of the NPPF; and
 - Intentions need to be managed and landowners should not dictate what's provided.

Policy C2: Safeguarding Community Facilities

- 15.5. Four representations were received relating to Policy C2. The representations raised the following issues:
- The policy is overly restrictive and would harm the NHS's ability to meet local healthcare needs and provide suitable facilities. The requirement for substantial periods of marketing could prevent or delay investment;
 - The policy only refers to particular uses, i.e. cultural facilities such as theatres. Paragraph 12.2 should be revised to better reflect the matters described in paragraph 12.1 and the types of facilities described in NPPF paragraph 70; and
 - Sometimes, community facilities cannot be 'valued' in commercial terms as they have such significance to the local community.

Policy C3: Provision of Open Space

- 15.6. Seven representations were received relating to Policy C3. The representations raised the following issues:
- Specialised housing for older people is unlikely to place much, if any, additional burden on open space facilities;
 - The Open Spaces Strategy is not available to the public;
 - Land at Princes Parade should be included in the protected open spaces;
 - Princes Parade is a historic and a tourist attraction, it should remain an open area;
 - There is no policy which specifically protects playing fields. The final paragraph would fulfil this function if it makes clear that existing open spaces include playing fields;
 - Allotments should be mentioned as facilities that should be maintained, and in the medium-term considered for expansion; and
 - The policy is contrary to NPPF paragraph 74 which seeks to protect open space and recreational buildings and land. The policy wording indicates open spaces will

be safeguarded but then indicates a presumption in favour of development proposals provided certain criteria are met.

Policy C4: Children's Play Space

- 15.7. One representation was received relating to Policy C4 stating that there is no need for provision within older persons' housing schemes.

Local Green Spaces

- 15.8. Nine representations were received relating to the supporting text on Local Green Spaces (paragraphs 12.45-12.49). These representations raised the following issues:

- Reference could be made to important spaces;
- Why build on any available space? (specific reference is made to Land at Princes Parade, Hythe);
- The land at Princes Parade should be left for local people and visitors to enjoy the canal and to give them access to the beach;
- Land at Station Road and Princes Parade sites should be identified as 'Local Green Spaces';
- The Open Space assessment is too narrowly interpreted and excludes areas which are clearly demonstrably special;
- The area of open space next to Seabrook adjacent to 280 Seabrook Road and opposite 203 and 205 Seabrook Road should be identified as a Local Green Space;
- It is not sound to treat the protection of local green spaces in the Kent Downs AONB in the same way as any other open land; and
- The policy should include a mechanism for people to propose sites in areas not covered by a Neighbourhood Plan.

16. Chapter 13: Transport

16.1. 19 representations were received relating to Chapter 13.

16.2. Five representations related to the chapter in general and raised the following issues:

- Where a development impacts on the strategic road network, the requirement for a Transport Assessment or Transport Statement would need to be agreed with Highways England rather than using indicative thresholds based on the archived DfT guidance. Highways England would also want to agree the scope of the TA or TS at pre-application stage in conjunction with the local highway authority;
- There is no reference to key Highways England documents including 'The Strategic Road Network and the Delivery of Sustainable Development' and 'Planning for the Future: A guide to working with Highways England on planning matters';
- The plan should include a policy which encourages London Ashford Airport's continued expansion;
- There is no strategic overview showing the cumulative effects that existing and proposed developments will have on the transportation network in Hythe and surrounding areas;
- The Transport Strategy was commissioned in May 2010 - this should be updated before the local plan is approved; and
- There is no overall transport strategy that takes into account the work done by the Roads Review Group.

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

Policy T1: Street Hierarchy and Site Layout

16.4. Two representations were received relating to Policy T1. These supported the inclusion of reference to active frontages and active travel routes.

Policy T2: Parking Standards, including Table 13.1 (IGN3: Guidance Table for Residential Parking)

16.5. Seven representations were received relating to Policy T2 and Table 13.1. The representations raised the following issues:

- The policy is not clear as to how the standards will be applied, referring to these as a "starting point". This does not accord with NPPF (paragraph 154). The policy should state when departures will be acceptable (e.g. in achieving good design);
- Reference to maximum parking standards should be removed from the Guidance Table for Residential Parking, as it is contrary to the NPPF (paragraph 39);
- Footnotes at the bottom of Table 13.1 should be removed, since they conflict with the advice in Policy T2, for example in respect of tandem parking spaces;
- In relation to IGN3: Guidance Table for Residential Parking, 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 be problematic;
- IGN3: Guidance Table for Residential Parking does not differentiate parking requirements for older person's developments; and
- The residential parking standards should be mandatory.

Policy T2: Parking Standards

- The council must be clear as to how it defines an area with a “*history of on-street parking problems*”;
- The requirement that parking courts should be small in size, with no more than five properties using each courtyard (criterion 4), should not apply to apartment buildings. For apartment blocks over four dwellings, it would be impossible to comply;
- The size of a “larger car” and the space required for “the movement of wheeled waste bins to a collection point” are undefined (criterion 8);
- The requirement to provide one charging point per dwelling is not evidenced or justified nor has consideration been given to design or viability (criterion 9). No assessment has been undertaken as to the requirement that would be placed on National Grid and what (if any) additional infrastructure needs to be planned for;
- The policy would require significant amounts of car parking to be provided for developments within the town centre, although such locations encourage travel by more sustainable modes and car parking is often available locally. The effect of requiring the same parking provision for central and out-of-centre developments will be to reduce the density of development in more central locations, increasing overall development costs and potentially making sites unviable or undevelopable;
- 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 (criterion 7); and
- The policy is unsound in relation to non-residential and commercial parking standards as it does not consider the location of development and how that may influence the need for car parking.

Policy T3: Residential Garages

- 16.6. One representation was received relating to Policy T3. This stated that there is no evidence to demonstrate why garages cannot be counted toward parking numbers and why they should be oversized. Evidence that garages are underused (IGN3) is 10 years old and based on insubstantial evidence.

Policy T4: Parking for Heavy Goods Vehicles (HGVs)

- 16.7. Three representations were received relating to Policy T4. The representations raised the following issues:
- The policy should require new businesses, or those that are extended and result 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; and
 - Given the relationship of the Kent Downs AONB boundary with the strategic road network, it is likely that HGV parking proposals may come forward within the AONB and/or its setting. The AONB Unit therefore requests inclusion of an additional criterion: “*If located within the Kent Downs AONB or its setting, the proposal conserves the landscape character and special qualities of the Kent Downs AONB and incorporates appropriate mitigation*”.

Policy T5: Cycle Parking

- 16.8. One representation was received relating to Policy T5. This states that the size requirements for garages incorporating cycle parking (paragraph 13.34) are not detailed and the ability to remove bicycles is likely to be dependent on the size of the car, therefore it is not clear how the policy can be applied.

17. Chapter 14: Natural Environment

- 17.1. 40 representations were received relating to Chapter 14.
- 17.2. Four representations related to the chapter in general (this includes one which made the same comments multiple times regarding Princes Parade). Representations raised the following issues:
- Since the previous consultation on Preferred Options, Defra has published its 25 Year Environmental Plan. This should be referenced in the plan and the key policy to achieve environmental net gain included;
 - A green infrastructure policy should be included. This could be tied into the rural tourism aspect of capitalising on the natural beauty of the district; and
 - The land at Princes Parade should be left for local people and visitors to enjoy outdoor recreation, the canal and to give access to the beach. The area is open space and full of wildlife. At all the public consultations the public said 'no' to this development.
- 17.3. Other representations related to specific policies and are summarised below.

Policy NE1: Enhancing and Managing Access to the Natural Environment

- 17.4. Six representations were received relating to Policy NE1. The representations raised the following issues:
- The Green Infrastructure Strategy and Sustainable Access Strategy will be key. The policy should also serve to relieve potential recreational pressure on other designated sites;
 - The Rights of Way Improvement Plan should be referred to;
 - The plan does not provide sufficient evidence to demonstrate that development in the district (and potentially beyond the district) will not have an adverse effect on the integrity of Natura 2000 sites;
 - Support the development of a robust strategy for mitigating recreational disturbance to European designated sites. Note the continuing work in developing a strategic approach to reduce significant impacts to the Dungeness complex;
 - The development of the land at Princes Parade should not happen: this is an open space for the people of Hythe; and
 - Managing access through land-use planning is unlikely to be achievable.

Policy NE2: Biodiversity

- 17.5. Six representations were received relating to Policy NE2. The representations raised the following issues:
- Defra's 25 Year Environment Plan includes a specific commitment for environmental net gain through development. All developments should achieve biodiversity net gain, and that is reflected in Policy NE2 and Housing and Built Development policies. Policy wording or supporting text includes a need for planning applications to be accompanied by a Biodiversity Mitigation and Enhancement Plan;
 - Phrasing of "expect" doesn't provide the necessary strength to indicate that maintaining the ecological integrity is a lawful requirement;
 - The local planning authority is able to consider if there are "imperative reasons of overriding public interest (IROPI)" when reviewing development proposals. These considerations should be reflected within the policy wording;

- Include Local Wildlife Sites (LWSs) within the Local Sites criteria to demonstrate that the council is conserving its LWS network;
- The policy does not specifically refer to appropriate ecological surveys, only “appropriate safeguarding measures”. Mitigation can only be constructed when it is based on appropriate ecological surveys;
- Include reference to the Hythe Bay Marine Conservation Zone;
- The policy does not provide sufficient guidance to ensure that development minimises impacts on biodiversity and achieves net gains;
- Detailed policy wording should establish the importance of ensuring development contributes to the creation and maintenance of habitat networks;
- Supporting text should explain the importance of conservation outside protected sites. ‘Living landscapes’ and landscape-scale biodiversity networks (including Biodiversity Opportunity Areas), and the role of resilient habitat networks to allow species to respond to the changing climate, should be explained;
- Include policy wording which refers to irreplaceable habitats, such as ancient woodland, marshland, certain hedgerows, veteran trees and traditional orchards;
- 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;
- 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. It needs to be clear that mitigation must be in the control of the developer; and
- There are too many “get out” clauses. In relation to European sites, the bar is “adverse impacts” not “significant adverse impacts”.

Policy NE3: Protecting the District’s Landscapes and Countryside

17.6. Six representations were received relating to Policy NE3. The representations raised the following issues:

- The policy should refer to NPPF paragraphs 115 and 116;
- The policy should refer to preserving and enhancing the role and distinctiveness of landscapes and utilise landscape character assessment;
- The final section, ‘Landscape Character Areas’, should be amended; development should respond to the landscape character of the locality. The policy should ensure that the value, character, amenity and tranquillity of the district’s landscapes are protected and enhanced where appropriate;
- Too many “get out” clauses; and
- Support; however there is an error in criterion 2 of the policy – “setting” should read “siting”.

Policy NE4: Equestrian Development

17.7. Two representations were received relating to Policy NE4. The representations raised the following issues:

- Protection of existing bridleway provision should be included; and
- The control of lighting and the impact on night-time views should be given more emphasis.

Policy NE5: Light Pollution and External Illumination

17.8. Four representations were received relating to Policy NE5. The representations raised the following issues:

- The policy is too restrictive and could unnecessarily prohibit development. The requirement for all major development applications to be accompanied by a lighting assessment must be removed;
- Concerned about the impact of lighting on rivers and other watercourses: this needs to be assessed when the council considers planning applications near water;
- Light pollution is not related to ‘tranquillity’ as defined within the glossary and the reference should be removed; and
- The policy or text should acknowledge the need for appropriate lighting at London Ashford Airport.

Policy NE6: Land Stability

17.9. No representations were received relating to Policy NE6.

Policy NE7: Contaminated Land

17.10. Five representations were received relating to Policy NE7. The representation raised the following issues:

- The council does not have a Contaminated Land Public Register, as this is a statutory requirement the Local Plan cannot be compliant; and
- The development of the land at Princes Parade should not happen: this is an open space for the people of Hythe.

Policy NE8: Integrated Coastal Zone Management

17.11. Four representations were received relating to Policy NE8. The representations raised the following issues:

- A co-ordinated approach to marine planning is essential since development can cause erosion or other effects elsewhere along the coast. This could adversely affect seabed ecology and biodiversity, marine ecology and heritage assets, such as the Goodwin sands;
- Pleased to see the inclusion of infrastructure for cycleways and public rights of way; and
- Object to Princes Parade, Hythe.

Policy NE9: Development Around The Coast

17.12. Three representations were received relating to Policy NE9. The representations raised the following issues:

- Object to Princes Parade; and
- Support the inclusion of reference to the “England Coast Path National Trail” and amended text in criterion 5.

18. Chapter 15: Climate Change

18.1. 14 representations were received relating to Chapter 15.

Policy CC1: Reducing Carbon Emissions

18.2. Four representations were received relating to Policy CC1. The representations raised the following issues:

- Paragraph 15.16 clarifies that policy CC1 will be applied to reserved matter applications. This policy could therefore be applied to developments that already benefit from outline consent;
- The policy is contrary to national guidance which identifies that energy requirements for new housing are a matter to be addressed through Building Regulations rather than the planning system;
- No evidence has been prepared to show that it would not negatively impact on viability;
- The supporting text should refer to the energy hierarchy as the primary means by which minimise energy use and CO₂ emissions;
- The use of decentralised energy should be considered before renewable energy; and
- The threshold for reducing carbon emissions could be lower - a 10 per cent reduction in carbon emissions is quite conservative.

Policy CC2: Sustainable Design and Construction

18.3. Five representations were received relating to Policy CC2. The representations raised the following issues:

- South East Kent is an area of water shortage and insufficient use is being made of “grey water”;
- Criterion 1 (water efficiency) - the council has not published an up-to-date viability assessment and has stated in paragraph 15.20 that the district is already under severe water stress but have not provided any evidence to support this;
- Criterion 2 (non-residential development) should not be applied to developments that already benefit from outline planning consent, especially where there have already been issues of viability;
- Criteria 3 and 4 (passive design and future adaption) are vague and not clearly defined;
- Flexibility was previously included within Policy CC2 to allow negotiation;
- Support the new optional standard of water efficiency in new dwellings mentioned in paragraph 15.5 and specified in Policy CC2 criterion 1 and also support the expectation of non-residential developments reaching at least the BREEAM standard of “Very Good”, mentioned in paragraph 15.21, and specified in policy CC2 criterion 2;
- The policy might be divided into two sections, so that essential site layout, orientation and infrastructure requirements are discernible from measures associated with building construction, materials and technology;
- The first paragraph should “require” development to be resilient to climate change and encourage all developments to meet the highest standards that are financially viable;
- The policy should make clear whether the information sought should be included in the design and access statement, or as a separate statement;
- Some measures should be framed more positively; and

- Water efficiency measures should be included.

Policy CC3: Sustainable Drainage Systems (SuDS)

18.4. Two representations were received relating to Policy CC3. The representations raised the following issues:

- Paragraph 15.35 outlines that for brownfield sites discharge rates should be reduced to the equivalent of greenfield run-off rates. On many brownfield sites it may be impossible to achieve this; and
- Supporting text should be reordered so that the SuDS measures clearly encourage a hierarchical approach. Potential value to ecological networks should be mentioned.

Policy CC4: Wind Turbine Development

18.5. One representation was received relating to Policy CC4. This raised the following issues:

- The plan should recognise the importance of consultation beyond the neighbourhood plan boundary;
- The plan should be clear how a proposal will be considered if an application is submitted without the benefit of a neighbourhood plan allocation; and
- There should be a presumption against large-scale wind turbine development in the AONB and on best and most versatile agricultural land.

Policy CC5: Small Scale Wind Turbines and Existing Development

18.6. One representation was received relating to Policy CC5. This stated that the policy is unclear in relation to: the scale of turbine that is acceptable; the means by which cumulative impacts will be considered; and the expected relationship to the dwelling.

Policy CC6: Solar Farms

18.7. One representation was received relating to Policy CC6. The representation raised the following issues:

- Criterion 1 (AONB) should 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 and solar farm developments in the AONB;
- It is unclear what value the word "direct" has (criterion 2);
- Criterion 3 (ancillary works) should refer to the sensitive siting of ancillary buildings;
- Ecological enhancements, such as pollinator habitat, should also be sought;
- The reference to best and most versatile agricultural land is supported; and
- The policy should prioritise previously developed land and buildings.

19. Chapter 16: Health and Wellbeing

19.1. Nine representations were received relating to Chapter 16.

Policy HW1: Promoting Healthier Food Environments

19.2. Three representations were received relating to Policy HW1. The representations raised the following issues:

- No assessment has been made of: the numbers or densities of hot food takeaways that are needed or harmful; the distance from schools at which harm might occur; the numbers that might be refused; the resulting job losses; or the resulting journey length increases;
- The policy is not supported by evidence and will do nothing to assist in reducing child obesity;
- Primary school pupils are not normally permitted to leave school at lunchtime and would be accompanied to and from school;
- Food high in fat, salt or sugar is sold at a wide variety of facilities in many Use Classes, including many supermarkets, and focussing on one type of land use is not an effective solution;
- The approach assumes all hot food takeaways serve the same type and standard of food; and
- National Planning Practice Guidance does not recommend banning hot food takeaways based on proximity to schools.

Policy HW2: Improving the Health and Wellbeing of the Local Population and Reducing Health Inequalities

19.3. Two representations were received relating to Policy HW2. The representations raised the following issues:

- The requirement to undertake a Health Impact Assessment (HIA) unnecessarily replicates the requirement of policy which already takes health considerations into account;
- The piecemeal preparation of HIAs when sites come forward risks the deliverability and viability of sites;
- The policy should make clear that it does not apply to developments which already benefit from outline consent. This would stop HIAs being requested at both the outline and reserved matter stages; and
- The requirement to explain how development facilitates health and well-being is unnecessary and an additional burden on applicants.

Policy HW3: Development That Supports Healthy, Fulfilling and Active Lifestyles

19.4. Two representations were received relating to Policy HW3. The representations raised the following issues:

- The policy would be strengthened through a reference to Sport England's Active Design guidance;
- The policy would cover all applications including reserved matter applications which follow on from outline applications that already have consent (granted before this policy comes into effect). Such developments would not have been able to account for the additional burden, potentially affecting the deliverability of sites; and

- The policy is inflexibly worded in requiring all new major developments to incorporate productive landscapes in the design and layout of buildings and landscaping - this may not always be practical.

Policy HW4: Promoting Active Travel

19.5. Two representations were received relating to Policy HW4. The representations raised the following issues:

- The Active Travel Strategy and the Rights of Way Improvement Plan should be referenced and supported in this policy; and
- A 'Green Walk' or 'Martello Trail' has been proposed that would add to the list of walks available in Folkestone; this should be added to the policy.

20. Chapter 17: Historic Environment

20.1. 36 representations were received relating to Chapter 17.

20.2. 14 representations related to the chapter in general and raised the following issues:

- Concern that the Heritage Strategy has not yet been completed, consulted on or adopted;
- The Heritage Strategy should preserve the heritage of the district and not 'build, build, build';
- The plan should include policies or text to assist on issues such as 'setting', for each conservation area and include an action plan for the next two years;
- The allocation of land at Princes Parade has been raised; and
- Revisions strengthen the historic environment purpose of the plan (Historic England).

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

Policy HE1: Heritage Assets

20.4. Six representation were received relating to Policy HE1. The representations raised the following issues:

- Strategic assets are based on a document not in the public domain;
- Supporting paragraphs are vague - the plan needs clear aims so that heritage assets are protected; and
- More explanation should be given regarding the criteria for applications being approved, or what would be denied. There should be a formal requirement for any assets demolished or altered to be recorded to set standards.

Policy HE2: Archaeology

20.5. Five representations were received relating to Policy HE2. The representation raised the following issues:

- There is no mention of a need for specialist advice or what happens when archaeology is discovered;
- Archaeological field evaluation and/or historic building assessment should be an essential planning condition; and
- The reference to the Areas of Archaeological Potential (AAP) should be removed.

Policy HE3: Local List of Heritage Assets

20.6. Seven representations were received relating to Policy HE3. The representations raised the following issues:

- The supporting text needs to clarify what level of protection will be given;
- How do local people identify and put forward suggestions - there is no timeline. Could the old Grade III listings be used?;
- Local lists should be recognised throughout the planning stages; and
- The policy does not accord with the NPPF as it does not balance the desirability of sustaining and enhancing the significance of a heritage asset with the desirability of new development; it is too far reaching; and the criteria are too broad.

Policy HE4: Folkestone's Historic Gardens

20.7. Four representations were received relating to Policy HE4. The representations raised the following issues:

- The section is relevant to parks and gardens throughout the district and should be renamed "Shepway's Historic Parks and Gardens";
- If parks and gardens are covered by Policy HE1, why are they not mentioned in it?; and
- The policy could create a barrier to statutory utility providers in delivering essential infrastructure.

21. Chapter 18: Monitoring

21.1. No representations were received relating to Chapter 18.

22. Policies Map

22.1. Six representations were received relating to the Policies Map. Representations raised the following issues:

- Introduction - a revision is requested to the settlement confines at Kitewell Lane, Lydd;
- Picture 2.8 - Princes Parade - sufficient care has not been taken to protect this historic site and the allocation is contrary to the NPPF;
- Paragraph 3.12 - Coast Drive Car Park, Greatstone - Object to the allocation on the basis of: the principle of development; flood risk; impact on surroundings; and environmental impact. The site is the only coach park so its removal would harm tourism. It should remain a community asset; and
- Picture 8.16 - the Civic Society supports the designation of land between the Imperial Green residential development and the Royal Military Canal as “open space”.

23. Places and Policies Local Plan Submission Draft – Sustainability Appraisal

23.1. Two representations were received relating to the Sustainability Appraisal (both from the Environment Agency). Representations raised the following issues:

- Support for the objectives and key strategies relating to remediation of contaminated sites, to maintain or improve groundwater, surface water, river or coastal water; the status of the Water Framework Directive and development where there is adequate foul drainage, sewerage treatment facilities and surface water drainage; and
- Section 1.40 - where there is potential for direct impacts from development on water quality and discharges of treated wastewater, the need for robust drainage assessments should be included.

24. Places and Policies Local Plan Submission Draft – Habitats Regulations Assessment

24.1. No representations were received relating to the Habitats Regulations Assessment.

Appendix 5 – Opening Hours for Main Offices and Libraries

Library	Address	Opening Hours	
Folkestone & Hythe District Council	Civic Centre, Castle Hill Avenue, Folkestone, CT20 2QY	Sunday	Closed
		Monday	8.30am - 5.00pm
		Tuesday	8.30am - 5.00pm
		Wednesday	9.30am - 5.00pm
		Thursday	8.30am - 5.00pm
		Friday	8.30am - 5.00pm
		Saturday	Closed
Folkestone Library	2 Grace Hill, Folkestone, Kent, CT20 1HD	Sunday	10.00am - 4.00pm
		Monday	9.00am - 6.00pm
		Tuesday	9.00am - 6.00pm
		Wednesday	9.00am - 6.00pm
		Thursday	9.00am - 8.00pm
		Friday	9.00am - 6.00pm
		Saturday	9.00am - 5.00pm
Wood Avenue Library	Wood Avenue, Folkestone, Kent, CT19 6HS	Sunday	Closed
		Monday	9.00am - 1.00pm 2.00pm - 5.00pm
		Tuesday	9.00am - 1.00pm 2.00pm - 5.00pm
		Wednesday	9.00am - 1.00pm
		Thursday	9.00am - 1.00pm 2.00pm - 5.00pm
		Friday	9.00am - 1.00pm 2.00pm - 5.00pm
		Saturday	9.00am - 1.00pm
Cheriton Library	64 Cheriton High Street, Folkestone, Kent, CT19 4HB	Sunday	Closed
		Monday	9.00am - 6.00pm
		Tuesday	9.00am - 6.00pm
		Wednesday	9.00am - 1.00pm
		Thursday	9.00am - 6.00pm
		Friday	9.00am - 6.00pm
		Saturday	9.00am - 2.00pm
Sandgate Library	Sandgate High Street, Sandgate, Folkestone, Kent, CT20 3RR	Sunday	Closed
		Monday	9.30am - 1.00pm
		Tuesday	9.30am - 1.00pm
		Wednesday	Closed
		Thursday	9.30am - 4.30pm
		Friday	9.30am - 1.00pm
		Saturday	9.30am - 1.00pm

Hythe Library	1 Stade Street, Hythe, Kent, CT21 6BQ	Sunday Closed Monday 9.00am - 6.00pm Tuesday 9.00am - 6.00pm Wednesday 9.00am - 6.00pm Thursday 9.00am - 6.00pm Friday 9.00am - 6.00pm Saturday 9.00am - 5.00pm
New Romney Library	82 High Street, New Romney, Kent, TN28 8AU	Sunday Closed Monday 9.00am - 6.00pm Tuesday 9.00am - 6.00pm Wednesday 9.00am - 1.00pm Thursday 9.00am - 6.00pm Friday 9.00am - 6.00pm Saturday 9.00am - 2.00pm
New Romney One Stop Shop	New Romney Town Hall, High Street, New Romney, TN28 8BT	Wednesday 9.00am – 12.00pm
Lydd Library	Skinner Road, Lydd, Romney Marsh, Kent, TN29 9HN	Sunday Closed Monday 9.00am - 5.00pm Tuesday 2.00pm - 5.00pm Wednesday Closed Thursday 9.00am - 1.00pm Friday 9.00am - 5.00pm Saturday 10.00am - 2.00pm
Lyminge Library	Station Road, Lyminge, Folkestone, Kent, CT18 8HS	Sunday Closed Monday 2.00pm - 5.00pm Tuesday 9.00am - midday Wednesday Closed Thursday 9.00am - 6.00pm Friday 9.00am - midday Saturday 10.00am - 2.00pm

Shepway District Council
NOTICE OF
PUBLIC CONSULTATION
(Preferred Options Local Plan)

***Planning and Compulsory Purchase Act 2004 and Regulation 18
of the Town and Country Planning (Local Planning) (England)
Regulations 2012***

Preferred Options Local Plan for Shepway District Council

Notice is hereby given, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 that Shepway District Council has produced a Preferred Options document of the Shepway Places and Policies Local Plan for consultation and is inviting representations from people resident or carrying out business in the District about the content of the plan.

a) Title of Document:

The Shepway Places and Policies Local Plan

b) Subject Matter:

The Draft Local Plan sets out land use allocations for housing and employment and specific development management policies. It is accompanied by the Sustainability Appraisal.

c) Period within which representations may be made:

Friday 7th October 2016 to 5.00pm Friday 18th November 2016.

d) How to comment

To make comments on the Preferred Options Local Plan and associated documents please use one of the following methods, providing your name and contact details:

- **Online:** www.shepway.gov.uk/telluswhatyouthink
- **Email:** planning.policy@shepway.gov.uk
- **Letter:** Planning Policy Team, Shepway District Council, Civic Centre, Castle Hill Avenue, CT20 2QY

Please note representations cannot be treated as confidential

The Preferred Options Local Plan and the Sustainability Appraisal may be viewed on the council's website: www.shepway.gov.uk/telluswhatyouthink or at the following locations within normal opening hours:

- Shepway District Council, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY
- The Council One Stop Service at New Romney,
- All Public Libraries within Shepway

Exhibitions will also be held at the following locations and dates from 3pm until 8pm:

- | | |
|----------------|---------------------------|
| • 11th October | Hythe Town Hall |
| • 12th October | Lydd Town Hall |
| • 13th October | Sellindge Village Hall |
| • 20th October | New Romney Assembly Rooms |
| • 25th October | Hawkinge Community Centre |
| • 27th October | Folkestone Academy |

For any queries please contact the Planning Policy Team at planning.policy@shepway.gov.uk



Shepway District Council

Planning and Compulsory Purchase Act 2004 (as amended) and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Publication of the Shepway Places and Policies Local Plan Submission Draft

Notice is hereby given that Shepway District Council has published the Places and Policies Local Plan Submission Draft for public consultation in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The purpose of the Plan is to set out allocations for future development and new policies to be used to consider the suitability of development proposals. Once adopted the Plan will cover a period starting from 2006 to 2031 and will form part of the Development Plan for the District along with the Shepway Core Strategy Local Plan (2013).

To View Plan

The Plan can be viewed on the Council's web site at <http://shepway-consult.objective.co.uk/portal/> and hard copies will be available to view at the District Council Offices and local libraries during normal office opening hours.

How to make a comment

To make comments on the Local Plan Submission Draft please use one of the following methods, providing your name and contact details:

Online: <http://shepway-consult.objective.co.uk/portal/>

Email: planning.policy@shepway.gov.uk

Post: Planning Policy, Civic Centre, Castle Hill Avenue, Folkestone, Kent, CT20 2QY

All comments must be made by using a standard form. This form is already provided in the consultation portal. Paper copies of the form will be available from the Council Offices and local libraries or can be downloaded from the Council's web site: www.shepway.gov.uk/places-and-policies.

Representations should relate to the 'soundness' of the Local Plan. To be sound, the Local Plan must be i) *positively prepared*, ii) *justified, effective* and iii) *consistent with national policy*. Please see guidance notes which are also available from the Council's web site.

Consultation Period

Comments are invited between **5th February and midnight on 19th March 2018**. Only representations made in writing (including electronic through the consultation portal) which arrive by the methods specified above within the consultation period will be considered.

Folkestone
Hythe & Romney Marsh
Shepway District Council

