



# Agenda

Meeting: **Cabinet**  
Date: **14 September 2016**  
Time: **5.00 pm**  
Place: **Council Chamber - Civic Centre Folkestone**

To: **All members of the Cabinet**

All Councillors for information

The cabinet will consider the matters listed below on the date and at the time and place shown above. The meeting will be open to the press and public.

1. **Apologies for absence**

2. **Declarations of interest**

Members of the Council should declare any interests which fall under the following categories. Please see the end of the agenda for definitions\*:

- a) disclosable pecuniary interests (DPI);
- b) other significant interests (OSI);
- c) voluntary announcements of other interests.

3. **Minutes (Pages 1 - 6)**

To consider and approve as a correct record the minutes of the meeting held on 30 June 2016.

4. **Folkestone Coastal Park - Heritage Lottery Fund (Pages 7 - 12)**

Report C/16/30 seeks Cabinet approval to submit a Stage 1 application to the Heritage Lottery Fund (HLF) for works at Folkestone's Coastal Park comprising:-

- reinstatement of cliff paths either side of the Leas Cliff Hall
- casting of a mould to reproduce Leas lamp columns

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- interpretation of the site's heritage and associated community activities

The application process is in two stages. Stage 1 provides information in outline and if successful would secure a HLF grant to help develop a Stage 2 application. The Stage 2 application would provide fully detailed proposals to the point where the HLF would make a final funding decision and works could be tendered. If both stages are successful it is expected that the work would take place in the autumn/winter of 2018.

Stage 2 development costs are expected to be £50,000, and final delivery costs are currently expected to be in the region of £640,000. The HLF requires a minimum 5% contribution towards costs, but, as this is a competitive process it is proposed to offer up to 20% (£138,000 in total) as the Council's contribution.

5. **5th Continent - Heritage Lottery Fund application and partnership agreement (Pages 13 - 18)**

Report C/16/31 Kent Wildlife Trust (KWT) has asked the Council to sign a partnership agreement relating to the Romney Marsh 5<sup>th</sup> Continent Landscape Partnership Scheme bid for a Heritage Lottery Fund (HLF) grant. Signing up to the agreement would not incur any direct costs to the Council, but it would strengthen the stage 2 bid for £1,736,000.

6. **Application bids to the Magnox Socio-Economic fund: (1) Feasibility and master planning of Mountfield Road Industrial Estate and New Romney Economic Plan; and (2) The continuation of funding for the Romney Marsh Partnership Coordinator Post (Pages 19 - 26)**

Report C/16/33 requests Cabinet's approval for two funding applications to the Magnox Socio-economic Fund: (1) support towards the development of feasibility work and a master plan for Mountfield Road Industrial Estate and a New Romney Economic Plan; and (2) a contribution to the costs for the Romney Marsh Partnership (RMP) Coordinator post for a further three years. In addition, Cabinet is requested to agree to SDC continuing to host the RMP Coordinator post and for a £10,000 per annum contribution from SDC, with the balance of costs (£10,000 p.a.) coming from other RMP partners.

7. **Folkestone Community Led Local Development (CLLD) - Accountable Body and Programme Strategy (Pages 27 - 148)**

Report C/16/45 seeks agreement for Shepway District Council to be the Accountable Body for the Folkestone CLLD Programme, should the European funding be secured, and to endorse the Programme Strategy.

8. **Places and Policies Local Plan - preferred options (Pages 149 - 580)**

Report C/16/35 On 29<sup>th</sup> June Cabinet agreed report C/16/13 which provided an update on the progress of the Shepway Places and Policies Local Plan, seeking cabinet approval for the formal structure of the

Preferred Options document, range of proposed policies and the consultation strategy and associated arrangements, prior to consideration of the document itself.

Appendix 1 to this report provides a copy of the final draft of the Places and Policies Local Plan Preferred Options Document. Cabinet is asked to agree this draft document, subject to any minor changes delegated to the Head of Planning. Cabinet is also asked to agree to the consultation arrangements set out within the report, so as undertake a 6 week engagement process in accordance with regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

9. **Shepway District Council - Dementia Friendly Communities Action Plan (Pages 581 - 666)**

Report C/16/17 Shepway District Council is a member of the Shepway Dementia Action Alliance and as part of the National Dementia Challenge the Council is required to have a local action plan on Dementia Friendly Communities.

10. **Risk Based Verification Policy for Housing Benefit and Council Tax Reduction (Pages 667 - 684)**

Report C/16/41 sets out a new policy within the administration of Housing Benefit and Council Tax Reduction to implement and carry out Risk Based Verification of applications and reported changes.

This forms an element of the eform application process to be introduced in October 2016.

11. **Medium Term Financial Strategy 2017/18 - 2020/21 (Pages 685 - 712)**

Report C/16/48 The Medium Term Financial Strategy (MTFS) is the Council's key financial planning document. It puts the financial perspective on the council's Corporate Plan priorities, expressing the aims and objectives of various plans and strategies in financial terms over the four year period ending 31<sup>st</sup> March 2021. It covers both revenue and capital for the General Fund and the Housing Revenue Account. Also included are the Council's reserves policies. The MTFS is a key element of sound corporate governance and financial management.

12. **Business Rates Retention consultation (Pages 713 - 730)**

Report C/16/46 In July 2016 the Government commenced consultation on proposals for local authorities and their preceptors to retain 100% of the business rates collected, in return for the cessation of central grant support to local government. This report seeks Cabinet's views on the Council's proposed response to these proposals and the 36 questions asked by Government so that a final response to the consultation can be agreed and submitted.

13. **Film Classification Policy (Pages 731 - 748)**

## Cabinet - 14 September 2016

Report C/16/42 In order for films to be shown at licensed premises they must be classified by the British Board of Film Classification or the Council in accordance with the Licensing Act 2003 (LA03). If the Council classify or re-classify films, they must have a relevant Policy in place. Currently Shepway District Council does not have a Film Classification Policy.

\*Explanations as to different levels of interest

(a) A member with a disclosable pecuniary interest (DPI) must declare the nature as well as the existence of any such interest and the agenda item(s) to which it relates must be stated. A member who declares a DPI in relation to any item must leave the meeting for that item (unless a relevant dispensation has been granted).

(b) A member with an other significant interest (OSI) under the local code of conduct relating to items on this agenda must declare the nature as well as the existence of any such interest and the agenda item(s) to which it relates must be stated. A member who declares an OSI in relation to any item will need to remove him/herself to the public gallery before the debate and not vote on that item (unless a relevant dispensation has been granted). However, prior to leaving, the member may address the meeting in the same way that a member of the public may do so.

(c) Members may make voluntary announcements of other interests which are not required to be disclosed under (a) and (b). These are announcements made for transparency reasons alone, such as:

- membership of outside bodies that have made representations on agenda items, or
- where a member knows a person involved, but does not have a close association with that person, or
- where an item would affect the well-being of a member, relative, close associate, employer, etc. but not his/her financial position.

Voluntary announcements do not prevent the member from participating or voting on the relevant item

**Folkestone**

Hythe & Romney Marsh  
Shepway District Council



# Minutes

## Cabinet

Held at:	Council Chamber - Civic Centre Folkestone
Date	Thursday, 30 June 2016
Present	Councillors Miss Susan Carey, John Collier, Malcolm Dearden, Alan Ewart-James, David Godfrey, Mrs Jennifer Hollingsbee, Rory Love, Philip Martin and David Monk
Apologies for Absence	Councillors Stuart Peall
Officers Present:	Andy Blaszkowicz (Head of Commercial and Technical Services), Dee Chambers (Policy and Improvement Officer), Ben Geering (Head of Planning), Amandeep Khroud (Head of Democratic Services and Law), Sue Lewis (Committee Services Officer), Tim Madden (Corporate Director - Organisational Change), Susan Priest (Corporate Director - Strategic Development), Alistair Stewart (Chief Executive), Suzy Tigwell (Leadership Support Manager) and David Whittington (Planning policy Team Leader)
Others Present:	

NOTE: All decisions are subject to call-in arrangements. The deadline for call-in is Monday 11 July at 5pm. Decisions not called in may be implemented on Tuesday 12 July.

10. **Declarations of interest**

There were no declarations of interest.

11. **Minutes**

The minutes of the meetings held on 25 May and 8 June 2016 were submitted, approved and signed by the Chairman.

12. **Corporate Plan update and Performance Indicators for 2016/17**

Report C/16/11 The Corporate Plan sets out the framework for delivering the Council's priorities over the next five years, outlining the strategic objectives, priorities and key actions required to meet the vision for the Council and district. This report provides an update against the actions within the Corporate Plan and details the performance indicators that will be monitored in 2016/17 to ensure that the Council's performance is measured and the results are used to improve service areas.

Proposed by Councillor David Monk  
Seconded by Councillor Malcolm Dearden and

**Resolved:**

1. **To receive and note report C/16/11.**
2. **To consider and approve the update of the actions outlined within the Corporate Plan for 2015-16.**
3. **To note the performance indicators detailed in Appendix 2 that will be collected during 2016/17**
4. **To consider and approve the Key Performance Indicators (KPIs) that will be reported quarterly to CMT and Members.**
5. **That officers report back quarterly to Cabinet on any significant under or over performance against the performance indicators detailed in Appendix 2.**

(Voting: For 9; Against 0; Abstentions 0)

13. **Customer Charter - 2016 Update**

Report C/16/12 informs Cabinet of the proposed 2016 update to the Corporate Customer Charter. The report recommends a number of amendments, to ensure the customer charter is updated to reflect service changes, digital delivery and social media.

Proposed by Councillor Rory Love  
Seconded by Councillor Mrs Jenny Hollingsbee and

**Resolved:**

1. **To receive and note report C/16/12.**
2. **To approve the proposed updated Corporate Customer Charter.**
3. **To recommend that the Overview and Scrutiny Committee review the Charter in 9 months time and ask that a further report is brought back to Cabinet in 12 months time taking this review into account.**
4. **To delegate to the Corporate Director - Organisational Change in conjunction with Councillor Rory Love to review the targets in relation to days, working days, altering as appropriate ahead of publication.**

(Voting: For 9; Against 0; Abstentions 0)

14. **Shepway Places and Policies Local Plan - preferred options**

Report C/16/13 provides an update on the progress of the Shepway Places and Policies Local Plan. It seeks Cabinet approval of the formal structure of the document, range of proposed policies and the consultation strategy and associated arrangements, prior to consideration of the document at Cabinet in September 2016.

The report also seeks Cabinet approval for the update of the Local Development Scheme (LDS) timetable for the completion of the Places and Policies Local Plan, as well as the timetable for the review of the Core Strategy Local Plan.

Proposed by Councillor David Monk  
Seconded by Councillor David Godfrey and

**Resolved:**

1. **To receive and note report C/16/13.**
2. **To note progress and agree the draft list of allocation sites and policies to be progressed within the Places and Policies Local Plan Preferred Options Document.**
3. **To agree to the consultation arrangements set out in section 5 of the report.**
4. **To agree the revised Local Development Scheme timetable as set out in Appendix 3.**

(Voting: For 9; Against 0; Abstentions 0)

15. **Coronation Parade - coast protection works**

Report C/16/24 sets out the requirement to formally approve the budget for the new coastal protection works at Coronation Parade, Folkestone scheduled to be undertaken during 2016/17 and 2017/18 and all externally funded from grants and contributions. Cabinet is requested to recommend to Full Council to approve that the scheme is added to the General Fund Medium Term Capital Programme.

Proposed by Councillor Philip Martin  
Seconded by Councillor Malcolm and

**Resolved:**

1. **To receive and note report C/16/24.**
2. **To recommend to Full Council that the £5.145m budget for the Coronation Parade coast protection works, entirely funded from external grants and contributions, is approved to be added to the General Fund Medium Term Capital Programme from 2016/17.**

(Voting: For 9; Against 0; Abstentions 0)

16. **Hythe Pool - state of repair**

Report C/16/15 sets out the current state of repairs at Hythe Pool and sets out the required work to enable the pool to remain open for Cabinet Members to approve.

Proposed by Councillor Philip Martin  
Seconded by Councillor Malcolm Dearden and

**Resolved:**

- 1. To receive and note report C/16/15.**
- 2. To approve the funding necessary to carry out essential works.**
- 3. To note that a further report will be brought back to Cabinet in the event of any further failures.**

(Voting: For 9; Against 0; Abstentions 0)

**17. Proposed replacement of the Council's Complaints Procedure with a customer feedback and Complaints Policy**

Reports C/16/16 seeks to update Cabinet on the findings of a review of the current policy. It also sets out the rationale for replacing the current complaints procedure with a more concise Customer Feedback and Complaints Policy, a draft of this policy appearing in Appendix 2 for consideration by Cabinet.

Proposed by Councillor Rory Love  
Seconded by Councillor David Godfrey and

**Resolved:**

- 1. To receive and note Report C/16/16.**
- 2. To approve the draft Customer Feedback and Complaints Policy as set out in Appendix 2.**

(Voting: For 9; Against 0; Abstentions 0)

**18. Urgent Decision taken by CMT to authorise the submission of a tender for Lifeline**

Report C/16/18 informs Cabinet of the decision taken under urgency powers by officers to submit a tender for Lifeline due to a short deadline.

Proposed by Councillor Malcolm Dearden  
Seconded by Councillor Mrs Jenny Hollingsbee and

**Resolved:**

- 1. To receive report C/16/18.**
- 2. To note the decision of the CMT to authorise the submission of a tender for Lifeline.**



(Voting: For 9; Against 0; Abstentions 0)

19. **Treasury Management and Actual Prudential Indicators annual report 2015/16**

Report C/16/20 report reviews the council's treasury management activities for 2015/16 and also summarises the actual prudential indicators for 2015/16. The report meets the requirements of both the CIPFA Code of Practice on Treasury Management and the CIPFA Prudential Code for Capital Finance in Local Authorities. The Council is required to comply with both Codes through Regulations issued under the Local Government Act 2003.

Proposed by Councillor Ms Susan Carey  
Seconded by Councillor Alan Ewart-James and

**Resolved:**

1. **To receive and note Report C/16/20.**

(Voting: For 9; Against 0; Abstentions 0)

Councillor Ms Susan Carey wanted it known of her appreciation of the work done by the officers.

20. **Housing Revenue Account Revenue and Capital Budget Monitoring 2016/17 - 1st Quarter and 2015/16 Financial Outturn**

Report C/16/21 provides a projection of the end of year financial position for the Housing Revenue Account (HRA) revenue expenditure and HRA capital programme based on net expenditure to 31 May 2016. The report also summarises the 2015/16 final outturn position (subject to audit) for the HRA revenue expenditure and HRA capital programme compared to both the latest approved budget.

Proposed by Councillor Alan Ewart-James  
Seconded by Councillor Malcolm Dearden and

**Resolved:**

1. **To receive and note Report C/16/21.**

(Voting: For 9; Against 0; Abstentions 0)

21. **General Fund Capital budget monitoring - 1st Quarter 2016/17 and 2015/16 Outturn**

Report C/16/22 provides a projection of the latest financial position for the General Fund capital programme, based on expenditure to 31 May 2016. The

report identifies variances on planned capital expenditure for the General Fund in 2016/17. The report also summarises the 2015/16 final outturn position (subject to audit) for the General Fund capital programme compared to both the latest approved budget and the quarter 4 budget monitoring position reported to Cabinet in April 2016.

Proposed by Councillor Ms Susan Carey  
Seconded by Councillor Alan Ewart-James and

**Resolved:**

- 1. To receive and note Report C/16/22.**

(Voting: For 9; Against 0; Abstentions 0)

**22. 2016/17 Quarter 1 Budget Monitoring and 2015/16 Provisional outturn**

Report C/16/23 Section A of this report sets out a projected year end financial position on the General Fund for 2016/17, based on actuals to 31 May 2016. In addition, Section B shows the provisional outturn for 2015/16. This report covers General Fund revenue alone. Capital expenditure and Housing Revenue Account expenditure are covered under separate reports on this Agenda.

Proposed by Councillor Ms Susan Carey  
Seconded by Councillor Mrs Jenny Hollingsbee and

**Resolved:**

- 1. To receive and note Report C/16/23.**
- 2. As indicated in paragraph 4.5.6, to allocate £1.304 million of unspent budgets in 2015/16 to the Carry Forward reserve.**
- 3. To approve the use of £20,163 from the Corporate Property Reserve on health and safety works at the workshop to Oxenden Road Depot.**
- 4. To note, as per paragraph 4.6, a new charge for Lifeline GPS Devices, as agreed by Corporate Management Team (CMT).**

(Voting: For 9; Against 0; Abstentions 0)

This Report will be made public on 6 September 2016

**Folkestone**

Hythe & Romney Marsh  
Shepway District Council



Report Number **C/16/30**

**To:** Cabinet  
**Date:** 14 September 2016  
**Status:** Non-key Decision  
**Head of service:** Katharine Harvey Head of Economic Development  
**Cabinet Member:** Councillor John Collier - District Economy

**SUBJECT: FOLKESTONE COASTAL PARK – HERITAGE LOTTERY FUND APPLICATION**

**SUMMARY:** This report seeks Cabinet approval to submit a Stage 1 application to the Heritage Lottery Fund (HLF) for works at Folkestone's Coastal Park comprising:-

- reinstatement of cliff paths either side of the Leas Cliff Hall
- casting of a mould to reproduce Leas lamp columns
- interpretation of the site's heritage and associated community activities

The application process is in two stages. Stage 1 provides information in outline and if successful would secure a HLF grant to help develop a Stage 2 application. The Stage 2 application would provide fully detailed proposals to the point where the HLF would make a final funding decision and works could be tendered. If both stages are successful it is expected that the work would take place in the autumn/winter of 2018.

Stage 2 development costs are expected to be £50,000, and final delivery costs are currently expected to be in the region of £640,000. The HLF requires a minimum 5% contribution towards costs, but, as this is a competitive process it is proposed to offer up to 20% (£138,000 in total) as the Council's contribution.

**REASONS FOR RECOMMENDATIONS:**

Cabinet is asked to agree the recommendations set out below for the following reasons:

- 1) Cabinet approval would allow submission of the Stage 1 application.

**RECOMMENDATIONS:**

1. To receive and note Report C/16/30.
2. To approve submission of a Stage 1 application to the Heritage Lottery Fund to take forward the project outlined in this report.

## 1. BACKGROUND

- 1.1 Following a positive response from the Heritage Lottery Fund (HLF) to a pre-application enquiry, officers in the Council's Economic Development Team have commissioned cost studies to support the submission of a Stage 1 application for works at Folkestone's Lower Leas Coastal Park.
- 1.2 The project would help to meet the Council's Corporate Objectives to "Boost the local economy and increase job opportunities" and "Support an attractive and vibrant place to live". It would focus on improving access in and out of the park, and between the park and the town centre, by reinstating cliff paths either side of the Leas Cliff Hall, and other works including:
- restoration of a subway connecting the Leas with the cliff path east of the Leas Cliff Hall
  - manufacture of a cast for the Leas lamp-columns and casting of a small number of new columns;
  - interpretation (information) about the Leas Cliff Hall and the park
  - associated community engagement activities
- 1.3 The HLF has a two stage process for applications of this nature, with the level of detail required increasing as the stages progress. The studies commissioned have identified:
- outline proposals developed sufficiently for use as the basis of a Stage 1 bid
  - the costs of developing a Stage 2 bid
  - outline project delivery (final) costs
- 1.4 The estimated costs are set out below.

Element	£'s
Development of Stage 2 bid	50,000
Path on eastern side of Leas Cliff Hall	97,500
Path on western side of Leas Cliff Hall	117,000
Subway	110,000
Interpretation	30,000
Lamp-columns	60,000
Activities	30,000
<b>Sub total</b>	<b>444,500</b>
Contingency (15%)	66,675
<b>Subtotal</b>	<b>511,175</b>
Project Management @ 20% if needed	102,235
<b>Total Delivery Costs</b>	<b>613,410</b>
<b>Total after Inflation @2% pa for 2 years</b>	<b>688,192</b>
<b>Total SDC contribution at 5% (rounded)</b>	<b>35,000</b>
<b>Total SDC contribution at 20% (rounded)</b>	<b>138,000</b>

- 1.5 If agreed the information and associated costs already produced could be used to submit a Stage 1 application. If this was successful, the HLF would invite submission of a more detailed Stage 2 application, with information

developed to the point where works could be tendered. Applicants are given up to two years to produce a Stage 2 application but this amount of time is not expected to be needed. The costs of developing the Stage 2 application are expected to be £50,000 and the HLF might provide up to 95% of these costs through a Development Grant. The Council would need to provide a minimum 5% contribution (£2,500). However, as this process is competitive, a 20% contribution (£10,000) would improve the possibility of success. This contribution would be required during financial year 2017/18.

1.6 The studies suggest that the total final costs, including development of the Stage 2 application, would be £690,000. The HLF stipulates a minimum contribution of 5% (£35,000) for projects of this scale. However, as the process is competitive it is suggested that a contribution of up to 20% (£128,000) would increase the bid's likelihood of success. If the timetable set out in paragraph 1.9 below is adhered to this funding would be required in financial year 2018/19.

1.7 Other considerations to take into account would include:-

- the HLF would require the council to commit to maintaining HLF funded works for at least 10 years. The current budget for the Coastal Park is felt to be sufficient for minor repairs but not for major repairs to new paths, for example in the case of a major landslip
- the possible need to appoint a project management team to oversee development and delivery if there are insufficient in-house resources (the outline delivery costs table in paragraph 1.4 includes a figure of £102k for project management)
- options to scale the scheme back, for example by choosing to reinstate one path rather than two
- the possibility of other funds being used to provide match funding such as Coastal Community Fund and Section 106
- the need for the Folkestone Parks & Pleasure Ground Charity's approval as the project would take place partly on FPPGC land

1.9 Taking into account these matters Cabinet's approval is sought to make a Stage 1 submission to the HLF. If agreed the expected timings for following due process would be as follows:

<b>Draft Timetable</b>	
<b>2016</b>	
October	Submit Stage 1 bid
<b>2017</b>	
January	HLF decision and possible award of Stage 2 development grant
January to September	Develop Stage 2 bid using HLF development grant
September	CMT/Cabinet permission to submit Stage 2 bid
September/October	Submit Stage 2 bid
<b>2018</b>	
January	HLF decision and award of delivery grant

January to March	Contract and permission to start delivery phase
March to June	Tendering
September	Start on site
Finish	End 2018

## 2. RISK MANAGEMENT ISSUES

2.1 The following risk and preventative action is identified.

Perceived risk	Seriousness	Likelihood	Preventative action
That the Stage 1 application is rejected.	Medium – the opportunity to secure improvements will have been lost	Medium	The process is competitive so success cannot be guaranteed, but HLF advice has been and will continue to be sought to ensure that the application meets the HLF's requirements.

## 3. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

### 3.1 Legal Officer's Comments (DK)

There are no legal implications arising directly out of this report. Legal Services will upon instruction advise on and assist in negotiating any contractual arrangements needing to be entered into in the event of a successful application for grant funding (including the Development Grant Agreement with HLF) and contractual arrangements with contractors for the anticipated works.

### 3.2 Finance Officer's Comments (LW)

At this stage there are no financial implications arising directly from this report. However, the report outlines the estimated financial contribution the council may be required to make towards the project should it be successful with both the Stage 1 and 2 application processes.

### 3.3 Diversities and Equalities Implications (DI)

There are no diversity or equality implications arising directly from this report.

## 4. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

Councillors with any questions arising out of this report should contact the following officer prior to the meeting:

David Illsley  
 Telephone: 01303 853474  
 Email: [dave.illsley@shepway.gov.uk](mailto:dave.illsley@shepway.gov.uk)

The following background documents have been relied upon in the preparation of this report: None

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This Report will be made public on 6 September 2016

**Folkestone**

Hythe & Romney Marsh  
Shepway District Council



Report Number **C/16/31**

**To:** Cabinet  
**Date:** 14 September 2016  
**Status:** Non-key Decision  
**Head of service:** Katharine Harvey Head of Economic Development  
**Cabinet Member:** Councillor John Collier - District Economy

**SUBJECT: 5<sup>TH</sup> CONTINENT – HERITAGE LOTTERY FUND APPLICATION AND PARTNERSHIP AGREEMENT**

**SUMMARY:** Kent Wildlife Trust (KWT) has asked the Council to sign a partnership agreement relating to the Romney Marsh 5<sup>th</sup> Continent Landscape Partnership Scheme bid for a Heritage Lottery Fund (HLF) grant. Signing up to the agreement would not incur any direct costs to the Council, but it would strengthen the stage 2 bid for £1,736,000.

**REASONS FOR RECOMMENDATIONS:**

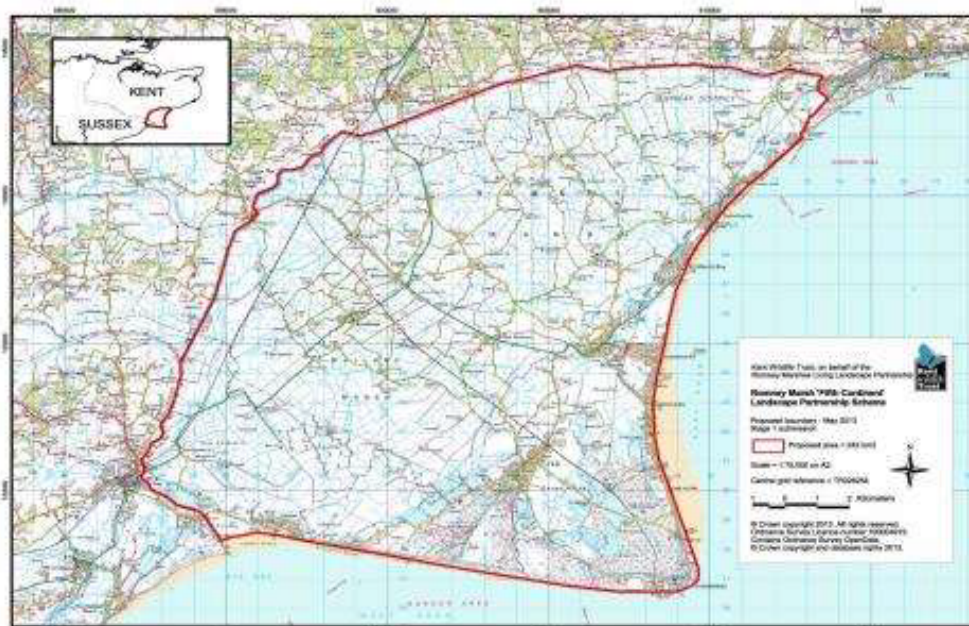
Cabinet is asked to agree to the recommendations set out below because signing the partnership agreement would demonstrate the Council's support for the scheme and increase its likelihood of success.

**RECOMMENDATIONS:**

1. To receive and note Report C/16/31.
2. To agree to Councillor David Monk, as Leader of SDC, or Councillor John Collier, as Cabinet lead Member for the District Economy, signing the Romney Marsh 5th Continent HLF Landscape Partnership Scheme Agreement on behalf of the Council.

## 1.0 BACKGROUND

- 1.1 As reported at the full Council in November 2014 (SDC Council Meeting; 19<sup>th</sup> November 2014; Minutes; para 62), Kent Wildlife Trust (KWT) was successful in its Stage 1 bid for £1.9m to the Heritage Lottery Fund (HLF) for the Romney Marsh Fifth Continent Landscape Partnership Scheme. The scheme covers the majority of the Romney Marshes south and east of the Royal Military Canal (map below).



- 1.3 The scheme is being supported by a range of organisations, including from the:-
- Business and Community - the Romney Marsh Partnership; Magnox Romney Resource Centre, the Marsh Academy, the Diocese of Canterbury, Visit Kent, Kent County Council Heritage Team, farmer representatives, Romney Marsh Internal Drainage Board
  - Environment – Kent Wildlife Trust (KWT), Sussex Wildlife Trust; Romney Marsh Countryside Partnership, Natural England, the RSPB, the Environment Agency
- 1.4 The scheme proposes a three year programme of works and activities focused on:-
- Restoring, re-creating and enhancing built and natural heritage features across Romney Marsh
  - Helping local communities and visitors to rediscover their landscape and heritage
  - Developing the skills of young people in a range of subjects and occupations, including agriculture, tourism and conservation

- 1.5 In receiving Stage 1 approval, the HLF has earmarked £1,988,700 towards the scheme and allocated funds to KWT to develop a Stage 2 submission. KWT is now preparing its Stage 2 submission which is to be submitted in September. If successful, the scheme will begin in March 2017 and continue until September 2020. As part of the Stage 2 submission KWT has asked all partners, including the Council to sign a Partnership Agreement (see Appendix A). This Agreement commits the Council to:
- membership of the Fifth Continent Steering Group which involves attending Fifth Continent Steering Group meetings on a regular basis and responding to Steering Group communications, where possible; and
  - providing specialist advice to support the effective delivery of the Fifth Continent Scheme, where deemed reasonable to do so by the Council.
- 1.6 The scheme fits well with the Shepway Corporate Plan objective to “Support an attractive and vibrant place to live”, and within that objective the actions to enhance the district’s tourism offer.
- 1.7 The Council is currently represented on the Steering Group by Dave Illsley, from the Economic Development Team, and has been providing support for the project. Signing the agreement would demonstrate to the HLF the Council’s willingness to continue to support the Partnership. Not signing the agreement would convey a negative message to the HLF which may reduce the likelihood of the success of the Stage 2 bid. It is proposed that either the Leader, Councillor Monk, or the Cabinet lead Member for the District Economy, Councillor Collier, signs the Partnership Agreement on behalf of the Council.

## 2. RISK MANAGEMENT ISSUES

### 2.1

Perceived risk	Seriousness	Likelihood	Preventative action
If the Council does not sign the agreement the HLF may query the level of community support for the bid.	Medium – this may decrease the bid’s chances of success	Low	By signing the agreement the Council would confirm its continued support for the scheme. It could also be demonstrated to the HLF that the Council has supported the scheme’s development outside of the partnership agreement.
Signing the Partnership Agreement may impact on future decisions taken by the Council which might be perceived as negatively impacting on the	Low – the scheme will encompass a variety of environmental, built heritage, tourism and training projects, many of which are extensions of	Low	As a partner the Council will be able to influence the scheme’s implementation.

aims of this project.	existing activity. The scheme cannot introduce new formal designations which might act as constraints		
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### 3. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

#### 3.1 Legal Officer's Comments (DK)

The Partnership Agreement commits the Council to being a member of the Steering Group for approximately 4 years and providing 'specialist advice': whilst the undertakings contained in the Partnership Agreement are unspecific and generalised, the fact that the Council is agreeing to do so must be taken into account from a time and resource perspective. However Cabinet should be aware that there may be cause to argue that the Partnership Agreement is not binding on the Council as currently drafted.

#### 3.2 Finance Officer's Comments (LH)

No financial implications arising from this report.

#### 3.3 Communications (ML)

#### 3.4 Diversities and Equalities Implications (DI)

There are no diversity or equality implications arising directly from this report.

### 4. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

Councillors with any questions arising out of this report should contact the following officer prior to the meeting:

David Illsley

Telephone: 01303 853474

Email: [dave.illsley@shepway.gov.uk](mailto:dave.illsley@shepway.gov.uk)

The following background documents have been relied upon in the preparation of this report:

None

#### Appendices:

Appendix 1: 5<sup>th</sup> Continent Partnership Agreement

**Partnership Agreement 1<sup>st</sup> September 2016- 30<sup>th</sup> September 2020**

**Romney Marsh Landscape Partnership Scheme ‘*The Fifth Continent*’ Delivery Stage**

The parties to this Agreement support the Romney Marsh Landscape Partnership Scheme ‘The Fifth Continent’ Stage 2 application (made on 1<sup>st</sup> September 2016) to the Heritage Lottery Fund, led by Kent Wildlife Trust and are committed to supporting the Delivery Stage of the bid (from January 2017 to September 2020) if successful, in the following ways:

- By being a member of the Fifth Continent Steering Group and as such attending Fifth Continent Steering Group meetings on a regular basis and/or responding to Steering Group communications, where possible.
- By providing specialist advice which helps to support the effective delivery of the Fifth Continent Scheme, where deemed reasonable to do so.

I, the undersigned, am authorised to sign on behalf of my organisation:

Organisation: Type or hand write organisation

Role: Type or hand write role of SENIOR PERSON WITH AUTHORITY TO SIGN

Name: Type or hand write name of SENIOR PERSON WITH AUTHORITY TO SIGN

Signature: Handwrite REAL SIGNATURE

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This Report will be made public on 6 September 2016

**Folkestone**

Hythe & Romney Marsh  
Shepway District Council



Report Number **C/16/33**

**To:** Cabinet  
**Date:** 14 September 2016  
**Status:** Non-key Decision  
**Head of service:** Katharine Harvey – Head of Economic Development  
**Cabinet Member:** Councillor John Collier, Cabinet Lead Member for the District Economy

**SUBJECT: APPLICATION BIDS TO THE MAGNOX SOCIO-ECONOMIC FUND: (1) FEASIBILITY AND MASTER PLANNING OF MOUNTFIELD ROAD INDUSTRIAL ESTATE AND NEW ROMNEY ECONOMIC PLAN; AND (2) THE CONTINUATION OF FUNDING FOR THE ROMNEY MARSH PARTNERSHIP COORDINATOR POST**

#### **SUMMARY:**

This report requests Cabinet's approval for two funding applications to the Magnox Socio-economic Fund: (1) support towards the development of feasibility work and a master plan for Mountfield Road Industrial Estate and a New Romney Economic Plan; and (2) a contribution to the costs for the Romney Marsh Partnership (RMP) Coordinator post for a further three years. In addition, Cabinet is requested to agree to SDC continuing to host the RMP Coordinator post and for a £10,000 per annum contribution from SDC, with the balance of costs (£10,000 p,a.) coming from other RMP partners.

#### **REASONS FOR RECOMMENDATIONS:**

Cabinet is asked to agree the recommendations set out below because if these applications are successful they will enable:

- the continuation of the Romney Marsh Partnership Coordinator role;
- feasibility studies and master-planning of Mountfield Road Industrial Estate to be undertaken; and
- an economic plan for New Romney to be undertaken.

#### **RECOMMENDATIONS:**

1. To receive and note Report C/16/33.

- 2. Agree to the submission of a grant application to the Magnox Socio-economic Fund for £60,000 towards the cost of undertaking a feasibility study and masterplan for the development of Mountfield Road Industrial Estate.**
- 3. To note that the application will also include £10,000 for a New Romney Economic Plan for New Romney Town Council who intend to appoint Regeneris to undertake this work.**
- 4. To note that SDC intends to contribute £20,000 towards the overall project costs of the Mountfield Road feasibility study and masterplan and that this sum is identified in the Economic Development budget for 2016/17.**
- 5. To agree to the submission of a grant application to the Magnox Socio-economic Fund for £60,000 towards the costs of the Romney Marsh Partnership (RMP) Coordinator Post for three years from December 2016.**
- 6. To agree to the allocation of £10,000 a year for three years from December 2016 towards the RMP Coordinator post's costs from the Economic Development Team's budget.**
- 7. To agree to the Council continuing to host the RMP Coordinator Post, should the funding from all other parties be agreed.**



## **1. BACKGROUND**

- 1.1 The Magnox Socio-economic Fund is available to the communities in the Romney Marsh area to mitigate the impact of the decommissioning of the Dungeness A Nuclear power station, which commenced in 2006.
- 1.2 Advice on funding applications is provided by Magnox locally and they have been involved in all steps of the process to develop the applications outlined in this report.
- 1.3 Applications to the fund are considered on a quarterly basis and the next meeting is scheduled for 21<sup>st</sup> September 2016. However, to secure a decision at this panel applications have had to be submitted by 4<sup>th</sup> August. These can be withdrawn at any stage prior to the final panel meeting.
- 1.4 The nature of these funding applications requires SDC Cabinet approval.

## **2. MOUNTFIELD ROAD INDUSTRIAL ESTATE AND NEW ROMNEY ECONOMIC PLAN.**

- 2.1 As a result of a meeting in December 2015 between SDC officers, Magnox (Haf Morris) and the NDA (Jonathan Jenkin), SDC was encouraged to submit an application to the Magnox Socio-economic fund to take forward proposals for further developing the Mountfield Road Industrial Estate, New Romney. This is identified as a key development opportunity to provide additional business accommodation for the Romney Marsh area in the Romney Marsh Partnership's Delivery Plan.
- 2.2 As a result of similar discussions that Magnox had with New Romney Town Council, who were looking to submit a funding application to develop a New Romney Economic Plan (similar to that which has been developed for Dymchurch with Coastal Community Team funding from DCLG), a meeting took place to explore whether the two proposals could be brought together as a single application. The clear steer from Magnox was that two independent applications would be unlikely to succeed.
- 2.3 The outcome of the discussions between SDC's Economic Development (ED) Team and New Romney Town Council was agreement that a joint bid made sense and that the feasibility of this from a procurement perspective would be investigated. Subsequent discussions with Finance and Procurement suggest that this is feasible, with SDC able to receive all the funding (which needs to come to a single body) and to passport £10,000 to New Romney Town Council for the commissioning of consultants Regeneris to do the Economic Plan.
- 2.4 The Economic Plan for New Romney will provide clarity and direction in respect of a number of initiatives that have been identified in the Romney Marsh Partnership's Delivery Plan. It will also provide a mechanism for assessing and developing a range of other ideas and opportunities that are currently being considered by the Town Council.

- 2.5 Mountfield Road Industrial Estate consists of 16ha of employment land and the largest remaining undeveloped area of 6.1 ha is in the ownership of SDC. The estate currently has over 70 separate business units with B1, B2 and B8 uses. In three units owned by SDC the Romney Resource Centre operates, delivering skills training and managing a small business start-up incubation facility. Kent County Council also operates a household waste recycling centre on the estate.
- 2.6 The 6.1 ha site is identified as a key employment site in the Local Plan, and is expected to remain as such following the district-wide employment land review currently underway. The undeveloped part of the site is currently in agricultural use and requires investment in utilities, site preparation and roads. Preliminary capacity assessments indicate that approximately 20,000 sq. m (gross) of employment space could be developed on-site.
- 2.7 Recent studies, including BBP's 2015 review of demand for workspace centres and incubators, found that facilities in Shepway, Ashford, Canterbury and Dover all had high occupancy rates and that there was demand for flexible incubators and grow-on space in several locations in each of the districts. Initial thoughts for the site therefore include the provision of a larger/replacement business incubator and skills centre; grow on space and serviced plots; provision of site specific utilities and infrastructure; and environmental improvements of the estate as a whole.
- 2.8 Access to the estate is currently poor and improving this is a likely prerequisite for the success of this site. This could be achieved through the development of a new spine road from the A259, west of New Romney High Street. As part of the call for sites under the Local Plan SHLAA process, Icen Projects have identified the area to the south of New Romney that borders the Mountfield Road site as having the potential to deliver up to 400 dwellings. Funding for the new spine road linking Mountfield Road Industrial Estate to the A259 could be a potential developer contribution. However, there are likely to be competing interests for what this developer contribution might be, if the plan goes ahead: New Romney Town Council has indicated a desire for a new health centre.
- 2.9 Funding for this road infrastructure was the subject of a recent bid made to KMEP for Local Growth Fund round 4 funding. Unfortunately this project was not successful, although there are likely to be further funding opportunities for LGF funding in the future.
- 2.10 The funding application to the Magnox fund will comprise the following elements:

<b>Element</b>	<b>Indicative cost</b>	<b>Source for indicative cost</b>
<b><i>New Romney Economic Plan</i></b>	£10,000	Regeneris
<b><i>Mountfield Road feasibility studies</i></b>		
- Master plan for environmental enhancements	£15,000	tbc
- Utilities & infrastructure report	£15,000	Knapp Hicks & Partners Ltd
- Business incubator & skills centre	£10,000	Bailey Partnership

design & cost		
- Grow on space & development plots design & cost	£10,000	Bailey Partnership
- Project management	£20,000	
<b>Total funding required</b>	<b>£80,000</b>	<b>(all costs exclude VAT)</b>

- 2.11 Magnox has indicated that a match funding contribution would strengthen the appeal of an application. It is therefore proposed that SDC will make a £20,000 contribution to this project and therefore the funding ask of Magnox is £60,000. This £20,000 SDC contribution to this project has been earmarked in the ED budget for 2016/17.
- 2.12 Should the Magnox bid be successful, SDC will be the accountable body for all the funding, with the £10,000 for the New Romney Economic Plan passported on to the Town Council. The Town Council would thereafter commission consultants directly to undertake the Economic Plan.

### **3. ROMNEY MARSH PARTNERSHIP (RMP) COORDINATOR**

- 3.1 The RMP is an economic development partnership formed in 2012 to mitigate the impacts of the decommissioning the Magnox Dungeness A power station. RMP is chaired by Cllr. Wilkins and current partners include Shepway, Ashford, Rother, Kent, and East Sussex Councils; the NDA, Magnox, EDF and the Dungeness Site Stakeholders' Group; the Marsh Academy and Romney Resource Centre; Lydd Airport, Bretts, and Kent Invicta Chamber of Commerce; Action with Communities in Rural Kent; The Rye Partnership and Alan Clifton-Holt representing the landbased sector.
- 3.2 The Council employs the Romney Marsh Partnership (RMP) Coordinator on the RMP's behalf and the post is based in the ED Team. In addition to servicing the RMP's meetings, the Coordinator has a project development role, with a particular focus on implementing the RMP Delivery Plan.
- 3.3 The post was initially funded for three years to 30<sup>th</sup> November 2016 through contributions from:-
- Magnox £120,000 (£40,000 per annum over three years)
  - Shepway District Council £15,000 (single payment in 2013/14)
  - Ashford Borough Council £5,000 (single payment in 2013/14)
- 3.4 The question of continuation of this post has been considered by RMP partners and Magnox and all have indicated informally a desire for the post to continue. In view of the process to identify a site for a GDF due to commence again shortly, the need for a coordinator for this partnership will be even more important over the next few years.
- 3.5 Magnox has indicated that they would expect their contribution towards the post to reduce to 50% of the annual £40,000 costs, which includes the post's salary and on-costs and a small working budget. Following discussions between partners the following funding package for the next

three years is proposed, reflecting the proportions of the Romney Marsh population in each area:

Magnox	£60,000 (£20,000 pa over 3 years)
Shepway DC	£30,000 (£10,000 pa over 3 years)
Ashford BC	£15,000 (£5,000 pa over 3 years)
Rother DC	£15,000 (£5,000 Pa over 3 years)
<b>Total</b>	<b>£40,000 per annum over 3 years</b>

3.6 Strong support has been voiced at RMP meetings for this package approach to funding the post and while there has been verbal agreement in principle, no formal agreements are yet in place. If this application to the Magnox fund is successful then it is expected that each of the other partners, including Shepway District Council, will confirm their funding contributions and the current contract for the Coordinators post extended for three years to 30<sup>th</sup> November 2019.

3.7 The additional SDC funding for the Coordinator post for the remainder of 2016/17 is identified in the ED budget. However, in the recent ED Team budget planning exercise for 2017/18, only £5,000 has been identified in 2017/18. To meet the recent proposal for a £10,000 SDC annual contribution, funds can be reallocated to this from other ED budget areas as necessary in 2017/18. The required allocation will also be made in the 2018/19 and 2019/20 ED budget.

#### 4. RISK MANAGEMENT ISSUES

4.1 Risk management issues are as follows:-

Perceived risk	Seriousness	Likelihood	Preventative action
Magnox funding approval is not secured for the Mountfield Road masterplan and New Romney Economic Plan.	Medium – the opportunity to fund this important project will be lost for at least another three months.	Medium	The application for funding has been developed with Magnox and has received their verbal support at RMP meetings.
Magnox funding approval is not secured for the continuation of the RMP Coordinator Post.	High – the ability of the RMP to continue its work would be severely hampered.	Low	The application for funding has been developed with Magnox and has received their verbal support at RMP meetings.

#### 5. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

##### 5.1 Legal Officer's Comments (DK)

Legal Services have not seen or advised on the text of either the grant agreement due to be entered into with 'Magnox Socio-Economic Fund' or the funding agreements with Ashford BC and Rother BC; legal advice will be given on each upon instruction.

Cabinet should be conscious of the fact that if the Council is the actual recipient of the funding from Magnox (and is the 'accountable body') and we in turn pay part of the grant to New Romney Town Council ('NRTC'), the Council may be liable to Magnox if NRTC does not use their proportion of the grant (£10,000) for the purposes for which they were awarded. If that is the basis on which the Council anticipates receiving the grant(s), it may be in the interests of the Council if it obtains an undertaking from NRTC that it will use the grant for the authorised purpose before payment is made of their proportion.

## 5.2 **Finance Officer's Comments (LW)**

This report relates to possible grant applications to the Magnox Socio-economic Fund for two projects: (1) feasibility work and a master plan for Mountfield Road Industrial Estate and a New Romney Economic Plan; and (2) a continuing contribution to the costs for the Romney Marsh Partnership (RMP) Coordinator post for a further three years.

Project (1) is a grant application for £60,000 for a new project. In addition the Council will fund a further £20,000. Paragraph 2.11 shows that the latter will come from the existing Economic Development (ED) budget. Project (2) is based on existing arrangements. Paragraph 3.5 indicates that Magnox will reduce their funding by £20,000 per annum with an expectation that two other Councils will fund an extra £10,000, the latter requires confirmation. The Council would, therefore, be required to fund an extra £10,000 from the ED budget. Paragraph 3.7 shows that this additional cost can be met from the existing budget and budgets for 2017/18 to 2019/20

## 5.3 **Diversities and Equalities Implications (DI)**

no diversity or equality implications arising directly from this report.

## 6. **CONTACT OFFICERS AND BACKGROUND DOCUMENTS**

Councillors with any questions arising out of this report should contact the following officer prior to the meeting:

Katharine Harvey – Head of Economic Development

Telephone: 01303 853287

Email: [katharine.harvey@shepway.gov.uk](mailto:katharine.harvey@shepway.gov.uk)

The following background documents have been relied upon in the preparation of this report:

None

**Appendices:** None

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This Report will be made public on 6 September 2016

**Folkestone**

Hythe & Romney Marsh  
Shepway District Council



Report Number **C/16/45**

**To:** Cabinet  
**Date:** 14 September 2016  
**Status:** Non-key Decision  
**Head of service:** Katharine Harvey, Head of Economic Development  
**Cabinet Member:** Councillor John Collier, District Economy

**Subject: FOLKESTONE COMMUNITY LED LOCAL DEVELOPMENT (CLLD) – ACCOUNTABLE BODY AND PROGRAMME STRATEGY**

**SUMMARY:** This report seeks agreement for shepway district council to be the accountable body for the Folkestone CLLD Programme, should the European funding be secured, and to endorse the programme strategy.

### **REASONS FOR RECOMMENDATIONS**

Cabinet is asked to agree to Shepway District Council being the Accountable Body for the Folkestone CLLD Programme because:

- Progress through the application process requires that an Accountable Body is identified;
- SDC is well placed and experienced in acting as an Accountable Body; and
- No other organization is able or willing to take on this role.

If there is agreement to the role of Accountable Body role, Cabinet is asked to:

- Endorse the Folkestone CLLD Programme Strategy, as the Accountable Body is required to do this by the Managing Authorities (DCLG and DWP) for this stage of the application process.

### **RECOMMENDATIONS:**

1. To receive and note Report C/16/45.
2. To agree to Shepway District Council being the Accountable Body for the Folkestone CLLD Programme.
3. To endorse the Programme Strategy for the Folkestone CLLD Programme.

## 1. BACKGROUND

- 1.1 SELEP's European Structural Investment Fund (ESIF) strategy allocated around £10 mill for Community Led Local Development within the SELEP area and identified four potential locations for these programmes – Hastings & Bexhill, Ramsgate, Dover and Folkestone.
- 1.2 The application process for a CLLD programme involves three stages:
  - **Expression of Interest** setting out the case for a CLLD programme in the area
  - **Stage 1** preparatory stage outputs required include establishing a Local Action Group (LAG), identifying an Accountable Body for the programme and submission of programme strategy for agreement by the Managing Authorities (DCLG & DWP); and
  - **Stage 2** implementation stage which is the submission by the Accountable Body of full ERDF and ESF applications grants for the CLLD programme to deliver the agreed Programme Strategy.
- 1.3 Following approval of Shepway District Council's EOI submitted in November 2015, SDC was awarded ESF/ERDF funding (matched 50% by 'staff in-kind' SDC funding) to develop the Stage 1 outputs which needed to be submitted by 31<sup>st</sup> August.
- 1.4 Although the implications of the Referendum vote to leave the EU are yet to be clarified the original estimated timetable for the remainder of the CLLD application process is:
  - Decision of the Managing Authorities and invitations to successful CLLD programmes to progress to Stage 2 of the application process by October 2016.
  - Stage 2 submissions required by 31<sup>st</sup> December 2016
  - CLLD programme commences and spend incurred from 1<sup>st</sup> April 2017.
- 1.5 To guide the stage 1 process, a Steering Group led by the Head of Economic Development was established in March 2016. Representatives on the group include officers from SDC's Communities team, Folkestone Town Council, Kent County Council, the Citizens Trust Strand House/Folkestone Harbour Company, Folkestone Business Hub, the Shepway Employment & Training Forum, East Kent College and the Rainbow Centre. This group has evolved into the Local Action Group and membership extended to include an SDC Member (Cllr David Monk), a Folkestone Town Council Member (Martin Salmon) and representatives from Folkestone Rotary, Folkestone and District Mind, Sustainability Connections, the Samaritans and East Folkestone Together
- 1.6 The development of the Programme Strategy has been led by consultants CSES (Centre for Strategy and Evaluation Services) who were appointed



in March 2016. They have undertaken considerable community engagement for its development of the strategy, which was a very important part of the process because the nature of the programme requires this to be developed 'bottom-up' and 'community-led'.

- 1.7 Following the vote to leave the EU in the Referendum, there has been little clarity from Government on the future of the CLLD programme, beyond a steer that they expect applicants receiving funding to deliver the Stage 1 outputs to continue and if these are not completed then the allocated European funding for this stage would not be payable. It is also not clear whether the Government will continue with the CLLD application process beyond the current stage and further information is expected soon.

## **2.0 ROLE OF THE ACCOUNTABLE BODY**

- 2.1 A required output for Stage 1 of the application process for a CLLD Programme requires an Accountable Body to be identified for the operation of the programme.

- 2.2 The specific tasks and responsibilities for the Accountable Body of CLLD are set out in guidance<sup>1</sup> and includes:

- Developing the Stage 2 submission - the full ERDF and ESF application, for the CLLD programme, once the strategy has been agreed by the Managing Authorities (DCLG for ERDF and DWP for ESF);
- Responsibility for managing the CLLD programme funds, including ensuring eligibility of use, maintenance of appropriate records, the submission of claims in line with ERDF and ESF, signing funding agreements with the Managing Authorities and Project Leads and delivery of the programme outputs;
- Providing executive support for the Local Action Group and programme management support through employing CLLD Programme Staff.

- 2.3 Up to 25% of the total CLLD Programme costs can be allocated to the Management and Administration of the programme. The programme strategy for the Folkestone CLLD has identified 24% of a total programme budget of £4.998 mill which equates to £600,000 over the 5 years. However, at this stage a minimum sized Management & Administration function has been identified, with 'financial capacity built in to potentially draw on Management and Administration resources to appoint community workers to help develop new and innovative approaches for CLLD funding'<sup>2</sup>. It is proposed that should the full allocation for the Management and Administration function not be drawn upon, 'then these resources will be redirected to address the main objectives to the programme itself.'<sup>3</sup>

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<sup>1</sup> Community-led Local Development Strategies: Additional Guidance for Accountable Bodies, Version 1, May 2016

<sup>2</sup> Folkestone CLLD Programme Strategy Aug 2016, p.73

<sup>3</sup> Ditto<sup>2</sup>

- 2.4 The Strategy sets out the Programme Staff that will be required to manage the Folkestone CLLD Programme and be employed by the Accountable Body. The CLLD Strategy identifies that as a minimum, the functions will require the involvement of at least four people to ensure that:
- The person involved in the development of a project application does not assess or approve it.
  - The person that assesses a project is not involved in the development of the project and does not approve it;
  - The person who has checked a grant claim does not authorise payment of any financial claim; and
  - The person who has approved a project does not authorise payment of associated grant claims
- 2.5 Once the programme has been approved, it is proposed that two full time staff members are appointed and line managed by the Head of Economic Development, with one being the Programme lead second a supporting officer. It is also proposed that an officer in Shepway District Council's Finance Department is used on a part time basis, responsible for checking any grant claims and for ensuring that all financial records are maintained correctly. From time to time there may be a requirement for legal advice for the CLLD Programme and this will be provided on an ad hoc basis by the council's Legal Team. Similarly, although most of the promotion and publicity for the programme will be undertaken by the full time Programme Staff, some support may be required from the council's Communications Team.
- 2.6 The CLLD Programme is subject to a 50% public sector matched funding contribution towards any European funds and this also applies to the Management and Administration (M&A) element of the programme. This means that of the £1.2 mill allocated to M&A over the five years, £600,000 could be required as public sector match funding. This can be a 'staff in-kind' contribution. At this stage, there is no requirement for us to specify where this match funding will come from in the Strategy. We are therefore still exploring how this match funding requirement can be met, which could be in whole or part from Shepway District Council's allocation from being part of the Kent Growth Pool. This will be the subject of a further paper to Cabinet later in Autumn, should the Folkestone CLLD Programme Strategy be approved by DCLG and DWP and SDC is invited, in its role as Accountable Body, to submit a Stage 2 application.

### **3.0 FOLKESTONE CLLD PROGRAMME STRATEGY**

- 3.1 The Folkestone CLLD Programme Strategy is one of the required outputs for stage 1 of the application process for a CLLD programme. This strategy is required to be endorsed by the Local Action Group (LAG), who owns the strategy, and by the Accountable Body.
- 3.2 A draft of the Programme Strategy was considered at the inaugural meeting of the LAG which took place under the chairmanship of the newly elected Chair Terry Cooke-Davies of Folkestone Rotary, on August 24<sup>th</sup>.

Shepway District Council is represented on the Local Action Group by Cllr David Monk, the Leader of the Council.

3.3 During the discussions on the Draft Programme Strategy at the LAG meeting, a number of changes were suggested. Approval of the Strategy was agreed with these changes incorporated. Sign off of the final version of the Strategy was delegated to the Chair, so that this could be submitted to the Managing Authorities by the deadline of 31<sup>st</sup> August.

3.3 A copy of the Programme Strategy is contained in Appendix A.

3.4 Guidance on the role of the Accountable Body<sup>4</sup> indicates that the Accountable Body needs to formally agree its role and to approve the Programme Strategy. In view of the timescale imposed by the Managing Authorities for Stage 1, it was recognized that this ‘might not align with the governance arrangements of potential accountable bodies’ and therefore it might not be possible for the Accountable Body to review the strategy and fully consider its role in the short period between drafting the Strategy and its submission to the Managing Authorities by 31<sup>st</sup> August. In this situation, which has been the case for the Folkestone CLLD Programme, the Managing Authorities agreed to accept evidence, which has been provided in the form of a letter<sup>5</sup>, to undertake the role in principle. In these circumstances any approval of the Programme Strategy by the Managing Authorities ‘will be conditional upon formal confirmation of the Accountable Body’.

3.5 Cabinet is asked to endorse the Programme Strategy as approved by the Local Action Group.

#### 4.0. RISK MANAGEMENT ISSUES

4.1 Risk management issues are as follows:-

Perceived risk	Seriousness	Likelihood	Preventative action
The Government decides not to continue the CLLD Programme application process	Medium – the opportunity for funding to ensure that residents in the deprived communities of Folkestone benefit from the regeneration opportunities is lost  Expectations	Medium	Although this is ultimately a Government and (possibly) a SELEP decision, the delivery of a robust strategy and demonstration of local support and commitment to the programme will help.  All engagement with the public reflects the uncertainty of the

<sup>4</sup> Community-led Local Development Strategies: Additional Guidance for Accountable Bodies, Version 1, May 2016

<sup>5</sup> Folkestone CLLD Programme Strategy, Aug 2016, Appendix F

	amongst the local community are raised and ultimately not met resulting in disillusionment with SDC as the lead		programme in order to ensure that there is a realistic understanding of the prospects of this programme commencing
Projects do not come forward for funding due to the public sector match funding requirement	Medium– the ability to spend the programme allocation will be jeopardized and the resultant reputational damage to SDC.	Low	The engagement process in developing the Strategy has resulted in many project ideas already coming forward and the process of encouraging new projects ideas started. The appointment of Programme Staff to work with the community to develop project ideas

## **5.0 LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS**

### **5.1 Legal Officer’s Comments (DK)**

The terms upon which the Council must take on the role of ‘Accountable Body’ for the CLLD program are contained in the document entitled “Community-Led Local Development Strategies: Additional Guidance for Accountable Bodies” (referred to in paragraph 2.2 above). It appears that the obligations contained in the Guidance are not negotiable and the Council is solely responsible.

Upon receipt of instructions, Legal Services will advise on the terms of any grant funding agreements which ERDF/ESF require successful beneficiaries of funding to enter into and any funding arrangements which Kent County Council may require the Council to enter into prior to benefiting from ‘Kent Growth Pool’ funding

### **5.2 Finance Officer’s Comments (GW)**

The report sets out some indicative financial implications arising from the Council being the Accountable Body. The Programme Strategy also provides some indicative figures for project costs. It is proposed that a further report will come back to Cabinet later this year setting out in detail how Shepway’s match funding requirement will be met, once approval has been given by the necessary bodies. At this stage, I am satisfied that the Council will be able to fund its management and administration role once this is confirmed in more detail.

### **5.3 Diversities and Equalities Implications**

This programme focuses on addressing issues in the most deprived communities in the district through providing support to ultimately help them to access jobs.

## **6.0. CONTACT OFFICERS AND BACKGROUND DOCUMENTS**

Councillors with any questions arising out of this report should contact the following officer prior to the meeting:

Katharine Harvey – Head of Economic Development  
Telephone: 01303 853287  
Email: [katharine.harvey@shepway.gov.uk](mailto:katharine.harvey@shepway.gov.uk)

The following background documents have been relied upon in the preparation of this report:

- Community-led Local Development Strategies: Additional Guidance for Accountable Bodies, Version 1, May 2016

Appendix A: Folkestone Community-led Local Development Programme Strategy, August 2016

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# Folkestone Community Led Local Development

## Programme Strategy

31<sup>st</sup> August 2016



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## Abbreviations

CCT	Folkestone Coastal Community Team
CLLD	Community Led Local Development
CLLD Strategy	Community Led Local Development Strategy
DCLG	Department of Communities and Local Government
DLA	Disability Living Allowance
DWP	Department of Work and Pensions
ERDF	European Regional Development Fund
ESA	Employment Support Allowance
ESF	European Social Fund
IDBR	Inter-departmental Business Register
IMD 2010	Index Multiple Deprivation of 2010
IMD 2015	Index Multiple Deprivation of 2015
JSA	Job Seekers Allowance
KCC	Kent County Council
LAG	Local Action Group
LSOA	Lower Super Output Area used by Office of National Statistics to compare geographic areas
NEET	Young people Not in Employment, Education or Training
NOMIS	National Online Manpower Information System (national socio-economic statistics system run by the University of Durham)
ONS	Office for National Statistics
SDC	Shepway District Council
SELEP	South East Local Enterprise Partnership
SIC	Standard Industrial Classification of employment sectors
SME	Small Medium Enterprise
SWOT	Analysis tool Strengths Weaknesses Opportunities and Threats

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# Executive Summary

**This is an executive summary of the Folkestone Community Led Local Development Strategy (CLLD Strategy).**

## Background

Community Led Local Development (CLLD) is a new way of promoting local economic, social and environmental development support using the EU's Structural Investment Funds and public sector match funding. The aim is to help people furthest from employment get access to jobs and support businesses to grow.

CLLD programmes are supported by both the European Social Fund (ESF) and the European Regional Development Fund (ERDF) and are expected to run from April 2017 to March 2022.

## Context

The area in Folkestone proposed for a CLLD programme consists of 19 Lower Super Output Areas (LSOAs) that includes nine that are among the 20% most deprived LSOAs in the country (based on the 2010 Index of Multiple Deprivation (IMD)E). This cohesive geographic area has a resident population of 31,406 (2014).

The assessment of the development needs and potential of the area shows that Folkestone has suffered over the years from the decline of traditional seaside tourism. Recent improvements include faster rail links to London, the growth of the Creative Quarter and the redevelopment of the harbour area.

Nevertheless, parts of Folkestone continue to suffer from levels of deprivation that are amongst the highest in the country. Around 65% of the population in the CLLD area are in the top 20% most deprived parts of the country and 85% is in the UK's 30% most deprived areas.

The risk is that disparities will become more pronounced as regeneration of the town progresses, with a potential deepening sense of alienation and hopelessness in the deprived communities.

Therefore, the rationale for the Folkestone CLLD Programme is to ensure that the deprived communities in the town are given an opportunity to benefit from the economic growth through this programme which aims to promote social and economic cohesion.

## Strategic Objectives

A community-led analysis of strengths, weaknesses, opportunities and threats (SWOT) suggested that the aim of the programme should be to promote social and economic cohesion through interventions to help the most deprived communities by helping residents to access jobs and by supporting local businesses to help them grow and provide new job opportunities.

The programme has three objectives:

- Objective 1 - Enhancing work-readiness and well-being;
- Objective 2 - Promoting local business and social enterprise;
- Objective 3 - Setting up an integrated delivery mechanism for the strategy.

A total of eight actions have been defined to support the promotion of the objectives. These have been arrived at through a 'bottom-up' process involving extensive consultations with representatives from the local community.

The total cost of the CLLD Programme is £4.9m. The total European funding for the programme is 50% of the total and the rest will come from public sector and charitable sources. Some 43% of the

# Executive Summary

European funding will be from the European Social Fund (ESF) and the remainder (57%) from the European Regional Development Fund (ERDF).

At this stage, 24% of the total costs of the programme have been allocated to the programme Management and Administration, because the nature of the programme requires a bottom-up approach of working with the community to develop initiatives. This amounts to £1.2mill in total, of which £600,000 will be drawn from the European Social Fund.

## Folkestone CLLD Programme: Summary of Objectives, Actions and Funding

Objective 1 - Facilitate and improve chances of people being able to access employment	
<b>Target Groups</b>	<ul style="list-style-type: none"> <li>Youth particularly NEETS</li> <li>Long term unemployed,</li> <li>Working People without the appropriate skills for the market</li> <li>Carers</li> <li>People with mental, physical or emotional barriers to work</li> </ul>
<b>Actions</b>	Action 1: Work experience and job preparation for young people Action 2: Getting people back into work and job retention Action 3: Emotional and physical well-being services Action 4: Promoting financial wellbeing
<b>Total funding</b>	£1,950,000
Objective 2 - Promoting local business and social enterprise	
<b>Target</b>	<ul style="list-style-type: none"> <li>Small business</li> <li>Potential Start-ups/Entrepreneurs</li> </ul>
<b>Actions</b>	Action 5: Promotion of social enterprise Action 6: Support for business start-ups Action 7: 'DIY space' and/or incubation facilities
<b>Total funding</b>	£1,348,000
Objective 3 - Setting up an integrated delivery mechanism for the strategy	
<b>Target</b>	Provision of infrastructure to service users
<b>Actions</b>	Action 8: A central networked hub to facilitate the delivery of integrated programming and services - a Community Hub
<b>Total funding</b>	£500,000

## Folkestone CLLD Programme: Outputs and Results

ESF Output Indicators	Number
Number of participants	2,000
Participants that are unemployed including long-term unemployed	743
Participants that are inactive	357
Participants that are aged over 50	271
Participants that are from ethnic minorities	n/a

# Executive Summary

Participants that have disabilities	320
<b>Results</b>	
Participants in education or training on leaving	385
Unemployed participants in employment, including self-employment on leaving	260
Inactive participants into employment or job search on leaving (36% success rate)	187
<b>ERDF Outputs Indicators</b>	<b>Number</b>
Number of existing enterprises receiving support	160
Number of new enterprises receiving support	125
Number of potential entrepreneurs assisted to be enterprise ready	125
Square metres public or commercial building built or renovated in target areas	n/a

# Introduction

# 1

## 1.1 Background – Community Led Local Development Programme Strategy

This document contains the Folkestone Community Led Local Development Programme Strategy (CLLD Strategy).

Community Led-Local Development (CLLD) is a new way of promoting local economic, social and environmental development support using the EU's Structural Funds and public sector match funding. The aim of the Folkestone CLLD Strategy is to help people in the most deprived parts of Folkestone to bring them closer to employment and increase their prosperity. This will be achieved by specifically targeted interventions to remove barriers to work, provide opportunities to gain locally relevant skills and experience and thereby improve employment chances. The Programme also aims to support local businesses to increase the number of jobs available to local people.

The CLLD Programme will operate over 5 years, as many of the issues contributing to the deprivation in this area are deep seated and will need to be addressed over a long period to achieve impact.

The CLLD approach is based on a number of key tenets: it is driven by local needs; it is 'bottom-up' and led by a Local Action Group (LAG) representing the local community; and it will bring added value over other mainstream European funded programme activity.

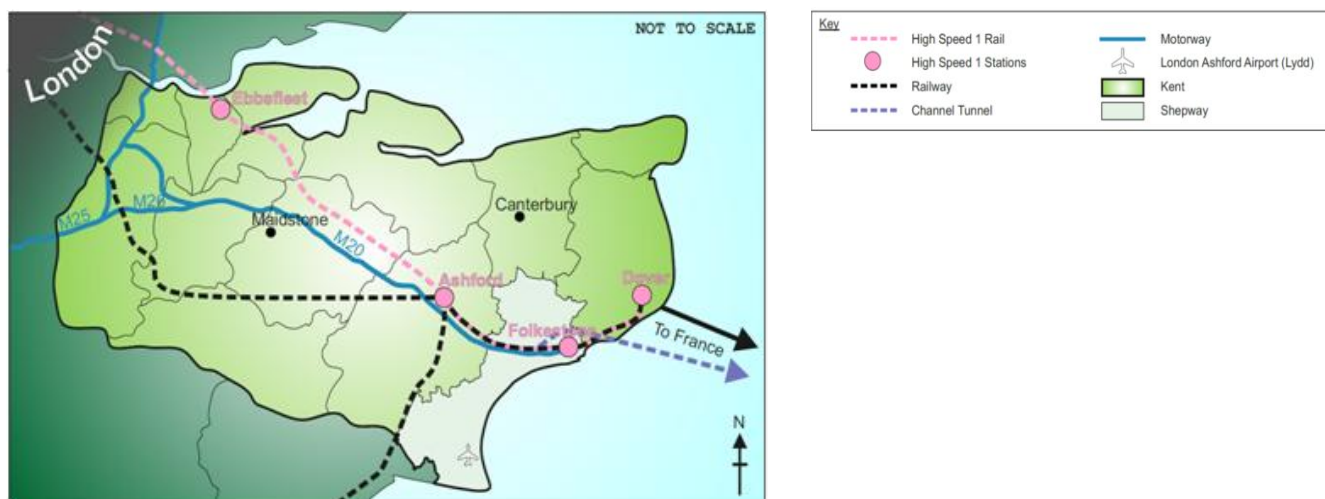
The CLLD Programme is intended to contribute to achieving smart, sustainable and inclusive growth which is both designed and implemented by the local community through a Local Action Group.

## 1.2 Rationale and Context for the Folkestone CLLD Strategy

After defining the proposed CLLD intervention area (Section 2), Section 3 sets out an assessment of the development needs and potential of the area which demonstrate the need for the CLLD Programme in Folkestone.

Figure 1.1 below shows Folkestone's position on the Kent coast in the South East of England.

**Figure 1.1 Folkestone's location and main transport links**



# Introduction

# 1

Like some other coastal towns, Folkestone has suffered over the years from the decline of traditional seaside tourism. But unlike most others, it has also been hard-hit by the closing of the cross-Channel ferry services which in their heyday (1972) handled 1.2 million passengers and 900,000 cars p.a. More recently, Folkestone has seen an improvement in its fortunes with faster rail links to London making it attractive to commuters and those wishing to retire to or have a second home by the sea. There is also increasing interest in inward investment by start-ups and creative businesses, attracted to Folkestone's Creative Quarter, and from other enterprises seeking easy access to London at a lower cost base. The town is home to several major companies including Saga and Eurotunnel. Regeneration from within the area has been important too, with the Creative Quarter and redevelopment of the harbour front being important drivers of Folkestone's recovery.

Nevertheless, despite evidence of some changes in fortune, parts of Folkestone continue to suffer from levels of deprivation that are amongst the highest in the country. As the baseline assessment in Section 2 shows, the proposed Folkestone CLLD area has some of the most deprived communities in the country with:

- 12 out of 19 selected LSOAs in the CLLD area amongst the top 20% most deprived areas in the country;
- 65% population and 68% households being amongst the top 20% most deprived areas in the country and 80% of the population are amongst the UK's 30% most deprived;
- Between 2010 and 2014, employment fell by -15.9% in the Folkestone CLLD area, compared with growth of +1.9% in Kent and Medway, +2.6% in the SELEP (South East Local Enterprise Partnership) area and +4.9% in England as a whole;
- At 7.3%, unemployment is almost twice the rate for Kent and Medway (4.1%) and significantly higher than the average for England (4.4%) (see Table 3.5).

There is a danger that if no action is taken, the disparities between the deprived parts of Folkestone in the east and the more prosperous west will become more pronounced with a potential deepening sense of alienation and hopelessness.

The rationale for the Folkestone CLLD Strategy lies in helping to ensure that deprived communities in the town are given an opportunity to escape from the downward spiral of the 'poverty gap' and are not left behind. Its aim is to promote social and economic cohesion and to ensure that all residents can participate in and benefit from the regeneration of Folkestone.

## 1.3 Strategic and operational objectives

The overall strategic objective of the CLLD Programme is **to promote social and economic cohesion through interventions to help the most deprived communities in Folkestone**. This will be achieved through three operational objectives:

- **Objective 1** - Enhancing work-readiness and well-being;
- **Objective 2** - Promoting local business and social enterprise;
- **Objective 3** - Setting up an integrated delivery mechanism for the strategy.

The first of these operational objectives corresponds with the ESF-funded component of the Folkestone CLLD Programme while the second would be ERDF-supported. The third operational

# Introduction

# 1

objective is proposed to be funded jointly by the ESF and ERDF and provides the mechanism to help ensure that ESF and ERDF investment is aligned at the local level. The Programme as a whole will achieve alignment by offering an integrated approach for solutions to the issues. A total of eight actions have been defined to support the promotion of the objectives (see Section 4).

In accordance with the Guidance<sup>1</sup>, the CLLD Strategy's objectives and supporting actions have been arrived at through a bottom-up process involving **extensive consultations with the local communities** and their representatives in the CLLD area. In total, there was input from 96 individuals and 16 businesses to the CLLD consultation process through an interview programme, five focus groups, two workshops and a survey (details are provided in Section 5).

In terms of **geographical scope**, the Strategy focuses on an area in Folkestone that includes most of the electoral wards of Broadmead, East Folkestone, Folkestone Central, and Folkestone Harbour. The area is made up of 19 LSOAs defined by the English Indices of Multiple Deprivation 2010 (IMD 2010). Taken together, the proposed CLLD area has a population of 31,406 (2014 ONS Annual Population Survey) of whom 65% (20,400) are classified as living in the 20% most deprived areas of the country. The CLLD population accounts for 28.7% of the overall population of the Shepway District. (Shepway District also includes the towns of Hythe, New Romney, Lydd and Hawkinge).

The Folkestone CLLD Strategy **specifically targets those who are most in need** of help, including the unemployed (1,600 people – see Table 3.5), NEETs (young people not in employment, education or training) and people not actively seeking work.

Section 9 of the document sets out the financial plan for the Folkestone CLLD Programme and identifies **the total cost of delivering the Folkestone CLLD Strategy is £4.998 million**. The total European funding requested is 50% of this total, of which 43% would be funded from the ESF and the remainder (57%) from the ERDF.

We welcomed the important allocation of a 5 year programme to CLLD in recognition of the real period required to achieve community led positive economic and social impact within the most deprived communities; to this end should the full 5 years not be achieved due to the UK no longer being an EU Member State, we wish to record that the full Programme will still need to be achieved and would look to the UK Government to help ensure this transpires.

Section 9 also provides details of the CLLD Strategy's **expected outputs and results**, including the number and type of beneficiaries.

This document is structured to correspond with the Department for Communities and Local Government's Guidance for the Development of Community Led Local Development Strategies (Version 2, March 2016).

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<sup>1</sup> Guidance for the Development of Community Led Local Development Strategies, Version 2, March 2016



# Definition of the Intervention Area 2

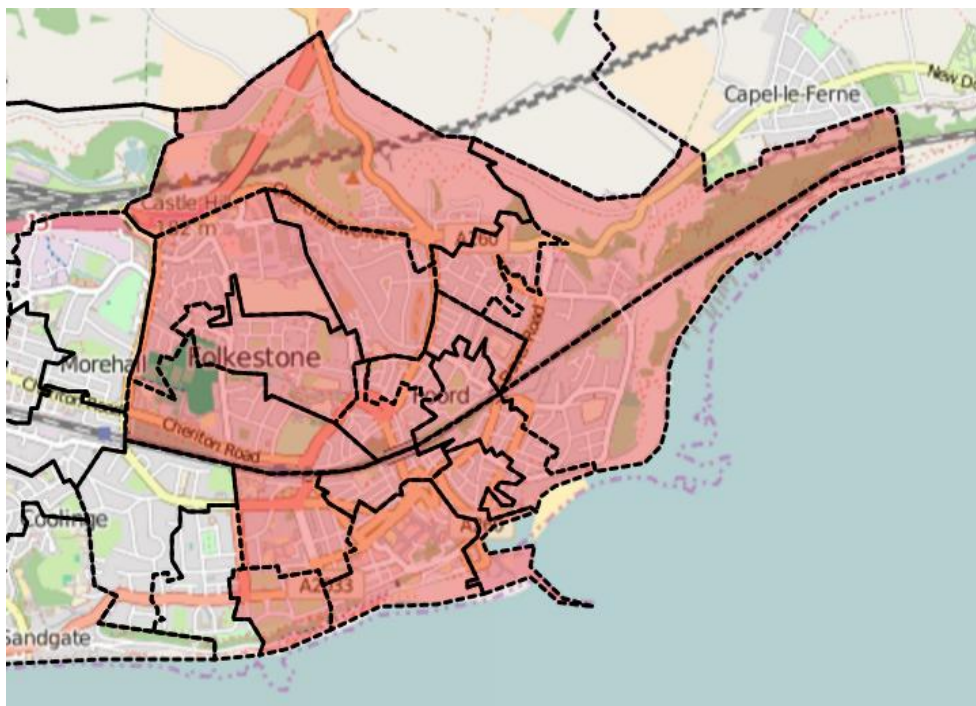
This section provides a definition of the proposed Folkestone CLLD intervention area.

## 2.1 Geographical boundaries

This Strategy focuses on an area in Folkestone that includes parts of the electoral wards of Broadmead, East Folkestone, Central Folkestone, and Folkestone Harbour.

The area is made up of 19 'Lower Super Output Areas'<sup>2</sup> (LSOAs) defined by the English Indices of Multiple Deprivation 2010 (IMD 2010). This index provides an area based measure of deprivation. Each area is assigned a deprivation score and rank so that their level of deprivation can be measured relative to other areas. The Index was most recently updated in 2015. This area is shown below and there is also a more detailed map showing the LSOA and ward boundaries in Appendix A.

**Figure 2.1: Map of the area of intervention for the CLLD (showing 2011 LSOAs)**



Since the original definition of this area in the Expression of Interest for the Folkestone CLLD Programme, and following consultation with the community, the area was extended to the east. There are four reasons for this:

- The community mapping exercise undertaken as part of the public consultation indicated there are significant pockets of deprivation to the North East and this was later reconfirmed through further research (see deprivation profile for 003B).
- Changes in the Index of Multiple Deprivation from 2010 to 2015 indicated that the LSOA in north east Folkestone was ranked significantly lower, indicating the level of deprivation has increased.

<sup>2</sup> There are 32,844 in England Lower-layer Super Output Areas (LSOA). They are designed to be of a similar population size with an average of 1,500 residents each and are a standard way of dividing up the country. The number of LSOAs in an electoral ward can vary from one to five depending upon the original size of the electoral ward.

# Definition of the Intervention Area 2

- Both LSOA 003B and 003D in the eastern area have concentrations of employers and forms an important part of the labour market for the residents within the originally defined CLLD area. Some of these employers have identified specific needs relevant to a CLLD programme.
- The additions create a more geographically coherent intervention area (003B and 003D).

Of the 19 LSOAs making up the CLLD intervention area, 12 were in the 20% most deprived LSOAs and five LSOAs were in the most deprived 10% decile in the IMD 2010. An additional three LSOAs were in the third decile.

## 2.2 Population size

Taken together, the CLLD area has a population of 31,406 (2014 ONS Annual Population Survey) and there are approximately 14,504 households (2011 Census). The breakdown of population by LSOA is provided below.

**Table 2.1: Total Population by LSOA and Electoral Ward (2014) and household (2011)<sup>3</sup>**

IMD 2010 Name	IMD 2011 Code <sup>4</sup>	IMD 2010 Rank	Decile	2014 pop	% pop per decile	2011 Hhds	% Hhds per decile
007B	014C	581	1	2,105	30.24%	913	30.89%
007B	014D	581	1	1,594		791	
007A	014A	713	1	1,914		1,078	
007C	014B	1,298	1	2,142		1,060	
003C	003C	2,044	1	1,743		638	
004B	004B	4,415	2	1,696	35.10%	532	37.47%
007D	015A	5,033	2	1,319		1,110	
007G	015D	5,118	2	1,625		742	
004E	004E	5,282	2	1,439		828	
003A	003A	5,363	2	1,364		660	
004D	004D	5,973	2	1,510		605	
007E	015B	6,140	2	2,070	957		
004A	004A	6,711	3	1,678	13.74%	654	13.39%
004C	004C	8,271	3	1,233		635	
003B	003B	8,736	3	1,404		653	
003D	003D	12,842	5	1,564	20.92%	780	18.26%
006F	006F	15,973	5	1,757		552	
006E	006E	20,479	7	1,644		639	
003E	003E	20,626	7	1,605		677	
<b>Total</b>				<b>31,406</b>	<b>100%</b>	<b>14,504</b>	<b>100%</b>

Sources: IMD 2010, ONS Mid-Year 2014 Population Estimates (for Population) and 2011 Census (for Households)

The CLLD population of 31,406 accounts for 28.7% of the overall population of the Shepway District. (Shepway District also includes Hythe, New Romney, Lydd and Hawkinge). Within the CLLD area:

<sup>3</sup> Mid-Year Population Estimates, LSOA level, Office for National Statistics, 2014

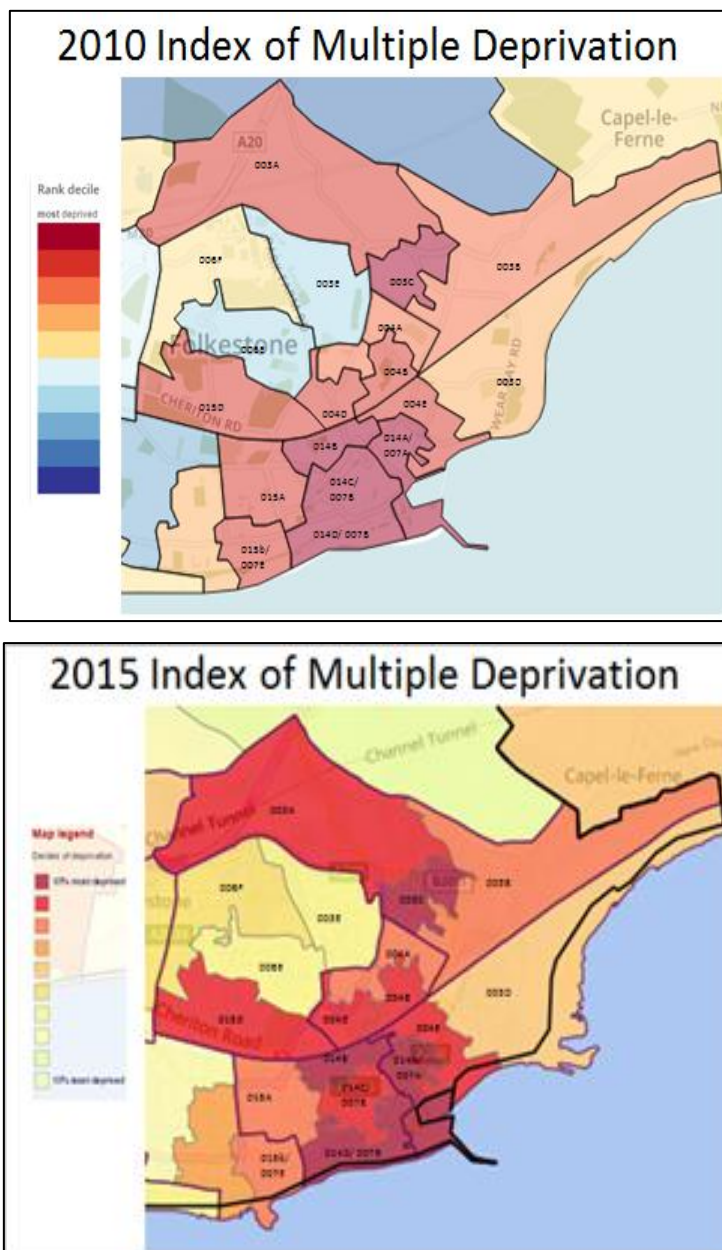
<sup>4</sup> The Code name changed in 2011. For comparative reasons this code will be used from now on.

# Definition of the Intervention Area 2

- 30% of the population and 31% of households are resident in the five LSOAs that rank in the 10% most deprived areas in the country according to the IMD 2010;
- 65% of the population and 68% of households are resident in the 12 LSOAs that rank amongst the 20% most deprived areas in the country;
- 80% of the population and 82% households are in the LSOAs in the three lowest deciles.

## 2.3 Deprivation rankings

In accordance with the guidance for the development of this CLLD strategy, the LSOAs were selected based on the IMD 2010. However, there have been some changes since then. The changes between the IMD 2010 and IMD 2015 are indicated in the map and table below.



Source: IMD 2010 from [opendatacommunities.org](http://opendatacommunities.org) and IMD 2015 from [IMD explorer](http://IMDexplorer)

# Definition of the Intervention Area 2

**Table 2.2: Changes of the IMD ranks between 2010 and 2015**

IMD 2010 name			IMD 2015				Comparison 2010/2015	
Code 2010	Rank	Decile	Equivalent LSOA name	IMD	Decile	Rank in Shepway	Change	Level of deprivation
007B	581	1	014C	3,296	2	5	+2,715	Better
007B	581	1	014D	3,125	1	4	+2,544	Better
007A	713	1	014A	5,720	1	1	-141	Worse
007C	1,298	1	014B	1,343	1	2	+45	Similar
003C	2,044	1	003C	1,751	1	3	-293	Worse
004B	4,415	2	004B	5,084	2	8	+669	Better
007D	5,033	2	015A	8,333	3	15	+3,300	Much better
007G	5,118	2	015D	5,443	2	9	+325	Better
004E	5,282	2	004E	3,953	2	6	-1,329	Much worse
003A	5,363	2	003A	4,936	2	7	-427	Worse
004D	5,973	2	004D	5,585	2	10	-388	Worse
007E	6,140	2	015B	8,353	3	16	+2,213	Much better
003B	8,736	3	003B	7,469	3	14	-1,267	Worse
004A	6,711	3	004A	8,411	3	17	+1,700	Much better
004C	8,271	3	004C	7,283	3	13	-988	Worse
003D	12,842	5	003D	13,577	4	31	+735	Better
006F	15,973	5	006F	17,480	6	42	+1,507	Much better
006E	20,479	7	006E	19,710	7	48	-769	Worse
003E	20,626	7	003E	20,664	7	53	-38	Similar

Source: IMD 2010 from [opendatacommunities.org](http://opendatacommunities.org) and IMD 2015 from IMD Explorer

The map and table above highlight several significant trends which demonstrate that there has continued to be a widening of the divide

- Nine of the LSOAs have improved their ranking since 2010, two have similar rankings and eight have a significantly lower ranking.
- Deprivation in the Folkestone CLLD area has increased markedly in East Folkestone ward where four LSOAs have a lower rank than they had in 2010 (003A, 003C, 004D, 004E). Likewise, three out of the four LSOAs in Folkestone Harbour ward have dropped rankings. 003B has dropped in rank the most which further justifies the extension of the CLLD area.
- Overall, the situation has worsened for 40% of the population in the LSOA wards (12,251 people).
- According to the IMD 2015, 55% of the population and 54% of households of the CLLD area are in the 20% most deprived LSOAs and 79% of the population and 82% of households are in the 30% most deprived LSOAs.<sup>5</sup>

The LSOAs where there has been the most marked improvement in rankings are in the southern part of the CLLD intervention area, in the areas around the harbour. The development of the Creative Quarter has probably been the most important driver of the improvement.

<sup>5</sup> IMD 2015 (not to be confused with 2010 data provided above).

# Analysis of the Needs & Potential of the Area

## 3

This section provides an analysis of the social and economic conditions in the CLLD area. It provides the evidence base to develop the strategy and, secondly, sets out local baselines which should enable the LAG to assess the progress and success of the CLLD Strategy.

### 3.1 Key indicators of social and economic conditions

The following key indicators have been analysed to depict the characteristics of the CLLD intervention area and the key findings are summarised in the table below

**Table 3.1: Summary of the key socio-economic characteristics of the CLLD area**

<p><b>Demographic characteristics of the area (section 3.2)</b></p> <ul style="list-style-type: none"> <li>• A relatively high proportion of the CLLD population of younger working age between 16 and 35 years.</li> <li>• A relatively higher proportion are lone parents</li> </ul> <p><b>Employment patterns (section 3.3)</b></p> <ul style="list-style-type: none"> <li>• The unemployment rate is high, being almost twice the rate of the Kent and national average</li> <li>• Unemployment for 25-29 year olds is particularly high, as is long term unemployment.</li> <li>• A high percentage of the working age population has never worked.</li> <li>• There are a high proportion of households with no adults employed, with dependent children and with 1 person with a long term health problem or disability.</li> </ul> <p><b>Work skills and qualifications (see section 3.4)</b></p> <ul style="list-style-type: none"> <li>• A high percentage of residents have no qualifications</li> <li>• A low percentage of residents have an apprenticeship qualification</li> <li>• A low proportions of residents have qualifications at level 3 and above</li> </ul> <p><b>Income levels (section 3.5)</b></p> <ul style="list-style-type: none"> <li>• Median average earnings are lower than the Kent and national average</li> </ul> <p><b>Benefit claimant rates (section 3.6)</b></p> <ul style="list-style-type: none"> <li>• A high percentage of residents claim Disability Living Allowance and Employment Support</li> </ul> <p><b>Local infrastructure provision and access to services (section 3.7)</b></p> <ul style="list-style-type: none"> <li>• Generally good access to services across the CLLD area.</li> <li>• Good transport links between Folkestone and the wider area.</li> <li>• A low number of GPs per 100,000 population</li> </ul> <p><b>Physical wellbeing (see section 3.8)</b></p> <ul style="list-style-type: none"> <li>• A high proportion of residents report that poor health impacts their activities</li> <li>• A high proportion claim they have bad or very bad health</li> <li>• The percentage of residents with mental health conditions is three times more than the Kent and national average</li> </ul> <p><b>Crime rates (section 3.9)</b></p> <ul style="list-style-type: none"> <li>• The Folkestone Harbour area is in the 10% worse decile for crime deprivation in the country</li> </ul> <p><b>Housing (section 3.10)</b></p>
---

# Analysis of the Needs & Potential of the Area

## 3

- Significantly low rates of home ownership

### Ethnic Minority (see section 3.11)

- The population is predominantly White British and Other White, with Eastern Europeans accounting for a relatively high proportion of the latter.

### Troubled Families (section 3.12)

- Over one third of the troubled families identified for the Shepway Troubled Families programme are resident in the CLLD area

### Business composition (section 3.13)

- Employment decline in the CLLD area which contrasts with growth in the wider area
- Poor perception amongst CLLD area business of the area being favourable for business growth

The socio-economic analysis is based on data from the 2011 Census unless otherwise stated. Following the analysis of key indicators, the SWOT brings together key findings from the data analysis and feedback from the research.

Although some of the indicators examined in this section relate to factors that cannot be directly influenced by the CLLD Strategy (e.g. crime, housing, transport links) they are nevertheless relevant to an understanding of the context in which the strategy will be implemented and have therefore been included in the baseline assessment.

In conducting the analysis and where appropriate, we have included data for a subsection of the CLLD area, the 12 LSOAs amongst the 20% IMD decile in the country, to create a baseline of the most severely deprived part of the CLLD area.

## 3.2 Demographic characteristics

The latest statistics indicate that there are 31,406 people resident in the Folkestone CLLD area. As indicated in the table below, there is a relatively high proportion of young working age people aged between 16 and 35 years in the CLLD area (27% of the total population) compared with Shepway District (22%) and the SELEP area (24%).

**Table 3.2: Breakdown of CLLD population by age (2014)**

Age	CLLD		Shepway		Kent & Medway		SELEP	
	No.	%	No.	%	No.	%	No.	%
0-15	6,101	19	18,809	17	317,694	19	746,337	19
16-25	4,120	13	12,194	11	206,353	13	493,518	12
26-35	4,332	14	11,547	11	193,081	12	477,705	12
36-45	4,024	13	13,093	12	210,420	13	517,558	13
46-55	4,301	14	15,743	14	234,827	14	566,095	14
56-64	3,483	11	14,239	13	190,498	12	454,476	11
65-90	5,045	16	23,827	22	293,486	18	705,538	18
<b>Total</b>	<b>31,406</b>	<b>100</b>	<b>109,452</b>	<b>100</b>	<b>1,646,359</b>	<b>100</b>	<b>3,961,227</b>	<b>100</b>

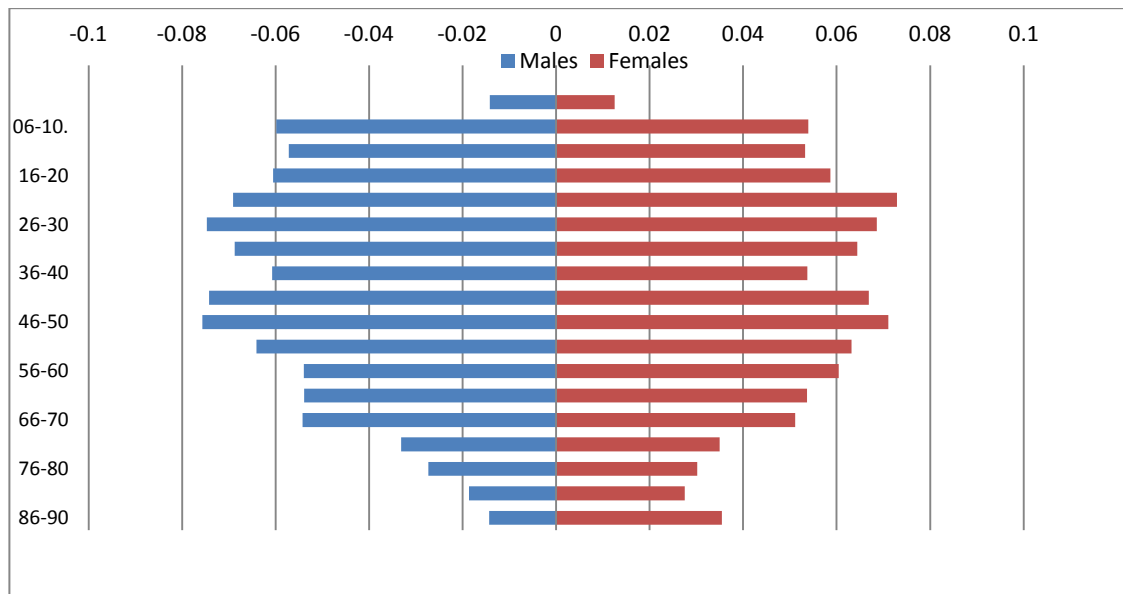
Source: ONS Mid-Year Population Estimates, 2014

The gender profile shows that there are more men (53.2%) than women (46.7%) and differs from the profile for Shepway, Kent and England where there are generally more women than men

# Analysis of the Needs & Potential of the Area

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**Figure 3.1: CLLD Demographic profile of CLLD area by age and gender**



Source: Derived from Mid-Year, 2014 Population estimates, ONS

It is also useful to consider the number of people who are lone parents in the CLLD area (see table below) as they are likely to have additional caring responsibilities. This shows that there is a higher percentage in the CLLD area compared to Kent & Medway, the SELEP area and England as a whole. Within the LSOAs in the most deprived 20%, the number of lone parents is slightly higher again.

**Table 3.3: Number of Lone Parents (2011)**

	LSOAs in 20% decile		CLLD Area		Kent & Medway		SELEP		England	
	No.	%	No.	%	No.	%	No.	%	No.	%
Lone parent	3,069	15.9	4,643	15.3	191,683	11.3	431,884	11.0	6,099,353	11.7
Total	19,258		30,443		1,695,733		3,915,332		52,059,931	

Source: 2011 Census, retrieved from NOMIS

Note: 2011 Population numbers were used to avoid inaccuracies in rates. Not to be confused with population estimates given for CLLD Area (2014)

### 3.3 Employment and Economic Activity patterns

The focus of the CLLD Programme is on helping people to access employment opportunities and supporting the creation of jobs so it is essential to consider the nature and type of employment in the CLLD area.

Prior to considering the data, it is useful to look at the ranking of the various LSOAs according to the Employment Deprivation domain of the IMD 2015. The Employment Deprivation Domain measures the proportion of the working-age population in an area involuntarily excluded from the labour market. This includes people who would like to work but are unable to do so due to lack of suitable

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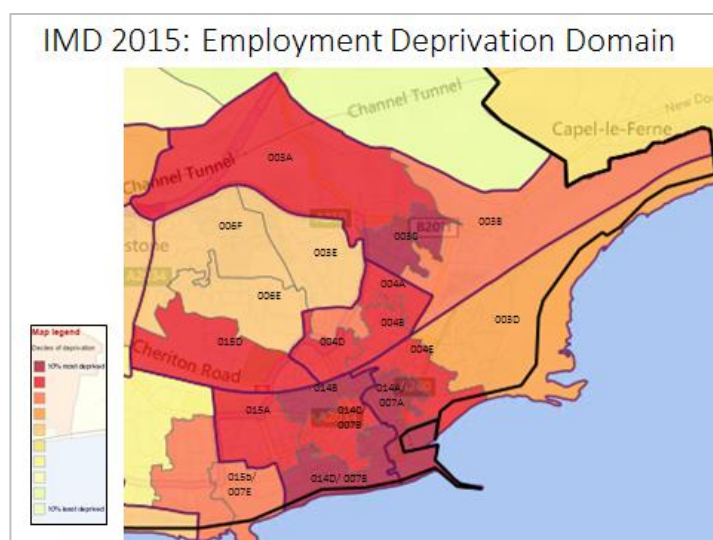
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vacancies, sickness or disability, or caring responsibilities. The following table indicates the national ranking of each LSOA under this domain.

**Table 3.4: IMD 2015 Ranking on Employment domain**

LSOA Name (2011)	Employment Domain Rank (1= most deprived)	Employment Rank Decile (1 = deprived 10%)	Population	% CLLD population in Decile	Working age population	% CLLD Working aged population in Decile
Shepway 003C	946	1	1,605	22.83%	331	20.92%
Shepway 014A	1,105	1	2,142		1,553	
Shepway 014B	1,705	1	2,105		1,407	
Shepway 014D	2,837	1	1,319		810	
Shepway 015D	3,626	2	1,743	36.65%	1,163	38.89%
Shepway 014C	4,116	2	1,594		1,228	
Shepway 003A	4,611	2	1,564		958	
Shepway 004B	4,935	2	1,233		789	
Shepway 004E	5,178	2	1,914		1,202	
Shepway 004D	5,225	2	1,439		976	
Shepway 004A	5,926	2	1,696		1,071	
Shepway 015A	6,057	2	2,070		1,398	
Shepway 015B	6,969	3	1,625	15.22%	941	14.79%
Shepway 003B	6,970	3	1,644		998	
Shepway 004C	7,775	3	1,510		960	
Shepway 003D	11,705	4	1,757	5.59%	1,096	5.59%
Shepway 006F	13,867	5	1,404	14.16%	862	13.87%
Shepway 003E	14,796	5	1,678		1,057	
Shepway 006E	15,996	5	1,364		800	

Source: IMD 2015 from IMD Explorer



Source: IMD 2015 Explorer



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As shown above:

- Four LSOAs are in the most deprived 10% in the country and 12 are in the most deprived 20%. This accounts for 60% of the CLLD population in general and 60% of the working age population.
- The working age population in the most deprived 10% of LSOAs is 4,101 and is 12,886 in the most deprived 20%.
- LSOA 003C has the lowest rank followed by 014A and 014B.

The table below shows that there are notably higher levels of unemployment in the CLLD area. The unemployment rate of 7.3% is almost twice the average for Kent (3.9%) and significantly higher than the average for England (4.4%). Within the CLLD area, the unemployment rate in the most deprived 20% is even higher at 8.6% and the unemployed residents in this area accounts for 76% of all the unemployed in the whole of the CLLD intervention area.

**Table 3.5: Economic activity in, CLLD area by age compared to region**

Economic activity	LSOAs in 20% decile		CLLD Area		Kent & Medway		SELEP		England	
	No.	%	No.	%	No.	%	No.	%	No.	%
Active	9,808	68.4	15,306	68.7	875,862	70.1	2,023,032	70.4	27,183,134	69.9
Unemployed <sup>6</sup>	1,235	8.6	1,616	7.3	5,101	4.1	114,986	4.0	1,702,847	4.4
Inactive <sup>7</sup>	4,534	31.6	6,982	31.3	373,693	29.9	851,783	29.6	11,698,240	30.1
All 16 -74	14,342		22,288		1,249,555		2,874,815		38,881,374	

Source: 2011 Census, retrieved from NOMIS

It is also useful to understand the unemployment by age group and its nature, shown in the table below.

**Table 3.6: Nature of unemployment in the CLLD area compare to regional comparators**

Unemployed	LSOAs in 20% decile		CLLD Area		Kent & Medway		SELEP		England	
	No.	%	No.	%	No.	%	No.	%	No.	%
Aged 16-24	316	2.2	411	1.8	15,201	1.2	33,068	1.2	471,666	1.2
Aged 25- 49	704	5	910	4	25,491	2.0	58,100	2.0	915,318	2.0
Age 50 -74	215	1.5	295	1.3	10,318	0.8	23,818	0.8	315,863	0.8
Never worked	176	1.2	225	1.0	7,300	0.6	15,309	0.5	276,121	0.7
Long-term	547	3.8	711	3.2	19,938	1.6	46,113	1.6	668,496	1.7

Source: 2011 Census, retrieved from NOMIS

Closer analysis indicates:

<sup>6</sup> Unemployed - seeking work in the past 4 weeks and available to start work within 2 weeks

<sup>7</sup> In active are not engaged in the labour market and includes people who are in education, looking after family, retired, or sick/disabled

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- **Unemployment across the working age population (aged 16-74 years) is significantly higher** in the CLLD area than in Kent & Medway, the SELEP area and England. In fact, for the group 25-49 year olds it is double the rate of the comparators (4% versus 2%).
- **Long term unemployment in the CLLD area (3.2% is around double the rate** when compared to the rates for England (1.7%) and Kent (1.6%).
- **A higher percentage (1%) of the working age population in the CLLD area has never worked** compared with 0.5% in the SELEP region. The majority of these people come from the 12 LSOAs in the most deprived 20% decile (176 of the 225 people).
- Within the CLLD area, the residents in the **20% most deprived areas have higher unemployment rates for all categories of unemployment** and account for between 73% and 78% of the total unemployed in each group within the CLLD area. This is particularly significant for the long-term unemployed where 78% of the people are resident in this part of the CLLD area.

**Table 3.7: Adults not in employment and dependent children and persons with long-term health problems or disability for all households**

Households	CLLD area		Shepway		Kent & Medway		SELEP		England	
	No.	%	No.	%	No.	%	No.	%	No.	%
No adults in employment in household	5,819	40.2	18,363	38.8	562,294	33.8	236,633	33.2	7,348,649	33.3
No adults in employment & dependent children	874	6.0	1,881	4.0	28,381	4.0	61,715	3.7	922,192	4.2
1 person with long-term health problem / disability	4,301	29.7	13,570	28.6	181,242	25.5	426,196	25.6	5,659,606	25.7
All Households	14,484		47,379		711,847		1,662,372		22,063,368	

Source: 2011 Census, retrieved from NOMIS

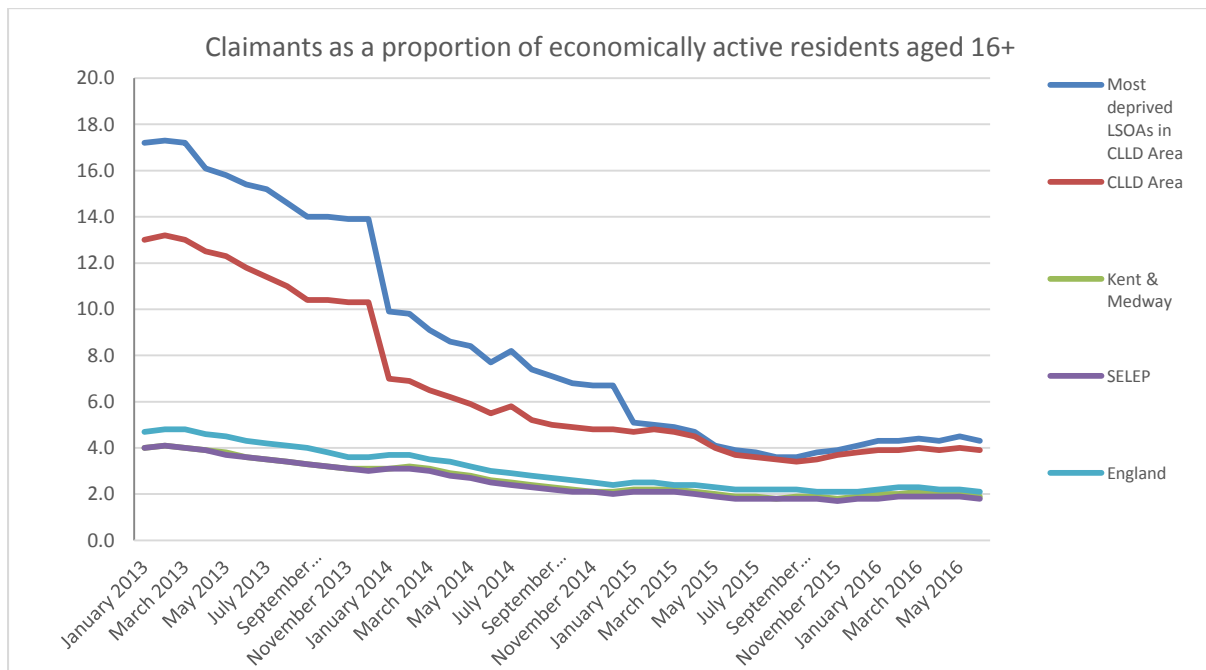
The above household composition data shows:

- The percentages of the population in households with no adults employed and with dependent children and with one person with a long term health problem are consistently higher in the CLLD area than in the wider Shepway, Kent & Medway and SELEP areas.
- One third of the population in the CLLD area is in households with one person with a long-term health problem or disability and this is significantly higher than in the comparator areas and confirms feedback from interviews which highlighted concerns about poor health and disability.

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**Figure 3.3: Unemployment Claimant rates in CLLD Area, Kent, SELEP and England 2013-2016**



Source: JSA Claimant Rates as published by ONS and Department of Work and Pensions, Query retrieved from NOMIS, 2013-2016

Note: Kent & Medway figures are almost identical to those for SELEP so are not visible on the graph above

The figure above shows that the unemployment claimant rate over time has decreased for all areas since January 2013, including in the CLLD area. However, this also shows that the CLLD area has consistently had a higher unemployment claimant rate than Shepway, Kent & Medway or the SELEP area and the rest of England, although the difference has been reducing over the period.

Economic activity is shown in the table below for the CLLD area. This indicates that the percentage of economically active residents in employment is much lower in the CLLD area, and the level of self-employment (8.4%) is also significantly lower than in Kent & Medway (10.5%), the South East LEP and nationally (11%).

**Table 3.8: Economic Activity of CLLD area compared to other regions**

Economic activity	LSOAs in 20% decile		CLLD Area		Kent & Medway		SELEP		England	
	No.	%	No.	%	No.	%	No.	%	No.	%
Part-time	1,914	13.3	3,231	14.5	176,314	14.1	411,602	14.3	5,333,268	13.7
Full-time	5,013	35.0	7,844	35.2	477,537	38.2	1,094,974	38.1	15,016,564	38.6
Self employed	1,212	8.5	1,876	8.4	131,557	10.5	317,239	11.0	3,793,632	9.8
Total Employed	8,139	56.7	12,951	58.1	785,408	62.9	1,823,815	63.4	24,143,464	62.1

Source: 2011 Census, retrieved from NOMIS

Employment trends since 2009, as shown in the figure below, indicate that CLLD area has suffered from job losses which are contrary to employment growth in Kent & Medway and the broader SELEP area.

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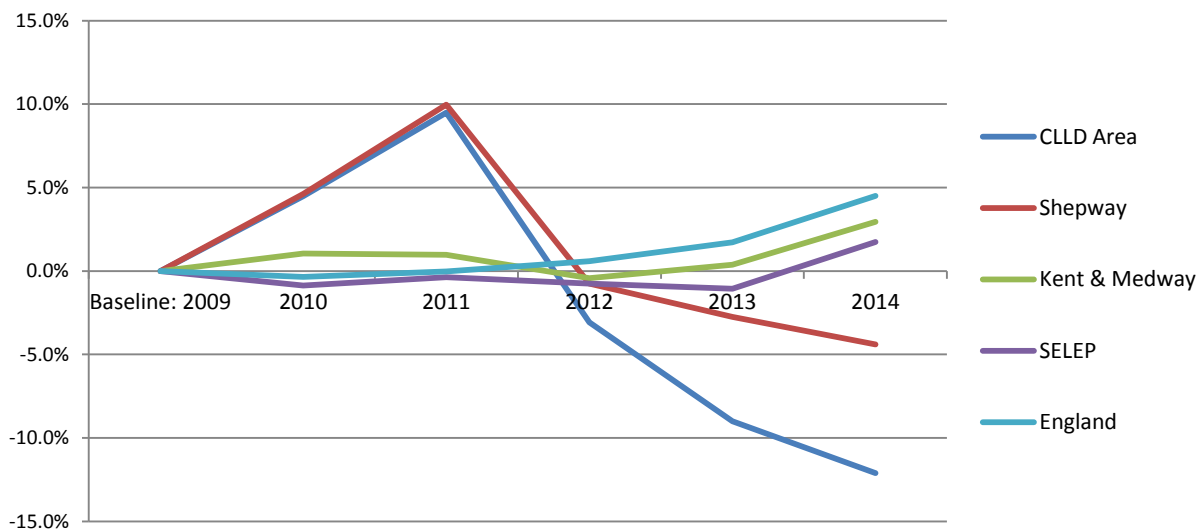
**Table 3.9: Employment trends 2009-2014 in the CLLD area compared to other regions**

	CLLD Area	Kent & Medway	SELEP	England
<b>Total Employment</b>				
2009	15,500	661,700	1,517,500	23,982,000
2014	13,600	681,200	1,543,900	25,151,200
Change (no)	-1,900	+19,500	+26,400	+1,083,100
Change (%)	-12%	+3%	+2%	+4%
<b>Knowledge Intensive Employment</b>				
2009	2,200	88,500	201,300	4,058,200
2014	2,200	100,700	222,400	4,386,200
Change (no)	-100	+12,200	+21,100	+335,400
Change (%)	-3%	+14%	+10%	+8 %

Source: BRES 2009, 2014

Note: Number are rounded to nearest 100 as required by ONS and percentages to whole figure

**Figure 3.4: Percentage change in the number of jobs from 2009 baseline**



Source: Derived from Business Survey Data, BRES, 2009-2014, retrieved from NOMIS

Between 2009 and 2014 some 1,900 jobs were lost in the CLLD area, which is equivalent to a 12% decline which contrasts markedly to an increase in jobs in Kent & Medway, the SELEP area and England over the same period.

Looking specifically at employment in the knowledge-intensive industries<sup>8</sup>, which generally offers higher wages, the decline has been less severe (only a 3% drop over the 5 years) compared to the decline in total employment in the CLLD area. Nevertheless, this decline still contrasts with growth in knowledge-intensive industries in the comparator areas.

<sup>8</sup> Using the SIC definition of Knowledge intensive employment used by Kent County Council

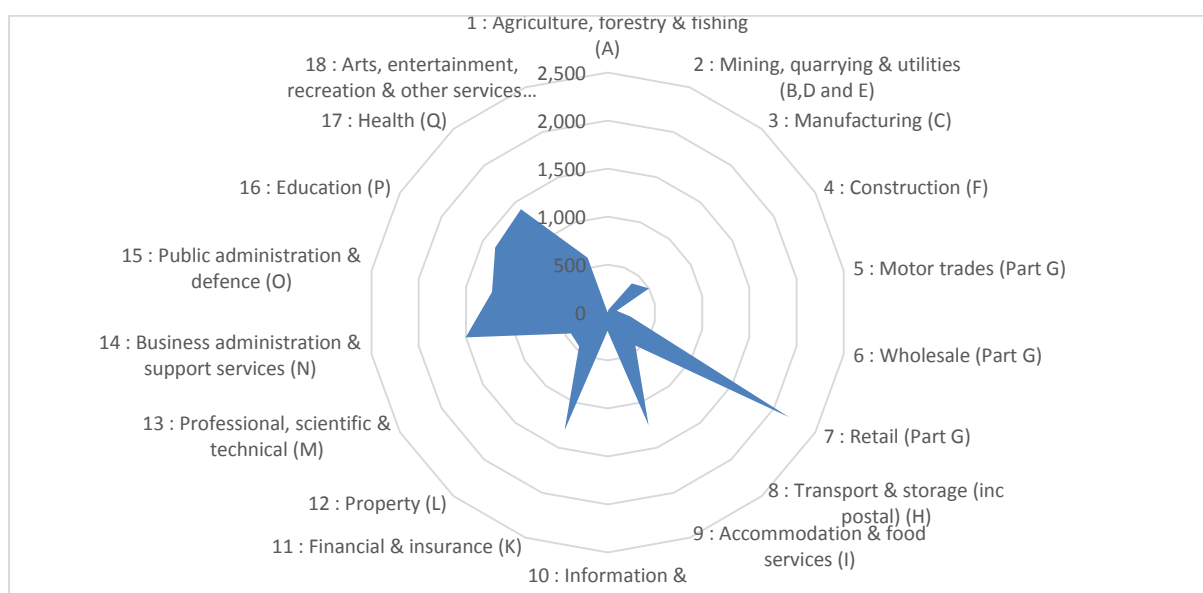
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The main knowledge-intensive industries that shed jobs in the CLLD area over the period were insurance and activities auxiliary to finance and insurance service. Some knowledge-intensive sectors did see some job growth within the CLLD area over the five years, however, including office administrative support, architecture and engineering, computer programming and consultancy, advertising and publishing.

The trends highlight the need for further investment and support for businesses within the CLLD area in order to ensure that there is employment growth and job opportunities created for the local residents and the wider community.

**Figure 3.5: Number employed by sector in CLLD area**



Source: Derived from Business Survey Data, 2014, BRES, retrieved from NOMIS

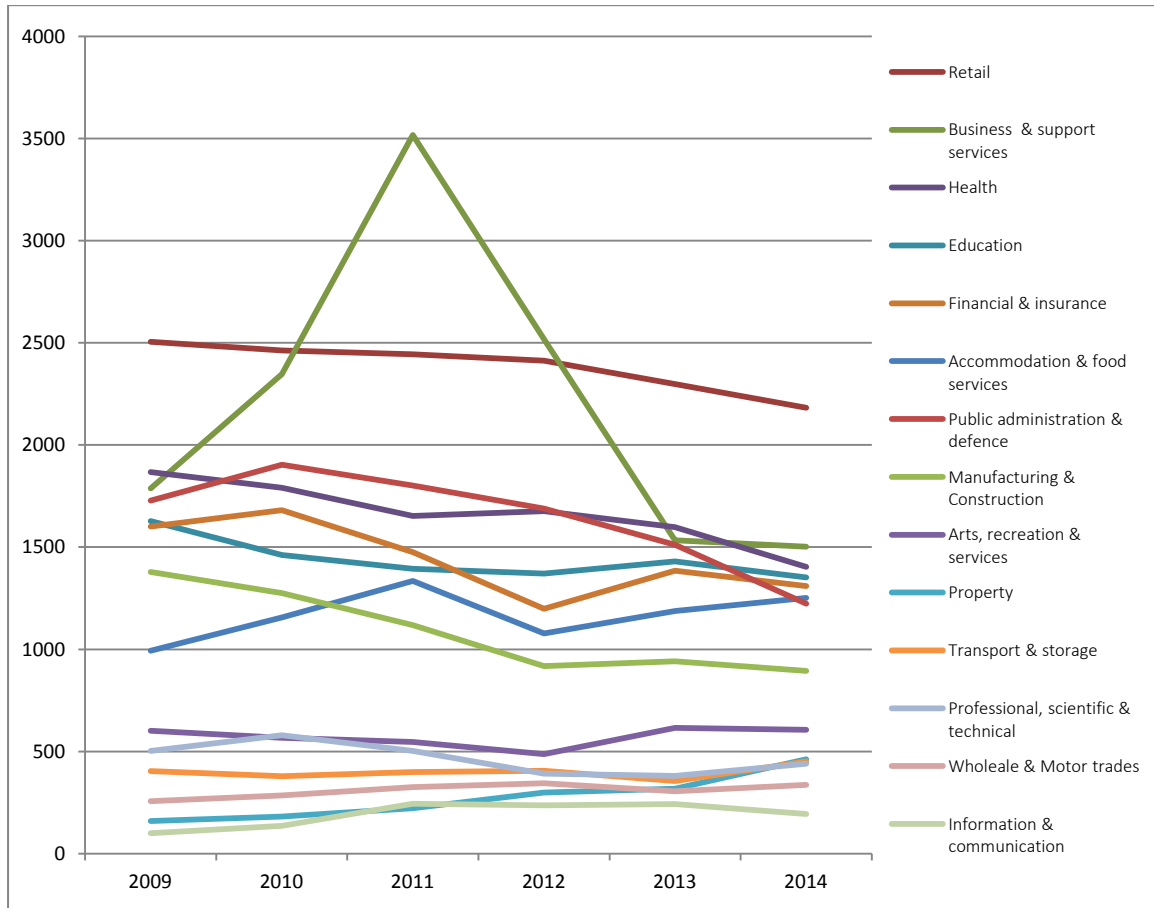
As shown above, the highest number of jobs in the CLLD area is in the Retail sector, with other prominent sectors being Business administration and support services, Health, Education and Public administration. There are low numbers of jobs in the Information & Communications.

In comparison to Kent & Medway, the SELEP area and England, there is a higher percentage of people employed in Transport and Storage, Accommodation and Food Services and Financial Services as a percentage of total employment. In Manufacturing, Information and Communication and Professional Scientific and Technical sectors there is a low representation of these sectors compared to in Kent, the South East LEP and England as a whole.

The figure below shows that the number of jobs in the retail sector in the CLLD area remained constant until 2013 and 2014 and has since fallen slightly. There was a large spike in the Business support services jobs in 2011 and a smaller spike in Accommodation and Food services following this trend. Jobs in the Health and Public Administration, Arts and Recreation sectors have declined over the period, as have the numbers in Manufacturing and Construction. Employment in Professional Services, Information and Communication, Wholesale and the Motor Trade have increased slightly but still represent only a smaller number of total jobs.

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**Figure 3.6: Change in the number of jobs per sector over time in CLLD area**



Source: Derived from Business Survey Data, 2009-2014, BRES, retrieved from NOMIS

These sector trends show that employment in retail has been fairly stable and this provides a large source of the jobs in the CLLD area. Jobs in retail can offer opportunities to those furthest away from the job market that often have no or low qualification levels and so may offer a pathway to other careers. Sectors that are currently growing and therefore have the potential to provide new job opportunities are Accommodation & Food, Professional, Scientific and Technical and Wholesale and Motor Trades.

### 3.4 Work Skills and Qualifications

The IMD 2015 provides a ranking of LSOAs according to their level of deprivation in the Education Skills and Training Domain. This measures the level of attainment and skills in the local population. The indicators fall into two sub-domains: one relating to children and young people and the other relating to adult skills. The table below shows the CLLD LSOA national rankings.

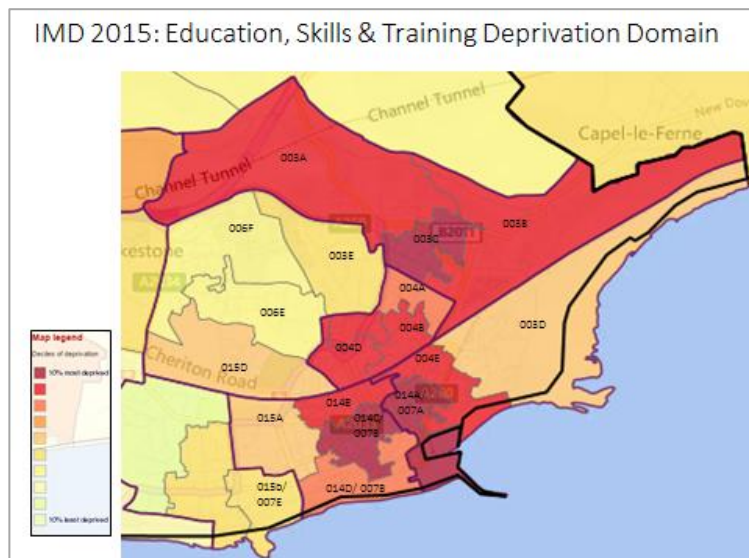
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**Table 3.10 IMD 2015 Ranking on Education, Skills and Training Domain**

LSOA Name (2011)	Education Domain Rank (1= most deprived)	Education Domain Rank Decile (1 = deprived 10%)	Population	% CLLD population
Shepway 014C	1,575	1	1,594	17.01%
Shepway 003C	1,616	1	1,605	
Shepway 014A	1,644	1	2,142	
Shepway 014B	3,348	2	2,105	36.33%
Shepway 004B	3,808	2	1,233	
Shepway 003B	4,647	2	1,644	
Shepway 004E	4,858	2	1,914	
Shepway 004D	5,863	2	1,439	
Shepway 004C	6,021	2	1,510	
Shepway 003A	6,522	2	1,564	
Shepway 004A	7,161	3	1,696	9.60%
Shepway 014D	9,699	3	1,319	
Shepway 015D	13,184	5	1,743	17.74%
Shepway 015A	13,977	5	2,070	
Shepway 003D	14,166	5	1,757	
Shepway 003E	18,343	6	1,678	10.52%
Shepway 015B	18,897	6	1,625	
Shepway 006F	20,066	7	1,404	8.81%
Shepway 006E	20,107	7	1,364	

Source: IMD 2015, IMD Explorer



Source: IMD 2015, IMD Explorer

As indicated above:

- Three LSOAs are listed in the 10% most deprived LSOAs in the country.

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- Ten LSOAs are in the lowest 20% deciles and 53.3% of the CLLD are resident in these areas.
- 63% of the CLLD population is in the three most deprived deciles for this domain.
- The 014C, 003C and 014A LSOAs rank the lowest for the Education, Skills and Training deprivation domain.

The highest level of qualifications acquired by individuals is a useful indicator of the skills levels within the community and can help ensure that training support programmes are tailored to meet local needs. Data on this indicator is shown in the table below.

**Table 3.11: Highest level of qualifications<sup>9</sup> of CLLD area compared to other areas**

Qualification	LSOAs in 20% decile		CLLD Area		Kent & Medway		SELEP	
	No.	%	No.	%	No.	%	No.	%
None	4,325	26.8	6,52	26.1	313,552	22.5	750,062	23.3
Level 1	2,550	15.8	3,952	15.8	208,638	15.0	498,024	15.4
Level 2	2,898	18.0	4,599	18.4	238,28	17.1	552,968	17.2
Apprentice	399	2.5	705	2.8	54,849	3.9	121,018	3.8
Level 3	1,917	11.9	3,046	12.2	172,337	12.4	385,638	12.0
Level 4+	3,017	18.7	4,65	18.6	331,486	23.8	758,627	23.5
Other	1,026	6.4	1,469	5.9	71,555	5.1	157,624	4.9
All	16,132	100	24,941	100	1,390,697	100	3,223,961	100

Source: 2011 Census, retrieved from NOMIS

As shown above

- **A high proportion of residents in the CLLD have no qualifications.** 26.1% of the population in the CLLD area are without qualifications, which is considerably more than the proportion in Kent (22.5%), the South East LEP (19.1%) and England (22.5%).
- **A lower proportion of the CLLD population has apprenticeship qualifications.** Only 2.8% of the CLLD population has an apprenticeship qualification, which is below the 3.8% average for Kent and Shepway and 3.6% in England.
- **Relatively few residents in the CLLD area are qualified at Level 3 and above.** Only 30.8% of the residents in the CLLD area are qualified at level 3 and above, which compares to 36.2% in Kent & Medway and 39.8% in England.

### 3.5 Income levels

The IMD 2015 Income Deprivation Domain measures the proportion of the population in an area with low income levels. The definition of low income used includes both those people that are out-of-work and those that are in work but who have low earnings. The following table shows the rankings for the LSOAs in the CLLD area on the Income Deprivation Domain:

<sup>9</sup> Qualification levels are defined by the National Careers Service. Level 1 include GCSEs (grades D-G) and equivalents; Level 2: includes GCSEs (grades A-C); O Levels and equivalents; Level 3: includes A Levels (grades A-E); and Advanced apprenticeship; Level 4 includes Higher National Diploma and any university education above that



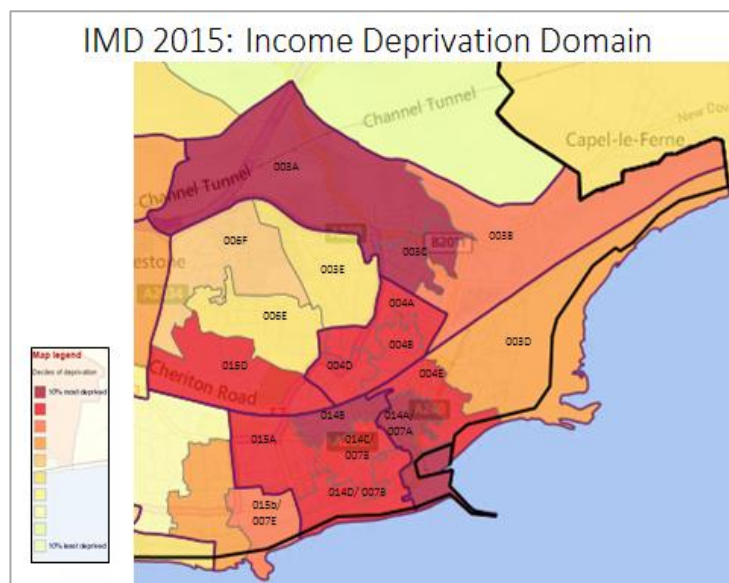
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**Table 3.12: IMD 2015 Ranking on Income domain**

LSOA Name (2011)	Income Domain Rank (1= most deprived)	Income Domain Rank Decile (1 = deprived 10%)	Population	% CLLD population in Decile	Working age population <sup>10</sup>	% CLLD Working aged population in Decile
Shepway 014A	1,037	1	2,142	23.61%	1553	21.68%
Shepway 014B	1,141	1	2,105		1407	
Shepway 003C	1,250	1	1,605		331	
Shepway 003A	2,715	1	1,564		958	
Shepway 004B	4,132	2	1,233	46.23%	789	48.96%
Shepway 004E	4,170	2	1,914		1202	
Shepway 014C	4,274	2	1,594		1228	
Shepway 004C	4,865	2	1,510		960	
Shepway 014D	5,067	2	1,319		810	
Shepway 004A	5,400	2	1,696		1071	
Shepway 015D	5,673	2	1,743		1163	
Shepway 004D	5,799	2	1,439		976	
Shepway 015A	6,020	2	2,070		1398	
Shepway 003B	6,844	3	1,644		10.58%	
Shepway 015B	8,764	3	1,625	941		
Shepway 003D	9,992	4	1,757	5.59%	1096	5.59%
Shepway 006F	13,959	5	1,404	4.47%	862	4.40%
Shepway 006E	18,003	6	1,364	9.69%	800	9.47%
Shepway 003E	18,066	6	1,678		1057	

Sources: IMD 2015, IMD Explorer; Mid-Year 2014 Population Estimates, ONS



Source: IMD 2015 Explorer

<sup>10</sup> Working Age Population defined as 16-65 Year Old Persons, Mid-Year 2014 Population Estimates

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The IMD 2015 income deprivation domain indicates that:

- Four of the LSOAs in the CLLD area are in the most deprived 10% decile for Income deprivation.
- Thirteen LSOAs are in the lowest 20% decile in the country which accounts for 70% of the population and 71% of the working age population of the CLLD area.
- Income deprivation is most severe in the 0014A LSOA in the Folkestone Harbour ward followed by 014B in Folkestone Central and 003C in the Folkestone Central ward.

Unfortunately no data on the household income is available for the CLLD area. However, table below shows that median earnings in Shepway are below Kent and SELEP averages.

**Table 3.13: Median earnings for Shepway and the region**

Median Average Earnings	Shepway	Kent & Medway	SELEP	England
Full-time	28,231	29,475	29,229	27,869
Part-time	8,978	9,012	9,163	9,230

Source: 2011 Census, retrieved from NOMIS

Many interviewed during the consultation for the development of the CLLD Strategy identified that many CLLD area residents faced problems of debt and financial difficulties. Although there is no single source of data on debt levels in the UK, the 2012 BIS Debt Track survey found that 12% of households were in one or more months in arrears on bills and credit payments.<sup>11</sup> A survey conducted by the Smith Institute found this to be higher at 25%.<sup>12</sup> There are also no statistics on the problem debt amongst poor households. However much of the research indicates that households on the lowest incomes are at greater risk of experiencing financial difficulties and problems.<sup>13</sup> The Joseph Rowntree Foundation finds that a quarter of adults in poverty are behind paying a bill and this is five times higher than other adults.<sup>14</sup>

### 3.6 Benefit Claimant Rates

An important indicator of deprivation is the working-age population in an area who are involuntarily excluded from the labour market. This includes those who would like to work but are unable to do so due to sickness or disability, caring responsibilities or for other reasons. The table below indicates the claimant rates for different types of benefits amongst residents of the CLLD area.

<sup>11</sup> Credit, debt and financial difficulty in Britain, 2012: a report using data from the YouGov Debt Track survey

<sup>12</sup> Smiths Institute, 2013 tomorrow's borrowers: personal debt by 2025 and the policy response

<sup>13</sup> University of Bristol, 2013 Poverty, debt and credit: An expert-led review - .

<sup>14</sup> Joseph Rowntree Foundation Debt Website

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**Table 3.14: Benefit Claimants in the CLLD area<sup>15</sup>**

DWP Benefit	Date	No.	% of CLLD Pop
Disability Living Allowance (DLA)	November 2015	2,240	7.1
Employment Support Allowance (ESA)	November 2015	1,970	6.3
Housing Benefit	February 2016	4,462	14.2
Universal Credit	May 2016	705	2.2
Job Seekers Allowance	November 2015	635	2.0
Benefit Claimants	November 2015 – May 2016	4,090	13.0
Total Persons CLLD Area	Mid-2014	31,406	100

Source: Department of Work and Pensions, Stat X-plore

**Table 3.15: Benefit Claimants in Comparative Areas<sup>16</sup>**

DWP Benefit	Shepway		Kent & Medway		SELEP		England	
	No.	%	No.	%	No.	%	No.	%
DLA	N/A	N/A	84,220	5	181,170	5	2,467,980	5
ESA	4,280	4	54,610	3	124,770	3	1,943,580	4
Housing Benefit	8,899	8	127,632	8	277,620	7	4,047,329	8
Total Residents	107,969	100	1,695,733	100	3,915,332	100	52,059,931	100

Source: Department of Work and Pensions, Stat X-plore

Note: ESA = Employment and Support Allowance; DLA = Disability Living Allowance

For every category of benefit claimant shown above, the percentage of the population claiming these benefits is much higher in the CLLD area than regionally or nationally.

The following table provides more detail on the claimant rates at the LSOA level within the CLLD area.

**Table 3.15: Benefit Claimants per LSOA<sup>17</sup>**

LSOAs 2011 Areas	DWP Benefits (Total No)		LSOAs 2001 Areas	DWP Benefits (Total No.)			
	Universal Credit Total	JSA Total		DLA Total	ESA Total	Working Age Claimants	Housing Benefit
003A	25	26	003A	135	110	215	219
003B	25	21	003B	115	70	185	127
003C	40	37	003C	205	150	300	309
003D	25	20	003D	90	60	140	197
003E	10	8	003E	90	40	105	85
004A	25	22	004A	115	90	190	198
004B	20	16	004B	110	75	175	228
004C	30	31	004C	95	60	170	161
004D	25	23	004D	125	95	195	188
004E	40	36	004E	130	100	250	274
006E	10	8	006E	70	40	75	42

<sup>15</sup> Stat Explore, Department of Work and Pensions

<sup>16</sup> Data was implied using mid-year 2014 population data. Care should be taken with the value placed on these figures, given the benefit numbers vary in date and should be treated as a rough indication only.

<sup>17</sup> Data is captured in accordance with dates listed in Table on Benefit Claimants in CLLD area

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006F	10	9	006F	80	60	125	64
014A	120	108	007A	160	230	465	501
014B	100	90	007C	150	185	380	535
014C	40	40	007B	190	265	460	589
014D	40	31					
015A	50	44	007D	145	130	255	290
015B	35	33	007E	85	90	170	237
015D	35	32	007G	150	120	235	218

Source: Department of Work and Pensions, Stat X-plore (refer to Table 3.15 for dates by benefit)

The table above shows that:

- LSOA 014A (Harbour Ward) and 014B (Folkestone Central Ward) consistently have the highest scores across all areas for total claimants, whether Housing Benefit, JSA, ESA, DLA or Universal Credit.
- LSOA 003C has a high total claimant rate for ESA and DLA.

Data from the Office of National Statistics indicates that in the CLLD area there is a greater concentration of claimants in the 25-49 year age group for both JSA and Universal Credit, whereas for housing benefits, the highest number of claimants is in the 25-34 and 35-44 year age groups.

The majority of ESA and DLA claimants cite mental disease or psychiatric disorders as the reason for claiming benefits. In areas 014A, 014B, 014C and 014D there is the greatest concentration of ESA claimants citing mental disease as the explanation. This support feedback from the consultations which indicated that there are high rates of mental illness in the area.

### 3.6 Local Infrastructure Provision and Access to Services

Although most features of the CLLD area's local infrastructure provision and access to services do not fall within the scope of the proposed strategy, they are nevertheless relevant to an understanding of the context of the area and therefore have been included in this analysis.

The IMD 2015 score for the 'Barriers to Housing and Services' derivation domain measures the physical and financial accessibility of housing and local services. The indicators fall into two sub-domains: 'geographical barriers', which relate to the physical proximity of local services, and 'wider barriers' which includes issues relating to access to housing such as affordability.

**Table 3.16: IMD 2015 Ranking on Infrastructure Provision and Access to Service Domain**

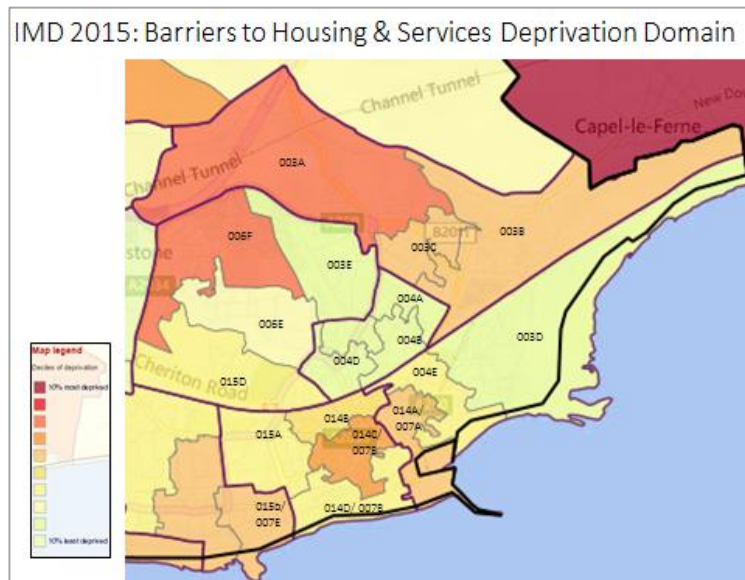
LSOA name (2011)	Barriers to Housing & Services Domain Rank (1 =most deprived)	Barriers to Housing & Services Rank Decile (1 =most deprived 10%)	Population	% CLLD population in Decile
Shepway 006F	7,076	3	1,404	9.45%
Shepway 003A	7,347	3	1,564	
Shepway 014C	13,071	4	1,594	5.08%
Shepway 003B	13,811	5	1,644	
Shepway 015B	14,483	5	1,625	22.34%
Shepway 014A	15,214	5	2,142	
Shepway 003C	15,704	5	1,605	
Shepway 014B	18,157	6	2,105	6.70%

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Shepway 014D	20,172	7	1,319	22.44%
Shepway 015D	21,225	7	1,743	
Shepway 004E	22,598	7	1,914	
Shepway 015A	22,883	7	2,070	
Shepway 006E	23,834	8	1,364	4.34%
Shepway 004D	26,307	9	1,439	29.65%
Shepway 003D	26,793	9	1,757	
Shepway 004B	26,956	9	1,233	
Shepway 004A	28,014	9	1,696	
Shepway 004C	28,027	9	1,510	
Shepway 003E	28,423	9	1,678	

Source: IMD 2015, IMD Explorer



Source: IMD 2015, IMD Explorer

As indicated above, the CLLD area scores well on the IMD 2015 on the access to local services, with only LSOAs 003A and 006F scoring poorly on this domain. This amounts to 9.45% of the population in the third most deprived decile for this indicator.

It is also useful to look at the average distance to service that people need to travel shown below. This reflects that most people in the CLLD area are able to access services relatively easily.

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**Table 3.17: Average distance from Service in electoral wards<sup>18</sup>**

Average distance from service (km)	CLLD Area Average
Road distance to a post office (km)	1.09
Road distance to a primary school (km)	0.75
Road distance to store (km)	0.50
Road distance to a GP surgery (km)	0.68

Source: 2011 Census, retrieved from NOMIS

Like most urban areas, residents living in the outer parts of the urban area, such as in East Folkestone in the CLLD Area, have to travel further to access services. For those with walking difficulties or disabilities, over a kilometre to reach a post office, and half a kilometre for a store may cause difficulty.

Access to health care services such as a GP practice is also a useful indicator. Below, the table shows the number of general practitioners per 10,000 people.

**Table 3.18: Number of GP practitioners per 10,000 persons in the CLLD Area**

CLLD Area Surgeries	No. of GP Practitioners per 10,000 population (using total patients per general practice) (2014)
Central Surgery	4.0
Folkestone Health Centre	4.3
Guildhall Surgery	7.5
Manor Clinic	1.4
Park Farm Surgery	3.3
Sandgate Road Surgery	5.6
The New Surgery	5.2

Source: Kent Health Observatory, 2014

In England there are on average 6.6 practitioners per 10,000 people. In the CLLD area there is only on average 4.0 GPs per 10,000 people. However, it should be noted that some of the residents in the area might access care outside of the CLLD area.

### Education

In the CLLD area there are nine state-funded primary schools. Only one of these, Highview School<sup>19</sup> is ranked outstanding by Ofsted. Six are ranked “Good” and two are ranked as “Needs Improvement”. Only three of the nine primary schools (66%) meet the national rate of pupils achieving level 4 of the national curriculum, which compares to the national percentage of 80%. The percentage of pupils achieving level 4 ranges from 56% to 90%, with the median average for primary schools in the CLLD area being 71% (2015).<sup>20</sup>

<sup>18</sup> 2011 Census

<sup>19</sup> Highview is a special needs and learning difficulties school

<sup>20</sup> Compare School Performance

# Analysis of the Needs & Potential of the Area

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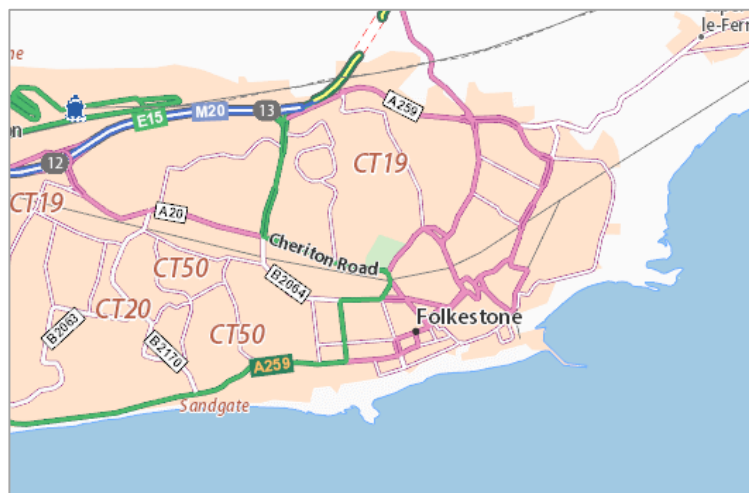
There are six secondary schools and an FE Collage in or nearby, including Folkestone School for Girls, Harvey Grammar School, Highview School (ranked as “Outstanding”), Earlscliffe, Folkestone Academy and East Kent College which has a campus within the CLLD area.

These statistics suggest that a lack of access to good quality schools is not necessarily a cause of the low levels of skills attainment amongst the CLLD resident population.

### **Transport links**

There are good access routes in and out of the CLLD area, whether by train or road. The M20 is just to the north of the area with a junction and A road that provides good access between the motorway and the CLLD area. Folkestone is well connected to London by high speed rail allowing commuters to reach the city in under an hour. Folkestone Central railway station is located in the CLLD area. Buzzlines, National Express and South Eastern Trains all provide transport services from Folkestone to the surrounding areas. Local bus services run by Stagecoach operate across the CLLD area and the rest of Shepway and beyond.

Google Map traffic density data shows congestion on A259 leading in and out of the CLLD area. Congestion is worst in Folkestone Central and Folkestone Harbour wards on the A260 and on Shellons Street. Congestion on roundabouts on Dover Hill Road in East Folkestone appears to create a bottleneck from the M20. Generally, there appears to be better access to the western part of Folkestone than the CLLD area. Poor access and limited transport options other than private car, is a barrier to people in the CLLD area seeking employment. It also can compound the feeling of isolation and separation from the comparatively more prosperous west.



Source: Michelin Digital Road Map

## **3.8 Physical wellbeing**

The IMD provides a measure of deprivation for health and disability through a Health and Disability Domain. This measures the risk of premature death and the impairment to the quality of life through poor physical or mental health. The domain measures mortality, disability and premature mortality, but does not include aspects of behaviour or environment that may help predict health deprivation in the future. The following table shows the LSOA rankings for the Health and Disability domain in the CLLD area.

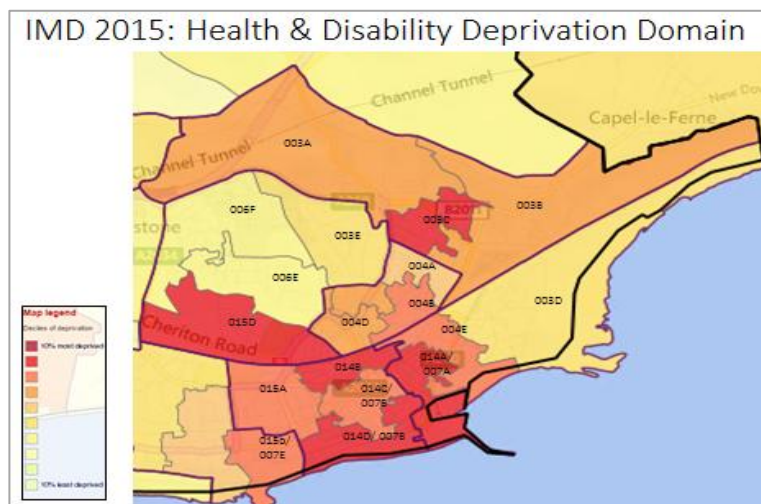
# Analysis of the Needs & Potential of the Area

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**Table 3.19: IMD 2015 Ranking on Health domain**

LSOA Name (2011)	Health Deprivation & Disability Domain Rank (1 = most deprived)	Health Deprivation & Disability Decile (1 =most deprived 10%)	Population	% CLLD population in Decile
Shepway 003C	4,285	2	1,605	28.38%
Shepway 014A	4,880	2	2,142	
Shepway 015D	4,882	2	1,743	
Shepway 014D	5,561	2	1,319	
Shepway 014B	6,232	2	2,105	
Shepway 004B	6,618	3	1,233	26.86%
Shepway 004E	6,649	3	1,914	
Shepway 015B	8,390	3	1,625	
Shepway 014C	8,538	3	1,594	
Shepway 015A	9,772	3	2070	
Shepway 004D	11,149	4	1,439	19.60%
Shepway 004C	11,923	4	1,510	
Shepway 003A	12,223	4	1,564	
Shepway 003B	12,783	4	1,644	
Shepway 004A	13,691	5	1,696	5.40%
Shepway 003D	16,650	6	1,757	10.94%
Shepway 003E	19,574	6	1,678	
Shepway 006F	20,355	7	1,404	8.81%
Shepway 006E	21,501	7	1,364	

Source: IMD 2015, IMD Explorer



As shown above:

- LSOAs in the CLLD area are primarily in the second, third and fourth decile.
- Out of the 19 LSOAs in the CLLD area, five are in the lowest 20% of the country which accounts for 28.4% of the CLLD population.
- With the CLLD area, LSOA 003C, 014A and 015D have the lowest rankings.



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The table below presents data from the 2011 Census on the extent to which poor health limits activities and self-reported measure of health.

**Table 3.20: Health limiting activities**

Daily activities limited (16-64)	LSOAs in 20% decile		CLLD Area		Kent & Medway		SELEP		England	
	No.	%	No.	%	No.	%	No.	%	No.	%
"A lot"	1,173	5.9	1,583	5.1	56,849	3.3	128,834	3.2	1,924,080	3.6
"A Little"	1,261	6.4	1,783	5.8	77,464	4.5	177,56	4.5	2,452,742	4.6
Not limited	10,541	53.4	16,532	53.5	957,073	55.4	2,192,241	55.1	29,952,269	56.5
Very good health	7,548	38.3	12,564	40.6	803,867	46.5	1,845,737	46.4	25,005,712	47.2

Source: 2011 Census, retrieved from NOMIS

The table indicates that:

- A relatively high proportion of residents in the CLLD area report that their health is limited, with 10.9% saying "a little" or "a lot" which compares with 7.8% in Kent & Medway, 7.7% in the SELEP area and 8.2% nationally
- In the 20% most deprived LSOAs in the CLLD area, an even higher proportion (12.3%) of residents report that poor health limits their activities (12.3%).

Of residents that report that their health is 'bad' or 'very bad' shown in the table below, this is significantly higher in the CLLD area (7.4%) than Kent and Medway (5.1%), the SELEP area (5.1%) and England (5.4%). Again this percentage is even higher at 8.4% in the health is higher in the most deprived 20% part of the CLLD area.

**Table 3.21: Perceptions of health**

Perceptions of health	LSOAs in 20% decile		CLLD Area		Kent & Medway		SELEP		England	
	No.	%	No.	%	No.	%	No.	%	No.	%
Good	7,258	36.8	11,219	36.3	606,078	35.1	1,396,442	35.1	18,141,457	34.2
Fair	3,269	16.6	4,848	15.7	229,238	13.3	533,403	13.4	6,954,092	13.1
Bad	1,298	6.6	1,792	5.8	68,924	4.0	158,268	4.0	2,250,446	4.2
Very bad	350	1.8	486	1.6	19,558	1.1	45,436	1.1	660,749	1.2

Source: 2011 Census, retrieved from NOMIS

The following table shows the number of hours dedicated to unpaid care. Despite high levels of long term illness or disabilities (in Tables 3.7 and 3.22 above), within the CLLD population, a similar proportion or fewer hours are dedicated to caring.

**Table 3.22: Hours of unpaid care**

Hours of unpaid care / week	LSOAs in 20% decile		CLLD Area		Kent & Medway		SELEP		England	
	No.	%	No.	%	No.	%	No.	%	No.	%
1- 19 hours	1,005	5.1	171	5.5	112,465	6.5	268,706	6.8	3,452,636	6.5
20 - 49 hours	265	1.3	430	1.4	21,78	1.3	5,042	1.3	721,143	1.4
50+ hours	477	2.4	809	2.6	42,565	2.5	95,592	2.4	1,256,237	2.4
No unpaid care	17,976	91.1	2,796	90.5	1,550,855	89.8	3,564,568	89.6	47,582,440	89.8

Source: 2011 Census, retrieved from NOMIS

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Data on hospital admissions, mortality rates and life expectancy is indicated below.

**Table 3.23: Hospital Admissions, Mortality Rates and Life Expectancy (2015)**

		CLLD	Shepway
Emergency Admissions (No. per 100,000 population)	AMI	151.80	142.09
	COPD	210.02	188.71
	Diabetes	149.29	78.05
	Falls	815.78	751.3
	Over 65s	20,348.14	22,682.6
Under 75 Mortality (No. per 100,000 population)	Cancer	176.56	140.22
	Circulatory	120.02	77.42
	Respiratory	51.76	35.77
Life Expectancy		79.8	81.77

Source: 2015 Kent Observatory, as featured in 2015 Ward Profiles, Shepway District Council

As indicated above, life expectancy in the CLLD area is below the Shepway and national average. Rates of emergency admissions are also above the Shepway rates for AMI, COPD diabetes and falls and mortality from circulatory and respiratory disease is also higher.

In terms of mental health, which was mentioned in the consultation process, the following table shows mental health figure for the economically active population (including unemployed) for the wider Shepway district but are not available for the CLLD area.

While figures are not available for the unemployed in Shepway, amongst residents that are economically active and employed, the rate in Shepway is three times more than the regional and national level.

**Table 3.24: Residents with Mental Health Conditions**

Mental Health Indicators	Shepway		Kent & Medway		SELEP		England	
	No.	%	No.	%	No.	%	No.	%
<b>Economically Active</b>								
In Employment with depression, bad nerves, severe or specific learning problems, mental illness, phobias, panics or other nervous disorders	2,900	6	21,000	2	49,800	2	670,900	2
Unemployed with depression, bad nerves, severe or specific learning problems, mental illness, phobias, panics or other nervous disorders	N/A	N/A	7,200	1	14,300	1	183,100	1
Economically active	52,387	100	875,862	100	2,023,032	100	27,183,134	100
<b>Economically Inactive Persons</b>								
Economically inactive with depression, bad nerves, severe or specific learning problems, mental illness, phobias, panics or other nervous disorders	2,100	8	43,400	12	96,200	11	1,282,800	11
Economically Inactive	25,551	100	373,693	100	851,783	100	11,698,240	100

Source: 2011 Census, retrieved from NOMIS

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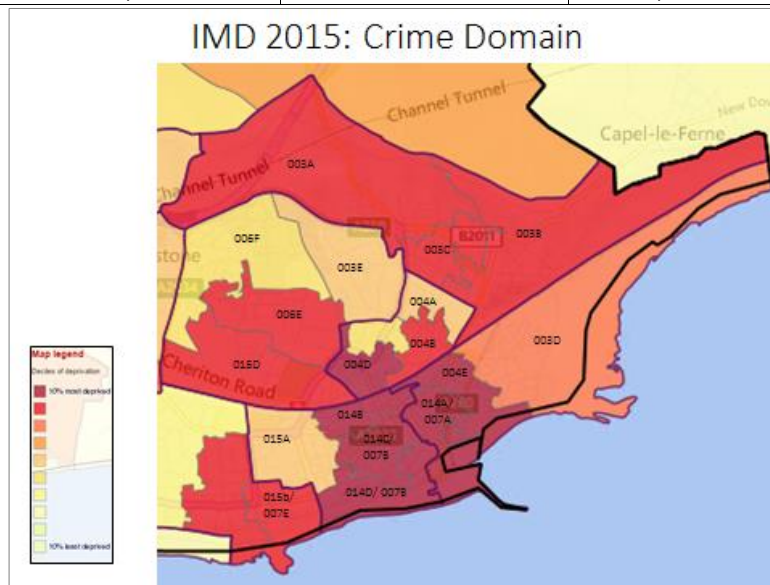
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### 3.9 Crime Rates

Crime is an important feature of deprivation that has major effects on individuals and communities. It can also influencing the ability of businesses to grow and for new businesses to start up. The Crime Domain of the IMD 2015 measures the risk of personal and material victimisation and the indicators that make up this Crime Deprivation domain include the rate of violence, burglary, theft and criminal damage. The ranking of the LSOA scores for this domain (IMD 2015) are shown below.

**Table 3.25: IMD 2015 Ranking for the Crime Deprivation Domain**

LSOA name (2011)	Crime Deprivation Domain Rank (1= most deprived)	Crime Deprivation Decile (1 =most deprived 10% )	Population	% CLLD population in Decile
Shepway 014D	18	1	1,319	33.47%
Shepway 014A	45	1	2,142	
Shepway 004E	277	1	1,914	
Shepway 014B	1,260	1	2,105	
Shepway 014C	2,109	1	1,594	
Shepway 004D	2,444	1	1,439	
Shepway 004B	3,302	2	1,233	34.32%
Shepway 003B	3,514	2	1,644	
Shepway 003A	4,538	2	1,564	
Shepway 015B	4,582	2	1,625	
Shepway 003C	4,958	2	1,605	
Shepway 015D	5,373	2	1,743	
Shepway 006E	6,324	2	1,364	4.30%
Shepway 003D	6,676	3	1,757	
Shepway 015A	13,631	5	2,070	17.33%
Shepway 003E	14,067	5	1,678	
Shepway 004A	15,152	5	1,696	
Shepway 004C	17,188	6	1,510	9.28%
Shepway 006F	19,276	6	1,404	



Source: IMD 2015, IMD Explorer

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Source: IMD 2015, IMD Explorer

The data as shown above indicates that:

- 014D in Folkestone Central/Folkestone Harbour wards is ranked 18<sup>th</sup> in the country in terms of Crime Deprivation score, with 014A 45<sup>th</sup> followed by 004E both in Folkestone Harbour.
- Thirteen LSOAs are in the most deprived 20% decile for Crime and 68% of the population of the CLLD area live in these areas and therefore face the highest risk of personal and material victimization.

Crime data is only available for wards. An analysis of the Police data from June 2015 – May 2016<sup>21</sup> indicates that in Folkestone Central there are high rates of anti-social behaviour (767 incidents) and violence and sexual offences (573 incidents). Criminal damage and arson (246) is also high. Broadmead has the same pattern of crime, but the numbers are much lower: 297 incidents of anti-social behaviour, 221 incidents of violence and sexual offences and 108 incidents of Criminal damage and arson. In Folkestone Harbour and East Folkestone the trend is slightly different with more violence and sexual offences. In East Folkestone there were 320 incidents of anti-social behaviour and 335 incidents of violence and sexual offences. In Folkestone Harbour there were 227 incidents of violence and sexual offences.

### 3.10 Housing

The following table shows the nature of tenure in the CLLD area:

**Table 3.26: Tenure by Number of Households**

Tenure	LSOAs in 20% decile		CLLD Area		Kent & Medway		SELEP		England	
	No.	%	No.	%	No.	%	No.	%	No.	%
Owned: Total	3,607	36.4	6,763	46.7	479,423	67.3	1,144,626	68.9	13,975,024	63.3
Owned with a mortgage/loan	1,803	18.2	3,351	23.1	248,088	34.9	584,923	35.2	7,229,440	32.8
Shared ownership (part own /rent)	44	0.4	54	0.4	6,890	1.0	12,414	0.7	173,760	0.8
Social rented	1,671	16.9	2,254	15.6	98,123	13.8	227,225	13.7	3,903,550	17.7
Private rented	4,480	45.2	5,261	36.3	118,335	16.6	258,423	15.5	3,715,924	16.8
Living rent free	112	1.1	152	1.0	9,076	1.3	19,684	1.2	295,110	1.3
All categories	9,914	100	14,484	100	711,847	100	1,662,372	100	22,063,368	100

Source: 2011 Census, retrieved from NOMIS

As indicated above:

- The percentage of households that own their own houses is significantly lower (46.7%) in the CLLD area (particularly in the LSOAs within the lowest two deciles of the IMD 2010) than in Kent & Medway (67.3%), the SELEP area (68.9%) and England (63.3%) as a whole.

<sup>21</sup> See Police.co.uk

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- The proportion of properties owned with a mortgage or loan is also significantly lower in the CLLD area (18.2%) than the regional (Kent & Medway 34.9%) and national (32.8%) averages.
- The CLLD area has a particularly high rate of private rentals and socially rented tenure is also higher than in Kent and Medway and the SELEP area, but below national average.

### 3.11 Ethnicity

The population in the CLLD area is 94% White British which is higher than in the South East region overall (92.3%) and the national average (87% ) The largest ethnic minority group is Other White (2.39%) and the third largest is White Irish. Every other ethnic group is less than 1% of the local population.

**Table 3.27: Percentage of residents in Ethnic Groups**

	CLLD area	Shepway	South East	England
White: British	94.00	94.59	91.3	86.99
White: Irish	1.09	0.78	1.03	1.27
White: Other White	2.39	1.92	2.77	2.66
Mixed: White and Black Caribbean	0.25	0.18	0.30	0.47
Mixed: White and Black African	0.12	0.06	0.12	0.16
Mixed: White and Asian	0.29	0.27	0.37	0.37
Mixed: Other Mixed	0.27	0.2	0.28	0.31
Asian or Asian British: Indian	0.33	0.22	1.12	2.09
Asian or Asian British: Pakistani	0.08	0.05	0.73	1.44
Asian or Asian British: Bangladeshi	0.18	0.08	0.19	0.56
Asian or Asian British: Other Asian	0.16	1.1	0.29	0.48
Black or Black British: Caribbean	0.17	0.09	0.34	1.14
Black or Black British: African	0.15	0.08	0.31	0.97
Black or Black British: Other Black	0.03	0.03	0.06	0.19
Chinese or other ethnic group: Chinese	0.21	0.19	0.41	0.45
Chinese or other ethnic group: Other ethnic group	0.28	0.15	0.37	0.44

Source: ONS 2011

More detail on the ethnic composition of the 'Other White' ethnic group is not provided in the Census. However, analysis across England and Wales in 2001<sup>22</sup> showed that 80% of people who identified as Other White were born overseas and a third were born in a Western European country other than the UK. 14% were born in an Eastern European country.

Anecdotal evidence suggests that the Other White ethnic minority group in the Folkestone CLLD area are primarily from Eastern European countries.

### 3.12 Troubled Families

The Troubled Families programme provides some information on the extent to which there are families 'in need' in Shepway. The programme is for families facing multiple problems, such as

<sup>22</sup> Who are the 'Other' ethnic groups? ONS article October 2005

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unemployment, anti-social behaviour, truancy and mental health issues. The programme is operated by Shepway District Council, in conjunction with Kent County Council. The inclusion of families in the programme is based on a cluster of six headline problems.<sup>23</sup>

The following number of families has been identified in Shepway and Kent to date based on the criteria.

**Table 3.28: Information on families eligible for Troubled Families Programme (2016)**

	Shepway	Kent
Number of families verified	693	8,579
Number of individuals	2, 802	32, 678
Average number of family members	4	4
Number of dependent children (under 18 year olds)	1, 442	17, 364

Source: *Troubled Families Monthly Report, June 2016, Kent County Council*

The 2,802 individuals in these families constitute about 2.6% of the population in Shepway, while in Kent as a whole, those involved in the programme constitute 2.1% of county's population. Below are some more detailed statistics on the headline problems:

**Table 3.29: Families that meet the national headline criterion for the 6 axes (2016)**

Headline national criteria	Shepway		Kent	
	No Families	%	No Families	%
Crime or anti-social behaviour	147	21	1,363	16
Education	425	61	4,842	56
Children needing help	642	93	8,192	95
Worklessness	147	21	1,828	21
Domestic violence and abuse	112	16	1,464	17
Health	325	47	4,425	52

Source: *Troubled Families Monthly Report, June 2016, Kent County Council*

As indicated above, the percentage of families who meet the national criteria for crime or antisocial behaviour in Shepway is above that of Kent. Similarly, the rate of families where children have not been attending school regularly is higher in Shepway than in Kent. It is estimated that approximately 35% of the Shepway families identified reside in the CLLD area.

### 3.13 Business base and trends

The business community within an area provides employment and wealth creation for the workforce in the surrounding labour market area. Therefore understanding the dynamics of the business base is an important influence on the job opportunities available to residents.

<sup>23</sup> Each family must have at least two of the following six problems: parents or children involved in crime or anti-social behaviour; children who have not been attending school regularly; children who need help: are identified as in need or are subject to a Child Protection Plan; adults out of work or at risk of financial exclusion or young people at risk of Worklessness; families affected by domestic violence and abuse; and parents or children with a range of health problems. DCLG, 2015 Financial Framework for the Expanded Troubled Families Programme

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No data is available specifically on business counts for the CLLD area but Shepway as a whole provides an indication.

### **Business Births, Deaths and Survival Rates**

The following table shows us the number of businesses in Shepway and the growth or decline year on year.

**Table 3.30: Total Business Count by Area**

Date	Shepway		Kent & Medway		SELEP		England	
	No	Year on year growth	No	Year on year growth	No	Year on year growth	No	Year on year growth
2010	3,855		68,315		164,280		2,183,840	
2011	3,765	-2.3%	67,020	-1.9%	161,220	-1.9%	2,161,190	-1.0%
2012	3,840	2.0%	68,715	2.5%	165,160	2.4%	2,218,205	2.6%
2013	3,815	-0.7%	68,850	0.2%	165,360	0.1%	2,234,320	0.7%
2014	3,880	1.7%	70,955	3.1%	171,175	3.5%	2,322,375	3.9%
2015	4,115	6.1%	75,460	6.3%	182,110	6.4%	2,489,825	7.2%

Source: UK Business Counts, ONS, retrieved from NOMIS

As shown above, over the period 2010 to 2015, the total number of businesses has grown by 6.7% in Shepway. However, this is lower than the 10.5% growth in Kent and Medway, the 10.9% growth in the SELEP area and the 14% growth rate for England.

The following table shows a more detailed analysis of the births and survival rate of businesses established each year from in 2009 to 2014. This indicates that percentage of businesses that started in 2009 and survived more than one year in Shepway is low in comparison to Kent and Medway, the SELEP area and England as a whole

**Table 3.31: Survival Rates for Businesses born 2009 to 2014**

	Shepway		Kent and Medway		SELEP		England	
<b>2009</b>								
<b>Births</b>	375		6,185		15,415		209,035	
<b>Survival Rate</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>
<b>1-year survival</b>	325	86.7	5,690	92.5	14,220	91.9	190,010	90.9
<b>2-year survival</b>	250	66.7	4,655	75.5	11,650	74.0	154,415	73.9
<b>3-year survival</b>	195	52.0	3,740	60.9	9,375	59.5	124,765	59.7
<b>4-year survival</b>	150	40.0	3,035	48.9	7,640	48.9	102,315	48.9
<b>5-year survival</b>	130	34.7	2,520	40.1	6,470	41.3	87,310	41.8
<b>2010</b>								
<b>Births</b>	335		6,125		15,195		207,520	
<b>Survival Rate</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>

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<b>1-year survival</b>	290	86.6	5,425	89.8	13,415	87.5	180,160	86.8
<b>2-year survival</b>	255	76.1	4,590	76.2	11,310	73.8	150,415	72.5
<b>3-year survival</b>	190	56.7	3,600	60.1	8,885	57.6	118,560	57.1
<b>4-year survival</b>	160	47.8	3,030	51.0	7,485	48.4	99,825	48.1
<b>2011</b>								
<b>Births</b>	440		7,065		16,880		232,460	
<b>Survival Rate</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>
<b>1-year survival</b>	320	72.7	6,555	93.9	15,795	93.8	216,315	93.1
<b>2-year survival</b>	255	58.0	5375	76.1	12,960	76.2	175,405	75.5
<b>3-year survival</b>	205	46.6	4265	60.5	10,305	60.1	140,350	60.4
<b>2012</b>								
<b>Births</b>	530		7,265		17,420		239,975	
<b>Survival Rate</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>
<b>1-year survival</b>	355	67.0	6,550	90.8	15,920	92.2	218,685	91.1
<b>2-year survival</b>	285	53.8	5330	73.9	13,000	75.2	176,950	73.7
<b>2013</b>								
<b>Births</b>	470		8,960		21,825		308,770	
<b>Survival Rate</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>	<b>No.</b>	<b>%</b>
<b>1-year survival</b>	425	90.4	8,455	94.5	20,595	94.2	288,765	93.5

Source: UK Business Counts, ONS, retrieved from NOMIS

Looking over a longer time horizon, the table above shows that:

- Fewer businesses started in 2010 compared to 2009 for all areas, and the 1 year survival rate for businesses in Shepway was similar to the comparator areas.
- More businesses started in Shepway from 2011 to 2012 but there was a fall in 2013 while other areas continued to see increases.
- Businesses that started in 2011 in Shepway have a much lower survival rate than Kent & Medway, the SELEP area and England. One possible explanation is that the figures are skewed by the high turnover of businesses in the Creative Quarter, but this cannot be verified.
- Significantly more businesses started in Shepway in 2011 but their survival rate in the first year was only 67% compared to 91.1 % in England.

Data in the table below shows that in 2014 fewer businesses started up in Shepway – fewer than in every year 2011. This contrasts with the situation in the comparator areas where more businesses started compared to 2013.

**Table 3.33: Business Births, Deaths and Activity in 2014**

<b>2014</b>	<b>Shepway</b>	<b>Kent and Medway</b>	<b>SELEP</b>	<b>England</b>
<b>Births</b>	420	8,260	20,245	295,560
<b>Deaths</b>	295	5,495	13,385	186,395
<b>Active</b>	3,275	59,860	147,350	1,989,250

Source: UK Business Counts, ONS, retrieved from NOMIS



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For every business death in Shepway there were 1.4 births. However, this is lower than the ratios for the comparators. For every business death in England there were 1.6 births.

### **Perception of the area as a business location**

Perceptions of the area were assessed through a survey of local businesses that was carried out in July 2016 as part of the community consultation for the Folkestone CLLD Strategy. The feedback from this survey indicates that:

- 67% of local businesses do not see the CLLD Area as being a favourable environment for businesses.
- 69% have encountered difficulties recruiting people with the right skills, attitudes and experience from the local area.
- The most serious barriers to business growth prospects are a lack of access to appropriate finance(50%), lack of business support service (25%), a shortage of suitable business premises and parking( 19%), and more general factors relating to the quality of the environment overall (25%).
- 43% of the respondents offer work placements to young people from the CLLD area.
- Help with training of staff and management (57%), and support for entrepreneurship are viewed by local businesses as their top priorities for the area.

Overall, the majority of respondents indicated that the business environment in the CLLD area is not favourable for business. While respondents cited good transport links via the Channel Tunnel, motorway and the high-speed train link, others stressed a sense of remoteness and a civic culture of anti-social behaviour. One respondent remarked: "Our business is dependent to some degree on people's attitudes towards Folkestone as a place to invest in and to live. The biggest downside to Folkestone town and surrounds is the behaviour of some residents - people littering indiscriminately, shouting and swearing, drinking alcohol in the street and smoking in public areas. Better control of these anti-social matters will make a big difference to Folkestone".

The low level response rate to the business survey means that the results should be treated with caution.<sup>24</sup> However, the findings are supported by other evidence. *Locate in Kent's* 2014 perception study indicated that only 11% of business considers East Kent and Folkestone to be a favourable sub-region of Kent; having a sense of remoteness and a perception of being 'run-down', as well as having a poor stock of commercial premises and workforce skills.

### **3.14 Summary and SWOT Analysis**

Based on community consultation (see section 6) and the data analysis, the following SWOT has been developed for the Folkestone CLLD area. The SWOT summarises the strengths that the CLLD programme needs to build upon, the weaknesses and threats to be overcome and the opportunities available to provide focus for the future.

<sup>24</sup> There were 16 business survey respondents. 12.5% of these respondents were self-employed, 50% employed 1-9 people, and 31% employed 10-49 people. The majority of respondents (63%) employed people from, or are self-employed in, the CLLD area. The majority of respondents (62%) do not provide work experience placements or apprenticeships for young people.

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**Table 3.35: Summary SWOT Statement**

Strengths	Weaknesses
<ol style="list-style-type: none"> <li>1. The working age residents of the CLLD area account for a relatively higher proportion of the overall population and this offers an advantage in terms of the productive potential.</li> <li>2. Strong clusters of businesses exist in key sectors such as retail, financial services/insurance and tourism-related activities, offering potential for further job growth.</li> <li>3. The expanding creative sector poses a significant opportunity for growth in view of the recent investment by the Creative Foundation which also contributes to the community and through outreach activities.</li> <li>4. It is a relatively cost effective business location in the South East.</li> <li>5. There are good inter-regional transport links (Channel Tunnel, M20 road and high speed rail) that provide quick connections to London and mainland Europe.</li> <li>6. There are good secondary schools and access to adult education in the area and higher education institutions further afield.</li> <li>7. There are numerous parks, good quality architecture and heritage sites.</li> <li>8. Strong local partnership exists between the private sector, charities and associations and good relationships between the District and County Council.</li> <li>9. The town has major backing and potential funding from the activities of the Roger De Haan Charitable Trust.</li> <li>10. A strong volunteer ethic and commitment exists amongst retired, skilled residents with the time and energy to assist, such as providing mentoring to young people.</li> <li>11. A vibrant community events calendar through Folkestone Festivals, Strange Cargo, Jim Jam Arts, Folkestone Fringe, etc which contribute to community cohesion and foster a sense of pride in the town. The events also provide opportunities for volunteering and strengthen the cultural offer for the visitor economy.</li> <li>12. Folkestone Sports Centre, new skate park and several gyms provide facilities for healthy activities.</li> </ol>	<ol style="list-style-type: none"> <li>1. Employment declined between 2009 and 2014 with total employment in the CLLD area falling by -15.9%, when there was growth in the wider areas.</li> <li>2. Low representation of higher value knowledge intensive jobs (15.9% of jobs in Folkestone CLLD area compared to 17.4 % in England in 2014).</li> <li>3. Employment losses in higher value knowledge intensive jobs which contrasted with growth in the wider areas. Jobs losses in the insurance and auxiliary services for the financial and insurance industries outweighed job growth in some knowledge-intensive industries such as architecture and engineering, advertising, publishing and computing.</li> <li>4. Income levels are relatively low and there are pockets of very high deprivation.</li> <li>5. Relatively high levels of illness and disability, mental health problems, poor health indicators and lower life expectancy.</li> <li>6. High levels of NEETs and school leavers/ young people that struggle to find quality employment.</li> <li>7. Poor financial literacy and high levels of indebtedness amongst people in the CLLD area.</li> <li>8. There is a lower than average business survival rate for Shepway and a recent downturn in new firm start-ups.</li> <li>9. Poor business perceptions of the area including remoteness, being 'run-down', poor quality stock of premises and poor workforce skills.</li> <li>10. Limited development land available in the town bounded by the sea and the North Downs.</li> <li>11. Low level of home ownership and a high proportion of residents living in rental accommodation, some of which is low quality.</li> <li>12. Current interventions are fragmented and there is a need for improved coordination between some organisations working in the areas.</li> </ol>

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Opportunities	Threats
<ol style="list-style-type: none"> <li>1. The Channel Tunnel, High Speed rail link and M20 ensure Folkestone is well connected to London and the rest of the South East which provides scope to attract new residents and businesses.</li> <li>2. Proximity to Channel Tunnel and sea crossings makes Folkestone potentially attractive as a location for logistics and transport-related activities. Other key sectors (financial services, retail, etc) have a strong presence and scope to develop further.</li> <li>3. Creative Quarter - source of locally based entrepreneurship and jobs that can be further developed.</li> <li>4. Potential to develop Folkestone's night time economy. Folkestone has the ingredients to attract tourism and become a 'Destination' town.</li> <li>5. Opportunities to develop and expand the Seafront Masterplan to provide local jobs and attract new residents and entrepreneurs to the town.</li> <li>6. Potential to attract Inward investment, particularly in the abovementioned sectors due to being a cost effective business location.</li> <li>7. The relatively better off areas of west Folkestone offer opportunities for residents in the more deprived areas.</li> <li>8. Strong military links provide an opportunity to work with Armed Forces community to improve life skills amongst young people, helping to prepare them for jobs, apprenticeships or traineeships.</li> </ol>	<ol style="list-style-type: none"> <li>1. Continued decline of coastal/ seaside tourism.</li> <li>2. Negative impacts of "Operation Stack" aimed at managing congestion on the M20 when there are ferry delays or industrial action.</li> <li>3. Delays in implementing the seafront development could undermine confidence in the town.</li> <li>4. General difficulties in rejuvenating coastal towns.</li> <li>5. Community programmes are perceived to be run "for" rather than "with" people which poses a risk to their success.</li> <li>6. Inaction for the 18-24 year old NEETs group will have an impact on the economy as they grow older.</li> <li>7. Doubts over Folkestone's revival would have a negative impact on future business investment.</li> </ol>

# Description of the Strategy

## 4

This section provides a summary of the problem definition, the CLLD rationale and intervention logic, strategic and operational objectives, and target groups.

### 4.1 Overview of the Folkestone CLLD Strategy

#### 4.1.1 Problem definition

As the previous section demonstrates, the Folkestone CLLD area suffers from a combination of social and economic problems.

The community consultation and business survey indicates that although job opportunities exist, many younger people do not have the necessary personal attributes and skills to fill them. Likewise, older residents who have lost their jobs need retraining to help them back into employment. Often the individuals concerned lack the motivation to develop their skills and to seek employment. In addition, there are problems associated with emotional, mental and physical health issues, problems facing single parents and 'broken' families, the need for protection of children, challenges related to migrant populations, alcohol and substance abuse, etc. These issues often push people further away from the labour market and affect the abilities and motivations of people to seek employment.

The baseline assessment contained in Section 3 suggests that deprivation in the CLLD area is not only serious in comparison with other areas of the South East and England, but also proving to be persistent. Moreover, if current trends are projected forward it is clear that the situation will worsen relative to the more prosperous parts of the wider Shepway District, Kent and the South East. Reversing this trend and promoting social and economic cohesion is therefore the key aim of the Folkestone CLLD Programme.

#### 4.1.2 Intervention logic

Although, there are a number of local initiatives to address the challenges identified above, interview respondents indicated that they are often poorly coordinated and the available resources are thinly spread. For these and other reasons, feedback from the consultations suggests that the impact of some existing initiatives on the problems faced by the CLLD area has been more limited than hoped.

The rationale and intervention logic for the Folkestone CLLD Programme is to address the limitations of existing initiatives by:

- Developing new initiatives to fill gaps and shortcomings in existing schemes;
- Reinforcing the successful schemes where they are having significant positive impacts and so add value to existing investment;
- Developing new and innovative ways of addressing problems that either fall outside the scope of existing schemes or have not been effectively tackled by them;
- Ensuring that existing and new interventions are more effectively coordinated and targeted.

Examples of interventions that are largely new and innovative in a Folkestone context, which have been put forward for consideration in the CLLD Programme, include:

- using volunteering and other initiatives involving the Creative Sector to provide a bridge to job opportunities for people from the intervention area (one of the actions under Objective 1);
- setting up a business incubator with a focus on social enterprises that would benefit the intervention area (Objective 2); and
- the concept of a Community Hub as a delivery mechanism for the CLLD Programme (Objective 3).

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The Community Hub would directly address the need for improved coordination and targeting, helping to address the problem, identified through the consultation, that many of the current interventions are fragmented and there is poor case management or referrals between them.

Innovative aspects of the strategy will be reinforced through the project selection procedure adopted in the programme. As outlined in Section 8, one of the selection criteria for projects will be that they should ideally demonstrate an innovative approach to tackling problems and priorities (where this is the case, the projects will receive a higher score).

As well as promoting new types of interventions, it is important that the Folkestone CLLD Programme builds on and adds value to what is already being successfully done to help tackle deprivation and other problems. The aim will be to provide funding for ineligible mainstream European funded projects, so that existing schemes can undertake additional activities in the CLLD area (e.g. to improve mental health and readiness for work) that would otherwise not be possible. Equally, the research has highlighted a number of gaps (e.g. with regard to financial literacy) that existing schemes are not meeting and where the programme could be used to rectify shortcomings. Many of those consulted during the consultation argued that what was needed is more resources to help develop existing successful initiatives rather than to necessarily introduce new additional ones.

### 4.1.3 Strategic and operational objectives

The overall strategic objective is to **promote social and economic cohesion** in the CLLD area through interventions to **help residents in the most deprived communities access jobs** and to support **businesses in the area to grow and provide new job opportunities**.

This will be achieved through three operational objectives:

- **Objective 1** - Enhancing work-readiness and well-being
- **Objective 2** - Promoting local business and social enterprise
- **Objective 3** - Setting up an integrated delivery mechanism for the programme

These objectives have been arrived at through a bottom-up process involving extensive consultations with the local communities and their representatives in the CLLD area (see Section 6). They are designed to build on the strengths and opportunities outlined in the SWOT and the supporting Actions aim to address the weaknesses and threats facing the residents and business community within the CLLD area.

The first of the operational objectives corresponds with the ESF-funded component of the Folkestone CLLD Programme, while the second would be ERDF-supported. The third operational objective would be largely ERDF funded and provides a mechanism to help ensure that ESF and ERDF investment is aligned and will thereby ensure an integrated approach for the solutions to address the issues.

Added value will be ensured both at the programme level through the design of the programme and at the project level, through the appraisal criteria for funding applications which will include the need to demonstrate additionality and value for money.

The actions identified for each of the objectives have been developed from the priorities identified through the community consultation and supported by the baseline analysis in section 3. In some cases the proposed actions are not new, but the method of implementation through a call for proposals will require new and innovative approaches to tackle the problems. Furthermore, the strategy includes an innovative measure (see Objective 3) for ensuring that interventions are well coordinated and delivered. This will result in more focused interventions and ones that have a

# Description of the Strategy

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greater impact. A good example of this is the proposed debt crisis hub. This is an example of an initiative to address a significant issue amongst the population within the CLLD area which can affect self esteem and the ability to focus on gaining the skills and/or accessing work opportunities.

### 4.1.4 Target area and groups

The intervention area for the CLLD programme has been defined earlier (see Section 2) and consists of 19 LSOAs. There are some 31,400 residents in the CLLD area, of which 65% (20,400) are in the 20% most deprived areas of the country. The CLLD Programme will specifically target those who are unemployed (1,235 people) and other groups, including NEETs and people not actively seeking work due to having caring roles.

The consultations suggest that many problems in the Folkestone CLLD area are deep-seated, such as a lack of aspiration and sense of hopelessness for the future. These issues are particularly prevalent and need to be tackled amongst young people who have not yet entered the labour market and are identified as in danger of becoming NEET<sup>25</sup>.

In the following sections we elaborate on each of the strategy's operational objectives, explaining the priorities and sorts of actions that are envisaged and providing examples of the kinds of activity currently under way that could be built upon and further developed.

## 4.2 Objective 1 - Enhancing work-readiness and well-being

The first objective aims at enhancing work-readiness and promoting emotional, physical and financial well-being as preconditions for work-readiness. These are problems highlighted in the consultations and set out in the baseline analysis and SWOT. Objective 1 will be ESF-funded and mainly targeted at the residents in the most deprived 20% decile of the CLLD area.

Objective 1 is designed to tackle different aspects of deprivation. Actions 1 and 2 seek to help individuals improve their employability. At present, a high proportion of the population in the CLLD area (26.1%) have no qualifications or apprentice qualifications (2.8%) so there is a need to help improve their skills and raise aspirations. Some young people in the area face very difficult family or domestic circumstances and so may not have the motivation and/ or skills needed to get jobs, or even to take the first steps through volunteering. Likewise older people who have lost their jobs may need retraining and/ or support or assistance in managing caring responsibilities to help them get back into the labour market.

Actions 3 and 4 are aimed at addressing issues relating to mental, physical and financial wellbeing which are known to be serious problems in the CLLD area and have a key impact on job readiness. The need for this has raised through the consultations and is also well demonstrated in the baseline analysis, which shows that a high proportion (28.4%) of the residents in the CLLD area are in the 20% most deprived areas in the country for the Health Deprivation domain.

**Table 4.1: Summary – Objective 1 Target Groups and Actions**

<b>Aim</b>	Facilitate and improve chances of people being able to access employment
<b>Target Groups</b>	<ul style="list-style-type: none"> <li>• Young people NEET/likely to become NEET</li> <li>• Migrants and other marginalised groups</li> </ul>

<sup>25</sup> ESF funding allows for support for at risk young people age 15 to prevent them becoming NEET; ESF National Eligibility Rules, March 2016, p.5

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	<ul style="list-style-type: none"> <li>• Long term unemployed, particularly aged 35-50 and benefit claimants</li> <li>• People in the labour force without the appropriate skills for the market</li> <li>• Carers</li> <li>• People with mental, physical or emotional difficulties wanting to join the labour force</li> </ul>
<b>Actions and potential interventions</b>	<p><b>Action 1: Work experience and job preparation for young people entering the job market</b></p> <ul style="list-style-type: none"> <li>• Work experience</li> <li>• Preventing worklessness</li> <li>• Advice, information and signposting</li> <li>• Specific training</li> <li>• Job brokerage</li> </ul> <p><b>Action 2: Getting people back into work and job retention</b></p> <ul style="list-style-type: none"> <li>• Work readiness and development services</li> <li>• Training programmes</li> <li>• Volunteering and work experience</li> <li>• Targeted interventions for hard to reach groups</li> <li>• Services that help people into work by supporting their caring roles</li> <li>• Job brokerage schemes</li> </ul> <p><b>Action 3: Emotional and physical well-being services to transition people into work</b></p> <ul style="list-style-type: none"> <li>• Support to reduce/stop substance abuse</li> <li>• Support for people with emotional/mental issues and helping them to access work</li> <li>• Providing support for those caring for others to get back into paid work</li> <li>• Health promotion</li> </ul> <p><b>Action 4: Promoting financial wellbeing</b></p> <ul style="list-style-type: none"> <li>• Debt Crisis Hub</li> <li>• Advice and signposting</li> </ul>
<b>Link to SWOT</b>	<p>The proposed actions and interventions address the following elements of the SWOT</p> <ul style="list-style-type: none"> <li>• S1, S10. W5, W6, W9, T6</li> </ul>
<b>Indicative outputs</b>	<ul style="list-style-type: none"> <li>• Number of participants (including participants that are unemployed including long-term unemployed; economically inactive; aged over 50; migrants; those with mental health issues; carers and those with disabilities)</li> <li>• Participants in education or training on leaving school/ education</li> <li>• Unemployed/ inactive participants in employment, including self-employment on leaving unemployment</li> </ul>
<b>EU funding</b>	ESF

### **Action 1: Work experience and job preparation for young people entering the job market**

**Aim:** the aim of this action is to provide young people with the opportunities to gain skills and experience that will increase their employment chances and prevent young people from becoming NEET, through increasing their aspirations and helping them to identify future career opportunities. Secondary outcomes may include the development of networks or support and information, informal mentorship and access to a resources and contacts that will stand as a reference for the young person in future job applications.

**Target group:** the target group for this intervention is young people in the CLLD area who are NEET or at risk of becoming NEET.

**Types of interventions:** the interventions under this action will take a variety of forms and will build on existing examples of good practice. Some new project ideas to address the issues are outlined

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below together along with some good existing projects that could be further supported through the CLLD programme.

- **Preventing worklessness** is an early intervention service designed to target youth that are at high risk of failing to access employment or education opportunities due to emotional or learning difficulties, lifestyle or other factors. Activity might involve fostering career aspirations as a long term plan to preventing worklessness and encouraging entrepreneurship and self employment. One noteworthy intervention with the NEET group is run by the Prince's Trust and their local partners CXC Charity. This is a 12 week personal development course that gives 16-18 year olds identified as potential NEETs a nationally recognised qualification in employability, teamwork and community skills. Participants are engaged in team-building activities and develop a real project in the local community through individual work placements.<sup>26</sup>
- **Work experience** for young people in the intervention area may take the form of paid apprenticeships, internships or volunteer activities. A number of organisations in Folkestone offer work experience and training to young people and these provide an important route into employment. Examples of such schemes include the Creative Foundation's Triennial and the Shepway Sports Trust's apprenticeships. Other organizations, such as Citizen Trust, also have the potential to provide apprenticeship opportunities.
- **Apprenticeships** are offered by a number of the businesses within the CLLD area who have taken on local residents with support from the Shepway Apprenticeship Grant scheme run by the District Council. They have noted their effectiveness in providing opportunities for their businesses to grow, as well as providing training opportunities for local residents.<sup>27</sup> An example is the Shepway Sport Trust, which operates out of the Three Hills Sports Centre located in the most deprived 20% decile with the CLLD area. They run an apprenticeship scheme for young people who want to work in the sports field. Their "Learn, assist, earn" scheme requires completion of 35 sessions of volunteering. The Trust also funds a sport-related course and if the person is successful they might be employed by the Trust. The programme started 18 months ago, 88 have signed up, 35 are fully engaged, and there are now 6 people working on an hourly-paid basis. They suggest the model can potentially be used in other sectors such as building, sales, and customer relations.
- **Advice, information and signposting** to services might accompany some of these interventions, helping to identify beneficiaries and to coordinate schemes in a way that provides a package that can be delivered through the proposed Community hub (see Objective 3).
- **Specific training** might also be provided to young people in this group. Training should be appropriate and targeted to the needs of local businesses and the individual needs of the population group within the CLLD area. Priorities will be given to training that links directly to job opportunities or activities designed to meet local employers' needs (e.g. insurance or creative industries). In the private sector, a good example is the business 'Oh Crumbs' which employs young people to provide catering services and has a good track record of providing them with marketable skills. Mentoring for young people to help identify suitable careers and raise aspirations might also be supported, drawing upon the skilled older retired members of the community who have a strong volunteer ethic and want to support the local community.

<sup>26</sup> <https://www.cxc.org/young-people/training/princes-trust-team-programme>

<sup>27</sup> One respondent remarked: "We have used a grant from Shepway for placing a young person in work. This grant of £1500 was put towards additional wages for them so they were able to receive £6 per hour. This was enough to keep them in work for the 18 months it took them to qualify. This grant is so worthwhile."



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- **Job brokerage** activities might also be funded under this action provided that they aim to connect young people, particularly those NEET or at risk of becoming NEET, to job opportunities, apprenticeships or work experience activities in a holistic and supportive manner.

The Local Action CLLD Programme will work with the Shepway Employment and Training Forum which has been working in the area to coordinate such activities, some of which could be strengthened through the CLLD Programme

Some of the projects outlined above could be further developed through the programme to specifically focus on residents in the CLLD area. For example, some 71 businesses in the CLLD area have taken on 146 Shepway residents as apprentices since the Shepway Apprenticeship scheme started in 2013; this represents 40% of the total businesses that have received grants. However, only 29 (9%) of the local apprentices taken on through the scheme were residents in CLLD area. The CLLD programme could therefore look to address this by introducing new ways of getting more CLLD area residents into apprenticeships in businesses within the local area.

### **Action 2: Getting people back to work and job retention**

**Aim:** the aim of this action is to assist those who are unemployed to get back into work. This action is often highly resource intensive and holistic.

**Target group:** the target group is the long term unemployed and those marginalised for a variety of reasons, including poor health, debt or having caring responsibilities, and who are therefore furthest from the job market.

**Types of interventions:** building on the experience of approaches such as Troubled Families, interventions could include a case-based approach to understand an individual's circumstances and the development of targeted programmes to address what are often a range of complex issues that can affect the ability to access work.

Examples of the types of actions that the CLLD Programme could help to further develop include:

- **Work readiness and development services** help develop a labour force that is able to meet the needs of employers. This has been identified as a major barrier by businesses looking to recruit in the CLLD area. The SELEP has also identified that there are needs for employability/vocational skills, generic skills in customer service, basic front-line communication, plus numerical skills. Work readiness is a particular challenge for those experiencing long periods of unemployment and/or newly entering the labour market.
- **Training programmes** could also be further developed to assist this group. Re-skilling for jobs could be provided as part of broader programme supporting inactive or unemployed people. "What Works" shows shorter programmes (below six months, and probably below four months) are more effective for less formal training activity. Longer programmes generate employment gains when the content is skill-intensive<sup>28</sup>.
- **Volunteering and work experience** which builds on the success of existing schemes. The Town Sprucer scheme is an example of an initiative that could be further developed. It provides opportunities for people who have been unemployed for a significant time to participate in work to clean up public spaces and it also helps to build civic pride. The 'Sprucers' receive

<sup>28</sup> Seen <http://www.whatworksgrowth.org/policy-reviews/employment-training>

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training, tools and opportunities to gain experience and build their confidence levels. In addition to work experience, there is assistance with debt management, legal advice and dental hygiene. Another programme, the Green Gym has also demonstrated good results. Developed as a volunteer programme to get people active and fight the obesity crisis, the Green Gym provides people with basic training and tools to get outdoors and clear paths, parks and other communal areas. From its humble beginnings, it has shown some interesting results with people volunteering in the Green Gym going on to access employment as they have gained experience and a reference to help them access previously inaccessible opportunities.

- **Volunteer Shepway** are proposing a new scheme 'Passport to Employability' to address barriers to volunteering, such as a history of substance abuse, mental or physical ill health, low skills and sustained worklessness. This programme offers training and support that assists them into volunteering so that they can gain skills, an up to date CV and potential referees that will improve their employment prospects. Skilled staff and volunteer mentors will provide one-to-one support and tailored training, improving skills and confidence before providing them with a volunteering placement accompanied by mentors who accompany them and help to establish a routine that they can adhere to.
- **Targeted, holistic interventions for hard-to-reach groups**, such as people who are homeless, should be another area of focus. The Rainbow Centre provides a holistic service for adults, especially the homeless or those sleeping rough or sofa-surfing, and helps them move towards employment. Special services targeted at specific groups might come under this intervention. The 'Troubled Families' programme is an example of holistic integrated identification and support for hard-to-reach families. Case workers, working as part of a 'Team around the Family' put the whole family at the centre of service planning and coordinate services through a multiagency approach. This scheme might be improved and built on through the CLLD programme by extending the programme to specifically target families in the CLLD area. This holistic tailored support will help families to address a range of problems they face and make it easier for some family members to seek employment.
- **Services that help people into work by supporting their caring roles**, for example in relation to dependents and providing childcare, also need to be further developed. There are high numbers of people with health issues in the CLLD area that are dependent on family members. In addition, there are higher numbers of lone parent households which indicates a need to assist carers by providing services such as childcare. Programmes such as 'Troubled Families' look at barriers for carers wanting to enter the labour market and help families to connect with services that can help them to access employment opportunities. 'Shepway Youth Hub' provides support to children in a way that makes it easier for adults to enter or return to employment. The 'Folkestone Early Years' Children's Centre' supports young families to help adults get to work or back to work. Citizen Advice runs a programme called 'Advice Works' which helps to assist people to manage the transition into work. The move from unemployment into work can cause a range of new challenges as unemployment benefits cease, pay periods change and the work benefits take time to be processed and awarded. Ensuring that people are assisted to manage the transition into work prevents them from being left 'stranded' with no or reduced money, debt and a lack of knowledge of their rights and entitlements.
- **Job brokerage schemes** could provide more intensive support than current services provided through Job Centre Plus. There is also scope to extend programmes such as those run by 'Tomorrow's People' which is not currently operational in Folkestone. One of its key success factors in helping to place people in employment is to provide a facilitator who can help employers to take on individuals who have struggled to access employment previously. This

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model has been noted by the SELEP as a good example of additional support for employers to help provide jobs for people who are disadvantaged and in vulnerable circumstances. Mentoring or peer support initiatives might also be included as means to assist unemployed people within these programmes.

Action 2 could also include measures to help employers with staff recruitment and retention – especially where employees are drawn from the CLLD area. With lower housing costs, the CLLD area is more affordable than other parts of Shepway for younger people and these individuals tend to be especially mobile.

In view of SAGA having offices in both the Folkestone and the Hastings CLLD areas, there is discussion of a potential joint project to help the company to address their staff recruitment needs in Folkestone and their staff retention issues in Hastings.

### **Action 3: Emotional and physical well-being services to transition people into work**

**Aim:** improving emotional and physical wellbeing, as well as mental health, has been identified through the consultations as an important priority and an important part of a pathway back to work for many of the residents in the CLLD area. The aim of this action is to improve the well-being of people so they are better able to take advantage of job opportunities/training/volunteering, etc.

**Target group:** the target group for this action is wide ranging and would include assisting people at risk of developing mental health issues or who are already suffering from them, people with disabilities, those with substance abuse problems and those groups identified as needing special assistance.

**Types of interventions:** a number of interventions are run by organisations in Folkestone which are aimed at targeting the emotional well-being and mental health of various segments of the population. The CLLD programme will aim to strengthen those existing initiatives that facilitate access to employment which are working well and face limited resources, as well new and innovative stand-alone programmes.

- **Support to reduce substance abuse** has been identified as a provision gap in Folkestone and it poses a significant barrier to accessing employment for some residents of the CLLD area. The 'Volunteer Centre Shepway' programme has recently completed a very successful mentorship and peer support programme for this group. Mentors work with people who are using or have recently stopped using substances to get into employment.
- **Support for people with emotional and mental health issues and helping them to access work** is another area of intervention. There are high numbers of people who have mental or learning disabilities and are dependent on carers. The Rainbow Centre supports individuals by preparing them for independent living and by providing accommodation support. For children who have a parent that has left the family, the Rainbow Centre provides a supervised contact point which enables children to stay in touch with their parents. This supports emotional stability and reduces chances of those children developing problems that could reduce their employability, while at the same time making it easier for parents to live more normal lives and get jobs.
- **Physical health issues** also need to be addressed in the CLLD area. Physical and sporting activities are particularly important in this area given the high rates of chronic disease. There are also important links between physical and mental well-being. There is significant scope to expand what is on offer in the CLLD target area. In addition to promoting a healthy lifestyle, sporting activities can help to build soft skills, such as teamwork, perseverance and organisational skills which are essential in the workplace. Both Folkestone Mind and Shepway

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Sports Trust promote these activities and this could also help maximise the value of the Urban Sports Park which is set for completion in the second half of 2017. Services and activities provided under this intervention should build on NHS schemes (e.g. in relation to healthy eating) and be used as an opportunity to develop new innovative approaches to tackling the issues.

- **Shepway Citizens Advice** envisages a new project (Advice Works Project) to help the move into jobs. The move from unemployment into work can cause a range of different problems and ensuring that people are advised and assisted to manage the transition into work is often necessary to ensure the long term sustainability of individuals in jobs. The project will therefore support people to gain, increase and sustain employment through 1-2-1 advice and assistance which covers the full range of issues people can face when they begin work or increase their hours. Delivery would be multi-channel including face to face, telephone and email via dedicated caseworkers with support from volunteers.

There are some existing initiatives that are working well that the CLLD Programme could support. For example, 'Folkestone Mind', the main provider of community mental health in Folkestone, provides a wide range of programmes aimed at creating an environment in which people can deal with mental distress. These include arts and crafts, indoor sports, gardening and photography and also person-centred planning to support making positive life changes. Folkestone Mind also collaborates with MCCH Folkestone to support people who have or are recovery from mental health issues to get back into work, voluntary work, training or educational opportunities and there is scope to develop this programme further.

Throughout the consultations for the strategy it has been emphasised that some of the problems in the intervention area are so deep-seated that they need to be tackled before young people leave school. Likewise, it has been argued that a holistic approach is often needed to tackling wellbeing issues that can encompass whole families and not just individual family members. Both these approaches are needed to provide effective pathways to enable those that are furthest from the labour market to ultimately access employment.

### **Action 4: Promoting financial wellbeing**

**Aim:** the aim of this action is to help people to manage their personal finances in a more effective way. This is often a key to improved employment prospects and a better quality of life. Indebtedness lies at the root of many social, personal health and wellbeing challenges for residents in the CLLD area.

**Target group:** this action should target people who are in financial difficulties or at risk of indebtedness and could include benefit claimants. Feedback from the consultations indicates that previously unemployed people who enter the job market often struggle to deal with their personal finances and to manage their own budgets, particularly to cover the cost of housing and bills which were previously included in benefits when they were out of employment. This can act as a disincentive to gaining employment. There are already a number of initiatives that are active in the CLLD area in this field including Action for Children, B48s, Christians Against Poverty, the Citizens Advice Bureau, Porchlight, the Rainbow Centre, the Samaritans, Shepway Foodbank, the Salvation Army and the Shaw Trust. Each of these works effectively in its own specialist area and is staffed by a mixture of paid professionals, and volunteers.

**Types of intervention:** local charities have indicated that the number of people and families in need that could be effectively helped to reduce indebtedness could be significantly increased if a "Debt Crisis Hub" (DCH) is established in Folkestone. The DCH would direct families in need to the most

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appropriate services. This would improve the service for individuals and reduce the time that individual charities have to spend in assessing the needs of clients that are subsequently directed to other organisations better equipped to help them. Part of this service might also include a peer and general support network to facilitate a transition from reliance on welfare benefits to employment.

The Rotary Club is working to secure funding to establish a “Debt Crisis Hub” which could be supported through the CLLD Programme.<sup>29</sup> It is envisaged that the Citizens Advice Bureau would act as the lead charity and operate the Debt Crisis Hub. An App is also proposed to allow clients using mobile devices to make direct contact through the hub with agencies that could potentially help them. The aim would be to create pathways for people to get out of their current situation and into employment, rather than dealing with indebtedness as a single crisis situation. The added value of the CLLD programme is that it could make the resources available for this initiative to go ahead on a scale that would have a more significant impact on residents in the intervention area.

### 4.3 Objective 2 - Promoting local business and social enterprise

The second objective is aimed at strengthening the economy of the CLLD area, helping the businesses in the area to grow, thereby creating new employment opportunities for local residents.

As shown in the baseline assessment, the Shepway area has a relatively low rate of business start-ups and lower rate of business survivals. Feedback from the business survey, undertaken as part of the consultations for this strategy, also indicates that two thirds (67%) of local businesses do not see the CLLD area as a favourable environment for business and a slightly higher percentage (69%) have encountered difficulties recruiting people with the right skills, attitudes and experience from the local area.

Objective 2 will focus on measures to encourage local businesses to grow and promote social enterprise, in particular. Social enterprises often provide a suitable route into employment for people from disadvantaged communities by giving them the work experience and confidence to apply for jobs. In a Folkestone context, the focus on social enterprise is an innovative way of promoting community-led development. This also applies to the idea (Action 7) of creating a DIY space. Although such facilities exist elsewhere, this would be new to the CLLD area.

Objective 2 actions would be mainly ERDF-funded and for the whole of the CLLD area.

**Table 4.2: Summary – Objective 2 Target Groups and Actions**

<b>Promoting local business and social enterprise</b>	
<b>Aim</b>	Facilitate the creation and development of SME businesses, start-ups and entrepreneurship
<b>Target</b>	<ul style="list-style-type: none"> <li>• SMEs, particularly social enterprises</li> <li>• Potential Start-ups/Entrepreneurs</li> </ul>
<b>Actions</b>	<p><b>Action 5: Promotion of social enterprise</b></p> <ul style="list-style-type: none"> <li>• Business support activities</li> <li>• Interventions to enable procurement and subcontracting of social enterprises</li> <li>• The development of a social enterprise aspect to existing services</li> </ul> <p><b>Action 6: Support for business start-ups</b></p> <ul style="list-style-type: none"> <li>• Entrepreneur mentorship</li> </ul>

<sup>29</sup> International Sponsors include the Rotary Club of Cologne, and the local host would be the Rotary Club of Folkestone. The Rotary Clubs of Lille and Liege, as members of the Quadrangulaire are also involved.

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	<ul style="list-style-type: none"> <li>• Free workshops and events</li> <li>• Business support services</li> <li>• Financial support for SMEs</li> </ul> <b>Action 7: 'DIY space' and/or incubation facilities</b>
<b>Link to SWOT</b>	<p>The proposed actions and interventions address the following elements of the SWOT</p> <ul style="list-style-type: none"> <li>• S2, S3, S4, W1, W2, W3, W5, W7, W8, W9, T1, O6</li> </ul>
<b>Indicative outputs</b>	<ul style="list-style-type: none"> <li>• Number of enterprises receiving support</li> <li>• Number of new enterprises receiving support</li> <li>• Number of potential entrepreneurs assisted to be 'enterprise-ready'</li> </ul>
<b>EU funding</b>	ERDF

### **Action 5: Promotion of social enterprise**

**Aim:** the aim of this action is to support existing and new social enterprises in the CLLD area to help them develop and scale up their activities. A social enterprise combines entrepreneurial activity with a social purpose.

**Target group:** the target group for this action is entrepreneurs with social enterprise ideas, charities and businesses wanting to develop a social enterprise aspect to their work, as well as existing social enterprises. Such undertakings often provide a particularly suitable route into employment for young people and those out of work.

**Types of intervention:** interventions for new and existing social enterprises that could be further developed with CLLD programme support include:

- **Business support activities** in the form of mentorship, advice, and services to help entrepreneurs create a social enterprise, as well as to professionalise the offerings of current social enterprises that are ultimately still businesses albeit 'not-only-for-profit'. Assistance should also be provided to help social enterprises to help quantify their social value at the same time as developing their services and products to meet business needs. Business support could include incubation facilities with support programmes specifically for social enterprise start-ups (see Action 7).
- **Interventions to enable procurement and subcontracting involving social enterprises** is another way that these businesses might be supported to meet a market need and social goals. Sustainable procurement practices by the public sector might enable social enterprises to provide services as part of a larger contract and thus build their service and product while also addressing a social need.
- **The development of a social enterprise aspect of an already existing service** is also a way that social entrepreneurship might be supported. There is some scope for social enterprise in organisations that provide fee-based services for which there can be a profit margin, for example childcare services. This may be part of their core work or simply the social enterprise with which to supplement their core activities.<sup>30</sup> In addition, the involvement of service users in service provision as a form of job creation may also be an option. This is done in Sure Start Folkestone where mothers who attend are employed to provide child care services.

<sup>30</sup> See [http://www.ncb.org.uk/media/43170/vcssocial\\_enterprise\\_approaches.pdf](http://www.ncb.org.uk/media/43170/vcssocial_enterprise_approaches.pdf)

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A further example of a potential social enterprise initiative that was mentioned during the consultation is help to migrant communities to organise events involving local communities, for example open days or fairs, during which they present their culture (e.g. folk dancing) and invite the public to participate by helping to organise the activities. These could evolve into small businesses supplying food, clothing, etc, to the local community which could, in turn, also help create a more inclusive and cohesive community, as well as generating job opportunities. The Ghurkha community in Folkestone provides an example of how this sort of activity can have positive social and economic impacts that extend into the community as a whole.

The Creative sector provides a significant opportunity for Folkestone, as entrepreneurs drive a 'new way of thinking' about business. Several organisations in this sector have already branched out to meet social needs in the community. For instance, 'Growth Rings' based in Romney Marsh employs people who have been in trouble with the law, suffered from addiction or who are long-term unemployed with few employment prospects<sup>31</sup>. Growth Rings make oak flooring, furniture and home wares and provide skills development opportunities for previously unemployed people. This type of business could be encouraged to develop in the Folkestone CLLD area. A further example is provided by Oh Crumbs, a business already based in East Folkestone within the CLLD area. This currently provides work placement opportunities for around 12 young people in catering. These existing schemes have the capacity to be expanded upon and serve as examples of best practise within the area and offer potential mentoring for new social enterprises start-ups

### **Action 6: Support for self-employment and business start-ups in CLLD area**

**Aim:** to encourage self employment and new business start-ups in the CLLD area, particularly amongst residents, by encouraging entrepreneurship and providing business support.

**Target group:** the target group for this activity is potential entrepreneurs and existing small businesses, particularly those that seek to provide opportunities or employ residents in the CLLD area.

**Types of intervention:** the types of projects under this action could include providing space for entrepreneurs, training workshops, volunteer mentoring schemes and funding for small equipment grants to support new business ideas. The aim would be to help existing and new schemes to focus more intensely on the CLLD area, by boosting their resources for targeted beneficiaries, as well as introducing new innovative schemes. The following intervention types have been identified:

- **Entrepreneur mentorship** by business people is one means to help an entrepreneur develop their business idea. The Kent Foundation work with volunteers who mentor potential entrepreneurs to develop their ideas into viable businesses. Although there are some volunteers from the Folkestone area, they struggle to find potential entrepreneurs and hence have called for awareness-raising activities to their market services and to inform people of the services available to them.
- **Free workshops and events** are means to assist entrepreneurs, market support programmes and assist in networking to build supply chains. These types of initiatives might also link entrepreneurs to other services available for business such as the business loan and equity scheme (e.g. Expansion East Kent which has to date provided £35 million in financial assistance in Kent).

<sup>31</sup> <http://www.growthrings.net/>

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- **Business support services** include training, advice, space, signposting, and help for specific groups (e.g. gaining access to computers where childcare is available). An example of these types of services is provided by JPW Business Solutions which provides entrepreneurs with practical support on how to establish a business. The Workshop on Tontine Street also provides flexible space and collaborative support to help self-employed people or small businesses working from home to relocate to larger premises (desk space and small offices with IT and telecoms infrastructure).
- **Funding or grant support for SMEs** to enable SMEs to provide better paid/higher value job opportunities could be provided through this action. This might involve capital investment or support to access premises. The Business Survey indicated that poor access to funding is a major problem for businesses in the CLLD area. Funding or grants could be allocated for small projects or initiatives that show the potential to grow businesses, test innovative approaches or promote employment. One such example is a proposal to support a local business that designs and manufactures unmanned ground vehicles (UGVs). A new test track for a First Responder UGV would enable them to rigorously test it over all kinds of obstacles and internally certify the UGV against internationally recognised standards, hence improving the company's ability to win more tenders.

An example of a new initiative in this field that could fall within the scope of the CLLD Programme is Finance Folkestone, which includes amongst other elements, the idea of creating a Youth Fund by raising £100,000 through public subscription by the end of 2018. The purpose of the Fund would be to contribute to the financing of young people in particular, by: (i) providing uncollateralised monthly renewable short term liquidity; (ii) advancing uncollateralised fixed term loans for 1-5 years; (iii) Investing through shares; and (iv) making grants.

### **Action 7: 'DIY' Space and/or business incubation facilities**

A DIY hub might create a space in the CLLD area for events and activities that are linked to the Creative sector and focus on engaging people in the CLLD area. The target group would be individuals, new start-ups and existing businesses that are or could become engaged in Creative sector activities. The Creative Quarter of Folkestone currently provides a range of premises (apartments, retail premises, studios) in the Harbour area that are suitable for artists' studios and creative businesses generally. However, there is no large space available in the wider East Folkestone area that is suitable as a venue for larger-scale events, or which can be used as a drop-in space or space for informal networking and business activities to encourage residents from the CLLD area to get more engaged. There are several models elsewhere (e.g. London) which provide a flexible 'DIY' type of space.

A further possibility is to encourage more business incubator facilities specifically for social enterprises and/or businesses generally in the CLLD area. There are already a number of shared workspace facilities in Folkestone but they are mostly outside the CLLD area. Both Workshop and the Quarterhouse in the CLLD area have facilities which are currently oversubscribed. Moreover, they do not provide the 'hands-on' advisory and other support that characterises incubation systems.

The Folkestone Business Hub is proposing to develop an incubator facility offering a comprehensive range of business support services, as well as signposting to potential opportunities for raising finance to be available to tenants. The Folkestone Business Hub's premises are in the centre of Folkestone and funding through the CLLD programme could be used to develop support specifically for clients from the CLLD area (possibly using the proposed Community Hub as a 'satellite' office (see



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Action 8). If an existing facility is adapted to include an incubator-type system, this could be supported by a special programme specifically for (social) entrepreneurs from the Folkestone CLLD area (see Action 5).

### 4.4 Objective 3 - Setting up an integrated delivery mechanism for the strategy

The third objective of the Folkestone CLLD Strategy involves establishing integrated delivery mechanisms to improve the coordination and access to services within the CLLD area. The justification for this intervention comes from interviews and focus groups which highlighted the need for better coordination of activities and interventions and to ensure open communication, synergies and collaboration.

This strand of the CLLD programme would be ERDF funded.

<b>Aim</b>	Develop a central networked Community Hub to facilitate the delivery of integrated programming and services
<b>Focus</b>	Infrastructure to service users
<b>Actions</b>	Action 8: The Community Hub
<b>Link to SWOT</b>	The proposed actions and interventions address the following elements of the SWOT <ul style="list-style-type: none"> <li>• W12, T5</li> </ul>
<b>Indicative outputs</b>	<ul style="list-style-type: none"> <li>• Community Hub developed</li> <li>• Number of programmes running</li> <li>• Number of beneficiaries and hours of usage</li> <li>• Children in child care facilities</li> </ul>
<b>Delivering objectives</b>	ERDF and ESF

#### **Action 8: The Community Hub**

Feedback obtained from the community consultation for the CLLD Strategy highlighted a lack of coordination with regard to existing schemes and a key idea that emerged to address this was to establish a Community Hub within the CLLD target area. This would offer a physical presence in the area to provide local residents with a place where they can seek support and give them maximum access to the services they need. It is envisaged that an existing building/venue would be used for this hub and a number of potential options have been identified that might be suitable with some adaptations. (e.g. Sunflower House).

While the Community Hub would be a physical entity, this could also have a virtual dimension in order to help ensure that younger residents, who are more comfortable with electronic means of communication, can also easily access services.

**Aim:** the aim of this action is to provide a highly visible point from which to integrate programmes and provide coordinated services to people in the CLLD area. The Community Hub would bring together both the support providers and beneficiaries in the CLLD area. It might have a small staff, such as those involved in the management and administration of the CLLD programme that would manage the hub and provide an outreach service designed to proactively target potential beneficiaries in the area. The virtual dimension would consist of a website with details of programmes, events, etc. of potential interest to people living in the targeted LSOAs.

**Types of interventions:** some of the projects arising from Objective 1 and 2 actions could be coordinated from the Community Hub and the Local Action Group could use the Hub to hold meetings and involve the community in its proceedings. The hub will act as a coordinating and

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signposting point for delivery for employment (and pre-employment) services, as well as business start-up and support services and these might include:

### Community Hub – Key Functions

- A **triage service** within the hub to identify what services might be appropriate for residents seeking support. This would be proactively promoted by the hub team who would go out into the community to meet people who might benefit from the CLLD programme and help develop new initiatives to meet their needs with them.
- **Training, awareness raising activities** (meetings, website, publicity, etc) and signposting to available services. For example, there might be leaflets about the Green Gym, or Folkestone Mind's activities or cultural and sporting events.
- **Help to develop employability** including CV writing and presentation skills.
- **Provision of resources** such as computers and printers, internet, legal advice, dealing with indebtedness (the proposed debt crisis service could be based in the Community Hub or accessed from there) and childcare facilities.
- **Business support** including: free advice and awareness raising activities; signposting KCC services such as Growth Hub, Expansion East Kent (loans for businesses); and networking events. If there is enough space, the Community Hub could also house the proposed business incubator.
- **Coordination of voluntary sector activities** in the CLLD area (charity and volunteer group meetings, information about services, space for meetings, case management and referral).
- **Case management for family liaison officers** such as those from Troubled Families programme, employer facing liaisons (evidence from Tomorrow's People suggest that sometimes employers need assistance when they take on apprentices, people that have not worked, etc.).
- **DIY space for exhibitions and events** (e.g. for social enterprises, creative activities).

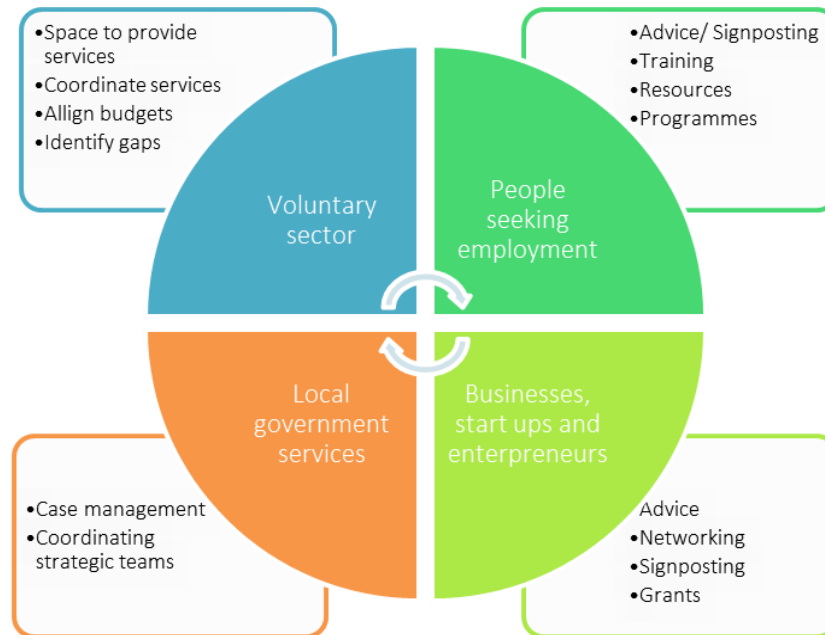
A Community Hub could be the coordinating point for strategic work such as: the Folkestone Coastal Plan; Destination management Plan; LEADER; the Town Team (retail development) and for groups such as the Folkestone Employment and Skills Forum. The hub could also be a point to coordinate activities involving the voluntary sector, private sector, charities and the public sector, to share priorities, budgets and identify gaps in provision of services and potential projects.

The Community Hub could include some income generating activities (e.g. a coffee shop and meeting room or hall for hire) which could be used to provide employment for some of the service users. This would help to ensure the long term sustainability of the hub beyond the available funding from the CLLD Programme. The potential functions of hub are summarised below:

# Description of the Strategy

## 4

**Figure 4.1: Community Hub Structure**



An option (particularly if funding for physical infrastructure is limited) for identifying suitable premises for the Community Hub would be for it to be based in an existing community centre (e.g. Sunflower House) or an empty building with sufficient space that could be renovated and converted for use. An alternative option could be for a 'pop up' Community Hub in existing venues (that could for example include a pub or a community centre, school or college).

Several possible buildings have been highlighted through the consultations, including St Saviours Church (which has been empty since 2014) and the parish hall belonging to 'Our Lady Help of Christians' Church where there are plans for major refurbishment that could make it suitable.<sup>32</sup>

<sup>32</sup> The hall is already being used on a weekly basis for a food bank, and as part of a winter shelter scheme for the homeless. Located in Folkestone Central Ward, the hall is comprised of three separate meeting spaces that when refurbished will accommodate up to 100 people with a spacious modern kitchen and facilities for the disabled. A comprehensive buildings' feasibility study funded by a Big Lottery 'Awards for All' grant has just been undertaken, and the estimated budget for the works is circa £540,000.

# Alignment with Other Strategies 5

***This section sets out the alignment of the CLLD Strategy with the various other strategies relevant for the area in order to ensure consistency, complementarity and synergy. The interventions and organisations working in the area have been mapped in Appendix B.***

## 5.1 Folkestone Coastal Community Team Economic Plan

In December 2015, Folkestone Coastal Community Team (CCT) submitted its Economic Plan which sets out the aspiration for economic growth and provides the strategic context for bids to the Coastal Community Fund delivered by Big Lottery Fund on behalf of UK Government.<sup>33</sup> The aim of the Plan is to *“Create the economic conditions to ensure the self-sustaining renaissance of Folkestone as a vibrant destination and creative environment, generating confidence for business and quality jobs for all”*. This is to be achieved through the objectives of:

- Promoting the Town’s considerable existing assets.
- Supporting current strategic initiatives to ensure they deliver their full potential.
- Building a sense of place and civic pride.
- Being a recognised partnership for the development of our town.
- Concentrating on growing jobs, skills and business opportunities in identified key sectors.
- Supporting access to funding to make designated projects happen.

The CLLD Strategy is aligned strategically with the Coastal Communities Team Economic Plan, and although its focus is broader and the intervention area wider, the alignment of these two enables the potential co-funding of projects that achieves the aims of both strategies. Some of the initiatives identified in the CCT Economic Plan have been included in a recent bid for Coastal Community Fund round 4 and, if successful, could provide a source of match funding for some of the initiatives relevant to the CLLD Strategy.

A number of the members of the Folkestone CCT are representatives on the CLLD Local Action Group, in order to ensure the continued alignment of these strategies and their associated projects and funding streams.

## 5.2 Shepway Corporate Plan 2013 2018

This plan<sup>34</sup> sets out Shepway District Council’s long-term vision for improving the lives of all those who live and work in the district. It sets out a vision for Shepway: *“Prosperous and ambitious - Working for more jobs and homes in an attractive district”*

The Council’s five strategic objectives are:

- Boost the local economy and increase job opportunities;
- More homes;
- Listening to local people;
- Support an attractive and vibrant place to live;

<sup>33</sup> See <https://www.biglotteryfund.org.uk/ccf>

<sup>34</sup> See [http://www.shepway.gov.uk/media/1527/Corporate-Plan-2013-18/pdf/Corporate\\_Plan\\_2013-18.pdf](http://www.shepway.gov.uk/media/1527/Corporate-Plan-2013-18/pdf/Corporate_Plan_2013-18.pdf)

# Alignment with Other Strategies 5

- Deliver value for money.

The CLLD Strategy is closely aligned with objective 1 in that it aims to build social and economic cohesion through supporting the development of a sustainable and vibrant local economy. In addition, the development of the CLLD Strategy has relied on community engagement and hence it gives effect to Objective 3, listening to local people.

Shepway District Council is represented on the LAG and will be the Accountable Body for the CLLD programme. It is a key player in ensuring alignment between the Corporate Plan and the CLLD Programme.

## 5.3 Shepway District Council Economic Development Strategy 2015-2020

The SDC Economic Development Strategy (EDS) sets out the district's plan to "Boost the local economy and increase job opportunities" through the development of an environmentally sustainable and vibrant local economy. The EDS 2015-2020 identifies four priorities:

- Building on our current and emerging economic strengths.
- Boosting productivity and supporting business growth.
- Promoting further investment by maximising the value of our assets and stimulating confidence.
- Improving education and skills attainment.

The CLLD Strategy has been developed with due regard to this strategy and gives effect to priority 2 and 4 by focusing on supporting business and helping people into employment in the intervention area. The localised nature of the CLLD Programme will enable a bottom-up implementation of the EDS priorities.

The Shepway Economic Development Team has led on the development of the CLLD Programme and will be represented on the LAG. Many SDC officers have been interviewed and their views considered in the development of the strategy. This has ensured that there is alignment between the vision set out by SDC, the CLLD Strategy and its implementation

## 5.4 Kent County Council's Strategic Statement 2015 – 2020

This plan<sup>35</sup> sets out Kent's Vision and focus on "*improving lives by ensuring every pound spent in Kent is delivering better outcomes for Kent's residents, communities and businesses*". It is centred on delivering 3 strategic outcomes:

- Children and young people in Kent get the best start in life.
- Kent communities feel the benefits of economic growth by being in-work, healthy and enjoying a good quality of life.
- Older and vulnerable residents are safe and supported with choices to live independently.

These strategic outcomes are underpinned by Supporting Outcomes. Those relevant for the CLLD Strategy are:

<sup>35</sup> See [https://www.kent.gov.uk/data/assets/pdf\\_file/0005/29786/Kent-County-Council-Strategic-Statement.pdf](https://www.kent.gov.uk/data/assets/pdf_file/0005/29786/Kent-County-Council-Strategic-Statement.pdf)

# Alignment with Other Strategies 5

- Kent young people are confident and ambitious with choices and access to work, education and training opportunities.
- Physical and mental health is improved by supporting people to take more responsibility for their own health and wellbeing.
- Kent business growth is supported by having access to a well skilled local workforce with improved transport, broadband and necessary infrastructure.
- All Kent's communities benefit from economic growth and lower levels of deprivation

Kent County Council is represented on the LAG and their inputs have been used to develop the CLLD Strategy and ensure strategic alignment.

## 5.5 Vision for Kent: 2012-2022

The Vision for Kent<sup>36</sup> is a countywide strategy for the social, economic and environmental wellbeing of Kent's communities. Leaders of Kent's 14 Local Authorities came together as the Kent Forum in 2011 to set out the priorities for the county. Vision for Kent 2012-2022 is written around 3 big ambitions for Kent:

- **Grow the economy:** This means supporting businesses to be successful, improving skills and career aspirations, providing apprenticeships and training opportunities, and improving Kent's infrastructure to support business, such as good transport and high-speed broadband.
- **Tackle disadvantage:** This means a good quality of life for everyone - helping unemployed people get back into work, encouraging Kent's young people to make the most of opportunities to learn and prepare for their future, and providing choice and quality in health and social care and housing.
- **Put the citizen in control:** This means involving people in making decisions, working with them to design services that meet their needs and suit them, and supporting Kent's voluntary and community sector to do even more to improve the lives of people in Kent.

The CLLD Strategy gives effect to these three ambitions in the localised CLLD area. As mentioned above, the alignment of this Vision and the CLLD shall be championed by the KCC representative on the LAG.

## 5.6 SELEP Strategic Economic Plan

The South East Local Enterprise partnership (SELEP) has developed an overarching Strategic Economic Plan<sup>37</sup> and Growth Deal which sets out an ambition to generate 200,000 private sector jobs and 100,000 new homes by 2021. This will be implemented through a coordinated programme of activity to deliver growth, supported by major new public/private investment funds, and new road and rail infrastructure. The Plan identifies four key SELEP priorities:

- Building on our economic strengths;

<sup>36</sup> See [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0003/5475/Vision-for-Kent-2012-2022.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0003/5475/Vision-for-Kent-2012-2022.pdf)

<sup>37</sup> See [http://www.southeastlep.com/images/uploads/resources/SECTION\\_2\\_South\\_East\\_LEP\\_-\\_Growth\\_Deal\\_and\\_Strategic\\_Economic\\_Plan\\_WEB-2.pdf](http://www.southeastlep.com/images/uploads/resources/SECTION_2_South_East_LEP_-_Growth_Deal_and_Strategic_Economic_Plan_WEB-2.pdf)

# Alignment with Other Strategies 5

- Boosting our productivity;
- Improving our skills; and,
- Building more houses and re-building confidence.

These priorities are aligned with the national industrial strategy. The Strategy also identifies the sectors with the most growth potential. Those most aligned with the Folkestone area and the CLLD Strategy includes: Creative, cultural and media; Tourism and leisure; Social care and health; Social enterprise and NGO sector.

## 5.7 SELEP's ESIF Strategy

SELEP has also produced a European Structural and Investment Fund Strategy for the 2014-2020 European programmes<sup>38</sup> (ESIF). This supports aspects of the SEP and aims to:

- Develop workforce skills.
- Support innovation and business.
- Tackle social exclusion across the SELEP area.

This fits with the SELEP area Strategic Economic Plan and Growth Deal and identifies clear EU Structural and Investment priorities for investment.

The SELEP ESIF Strategy recognises that there are some coastal towns within the LEP area that 'face a wide range of socio-economic challenges' and are 'areas of significant disadvantage compared with the rest of the SELEP area'. Some of the issues identified include low employment rates, poor skill levels and disproportionately high proportions of adults on benefits. These are all issues which are apparent in parts of central and eastern Folkestone where the CLLD programme will operate, and the programme aims to tackle them through this community-led approach.

SELEP's ESIF Strategy also recognises that in some of the larger coastal towns, such as Folkestone, the population faces entrenched social and economic disadvantages and that there often 'exists a culture of entrenched welfare dependency that requires a comprehensive programme of intensive support in training, job creation and increased access to opportunities to overcome multiple disadvantage'. It is these types of issues that a CLLD programme for Folkestone will seek to overcome and put in place measures to address these on a long term and sustainable basis.

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<sup>38</sup> See [http://www.southeastlep.com/images/uploads/resources/SELEP\\_ESIF\\_Refresh\\_2016.pdf](http://www.southeastlep.com/images/uploads/resources/SELEP_ESIF_Refresh_2016.pdf)

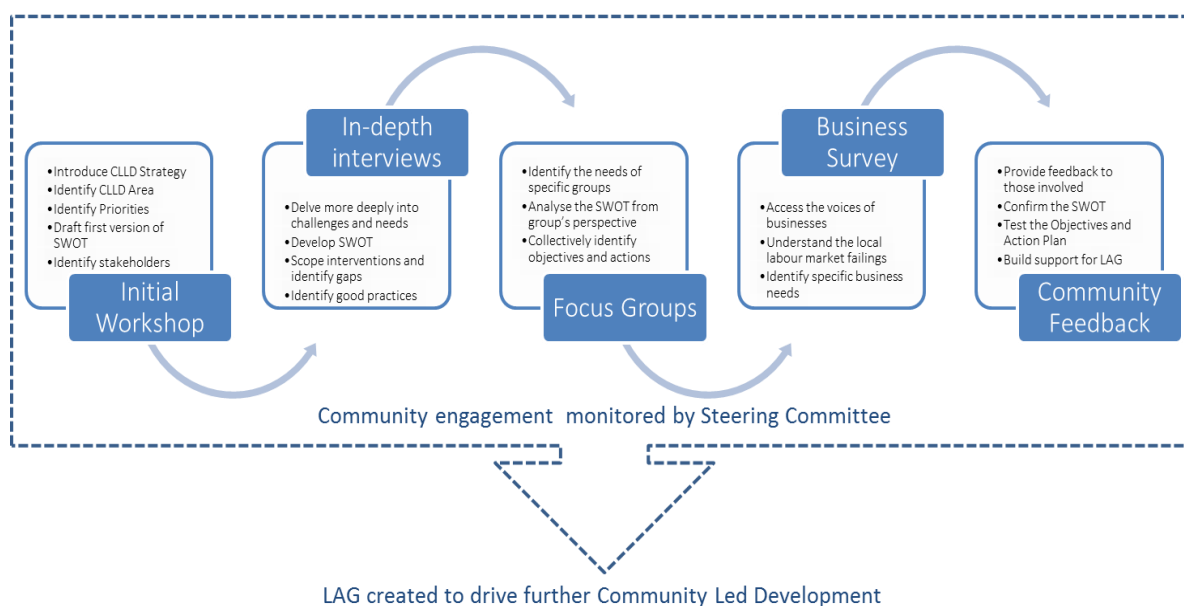
# Community Consultation Process 6

The CLLD Strategy has been developed through an inclusive 'bottom-up' approach drawing on the inputs of local leaders, local businesses, community organisations, and residents living or working in the intervention area. This section describes how this was achieved.

## 6.1 Overview of community involvement

In total, 96 people were reached through the methods indicated in the following diagram:

Figure 6.1: Overview of Community involvement process



## 6.2 Community involvement process

The community consultation and research for developing the CLLD Strategy was launched at the beginning of the period covered by the Pre-election Publicity Restrictions ('Purdah') imposed for the EU Referendum into EU membership on 23 June 2016. This severely restricted some aspects of the consultation for the CLLD programme, as no Local Government Officers and their representatives (such as consultants supporting the development of the CLLD Strategy) were able to speak about any possible European funded initiatives with members of the public during this time.

The consultation process for the CLLD Strategy was guided by a CLLD Steering Committee which also helped to identify stakeholders. The consultations were undertaken by consultants CSES and included:

**Launch workshop** - on 20 May 2016 (just prior to the commencement of Purdah), a launch workshop was held to introduce the CLLD strategy development process. Large maps were printed of the intervention area and participants were asked to identify areas of deprivation based on their own experience. It was in this workshop that participants suggested expanding the intervention area to the North East. This changed boundary was tested with the CLLD Steering Committee and in two further focus groups. The launch workshop was attended by 25 people representing businesses, local resident organisations, churches, volunteer organisations, and NGOs.



# Community Consultation Process 6

**Focus groups** – in a number of focus group meetings, including with specific groups seeking employment, entrepreneurs and businesses wanting to expand, participants were asked to identify the local needs and challenges facing communities within the CLLD area. This was the starting point for the development of a SWOT and any existing schemes that were working well, which could be further developed as part of the CLLD programme, and new initiatives that would address gaps in provision to meet need. Five focus groups were held with people from the following sectors:

- Creative and heritage sectors (representatives of other cultural sectors participated in the interview programme and two workshops).
- Organisations working in social and employment support.
- Organisations working specifically in East Folkestone in the CLLD area.
- People who have been unemployed in the long-term.

A total of 52 people were involved in the focus groups. The aim of these groups was to understand the specific challenges local residents or business sectors face, as well as help to identify specific interventions in a collaborative manner.

Some of the focus groups were specifically designed to help identify the needs and challenges of a specific group. The creative sector focus group looked specifically at activities necessary to stimulate entrepreneurship and specific interviews were held with people working in this sector to understand the interventions that were currently running, as well as needs that are not being met. The focus group with people who had been unemployed for a long period of time helped to identify the specific barriers that hindered their integration into the work force and considered specifically the interventions that might assist this group.

**Interview programme** – a total of 44 one-to-one interviews were undertaken. These also involved a specific section asking interviewees to identify local needs and challenges and interviewees were asked about community needs and challenges in a more in-depth manner than the workshop and focus groups allowed. Interviewees were selected in a number of ways:

- Recommended by the Steering Group;
- Participation at the workshops, which were promoted through social media, via the [www.Folkestone.works](http://www.Folkestone.works) website and through other local networks;
- Identified through research as representing community groups or other organisations that have an important role to play in the intervention area; and
- Recommended by others interviewed.

A full list of those interviewed and involved in focus groups is provided in Appendix C and the topic covered and questions asked are set out below

## Checklist of Key Interview Questions

CSES (Centre for Strategy & Evaluation Services) has been appointed by Shepway District Council to help develop a Folkestone Community-led Local Development Strategy.

To help develop the strategy, we would like to conduct interviews and focus groups with people from the areas the strategy is likely to cover and those involved in economic and community development in Folkestone. Below is a list of the key questions. Not all questions will be relevant to all discussions and similarly there may be other issues you wish to raise.

In answering the questions, please note that the main focus of the strategy is likely to be: (a) measures to develop skills and employability; and (b) support for entrepreneurship and small businesses that can create jobs for people in the targeted areas.

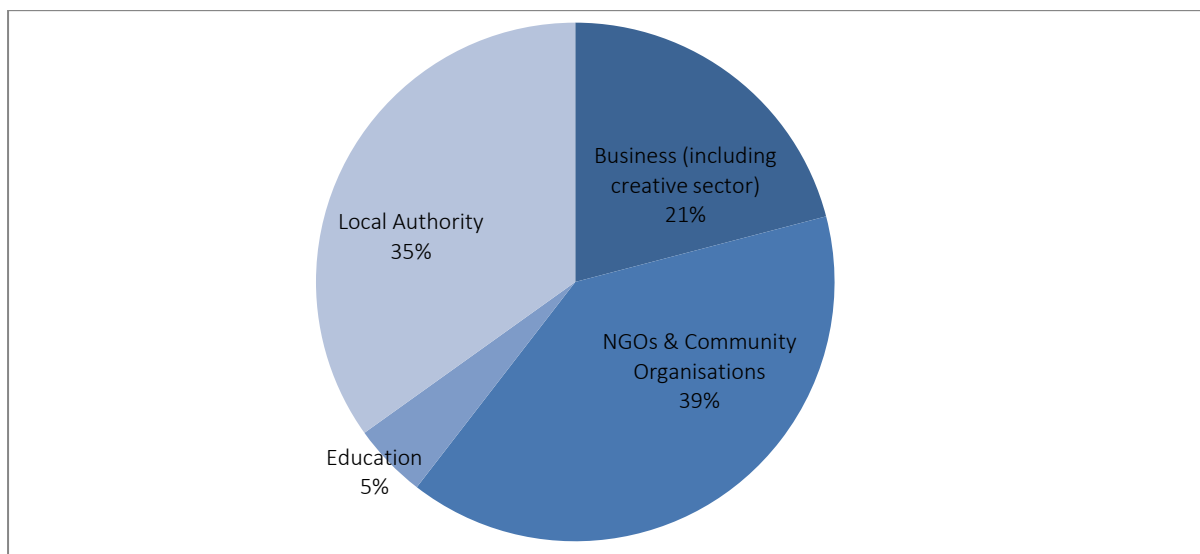
# Community Consultation Process 6

*Key Questions*

1. What do you see as being the **most important issues** that need to be tackled through the Community-led Local Development Strategy?
2. What sort of **existing schemes** are available in the area to tackle these (and other) issues and how effective are they on the ground? What are the strengths and weaknesses?
3. What should the priorities of the **Community-led Local Development Strategy** be in seeking to build on existing efforts to help local communities?
4. What should be the **main target groups** of the strategy in terms of: (a) geographical areas; (b) demographic characteristics; other factors?
5. What sort of **delivery mechanisms** should be used to implement the Community-led Local Development Strategy?
6. Are there any **other points** that should be taken into account in the Folkestone Community-led Local Development Strategy?

The sectors represented by those interviewed are shown below:

**Figure 6.2: sectors represented by interviewees**



Almost 40% of the interviews were conducted with representatives from NGOs or community groups, which included the sport sector, youth organisation, advice, churches, volunteer organisations, children’s organisations, business support, homeless support, employment support and neighbourhood groups and collaborations.

A further 35% of the interviewees involved local government and organisations that work directly with the community (e.g. community officers) and those who work with the LEADER programme and businesses in the area. However, we identified a need for more information from the private sector and hence a business survey was conducted.

**Business Survey** - a survey was sent to over 400 businesses operating in the CLLD area from as comprehensive list as possible, drawing on different databases available to Shepway District Council.

# Community Consultation Process 6

The aim was to better understand the challenges facing local businesses and the questions posed in the business survey are shown below. A total of 16 responses were received.

## Folkestone CLLD Business Survey Questions

- Q1. Is your business based in the East Folkestone area?
- Q2. How many people do you employ at the site in Folkestone?
- Q3. Do you employ people from the Broadmead, Central, East or Harbour areas of Folkestone?
- Q4. If yes, approximately what percentage of your employees comes from these areas?
- Q5. In your opinion, does the area where you are based provide a favourable environment for businesses?
- Q6. Have you encountered any difficulties recruiting people with the right skills, attitudes and experience from the local area?
- Q7. Which factors (apart from local skills) in the local area are barriers to your business's growth prospects? Please tick the boxes that are important to you
- Q8. Do you provide work experience placements or apprenticeships for young people?
- Q9. What support (if any) is needed to help new businesses and support the growth of existing businesses?
- Q10. Please use the space below for any other comments that you think might help us develop/ implement the Folkestone Community-led Local Development Strategy
- Q11. Do you want to be added to Shepway District Council's contact list to receive future information about the project?

**Final workshop** – those who participated in the launch workshop and other consultees (the steering group, those involved in the focus groups and interviews) were invited to participate in the final workshop to discuss key elements of the CLLD Strategy. The objectives and actions of this strategy were presented and a discussion followed. The workshop took place on 15 July 2016 and was attended by 27 people. The comments from the workshop were incorporated into the draft strategy which was then shared with the Steering Committee and then distributed to the wider community for feedback and suggestions before the strategy was finalised.

# Programme Governance Arrangements

In this section we set out arrangements for the governance and management of the Folkestone CLLD programme, including the details of the key bodies and their responsibilities in the programme.

## 7.1 Programme Governance

The development of the CLLD Strategy has been guided and supported by a CLLD Steering Committee that was established in April 2016 by Shepway District Council, which was the applicant for the Expression of Interest in the programme application process.

The Steering Committee comprised members and representatives of the local community in Folkestone who have the knowledge and experience of local issues that the programme will seek to address. This group has met regularly through the development of the strategy and has been important in advising consultants, CSES, on the consultation process (see Section 6) and the key themes of the strategy and in establishing the governance and management arrangements for the programme. This Committee evolved into the Local Action Group (LAG), with additional members added to the ranks, as a result of the wider consultation and call for additional LAG members.

In broad terms, the governance arrangements for the Folkestone CLLD Programme is similar to those adopted for the LEADER<sup>39</sup> programme and will comprise three elements: the Local Action Group (LAG); a Community Consultation Network Forum (CCNF); and the Accountable Body (AB). Of these elements, only the Accountable Body has legal status and the others, including the Local Action Group (LAG) are informal partnerships.

## 7.2 Local Action Group

The overarching role of the Local Action Group (LAG) is to:

- *Agree the Folkestone CLLD Programme Strategy.* This was endorsed at the first meeting of the LAG on 24 August 2016.
- *Implement and deliver an effective Folkestone CLLD Programme.* The LAG will oversee the programme to ensure that the required outputs are delivered and that it meets the expectations of the local community, the Managing Authorities and ultimately the European Commission. The programme is expected to commence April 2017, if there is successful completion of Stage 2 of the programme application process.

The Local Action Group is responsible for recommending an effective and robust process for project calls, selection and appraisal to the Accountable Body. This function will be delegated to CLLD Programme Staff or other suitably trained individuals involved in the programme, potentially including those in other SELEP CLLD programmes such as at Hastings and in Thurrock. The broad process to be adopted is outlined in Section 8.

The Local Action Group will receive Programme Staff recommendations on project applications and will be responsible for making decisions and funding recommendations to the Accountable Body. It will ensure that the projects selected for funding: contribute to CLLD strategy objectives; align with ESF and ERDF priorities; represent good value for money in terms of the expectations of the

<sup>39</sup> With thanks to Huw Jarvis, Kent County Council's LEADER guru

# Programme Governance Arrangements

programme; and make a positive contribution to the ERDF or ESF cross cutting themes of gender, equality and non-discrimination and sustainable development.

Regular financial reports on the progress of the programme and project output and activity reports will be presented by Programme Staff to the Local Action Group and it will make any required adjustments to the projects and programme in response. The Local Action Group will also oversee and receive an evaluation of the strategy and programme of activity at the midpoint of the programme and at the end.

Although CLLD Programme Staff will be employed by the Accountable Body, the Local Action Group will be consulted over the terms of the appointments that are made.

The Local Action Group will oversee the promotion of the programme and will make recommendations on this to the Accountable Body.

The detailed Terms of Reference and Code of Conduct and Declaration of Interest are in Appendix D.

Although at this stage it is unclear whether a national or regional network of CLLD Programmes will be established (as there is for the Leader Programme), but if so, then the Local Action Group will ensure that the Folkestone CLLD Programme plays a full role.

## 7.2.1 Membership of the LAG

Measures have been taken at the outset to ensure that the Local Action Group is representative of the area's private, public and third sector organisations and that it is representative, as far as possible, in terms of age and gender. Particular attention has been paid ensuring that:

- Public sector members or any single interest group will not have more than 49% of the voting rights during decision-making;
- At least 50% of members with project voting rights come from the non-public sector partners;
- There is a gender balance and have a fair representation of the population of the CLLD area as far as possible;
- At least 50% of votes in an individual selection decision are cast by non-public members; and
- LAG members have the necessary skills and experience to oversee the CLLD programme, including expertise on aspects such as sustainable development.

Membership of the LAG comprises 16 representatives from 14 organisations, of which three are public sector, one is a forum of public sector partners, five are Charities, three are from the private sector and one is an umbrella organisation for resident associations in the East Folkestone (part of the CLLD area). Some individuals represent more than one organisation, so the breadth of organisations involved in the LAG is wider. The gender composition of LAG membership is 62.5% male and 37.5% female.

	Organisation	Representatives	Sector
1	Shepway District Council	Cllr David Monk (Leader; Folkestone Ward); Dr Katharine Harvey (Head of Economic Development; Folkestone CLLD Lead Officer)	Public

# Programme Governance Arrangements

2	Folkestone Town Council	Cllr Martin Salmon (Mayor); Jennifer Childs (Town Clerk)	Public
3	Kent County Council	Rob Hancock	Public
4	Roger De Haan Charitable Trust/ Strand House	Peter Bettley	Charity / Private
5	Folkestone Rainbow Centre	Jon Wilson	Charity
6	Citizens Trust	Martin Almand	Charity
7	Folkestone Business Hub CIC /Enterprise Foundation	Joanna Strickland	CIC – Private/ Charity
8	Folkestone Employment & Skills Forum	Zena Cooper	Public
9	East Kent College	Paul Manning	Public
10	Folkestone Rotary	Terry Cooke-Davies	Charity
11	Folkestone Mind	Michael Lake	Charity
12	East Folkestone Together	Steve Shaw	Resident Association
13	Sustainability Connections CIC	Penny Shepherd	CIC - Private
14	Samaritans	Jo Oliver	Charity

Membership of the LAG is liable to change over the course of the CLLD Programme and any LAG member who does not wish to continue will advise Programme Staff in writing. Any new proposed LAG members (which can be through self or other nomination) will be considered by the Chair and will require the agreement of a majority of existing LAG members.

All LAG members may send a substitute from their organisations to LAG meetings, as it is the organisation, rather than the individual, that is generally considered to be the representative on the LAG. If a member or a nominated substitute from an organisation represented on the LAG fails to attend three or more consecutive LAG meetings, both the individual and organisation will be excluded.

Individual LAG members have responsibility to adhere to the Code of Conduct and Declaration of Interest and will be excluded if these are not followed.

LAG members are expected to perform an active role in the CLLD programme, working in the local community to identify and bring forward projects. Members will be expected to bring forward potential projects from their own organisation and to encourage other organisations to do so, where appropriate.

LAG members are expected to promote the CLLD programme through their own organisation's channels of communication and to help signpost the local community to the support available to develop their ideas for CLLD projects. Members will be expected to encourage and foster innovation at the local level through encouraging new ways to tackle issues.

Details of the Terms of Reference for the LAG, the Code of Conduct and Declaration of Interest and Conflict of Interest Statement are in Appendix D.

# Programme Governance

## Arrangements

In making decisions about projects, LAG members are required to commit to undertaking the necessary work, so that they have a sufficient understanding of a project and to make decisions in a consistent and impartial manner.

### 7.2.2 LAG Meetings

The Local Action Group had its inaugural meeting on 24 August 2016 and details of this meeting, including the agenda, minutes of the meeting and signed attendance record sheet are in Appendix E.

Once the Folkestone CLLD programme has been confirmed, the Local Action Group will meet every seven- eight weeks with dates agreed for the following calendar year every six months.

LAG members will be required to sign the attendance register at every meeting and the minutes of all LAG meetings shall be agreed at the next regular meeting and then signed by the Chair<sup>40</sup>. Records of the minutes will be kept and made publically available on a website.

A Register of Interests will be kept for all LAG members, Programme Staff and other officers of the Accountable Body involved in any part of the Folkestone CLLD Programme. It is proposed that a request for declarations of interest will be a standing item on the Agenda at every LAG meeting, with the Chair asking if members want to add, change or remove any interests; this will serve as a reminder to LAG members.

LAG members with any direct financial, personal or organisational links to a project under discussion at a LAG meeting shall:

- Declare any Interest at the commencement of the meeting, which will be minuted.
- Take no part in the discussion or in the decision about any such project, and leave the LAG meeting for the duration at the discretion of the Chair.

Where this involves the Chair, then a Deputy Chair will be appointed for the item under discussion, using the procedures for appointing a Deputy Chair set out in the Terms of Reference.

CLLD Programme Staff appointed by the Accountable Body to manage the programme are expected to attend LAG meetings as observers and will not be assigned any decision-making powers. Programme Staff will provide the secretariat for LAG meetings and will be asked to provide advice and guidance as required.

### 7.2.3 Chair of the LAG

The role of the LAG Chair is to conduct Local Action Group meetings and act in the best interests of the LAG as a whole.

The process for electing the LAG Chair was agreed by the CLLD Steering Committee and followed prior to the Inaugural meeting of the LAG. The process involved the Shepway District Council lead officer seeking nominations for the role of the LAG Chair by email on 18 August. Four candidates were identified from this process. After discussions with the individuals, two of whom did not want to be proposed, the names of the two remaining two candidates were put forward for decision to all

<sup>40</sup> Minutes of the LAG inaugural meeting are 'draft' until the next LAG meeting where members will be asked to formally agree the minutes.

# Programme Governance Arrangements

LAG members on 23 August by email. The candidate with the highest number of nominations, Terry Cooke-Davies, was informed ahead of the inaugural LAG meeting on 24 August.

The first main item of decision at the LAG meeting on 24 August was on the process to select the LAG Chair (Appendix E, LAG meeting Agenda). This was unanimously agreed and the selected LAG member, Terry Cooke-Davies then took over as Chair for the rest of the LAG meeting (Appendix E, LAG meeting Minutes).

The maximum term of office for the Chair will be two years.

The Chair will have a second or casting vote in the case of an equality of vote in respect of any decisions taken.

The Chair will represent the LAG and will sign off records, such as the minutes of meetings, and documents on behalf of LAG where necessary.

In the event of the Chair not being able to attend a meeting, or being compromised through a conflict of interest, a Deputy Chair will be nominated from amongst the LAG members for that meeting. The Deputy Chair in this instance can be a public sector member provided that the casting vote does not result in the public sector having more than 49% of votes.

## 7.2.4 Decision-making by the LAG

Attendance of seven voting members<sup>41</sup> of the LAG, including the Chair, is required to achieve a quorum for any decisions made by the LAG.

Each member of the LAG will have one vote per member, except where an organisation is represented by more than one member; in this situation only one member can vote.

Decisions shall be determined by a simple majority of the number of votes of members present and only LAG members attending the meeting can vote. This is necessary to ensure that individual LAG members take decisions in light of a collective discussion to make sure there is a full understanding of a project. Written procedures with regard to the decision to approve or reject funding for projects from members will not be accepted.

Should CLLD Programme Staff be unable to attend a LAG meeting for any reason, their comments on a project can be considered by the LAG through written procedure.

Any decisions made by the LAG will be recorded in the minutes of the meeting, although disclosure of the full discussions on an individual project will be at the Chair's discretion.

Where urgent decisions are needed before the next LAG meeting (for example, where a project has been considered at a previous LAG meeting and a decision made in principle, but further clarification is required from the project applicant), the Chair can call a special meeting of a sub group of the LAG to formally make the decision. This sub group will comprise as a minimum the following:

- Chair;
- Accountable Body representative on the LAG;
- One other LAG member;

<sup>41</sup> Where an organisation has more than one representative at a LAG meeting, this will only count as one voting member



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- One Programme Staff member.

Any decisions recommended by the sub group shall be communicated to other Local Action Group members within 48 hours and reported to the next regular meeting of this body.

Feedback on decisions taken by the LAG will be conveyed to the project applicants by Programme Staff. While there will be no right to appeal a decision, applicants will be able to resubmit amended applications taking into account feedback from the LAG.

## 7.3 Community Consultation Network Forum

To secure wider understanding and involvement of the local community in helping to shape the CLLD Programme over the 5 years of operation, it is important to have direct and regular engagement with the community it serves to support. This will be achieved through establishing a CLLD Community Consultation Network Forum (CCNF) which is open to all residents in the most deprived part (20% decile LSOAs) of the CLLD area and local stakeholders and parties who have a genuine interest in helping to achieve the aims of the programme and are willing to contribute their time and ideas.

The forum will meet twice a year, in September and March, to receive progress reports on the programme and details of the successful project applications over the previous six months. Through debate in workshop sessions, members will contribute to the future direction of the programme, suggest ideas for promoting the achievements and successes of the programme and to provide ideas for new types of initiatives to help deliver the programme outputs.

Forum members with particular expertise may be asked to attend LAG meetings to contribute to the debate on a project application, where the Chair and LAG members feel that their knowledge or expertise would be beneficial. Those attending LAG meetings would be required to declare any Interests or Conflicts of Interest.

## 7.4 Accountable Body

Shepway District Council has agreed, in principle, to be the Accountable Body for the Folkestone CLLD Programme (Appendix F Letter of agreement).

The Accountable Body will be responsible for:

- Submission of the stage 2 funding applications for ERDF and ESF support for the CLLD programme.
- Signing the Funding Agreements with the Managing Authorities.
- Achievement of the programme outputs through delivery of the programme.

The role of the Accountable Body is to support the Local Action Group through the appointment of Programme Staff who will be employed by Shepway District Council to work directly and indirectly with the Local Action Group.

Day to day management of Programme Staff will be provided by Shepway District Council and, where appointed on a full time basis, will be line managed by the council's Head of Economic Development. For other staff appointed to undertake roles on a part time basis (such as officers in the Finance, Legal and Communications teams), the Head of Economic Development will liaise directly with their team line managers to ensure satisfactory performance and compliance.

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Shepway District Council will be responsible for ensuring that there is openness and transparency in the design of the project selection and appraisal process which is recommended by the LAG and that the assessment of projects is undertaken in a correct and appropriate way.

The Accountable Body will ensure that projects proposed for ESF and ERDF funding through the CLLD programme are eligible expenditure and, taking account the recommendations of the LAG, will determine the appropriate cycle and frequency of local grant claims and payments. The Accountable Body will be required to pay grants to projects as set out in individual project Funding Agreements and to claim back all eligible ERDF and ESF funding on a quarterly basis.

Shepway District Council will implement appropriate monitoring systems, as recommended by the LAG, ensuring that these meet European requirements. It will ensure that the monitoring and verification regime is proportionate and reflective of the scale, complexity and risk of a project.

Shepway District Council will ensure that appropriate financial and activity monitoring records are kept, maintained and retained (relating to 100% project funding) over the required period; this will include all documentary evidence demonstrating that all projects have been assessed against the agreed selection criteria.

It is recognised that it is the responsibility of the Accountable Body to ensure that the correct procedures are carried out by all the parties involved in the CLLD programme, including local grant recipients for projects who will be required to retain original evidence in line with European requirements.

The Accountable Body will bring to the LAG's attention any matters likely to pose a risk to the implementation of the programme, e.g. long term sickness of staff.

Shepway District Council, as the Accountable Body, will have the final say in matters of detail that relates to personnel issues and the financial probity of projects relating to the Folkestone CLLD Programme. This is because it will be ultimately responsible for ensuring that the CLLD Programme spend is eligible and that outputs and results agreed in the Funding Agreement are achieved.

## 7.5 CLLD Programme Staff

Programme Staff will be appointed and employed by Shepway District Council, as the Accountable Body, to provide the secretariat and management support for the CLLD Programme. Programme staff will be the main conduit to the LAG, ensuring that that LAG runs effectively and discharge its responsibilities capably.

Programme Staff will work with the local community to help bring forward relevant project applications for the CLLD programme through an animation/facilitation role. This will specifically aim to encourage and foster innovation at the local level and to ensure that all sections of the community are engaged with the programme. This may involve Programme Staff being physically located within the CLLD area in order to undertake this role effectively (for example, potentially at the Community Hub).

Programme staff will be responsible for administering all project-related processes for the programme, including:

- The promotion and publicity of the call for project;
- Receiving project applications;

# Programme Governance Arrangements

- Appraising projects, ensuring that the correct processes and project selection criteria are used, as recommended by the LAG and approved by the Accountable Body;
- Making recommendations on projects to the LAG;
- Providing advice and guidance on projects when called upon to do so at LAG meetings;
- Informing project applicants of the funding decision;
- Organising Grant Funding Agreements;
- Processing payments to projects and maintaining financial records in accordance with ESF and ERDF requirements;
- Implementing LAG and Accountable Body project decisions, liaising with project leads and monitoring project spend and outputs;
- Providing project monitoring reports to the LAG and responding to LAG decisions.

Programme Staff will be responsible for providing regular reports on the progress and implementation of the CLLD programme to the LAG, the Community Consultation Network Forum and the Managing Authorities.

Programme Staff will be responsible for ensuring that an evaluation of the CLLD programme is undertaken effectively at both the mid-point and end of the programme. The results of these evaluations will be conveyed to the relevant authorities, including the LAG, CCNF, Accountable Body and Managing Authorities and that any required action is undertaken.

It is recognised in the guidance that as a minimum, the functions of the Programme Staff requires three people to be involved, in order to ensure that:

- The person that assesses a project does not approve it;
- The person who has checked a grant claim does not authorise payment of the claim;
- The person who has approved a project does not also authorise payment of associated grant claims

However, it is proposed that Programme Staff will also be required to work with potential applicants to develop a project to the application stage, so there is also a requirement that:

- The person involved in the development of a project application does not assess or approve it.

It is proposed that at the commencement of the CLLD programme, two full time staff members are appointed and officers in Shepway District Council's Legal, Finance and Communications teams are identified to work on a part time or ad hoc basis in specific roles.

Both full time Programme Staff will be line managed by the Head of Economic Development at Shepway District Council, with one being the Programme lead, who will directly liaise with the LAG Chair and the second will be a supporting officer. It is envisaged that both roles will cover a similar range of duties, but there will be a separation of duties for any one project. For example, a staff member involved in an animation/facilitation role during the development of a project, for which a funding application is subsequently made, will not undertake any part of the assessment and decision recommendation to the LAG.

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It is proposed that an officer in Shepway District Council's Finance Department is used on a part time basis for the Folkestone CLLD programme and will be responsible for checking any grant claim that is administered by the full time Programme Staff and for ensuring that all financial records are maintained correctly.

The approval for funding will be the responsibility of Shepway District Council's Head of Finance and authorisation of the payment will be granted by Shepway District Council's Head of Economic Development.

From time to time there may be a requirement for legal advice for the CLLD Programme and this will be provided on an ad hoc basis by the council's Legal Team. Similarly, although most of the promotion and publicity for the programme will be undertaken by the full time Programme Staff, some support may invariably be required from the council's Communications Team.

Records of the costs incurred by Shepway District Council for managing and administering the Folkestone CLLD Programme will be processed and maintained by the full time Programme Staff, with Finance officers providing checks that all financial records are maintained correctly.

Public sector funding for the Management and Administration of the CLLD Programme will be drawn from a combination of sources – potentially from Shepway District Council itself and from 'top slicing' the public sector match that project applicants will be required to contribute. All of these records will be maintained by CLLD Programme Staff.

## 7.6 Equal Opportunities

The European Structural and Investment Fund Regulations (Article 7 of the Common Provision Regulations: Regulation (EU) No 1303/2013) require all European Regional Development Fund and European Social Fund programmes to promote gender equality and equal opportunities. These are also required to comply with the Equality Act (2010) and, in particular, pay due regard to the General Duty of the Public Sector Equality Duty. This is especially important in Community-led Local Development as it will focus on disadvantaged neighbourhoods and people and a robust approach to equalities is vital to ensure that all available talents and abilities are harnessed.

The LAG will be responsible for enabling and ensuring equality of opportunity within the CLLD programme and this will be delivered through:

- Ensuring that LAG membership is gender balanced and inclusive, as far as possible, and represents the widest possible cross section of the local community.
- Promotion of the programme and the encouragement of applications specifically to individuals and groups who have or share one or more 'protected characteristics'. For example, the programme will be promoted through the networks with the ethnic minorities in the area, for example at the Roma Hub run by SDC.
- All applicants, beneficiaries, partners, stakeholders, the public and colleagues will be treated with fairness, respect and honesty.
- Particular efforts to support individuals who lack experience and wish to make project applications in completing funding applications. This may include residents with a disability or long term illness (including mental health) and single parents who have been identified as significant groups in the CLLD area that require support from the programme.
- Ensuring that the application process is as straightforward as possible and that the selection procedure is non discriminatory and transparent.

# Programme Governance Arrangements

- Decisions on project to be funded will be made with due regard to equal opportunities and that everyone has an equal opportunity to receive funding.
- All organisations receiving CLLD funding will be required to have an equal opportunities policy that is compliant with EU regulations.

The LAG will adhere to Shepway District Council's Equality Policy which sets out the organisations vision and commitment to acting positively to create and promote access to services to all irrespective of age, disability, gender, maternity, race, ethnicity, religion or belief, gender, sexual orientation, culture, social or economic background.

## 7.7 Environmental Sustainability

The European Structural and Investment Fund Regulations (Article 8 of the Common Provision Regulations: Regulation (EU) No 1303/2013 ) require all European Regional Development Fund and European Social Fund programmes to support sustainable development and, in particular, support environmental sustainability by delivering activities in a way which helps preserve, protect and improve the quality of the environment.

Integrating environmental sustainability in to the CLLD programme is important and the need for understanding environmental sustainability has been considered in membership of the LAG, which includes a representative from Sustainability Connections CIC, a Folkestone-based social enterprise whose mission is to support local communities to live more sustainably. The representative, Penny Shepherd, has a depth of experience in local sustainability, is a former member of the Mayor of London's Sustainable Development Commission and has been awarded the MBE for services to sustainable economic development.

The need for sustainable development has been taken into account in developing the CLLD strategy and it was concluded that the strategy did not require a formal sustainability appraisal.

Environmental sustainability will be taken into account in the CLLD programme in the following ways.

- The project application form will include specific questions that will require the applicant to set out the environmental impacts (negative, positive and neutral) of the project.
- The project selection criteria will ensure that a project funded through the programme does not lead to deterioration or loss of assets or resources.
- All organisations applying for CLLD funding will be required to have sustainable development policies and implementation plans.
- Projects that have a strong environmental focus, whilst also supporting the strategic needs, will be encouraged and supported through the project selection criteria adopted.
- Projects will be encouraged to include environmentally positive aspects within the project (e.g. reduced use of paper; use of public transport as opposed to private, virtual communication etc).

## 7.8 Communications and publicity

Good communications and actively publicising the Folkestone CLLD programme is very important to ensure that the target population within the CLLD area is aware of the programme and is actively

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# Programme Governance Arrangements

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engaged in developing initiatives to address the issues. A formal communications plans will be prepared for the programme following approval of this strategy.

All project recipients of ERDF and ESF funding through the CLLD Programme will adhere to the formally required Branding and Publicity Requirements under relevant the EU Regulations.

# Project Selection and Management

## 8

In this section we set out the arrangements for developing projects that address the strategic themes of the CLLD programme (see section 4) and the project selection arrangements.

### 8.1 Project Development

An important component of community led local development is that it is a 'bottom-up' programme that involves a cross-section of the targeted local community in finding solutions to local issues. Further work will be undertaken to promote the aims and objectives of the programme and encourage ideas for projects and initiatives amongst the local community, once the programme has been approved. This is particularly important in view of the Pre-EU Referendum Restriction Period (Purdah) and the restrictions this imposed on local authority officers and their consultant's<sup>42</sup> engagement with the public on any potential European funded programme at that time.

It is also recognised that to develop true 'bottom-up' proposals, there may be a need to use some of the allocated Management and Administration (M&A) programme funding to help communities develop project initiatives to meet the identified needs. While there is not any specific intention to focus on this during the early stages of the projects, there is recognition that over the course of the programme this may be required. This element has therefore been accounted for in the amount of allocated funding for Management and Administration (24%) at this stage.

It is envisaged that support for project development will be provided by Programme Staff in the form of developing an initial project idea into an Expression of Interest (EOI) submission to the Local Action Group and also potentially helping to develop this into a full ERDF or ESF application for CLLD funding.

### 8.2 Project Management

The CLLD Strategy will be implemented through a continual open 'call for projects' throughout the duration of the programme. It is envisaged that the call will be opened as early as possible in 2017 so that programme spend can start soon after the programme commences from 1st April 2017.

A key determinant of the success of the CLLD Programme will be the promotion and publicity for the call for projects and the work undertaken by the Programme Staff and the Accountable Body to ensure that relevant projects which deliver the required outputs and achieve the aims of the programme come forward.

There will be a two stage project application process designed to identify early on projects that are eligible but need more development work. This process will be managed by the Programme Staff and LAG.

- **Stage 1:** a call for expressions of interest (EOIs) for projects that will address the CLLD Strategy's three objectives. Recommendations will be made by Programme Staff on next steps, following an initial eligibility assessment. EOIs and these recommendations will be considered by the LAG, with the options under consideration being to:

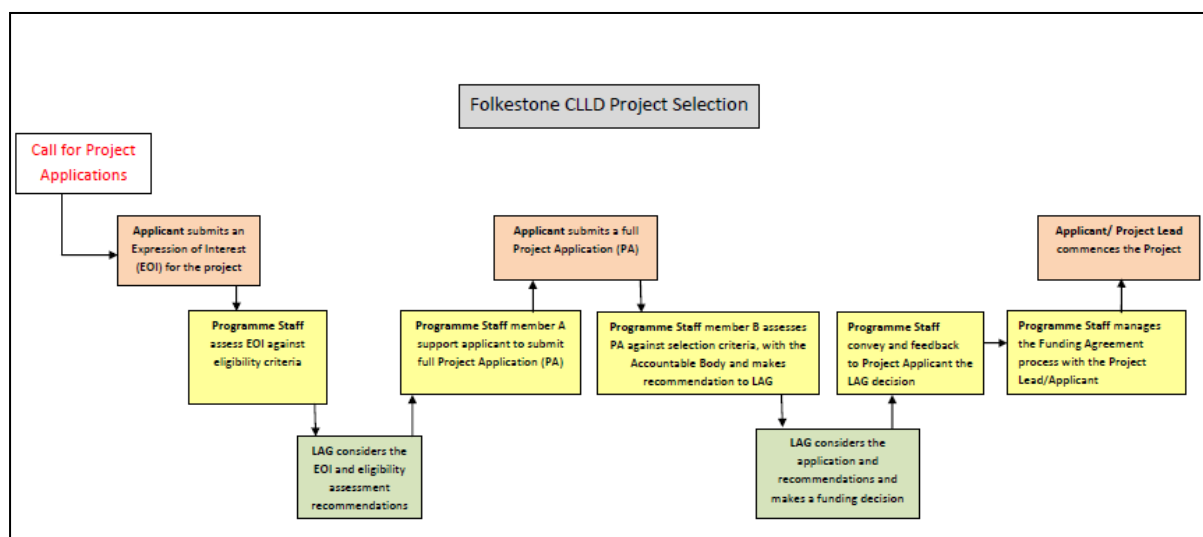
<sup>42</sup> Legal advice indicated that restrictions imposed on local authority officers applied equally to their representatives and that the consultants appointed to undertake this commission were viewed in this way

# Project Selection and Management

- Invite a full application; and/or
  - Assign of a full time Programme Staff member to work with the project applicant to support the development of the project and an application; or
  - Indicate the unsuitability of the EOI for the CLLD Programme.
- **Stage 2:** submission of a full project application. Calendar date deadlines for full project applications will be made public, so that all applicants are aware of when applications need to be submitted by for consideration by the LAG at a specific meeting. The appraisal of full project applications will be undertaken by a Programme Staff member not involved with the applicant at Stage 1.

The project selection process is shown graphically below.

**Figure 8.1: Project selection process for CLLD Programme**



## 8.3 Project Appraisal and Selection Criteria

The process for appraising a project at the Expression of Interest stage will consider a number of factors including that the project:

- Addresses the Objectives of the Folkestone CLLD Strategy.
- Beneficiaries are resident or located within the Folkestone CLLD area.
- Does not duplicate existing ERDF or ESF activity or could be funded through mainstream ERDF and ESF funding.
- Activities are eligible for ERDF or ESF funding.
- Will meet the required public sector match funding for the requested ERDF or ESF contribution and at the required intervention rate, ensuring that no ERDF or ESF funding has been matched at source by the organisation (such as with DWP and the Big Lottery).



# Project Selection and Management

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For the full project application, the selection criteria adopted, in addition to those required for the Expression of Interest above, will include:

- Evidence that the project has the support of the local community (the stronger the evidence, the higher the score).
- It promotes one or more of the CLLD Strategy's objectives and actions (project promoting more than one objective and/or action will score higher).
- Project costs demonstrates value for money, i.e. the cost per output compared with benchmarks or other projects (the lower the cost, the higher the score) and leverages other funding (the more leverage, the higher the score).
- The project will generate outputs and results corresponding with one or more of the CLLD Strategy's list of intended outputs and results (the higher the number of outputs and results, the higher the score).
- The project demonstrates innovation and added value.
- The project does not lead to a deterioration or loss of environmental assets or resources and that the lead applicant organisation has appropriate equal opportunities and sustainable development policies in place.

### 8.4 Project Selection

Each full project application will be assessed against the agreed criteria by Programme Staff who will also prepare a recommendation report for the LAG. The criteria will reflect the eligibility criteria in ESF and ERDF national eligibility rules<sup>43</sup>

The Local Action Group will make the final decision on whether a project should be funded after a full discussion on the project at the LAG meeting. This may include inviting the applicant to answer questions or inviting an expert from the Community Consultation Network Forum to provide advice.

The decision will ideally be made by consensus, but if this is not possible then by a majority vote.

For projects that are not selected for funding, applicants will be given feedback and, where appropriate, will be encouraged to address any shortcomings and to re-apply for support.

The minutes of the LAG meeting will generally only record the decision made, although this will be at the discretion of the Chair.

It is proposed that LAG members involved in all SELEP CLLD Programmes can be used on each other's programmes to independently assess large contract value projects, or where conflicts of interest are at such scale, an independent assessment is prudent. The requirement of independent assessment will be at the discretion of the LAG board and accountable body in each area.

### 8.5 Programme and Project Monitoring

<sup>43</sup> ESF National Eligibility Rules, March 2016

# Project Selection and Management

## 8

The Grant Funding Agreement between the Project lead organisation and the Accountable Body will, amongst other things, set out the spending profile for each project and the profile for delivering the required outputs. This will include milestones so that progress of the project can be monitored by Programme Staff on a regular basis.

The timeframe for reports on the progress of individual projects will be established as part of, or alongside, the Grant Funding agreement and Programme Staff will provide regular progress reports to the LAG, with recommendations for action, should further specific action be required.

The overall progress of the CLLD programme with respect to spend and the achievement of outputs and results will be reported as a regular item on the agenda of each LAG meeting and any corrective action advocated by the LAG will be implemented by the Programme Staff. The Programme Staff will be responsible for updating the Accountable Body of progress and relay any feedback to the LAG.

Reports on the progress on the programme will be reported at each six monthly CLLD Community Consultation Network Forum.

### 8.6 Programme Evaluation

Based on the assumption that a five year CLLD programme is approved, then a mid-term evaluation of the CLLD Programme will be undertaken in 2019/2020. This mid-term evaluation will highlight progress towards objectives and any actions that need to be taken to ensure that the outputs and results are ultimately achieved. It is envisaged that this evaluation will be undertaken by an organisation independent of the programme, overseen by the Programme Staff. The results will be presented to the LAG which will recommend actions, and will then be reported to the Accountable Body and at the Community Consultation Network Forum.

There will be a final evaluation on the outcomes achieved/likely to be achieved by the CLLD programme, drawing on data provided by project promoters, key stakeholders and other research (e.g. impact assessment). This will include not only expected results, but unexpected – good or bad or neutral. It will also analyse value for money of projects.

The evaluation reports will be reviewed by the LAG and the Accountable Body and will be made publically available.

The cost of undertaking the programme evaluations will be borne through the Management and Administration allocation for the CLLD Programme.

# Financial Plan & Outputs

## 9

This section sets out the financial plan for the CLLD Programme and the Outputs and Results that the strategy will seek to achieve.

### 9.1 Financial allocations

The following table provides indicative financial allocations for delivering the Folkestone CLLD programme. In accordance with the guidance, the table shows the ESF and ERDF allocations as part-funding towards a total cost for the various actions.

**Table 9.1: Indicative financial allocations (£000s)**

CLLD Strategy objectives and actions	Total		European Funds		50% Public Sector match funding (£)
	%	£	ESF (£)	ERDF (£)	
<b>Objective 1 - Enhancing work-readiness and well-being</b>					
Action 1: Work experience and job preparation for young people	14%	720	360	0	360
Action 2: Getting people back into work	16%	800	400	0	400
Action 3: Promoting emotional and physical well-being	6%	280	140	0	140
Action 4: Promoting financial wellbeing	3%	150	75	0	75
<b>Subtotal – Objective 1 (£):</b>	<b>39%</b>	<b>1,950</b>	<b>975</b>	<b>0</b>	<b>975</b>
<b>Objective 2 - Promoting local business and social enterprise</b>					
Action 5: Promotion of social enterprise	3%	162	0	81	81
Action 6 Support for business start-ups	13%	646	0	323	323
Action 7: DIY Space /incubation	11%	540	0	270	270
<b>Subtotal – Objective 2 (£):</b>	<b>27%</b>	<b>1,348</b>	<b>0</b>	<b>674</b>	<b>674</b>
<b>Objective 3 - Integrated delivery mechanism for the strategy</b>					
Action 8: Setting up and operating the Community Hub	10%	500		250	250
<b>Programme management costs:</b>	<b>24%</b>	<b>1,200</b>		<b>600</b>	<b>600</b>
<b>Grand total (% or £)</b>	<b>100%</b>	<b>4,998</b>	<b>975</b>	<b>1,274</b>	<b>2,499</b>

The total cost of the Folkestone CLLD Programme is £4.998m and the total European funding sought is £2.499m, of which 43% would be funded by the ESF and the remainder (57%) by the ERDF.

At this stage some 24% of the total programme costs have been identified for the Management and Administration (M&A) of the programme. While it is not envisaged that the costs for the Programme Staff outlined in section 7.5 will require this level of funding, there has been financial capacity built in to potentially draw on M&A resources to appoint community workers to help develop new and innovative projects to address the strategic themes and identified needs. Should the full M&A allocation not been drawn upon over the course of the programme, these resources will be redirected to projects that address the programme's objectives.

# Financial Plan & Outputs

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The assumptions underpinning the calculations for the financial allocations against themes are set out in section 9.3 below. In some cases (Actions 1, 2, 5 and 6) the starting point was defining the target group and then giving what is considered to be a reasonable average allocation of funds per individual or business to obtain a package of assistance. In other cases (Actions 3, 4, and 8) the financial allocations are based on the estimated costs of employing people to deliver services. In both cases, an alternative to providing funding directly to beneficiaries is to allocate a sum equivalent to the total allocation to the action in question to support a call for proposals.

The overall financial allocation for the programme has been split across the five year programme as follows:

**Table 9.2: Indicative financial allocations across programme period (£000s)**

Expenditure (£000s)	2016	2017	2018	2019	2020	2021	2022
(a) LAG Management and administration	30	195	195	195	195	195	195
(b) LDS Project Expenditure	0	380	684	684	684	684	684
Total LDS expenditure (a+b)	30	575	879	879	879	879	879

(a) 2.5% in 2016 then spread evenly over period 2017-22;

(b) 10% in 2017 and 2022 and remainder spread evenly over period 2018-21

Funding (£000s)	2016	2017	2018	2019	2020	2021	2022
(a) ESF (including M&A)	30	309	247	247	247	247	247
(b) ERDF		185	148	148	148	148	148
(c) ESIF total (a+b)	30	<b>494</b>	<b>395</b>	<b>395</b>	<b>395</b>	<b>395</b>	<b>395</b>
(d) Public sector match funding	30	494	395	395	395	395	395
<b>Funding total (c+e)</b>	<b>60</b>	<b>998</b>	<b>790</b>	<b>790</b>	<b>790</b>	<b>790</b>	<b>790</b>

(a) LAG M&A in 2016, then 20% in 2017 and the rest spread evenly over the period 2018-22

(b) 20% in 2017 and the rest spread evenly over the period 2018-22

Note: totals may not equal sum of years because of rounding

While some expenditure from the Management and Administration allocated is anticipated for 2016, this will be eligible spend incurred by the Accountable Body to take forward the stage 2 application for the CLLD programme.

The spend profile for CLLD projects has been assumed to be a relatively flat spend profile across the five years, with slightly more expenditure being allocated in the first year of the programme as it gets off to what is anticipated to be a good start.

## 9.2 Outputs and Results

As highlighted in the baseline analysis (Section 2) 31,406 people live in the CLLD intervention area and 65% (20,521) are resident in the twelve LSOAs that rank in the most deprived 20% areas in the country according to the IMD 2010. The residents in this most deprived 20% decile (20,521) will be the main beneficiaries of Objective 1 of the strategy and the ESF component of the programme funding will be focused on this group.

# Financial Plan & Outputs

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For Objective 2, the grants, assistance and support for small businesses and entrepreneurs will focus on the whole CLLD area and will create jobs and stimulate local economic development. It is in this broader area that businesses and new business growth opportunities provide employment opportunities for the residents in the most deprived part of the area.

The following table provides an estimate of the outputs and results using the categories stipulated in the guidance.

**Table 9.3: CLLD Strategy outputs and results**

ESF Output Indicators	Number
Number of participants	2,000
Participants that are unemployed including long-term unemployed	743
Participants that are inactive	357
Participants that are aged over 50	271
Participants that are from ethnic minorities	n/a
Participants that have disabilities	320
<b>Result</b>	
Participants in education or training on leaving	385
Unemployed participants in employment, including self-employment on leaving	260
Inactive participants into employment or job search on leaving (36% success rate)	187

ERDF Outputs Indicators <sup>44</sup>	Number
Number of existing enterprises receiving support	160
Number of new enterprises receiving support	125
Number of potential entrepreneurs assisted to be enterprise ready	125
Square metres public or commercial building built or renovated in target areas	400

The output for square metres of public building relates to Action 8, renovating or adapting an existing building for use as a community hub and/or providing accommodation for start-ups/social enterprises.

Whilst it is not possible to calculate the number of jobs that will be created directly from this investment, the CLLD Programme will make a significant contribution to support people from the intervention area to get directly into job opportunities or further along the pathway that will ultimately lead to employment through the provision of training and or other support.

The cost per beneficiary for the primary outputs is likely to be £2,045 per unemployed persons (i.e. £1,520,000 cost of Actions 1 and 2 / 743 Participants that are unemployed including long-term unemployed) and £1,971 per assisted enterprise (i.e. £808,000 cost of Actions 5 and 6 / 160 Number of existing enterprises receiving support + 125 Number of new enterprises receiving support + 125 Number of potential entrepreneurs assisted to be enterprise ready). This would appear to represent good value for money.

The following table provides a breakdown of the estimated outputs by year. It has been assumed that 10% of the outputs would be generated in Year 1 with the remainder being produced in equal amounts in each of the following four years. The lower volume of outputs in the first year reflects the time it will take for projects to deliver outputs.

<sup>44</sup> We have assumed a 35% success rate

# Financial Plan & Outputs

## 9

**Table 9.4: Outputs by year**

ESF Output Indicators	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Number of participants	200	450	450	450	450	2,000
Participants that are unemployed including	74	167	167	167	167	743
Participants that are inactive	36	80	80	80	80	357
Participants that are aged over 50	27	61	61	61	61	271
Participants that are from ethnic minorities	0	0	0	0	0	n/a
Participants that have disabilities	32	72	72	72	72	320
<b>Result</b>						
Participants in education or training on leaving	39	87	87	87	87	385
Unemployed participants in employment, including self-employment on leaving	26	59	59	59	59	260
Inactive participants into employment or job	19	42	42	42	42	187

ERDF outputs	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Number of enterprises receiving support	16	36	36	36	36	160
Number of new enterprises receiving support	9	20	20	20	20	90
Number of potential entrepreneurs assisted to be enterprise ready	16	36	36	36	36	160
Square metres public or commercial building built or renovated in target areas	0	0	400	0	0	400

The outputs compare to Thematic Objective 9 of the SELEP strategy on Poverty and Inclusion<sup>45</sup> (which includes the CLLD targets) in the following way:

**Table 9.5: Contribution to SELEP targets**

	SELEP target	Folkestone CLLD target	% SELEP
Number of participants	5,620	2000	36%
Participants that are unemployed	3,930	743	19%
Participants that are inactive	1410	357	25%
Participants that are aged over 50	1050	271	26%
Participants that are from ethnic minorities	940	n/a	n/a
Participants that have disabilities	1200	320	27%

There is no target for participants from Ethnic Minorities as the analysis of the CLLD area shows that they make up a relatively small proportion of the local population. The baseline analysis shows that only 6% of the population is non White British in the CLLD area compared to 8.7% in the South East LEP area and 13% in England as a whole.

The Folkestone CLLD outputs compare to the targets for SELEP ESIF Strategy's Thematic Objective 3 (SME Competitiveness)<sup>46</sup> in the following way:

<sup>45</sup> See page 76 of SELEP ESIF Strategy

<sup>46</sup> See page 43 of SELEP ESIF Strategy

# Financial Plan & Outputs

## 9

	SELEP target	CLLD target	% SELEP
Number of enterprises receiving support	505	160	32%
Number of new enterprises receiving support	353	190	25%
Number of potential entrepreneurs assisted to be enterprise ready	1,413	160	11%
Square metres public or commercial building built or renovated in target areas	1,207	400	33%

As indicated above, on average the CLLD interventions will reach approximately 25% of the targets for the SELEP. Considering that the Folkestone CLLD area encompasses approximately a quarter of the LSOAs in the lowest two deciles in the SELEP area this target seems appropriate.

### 9.3 Financial Assumptions

This section sets out the assumptions for the financial section and targets mentioned above.

#### Outputs

The table below sets out the output targets per action and the average cost for the target group:

**Table 9.6: Output targets per action and the average cost for the target group**

	Target	Unit	Approximate cost/ target	Cost /action
Action 1	824	Young people, 15-25 year olds, NEETs	874	720,000
Action 2	1000	Unemployed people, inactive people, careers, NEETs	800	800,000
Action 3	120	Families	2,333	280,000
Action 4	360	Households	417	150,000
Action 5	132	New/existing social enterprises & entrepreneurs	1,216	160,500
Action 6	528	New/existing enterprises & entrepreneurs	1,216	642,000
Action 7	180	Percentage of Action 5 and 6 groups	3,000	540,000
Action 8	1	Hub to serve all target groups above	500,000	540,000

It is assumed that there will be some double counting between Actions 1, 2, 3, and 4 as the target groups overlap. Also, a percentage of the SMEs and entrepreneur's in action 5 and 6 will benefit from action 7.

#### Financial Assumptions

##### Objective 1

##### Action 1: Work experience and job preparation for young people:

There are 4,120 young people aged 16-25 in the CLLD area. The aim is to reach 900 participants (including some NEET, inactive or unemployed) which is 22% of the 16-25 year olds in the CLLD area. Young people in the most deprived 20% area will be the main target - as illustrated below:

**Table 9.7: Target group for Action 1**

Age	Population in CLLD area	Population in LSOA Decile 1 & 2	% targeted over 5 years	Number
16-25	4,120	2,964	22%	900

It is assumed that there will be an average package of assistance of £800 per person over the five-year period (or that a sum equivalent to the total allocation to Action 1 would be used to support a call for proposals).

# Financial Plan & Outputs

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### Action 2: Getting people back into work:

There are some 1,000 individuals in this target group. Altogether there are 16,140 people aged 25-65 in the CLLD area. Of these 11,412 people aged 25-65 reside in the most deprived 20% area. Based on the average unemployment rate for the area (8.6%) and the inactivity rate (31%) it is possible to calculate the size of target group. This is set out in the table below (we have separated by age categories for reporting purposes):

**Table 9.8: Target group for Action 2**

Age	CLLD Area	Decile 1&2	Unemployed (8.6%)	Target (a)		Inactive (31%)	Target(b)		Target (a +b)
				%	No		%	No	
16-25	4,120	2,964	255	60%	153	919	8%	74	227
26-50	10,651	7,873	678		407	2,441		195	602
50-65	5,489	3,539	305		183	1,097		88	271
<b>Total</b>	<b>20,260</b>	<b>14,376</b>	<b>1,238</b>		<b>743</b>	<b>4,457</b>		<b>357</b>	<b>1,099</b>

Due to the nature of long-term unemployment and the need for holistic, integrated support services, it is assumed that a package of assistance equivalent to a total of £800 per person will have to be made available to each individual over the five year period (or that a sum equivalent to the total allocation to Action 2 would be used to support a call for proposals).

### Action 3: Promoting emotional and physical well-being

It is assumed that the CLLD strategy will part-fund the costs of employing two people to provide outreach support of a 5-day per week basis for five years (£28,000 x 2 x 5 = £280,000) or that a sum equivalent to the total allocation to Action 3 would be used to support a call for proposals.

Based on the information from the Trouble Families programme, it is assumed that there are approximately 200 families in need in the CLLD area (in Shepway 693 families met the criterion and expert advice from the programme managers suggest that 35% of the families reside in the CLLD area). The CLLD Strategy would aim to target 60% of these families through the employment of two workers who might each manage a case load of 12 families per year amounting to a target group of 120 families. This works out at approximately £2,300 per family. The aim of these roles is to support family members towards employment.

### Action 4: Promoting financial wellbeing:

As mentioned in Section 3, the 2012 BIS Debt Track survey found that 12% of households were in one or more months in arrears on bills and credit payments. Hence it can be calculated that in the CLLD area, of the households in the 20% decile approximately 1,190 could be in debt as shown below:

**Table 9.9: Target group for Action 4**

	CLLD area	Decile 1&2	% indebted	total	% target	Output
Households	14,504	9,914	12	1,190	30	357

The CLLD Programme would aim to target 30% of this group over the 5 years, amounting to approximately 360 households. The aim of the hub would be to provide a venue for the delivery of other CLLD funded initiatives, such as debt counselling to provide free and impartial advice to help people get out of debt and, therefore move them closer to employment by removing a significant barrier.



# Financial Plan & Outputs

## 9

### Objective 2

#### Action 5: Promotion of social enterprise and Action 6: Support for business start-ups:

In Shepway, there are approximately 400 new business started per year. This activity would aim to help those new start up and businesses in their first year (there is a 70-80% survival rate for the first year and this amounts to approximately 700 businesses).

In the CLLD area we expect there to be approximately 210 start ups and businesses in their first year (30% of the Shepway total) per year. The CLLD Programme would aim to assist a 15% of these each year through a variety of support measures. This amounts to almost 160 start-ups over the five years. This is approximately a quarter of the target for the SELEP region. As it is believed that social enterprise offers particular opportunities for the CLLD area, it is expected that 20% (approx 32) of new start-ups to have a 'social enterprise' dimension

In the CLLD area, we expect there to be approximately 210 start ups and businesses in their first year (30% of the Shepway total) per year. The CLLD Programme would aim to assist a 15% of these each year through a variety of support measures. This amounts to approximately 160 start-ups over the five years which is approximately a quarter of the target for the SELEP region.

The CLLD Programme would also seek to help 500 entrepreneurs to become 'enterprise-ready' and 125 existing businesses.

Of these, it is assumed that 20% of new start up (approximately 32) and entrepreneurs will be have 'social' dimension to their business (approximately 100) and 20% existing businesses or NGOs that would like to include a social enterprise aspect in their activities (approximately 25). For Action 5 it is assumed an average assistance package of £1,500 for each new start-up and existing business and £750 for support for each entrepreneur.

For Action 6, it is assumed the average assistance package for the 128 businesses will be an average of £2,000. Approximately £750 per entrepreneur has also been allocated for services to make them 'enterprise-ready'. This is summarized below:

**Table 9.10: Target group for Actions 5 and 6**

Social enterprises/Social Entrepreneurs	Unit	Cost/unit	Cost
Number of new enterprise supported	32	1,500	48,000
Number of entrepreneur supported	100	750	75,000
Number of existing businesses supported	25	1,500	37,500
<b>Action 5 Total</b>	<b>157</b>	<b>3,750</b>	<b>160,500</b>

SMEs/Entrepreneurs			
Number of new enterprise supported	128	1,500	192,000
Number of existing enterprise supported	100	1,500	150,000
Number of entrepreneur supported	400	750	300,000
<b>Action 6 Total</b>	<b>528</b>	<b>1,216</b>	<b>642,000</b>

#### Action 7: DIY Space /incubation

Of the enterprises and entrepreneurs assisted by Actions 5 and 6, a percentage will be targeted for incubation support as set out in the table below. It is assumed that this incubation support would last 2-3 years and cost £3,000 per enterprise:

# Financial Plan & Outputs

## 9

**Table 9.10: Target group for Action 7**

Incubation support group	% total target (action 5&6)	Number	Cost/unit	Total
Number of new enterprises incubated	30%	64	3,000	192,000
Number of existing enterprises incubated	30%	41	3,000	123,000
Number of Entrepreneurs incubated	10%	75	3,000	225,000
<b>Total</b>		<b>180</b>	<b>3,000</b>	<b>540,000</b>

### Action 8: Setting up and operating the Community Hub

it is assumed that the CLLD Programme will part fund the costs required to adapt existing premises for use by the Community Hub with on-going costs of £15,000 p.a. in maintenance and service charges (£200,000 + (15,000 x 4 years) = £260,000). There will be an emphasis on making the Community Hub financially self-sustaining beyond the period of CLLD funding period. This will be written into the business plan with targets for income generation (e.g. from renting space for meetings, sponsorship from local organisations and companies, running a café, etc).

Setting up the Community Hub project will create training and employment opportunities for individuals from target groups such as the long-term unemployed, young people who are NEETs. The project could pair local tradespeople with trainees. Examples of match funding that could be available are the DCLG Community Buildings fund and Jewsons Building Better Communities grants.

The Folkestone community has a track record of successfully delivering community buildings. Sunflower House <sup>47</sup>, previously a disused former chapel, has been renovated by the local community and is now established as a key community asset and is self supporting. It meets a specific need in the area and is already widely utilised.

### **9.4 Match funding**

The programme operating model for the Folkestone CLLD will require project applicants to contribute at least 50% match funding towards the total cost of the project from other public sector sources. This will meet the requirement for ERDF and ESF funding to be 50% matched by public sector sources.

Through the consultation process, a number initiatives have already been identified which are new and/or at a very early stage of development and some of these already have match funding sources potentially identified and some examples of these are shown below.

#### **Examples of Potential Match Funding**

- The **Rotary Club** has secured funding for a scheme to establish a Debt Crisis Hub and this could form part of the Folkestone CLLD Strategy. Around £50,000 has been committed by the Rotary movement, which could serve as match.
- The Economic Plan prepared by the Folkestone Coastal Communities Team, with support from DCLG identifies a number of initiatives that address the issues identified in this CLLD Strategy. A recent application to the Coastal Communities Fund round 4 call for projects could, if successful, provide match funding for some initiatives including:

<sup>47</sup> <http://sunflowerhouse.org.uk/>

# Financial Plan & Outputs

## 9

- **Folkestone Business Hub** - supporting innovation, start-ups, SMEs and young people through incubation (£120,000)
- **Folkestone markets** - supporting diverse economy, small business and year round activity (£15,000)
- Festivals - maximising year-round visitor economy, creating start up opportunities (£150,000)
- Skills development and apprenticeships, young people, jobs growth, SMEs (£12,000)

**Roger De Haan Charitable Trust** could be a source of match funding for projects relating to arts and culture, education, health and welfare, sport, young people, heritage and other regeneration projects. In the 2014/15 financial year the trust spent £3.96mill on charitable activities. This could provide a significant source of the public sector match funding for the CLLD Programme.

Several charities have also come forward with examples of projects that might fit under the strategy. For example, **Citizens Trust, Citizen Advice, Tomorrows People, Folkestone Mind, Kent Foundation.**

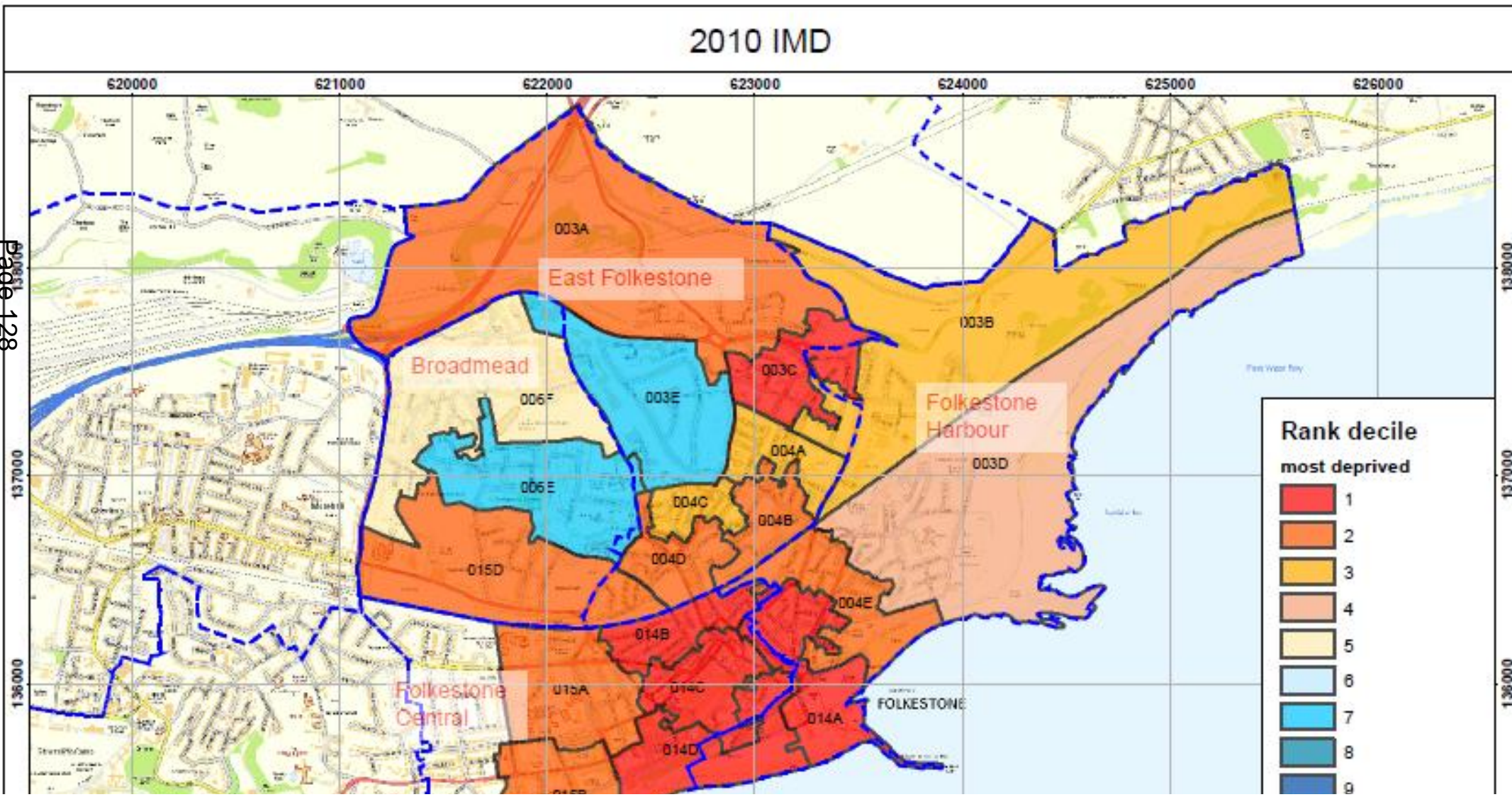
Other existing projects that could be further developed through the CLLD programme include projects such as the **Folkestone Sprucer, Green Gym, Rainbow Centre**, the **Troubled Families programme**, Volunteer Shepway's **Passport for Employability** and Shepway Sports Trust's and Shepway District **Councils' apprenticeship schemes**

Public sector match funding for the Management and Administration component of the CLLD Programme will be drawn from a combination of sources – potentially from Shepway District Council itself and from 'top slicing' the public sector match of projects funded through the same European funding stream as the Management and Administration component.

# Folkestone CLLD Area

# A

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# Mapping Interventions

## B

### Skills, Education & Employment Support

- Shepway Apprenticeship scheme
- East Kent College Campus skills offer and expansion
- Schools including the Glassworks Sixth Form
- The Cube – adult education
- Shepway Business Advisory Board
- Kent Adult Education
- Job Centre Plus
- Folkestone Business Hub
- Folkestone Baptist Job club

### Business Growth

- Shepway Business Advisory Board
- Start-up and Business Support (Enterprise First, Proactive)
- District Council discretionary business rates relief scheme
- Inward investment and Locate in Kent
- Strategic and Key sites for retail and employment use (Local Plan, Employment Land Review)

### Trusts, NGOs and Community organisations

- Action for Children
- Activate Folkestone
- Christians Against Poverty
- Church organisations and support groups
- Citizen Information Board
- Citizens Advice Shepway
- Communities in Rural Kent
- CXK charity
- East Folkestone Together
- Folkestone Mind
- Folkestone Rotary
- Green Gym
- KCC Early Help
- Kent Foundation
- Porchlight
- Prince Trust
- Rainbow Centre
- Residents organisations
- Roger De Haan Charitable Trust
- Samaritans
- Shaw trust
- Shepway Foodbank
- Sunflower House
- Sure Start Centre
- The Salvation Army
- Town Sprucer Scheme
- Volunteer Shepway

### Creative Organisation

- Creative Foundation
- Creative Quarter

# Mapping Interventions

## B

- Folkestone's HEART (HLF)
- Townscape Heritage Initiative (HLF)

### Regeneration

- Folkestone Harbour and Seafront Regeneration
- Folkestone Town Team
- Town Centre Management Company
- Heritage Strategy
- Up on the Downs
- White Cliff Countryside Partnership
- A Town Unearthed
- Great British High Street – Rising Star Award

### Marketing Branding and Events

- Triennial arts festival
- Growing calendar of other events (e.g. Book festival, Air Show, Charivari Folkestone Fringe)
- Folkestone Town Council promotional and civic activities
- Tourism Destination Management Plan (in process of development)
- Visit Folkestone & Folkestone Works websites (in development)
- Trans-national partnerships (BOSCO with Boulogne)

### Strategic Assets

- Heritage and the built environment
- Environment and coast (e.g. The Leas, Coastal Park, Folkestone Warren and beaches)
- Channel Tunnel (and managing Operation Stack)
- Road infrastructure
- Rail infrastructure (High Speed 1)
- Broadband and connectivity
- Excellent sports infrastructure and leisure facilities, cycle paths, walking routes, sea sports
- Housing
- Strategic development sites (Shorncliffe Garrison, Harbour and seafront)
- Empty Homes and Property Initiative
- Opportunitas (District Council regeneration and housing company)
- Numerous examples of high quality Victorian and Edwardian housing especially in West End of Folkestone

# Community Consultations for the Strategy

## C

Below is a list of people consulted through workshops and interviews. It should be noted that 10 people who have been long-term unemployed did not want to be listed. Those individuals listed with an asterisk are part of the steering committee.

Interviewee	Organisation	Type organisation	Engagement
Jon Clarke	Activate Folkestone	Resident Group	Interview
Alastair Upton	Business	Creative sector	Interview
Andi Elliott	Business	Creative sector	Workshop
Jim Lockey	Business	Creative sector	Workshop
Luke Jones	Business	Creative sector	Workshop
Ross Patrick	Business	Creative sector	Workshop
Val Conway	Changing Lives Kent!- Oh Crumbs!	NGO	Workshop
Martin Almand*	Citizen Information Board	NGO	Interview
Sue Day	Citizens Advice Shepway	NGO	Interview
Steph Hadlow	Communities in Rural Kent	NGO	Workshop
Jyotsna Leney*	Community Safety , SDC	Local authority	Interview
Tanya McCormack	Creative Foundation	Creative sector	Interview
Jane Batchelor	CXK	NGO	Workshop
Paul Manning	East Kent College	Education	Interview
Stephen Shaw	East Folkestone Together	NGO	Workshop
Pat Turley	EKH	Housing	Workshop
Chris Houghton Budd	Finance Folkestone	NGO	Interview
Joanna Strickland	Folkestone Business Hub	Business	Interview
Helen Gear	Folkestone Early Years Centre	NGO	Workshop
Lewis Biggs	Folkestone Festival	Arts	Interview
Clare Elliot	Folkestone Jobcentre Plus	Public Sector	Workshop
Michael Lake	Folkestone Mind	NGO	Interview
John Burgess	Folkestone Rainbow Centre	NGO	Workshop
Richard Bellamy	Folkestone Rainbow Centre	NGO	Workshop
Terry Cooke	Folkestone Rotary	Volunteer Group	Interview
Jennifer Childs*	Folkestone Town Council	Local authority	Interview
Susan Chivers	FTC Tourism	Tourism	Workshop
Giles Bernard	Green Gym	NGO	Interview
Carl Adams	Growth Rings	NGO	Interview
Roger Joyce*	HEART Forum	Business	Interview
David Hughes	KCC Business Support	Local authority	Interview
Julia Easton	KCC Early Help ("The Hub")	Business	Interview
Lisa Barrett-Smith	Kent Adult Education	Education	Interview
Frank McKenna	Kent County Council	Local Authority	Workshop
Rob Hancock*	Kent County Council	Local authority	Interview
Guy Robinson	Kent Employability Programme	NGO	Workshop
Paul Barron	Kent Foundation	NGO	Interview
Huw Jarvis	LEADER	Local authority	Interview
Tim Goss	mcch Aspirations	Creative Sector	Workshop
Sarah Hagues	Media	Media	Workshop
Ivan Rudd	SDC	Local authority	Interview
Debbie Bishop	Police	Police	Workshop
Wendy Checksfield	Porchlight	NGO	Workshop
Julie Hargreaves	Porchlight – Live Well Kent	NGO	Workshop

# Community Consultations for the Strategy

## C

Teresa Snowden	Porchlight – Live Well Kent	NGO	Workshop
Dee Turner/Anna Webb	Prince Trust	NGO	Interview
Jon Wilson	Rainbow Centre	NGO	Interview
Don Gregor	Remembrance Line	Heritage	Workshop
Richard Moffatt	Remembrance Line	Heritage	Workshop
Annie McGovern	Residence Group	Residence Group	Workshop
Peter Bettley*	Roger De Haan Charitable Trust	NGO	Interview
Shannon	Romney Resource Centre	NGO	Workshop
Daniel Keeling	Rotary Club	Volunteers	Workshop
Alex Wallington	Shepway Children Centres	NGO	Workshop
Emily Ghassempour	Shepway District Council	Local authority	Interview
John Collier	Shepway District Council	Local authority	Interview
Katharine Harvey*	Shepway District Council	Local authority	Interview
Mary Lawes	Shepway District Council	Local authority	Interview
Sarah Robson*	Shepway District Council	Local authority	Interview
Stephen Arnett	Shepway District Council	Local authority	Interview
Zena Cooper	Shepway Employment Forum	Employment Org	Interview
Laurence Hickmott	Shepway Sports Trust	NGO	Interview
Viv Kenny	Shorncliffe Trust	Heritage	Workshop
Phillip Clapham	Smith Woolley Perry	Business	Interview
David Taylor	Sprucer/Cycle Shepway	NGO	Interview
Anthony Bowler	Sprucers	Community member	Workshop
Brian Hardstone	Sprucers	Community member	Workshop
Chris Knight	Sprucers	Community member	Workshop
James Courtney	Sprucers	Community member	Workshop
Pebe	Sprucers	Community member	Workshop
David Wilson	St Peters Church	Church	Interview
Penny Shepherd	Sustainability Connections	Business	Interview
Stephanie Karpetas	Sustainability Connections	Business	Interview
Michael Stainer	The Grand	Business	Workshop
James Avery	The Workshop	Local authority	Interview
Philippa Wall	Threads	Creative sector	Workshop
Jan Thomlinson	Tomorrows People	NGO	Interview
David Weiss	Troubled Families	Local authority	Interview
Janet Johnson	Volunteer Shepway	NGO	Interview

\*Member of the Steering Committee



# Local Action Group: Terms of Reference, Declaration Statement and Code of Conduct

## D

### **Folkestone CLLD Local Action Group: Terms of Reference**

The overarching role of the Local Action Group (LAG) is to:

- *Agree the Folkestone CLLD Programme Strategy.*
- *Implement and deliver an effective Folkestone CLLD Programme.*

The LAG will oversee the Folkestone CLLD programme ensuring that the required outputs are delivered and that it meets the expectations of the local community, the Managing Authorities and ultimately the European Commission...

The Local Action Group is responsible for recommending an effective and robust process for project calls, selection and appraisal for the CLLD programme to the Accountable Body and this function will be delegated to CLLD Programme Staff or other suitably trained individuals involved in the CLLD Programme.

The Local Action Group will receive Programme Staff recommendations on project applications and will be responsible for making decisions and funding recommendations to the Accountable Body, ensuring that the projects selected for funding:

- Contribute to CLLD strategy objectives;
- Align with ESF and ERDF priorities;
- Represent good value for money in terms of the expectations of the programme; and
- Make a positive contribution to the ERDF or ESF cross cutting themes of gender, equality and non-discrimination and sustainable Development.

Regular financial reports on the progress of the programme and project output and activity reports will be presented by Programme Staff to the Local Action Group and it will make any required adjustments to the projects and programme in response.

The Local Action Group will also oversee and receive an evaluation of the strategy and programme of activity at the midpoint of the programme and at the end.

Although CLLD Programme Staff will be employed by the Accountable Body, the Local Action Group will be consulted over the terms of the appointments that are made.

The Local Action Group will also oversee the promotion of the programme and will make recommendations on this to the Accountable Body

Although at this stage it is unclear whether a national or regional network of CLLD Programmes will be established (as there is for the Leader Programme), if any are established, then the Local Action Group will ensure that the Folkestone CLLD Programme plays a full role.

#### **Membership of the LAG**

The Local Action Group will be representative of the CLLD area's private, public and third sector organisations and representative, as far as possible, in terms of age and gender.

There is a requirement that:

- Public sector members or any single interest group will not have more than 49% of the voting rights during decision-making;

# Local Action Group: Terms of Reference, Declaration Statement and Code of Conduct

## D

- At least 50% of members with project voting rights come from the non-public sector partners;
- There is a gender balance and have a fair representation of the population of the CLLD area as far as possible; and
- At least 50% of votes in an individual selection decision are cast by non-public members.

The LAG will comprise representatives from 14 organisations, but it is recognised that membership of the LAG is liable to change over the course of the CLLD Programme

Any LAG member who does not wish to continue will advise Programme Staff in writing. Any new proposed LAG members (which can be through self or other nomination) will be considered by the Chair and require the agreement of a majority of existing LAG members.

All LAG members may send a substitute from their organisations to LAG meetings. However, LAG members who infringe the Code of Conduct and Declaration of Interest and Conflict of Interest Statement may be excluded. For example, if a member or a nominated substitute fails to attend for three or more consecutive LAG meetings the organisation will be excluded.

LAG members are expected to perform an active role in the CLLD programme, working in the local community to identify and bring forward projects. Members will be expected to bring forward potential projects from their own organisation and to encourage other organisations to do so, where appropriate.

LAG members are expected to promote the CLLD programme through their own organisation's channels of communication and to help signpost the local community to the support available to develop their ideas for CLLD projects.

Members will be expected to encourage and foster innovation at the local level through encouraging new ways to tackle issues.

All LAG members will be required to abide by the Code of Conduct and Declaration of Interest and Conflict of Interest Statement.

In making decisions about projects, LAG members are required to commit to undertaking the necessary work so that they have a sufficient understanding of a project and make decisions in a consistent and impartial manner.

### **Local Action Group Meetings**

The Local Action Group will meet every seven- eight weeks with dates agreed for the following calendar year every six months.

LAG members will be required to sign the attendance register at every meeting and the minutes of all LAG meetings shall be agreed at the next regular meeting and then signed by the Chair. Records of the minutes will be kept and made publically available on a website.

A Register of Interests will be kept for all LAG members, Programme Staff and other officers of the Accountable Body involved in any part of the Folkestone CLLD Programme.

LAG members with any direct financial, personal or organisational links to a project under discussion at a LAG meeting shall:

- Declare any Interest at the commencement of the meeting, which will be minuted.

# Local Action Group: Terms of Reference, Declaration Statement and Code of Conduct

## D

- Take no part in the discussion or in the decision about any such project, and leave the LAG meeting for the duration at the discretion of the Chair.

The Folkestone CLLD Programme Staff appointed by the Accountable Body to manage the programme are expected to attend LAG meetings as observers and will not be assigned any decision-making powers.

### **Chair of the Local Action Group**

The role of the LAG Chair is to conduct Local Action Group meetings and act in the best interests of the LAG as a whole.

The process for electing a Chair of the LAG is as follows:

1. Nominations for the Chair will be sought from LAG members by email.
2. All LAG members will be asked by email to nominate their choice of LAG chair from the list of candidates by return email.
3. The candidate with the highest number of nominations will be selected as Chair.

The maximum term of office for the Chair will be two years.

The Chair will have a second or casting vote in the case of an equality of vote in respect of any decisions taken.

The Chair will represent the LAG and will sign records, such as the minutes of meetings, and documents on behalf of LAG where necessary.

In the event of the Chair not being able to attend a meeting, or being compromised through a conflict of interest, a Deputy Chair will be nominated from amongst the LAG members for that meeting.

### **Decision-making by the LAG**

For decisions to be made by the LAG, attendance of seven voting members<sup>48</sup> of the LAG, including the Chair, is required to achieve a quorum.

Each member of the LAG will have one vote per member, except where an organisation is represented by more than one member; in this situation only one member can vote.

Decisions shall be determined by a simple majority of the number of votes of members present and only LAG members attending the meeting can vote.

Should CLLD Programme Staff be unable to attend a LAG meeting for any reason, their comments on a project can be considered by the LAG through written procedure.

Any decisions made by the LAG will be recorded in the minutes of the meeting, although the full discussions about an individual project will be at the Chair's discretion.

Where urgent decisions are needed before the next LAG meeting (for example, where a project has been considered at a previous LAG meeting, but where further clarification is required from the project applicant), the Chair can call a special meeting of a sub group of the LAG to make the decision. This sub group will comprise as a minimum the following:

- Chair;
- Accountable Body representative on the LAG;

<sup>48</sup> Where an organisation has more than one representative at a LAG meeting, this will only count as one voting member

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# Local Action Group: Terms of Reference, Declaration Statement and Code of Conduct

## D

- One other LAG member;
- One Programme Staff member.

Any decisions taken by the sub group shall be communicated to other Local Action Group members within 48 hours via email and formally reported to the next regular meeting of this body.

Feedback on decisions taken by the LAG will be conveyed to the project applicants by Programme Staff. While there will be no ability to appeal a decision, applicants can resubmit amended applications that take into account feedback from the LAG.

# Local Action Group: Terms of Reference, Declaration Statement and Code of Conduct

## D

### Folkestone CLLD Local Action Group:

#### Declaration of Interest and Conflict of Interest Statement

This policy sets out the responsibility of both the Folkestone CLLD Local Action Group (LAG) members and the Accountable Body programme staff to declare any personal or pecuniary interest which they may have in an item on the agenda either at the beginning of the discussion or when the interest becomes apparent.

The policy starts from the position of trusting the integrity and professionalism of the LAG and Programme Staff members. The LAG and Programme Staff are expected to act in the best interests of the Folkestone CLLD programme at all times. There will, however, be occasions when a LAG member or Programme Staff member has more than one legitimate interest. Such interests may conflict with those of Folkestone CLLD programme. In order to protect themselves and programme, a LAG member or Programme Staff member should always declare a conflict of interest.

Conflicts of Interest arise when the interests of LAG members or Programme Staff (their own, their family, friends or other organisations with which they are involved) are incompatible with, likely to benefit directly from, or in competition with, the interests of the Folkestone CLLD programme. Such situations present a risk that LAG members or Programme Staff members could make decisions based on these external influences, rather than the best interests of the Folkestone CLLD programme, or that others, perhaps outside the programme could allege that LAG members or Programme Staff might have made decisions based on their external interests or influences.

Conflicts of Interest may come in a number of different forms;

- Direct financial gain (pecuniary) or benefit such as the award of a contract or benefit to a project or organisation in which a LAG member or Programme Staff has an interest e.g. *where the interest may arise because they work for, or are in receipt of remuneration from, the body seeking assistance, or because they have an investment in the body – usually (but not exclusively) in the form of a partnership, directorship or shareholding.*
- Indirect financial gain such as awarding a contract or benefit to a partner or relative of a LAG member or Programme Staff e.g. *where the interested party holds a non-financial but influential position – a committee member or trustee- of an organisation which is seeking assistance.*
- Non- financial or personal conflicts where a LAG member or Programme Staff receive no financial benefit but may be influenced by external factors e.g. *awarding contracts to friends or associates, benefitting from access to new or enhanced activities or suffer inconvenience.*

Dangers of Conflicts of Interest; There are circumstances when possible conflicts of interest could arise that may give rise to any of the following;

- Giving the impression that Folkestone CLLD has acted improperly.
- Impacting negatively on the reputation of Folkestone CLLD or individuals by attracting adverse publicity.

# Local Action Group: Terms of Reference, Declaration Statement and Code of Conduct

## D

- Prejudicing effective decision making or inhibiting free discussion.

The Code of Practice is designed to stop this happening. The most important point to remember is that LAG members and Programme Staff should always disclose an activity if they are in any doubt whether it represents a conflict of interest.

### **Declaring Conflicts of Interest;**

The first point of disclosure is the Register of Interests form. This will be updated whenever a new interest is identified and will be completed annually. It will be submitted with the annual Folkestone CLLD Delivery Plan. Programme Staff will maintain a register of interests from completed forms. This will be processed in accordance with the data protection principles as set out in the Data Protection Act 1998.

The second point of disclosure is at the start of each LAG meeting. Each meeting will contain a standing item for the declaration of interests that may be relevant to the business being discussed at the meeting.

### **Process;**

1. A member must declare an interest as soon as it becomes apparent, disclosing the existence and nature of that interest as required.
2. A member who has declared a direct personal or pecuniary interest may, at the discretion of the Chair, speak on an item to give background information, give evidence or answer questions, but may not vote on an item. In certain circumstances the member may be asked to leave the room for the item.
3. In circumstances where the LAG Chair has a direct, indirect personal or pecuniary or non-pecuniary interest in an item for discussion or decision, he/she will step down for that item and be replaced as Chair by another member of the LAG. The procedure in points 1 and 2 will then apply.
4. In circumstances where the Accountable Body has submitted an application, it will be processed by Programme Staff, but the appraisal process will be undertaken by a suitably skilled alternative which could be a Folkestone CLLD LAG member or Programme Staff from a similar programme (e.g. the Hastings or Thurrock CLLD Programmes) before submission to the Folkestone CLLD LAG for decision.
5. LAG members and Programme Staff must not accept gifts or hospitality from actual or prospective project applicants.

### **Adjudicating possible conflicts of interest;**

This will be undertaken by the LAG Chair or a substitute at the meeting with the support of Programme Staff.

The Accountable Body, with its overall responsibility for the compliance of the Folkestone CLLD programme, has the authority to overrule a decision of the LAG, the Chair or their

# Local Action Group: Terms of Reference, Declaration Statement and Code of Conduct

## D

representatives if the outcome will conflict with the Conflict of Interest code of practice or bring the Folkestone CLLD programme into disrepute.

Any complaint received by the LAG in writing stating that there has been a breach of this code, will be dealt with in accordance with the Accountable Body's Complaints Procedure.

### **Folkestone CLLD Programme: Code of Conduct of Local Action Group Members**

The responsibilities of LAG members are to:

- Abide by this Code of Conduct and Declaration of Interest and Conflict of Interest Statement
- Commit to attending Local Action Group meetings or nominate a substitute from the same organisation. If a LAG member, or nominated substitute, misses 3 consecutive LAG meetings, then the LAG member will be excluded from the LAG at the discretion of the Chair.
- Promote the CLLD programme through their own organisation's channels of communication.
- Bring forward potential projects from their own organisation where appropriate.
- Work with the local community to identify and bring forward projects to the CLLD Programme, where appropriate, or help signpost to support to develop their ideas for CLLD projects.
- Encourage and foster innovation in projects coming forward
- Commit to understanding the projects under consideration
- Work effectively with other LAG members and take collective responsibility for decisions made
- Provide impartial and consistent decision making.

# Local Action Group: Inaugural Meeting

## 24 August 2016

# E

## Folkestone

# CLLD

Community Led Local Development

### LOCAL ACTION GROUP (LAG) MEETING

Date: 24/08/2016  
 Time 13.00-14.30  
 Venue Middleburg Room, Civic Centre, Folkestone

#### Invitees:

Katharine Harvey, SDC (acting Chair)  
 Cllr David Monk, SDC  
 Rob Hancock, KCC  
 Zena Cooper, Shepway Employment and Training Forum  
 Martin Almand, Citizens Trust  
 Peter Bettley, RDHCT and Folkestone Harbour Company  
 Jennifer Childs, Folkestone Town Council  
 Cllr Martin Salmon  
 Paul Manning, East Kent College  
 Terry Cooke-Davies, Rotary  
 Jo Strickland, Folkestone Business Hub  
 Jon Wilson, Rainbow Centre  
 Penny Shepherd, Sustainability Connections  
 Jo Olliver, Samaritans  
 Michael Lake, Folkestone and District Mind  
 Stephen Shaw, East Folkestone Together  
 Alex Sansom, SDC  
 Lynn Dockar, SDC

### AGENDA

- |  |       |
|--|-------|
| 1. Welcome and introductions                         | KH    |
| 2. Apologies   | AS    |
| 3. Election of LAG Chair process                     | KH    |
| 4. Introduction of LAG Chair                         | KH    |
| 5. Folkestone CLLD Strategy                          | Chair |
| - Discussion of Draft Strategy                       |       |
| - Agree LAG Terms of Reference                       |       |
| - Endorsement and Approval process for final version |       |
| 6. Next meeting                                      | AS    |
| 7. AOB   |       |






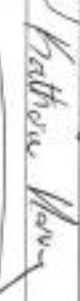




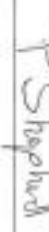







# Local Action Group: Inaugural Meeting E 24 August 2016

Folkestone CLLD LAG Meeting

### Attendance Sheet

Date: 24<sup>th</sup> August 2016

Name	Organisation	Signature
Cllr David Monk	Shepway District Council	
Jennifer Chads	Folkestone Town Council	
Joanna Strickland	Folkestone Business Hub/ Enterprise Foundation/ Strickland Accountancy	
Jo Oliver	Samartians	
Jon Wilson	Rainbow Centre	
Katharine Harvey	Shepway District	
Martin Almond	Citizens Trust	
Cllr Martin Salmon	Folkestone Town Council	
Michael Lake	Folkestone Mind	
Paul Manning	East Kent College	
Penny Shepherd	Sustainability Connections	
Peter Bettley	Strand House/ Roger De Haan Charitable Trust	
Rob Hancock	Kent County Council	
Stephen Shaw	East Folkestone Together	
Terry Cooke-Davies	Rotary	
Zena Cooper	Folkestone Employment & Skills Forum	

# Local Action Group: Inaugural Meeting

## 24 August 2016

# E

## Folkestone

# CLLD

Community Led Local Development

### LOCAL ACTION GROUP (LAG): MINUTES OF MEETING

Date: 24/08/2016  
 Time: 13.00-14.30  
 Venue: Middleburg Room, Civic Centre, Folkestone  
 Date: 24/08/2016  
 Time: 13.00-14.30  
 Venue: Middleburg Room, Civic Centre, Folkestone

#### Attendees:

Katharine Harvey (KH), SDC, CLLD Lead Officer (acting Chair)  
 Cllr David Monk (DM), Leader, SDC  
 Rob Hancock (RH), KCC  
 Jennifer Childs (JC), Town Clerk, Folkestone Town Council  
 Cllr Martin Salmon (MS), Mayor, Folkestone Town Council  
 Terry Cooke-Davies (TCD), Folkestone Rotary  
 Jon Wilson (JW), Rainbow Centre  
 Penny Shepherd (PS), Sustainability Connections  
 Jo Olliver (JO), Samaritans  
 Michael Lake (ML), Folkestone and District Mind  
 Stephen Shaw (SS), East Folkestone Together  
 Alex Sansom (AS), SDC, CLLD Project Coordinator  
 Lynn Dockar (LD), SDC, CLLD Project Support

#### 1. WELCOME AND INTRODUCTION

- 1.1 KH welcomed the group to the inaugural meeting of the Folkestone CLLD Local Action Group (LAG). She explained that many members were previously part of the CLLD Steering Group that had been established back in March to help steer the work on developing a strategy for the Folkestone CLLD Programme. New members were welcomed to the group.
- 1.2 KH asked everyone to introduce themselves and round table introductions followed.

#### 2. APOLOGIES

- 2.1 A number of apologies were received from members unable to attend this meeting: Peter Bettley (RDHCT and Folkestone Harbour Company), Paul Manning (East Kent College), Jo Strickland (Folkestone Business Hub), Martin Almand (Citizens Trust) and Zena Cooper (Shepway Employment and Training Forum).
- 2.2 Based on the proposed Terms of Reference, which requires 7 'voting' members of the LAG to be in attendance, the meeting was deemed to be quorate.

#### 3. ELECTION OF LAG CHAIR PROCESS

# Local Action Group: Inaugural Meeting

## 24 August 2016

### E

- 3.1 KH explained the proposed process for appointing the Chair of the LAG, which is set out in the Terms of Reference. These were handed out to Members but also were contained in the Draft Programme Strategy document that had been circulated to members with the meeting agenda prior to the meeting agenda on Friday 19<sup>th</sup> August.
- 3.2 KH asked whether there was agreement to adopt the proposed process and asked for members to vote. There was unanimously agreement in favour of this.
- 4. INTRODUCTION OF CHAIR OF THE LAG**
- 4.1 KH explained that this process to appoint the Chair of the LAG had been adopted prior to the meeting and the result was a majority in favour of Terry Cooke-Davies for the role of Chair. KH welcomed TCD to this role and TDC took over chairing the meeting from this point.
- 4.2 TCD thanked LAG members for their vote of confidence in appointing him as Chair.
- 5. FOLKESTONE CLLD STRATEGY**
- 5.1 The draft Folkestone CLLD Strategy had been previously circulated to LAG members for comment and discussion at this meeting.
- 5.2 TCD asked KH to provide an update of the feedback received from the SELEP appointed CLLD Programme 'critical friend', Shelagh Powell and Lorraine George, SELEP's lead for European programmes.
- 5.3 KH explained that the feedback had been generally positive but that there were four key areas that need to be addressed:
- i. Too much of the analysis focuses on IMD 2015 data rather than the IMD 2010 data. It was the 2010 data that had been used to determine the appropriateness of areas for a CLLD programme and so more was needed on this.
  - ii. There was concern about too much focus on working with youngsters still in full time education. This was felt to be outside the domain of this programme from DWP and DCLG's perspective who are the Managing Authorities for ESF and ERDF respectively.
  - iii. The Community Hub proposal mustn't be perceived as an opportunistic attempt to lever in major funding to develop a new building, but rather it should be made more explicit that the emphasis would be for building renovations and minor alterations.
  - iv. There needs to be greater emphasis on funding for projects which offer new innovations and ways of working, rather than funding for existing initiatives, albeit those that are working well but where resources are limiting their impact.
- 5.4 KH explained that these and other comments received from LAG members prior to the meeting would be addressed in the final version of the Strategy.
- 5.5 TCD invited other comments and views on the Draft Strategy from LAG members.
- 5.6 JO suggested that some of the figures in section 9 did not add up. KH explained that this was because the table did not show the public sector match requirement specifically and this would be inserted.

# Local Action Group: Inaugural Meeting

## E

### 24 August 2016

- 5.7 RH requested that the consultants, CSES, (who had prepared the Draft Strategy) be requested to provide an Executive Summary which could be used to inform wider stakeholders about the Strategy.
- 5.8 KH asked members whether the strategy should include more of the project ideas that had come forward through the consultation process, to give a better flavour of the types of initiatives that the programme could deliver. RH suggested that rather than providing more detail about these individual projects, a sentence to collectively indicate how many projects and their total value should be added.

#### **LAG TERMS OF REFERENCE**

- 5.9 TCD explained that there was a specific requirement for members to agree the Terms of Reference for the LAG at this meeting. KH was invited to outline the key elements of the TOR and the following points and suggestions were made during the discussions.
- 5.10 DM suggested that the TOR explicitly indicates that the Chair of the LAG cannot be selected from Public Sector members. This was agreed.
- 5.11 TCD raised the question of who would chair the meeting should he be required to leave the LAG meeting, if a project submitted by his organisation was under discussion. It was agreed that in these circumstances, a Deputy Chair would be appointed by the LAG members attending that meeting and that this could only be public sector member, if the casting vote did not result in the public sector having more than 49% of votes.
- 5.12 PS suggested that a sentence should be added about members of the LAG needing to have appropriate skill sets for the role.
- 5.13 In response to questions about membership, it was agreed that membership is with the organisation and not the individual and that this should be made clear in the TOR.
- 5.14 It was clarified that the length of LAG membership is envisaged to be for the duration of the programme, but the TOR does include a process for resignation and replacement with new members.
- 5.15 It was agreed unanimously to accept the TOR with the amendments agreed at the meeting. It was proposed that the Chair should ensure that these changes are made and provide the final sign off of the Terms of Reference on behalf of the LAG. This was unanimously agreed.

#### **APPROVAL OF THE FINAL FOLKESTONE CLLD PROGRAMME STRATEGY**

- 5.16 KH proposed that LAG members delegate the final sign off of the final version of the CLLD Programme Strategy, taking account of the points made during the discussions at the meeting, to the Chair. This was unanimously agreed.
- 5.17 KH agreed to circulate the final version of the CLLD Programme Strategy, due to be submitted to DCLG and DWP by 31<sup>st</sup> August, to LAG members.

#### **6. NEXT MEETING**

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# Local Action Group: Inaugural Meeting

## 24 August 2016

### E

6.1 KH proposed that at this stage to keep the dates of 21/09/2016 and the 19/10/2016 in the diary for the next LAG meetings. However, this will be subject to a response from the government and KH will communicate with LAG members and reconfirm dates as appropriate.

**7. AOB**  
None

# Accountable Body: Letter of Agreement from Shepway District Council

F

Ref: Folkestone CLLD Programme AB  
Direct dial: 01303 853315  
Email: susan.priest@shepway.gov.uk  
Date: 30/08/16



Astrid Jenkins  
Local Growth Delivery Team Leader  
Department for Communities and Local Government  
2, Marsham Street  
London  
SW1P 4DF

Dear Astrid,

## **Folkestone CLLD Programme 2017-2022**

I can confirm that Shepway District Council will be making a formal decision on 14<sup>th</sup> September 2016 at a meeting of its Cabinet to take on the role of Accountable Body for the Folkestone Community Led Local Development Programme 2017-2022. I anticipate this will be approved and that the Folkestone CLLD Programme Strategy will be endorsed.

We understand that DCLG and DWP require that there is formal approval of the above, before any approval of the Programme Strategy, required as an output from stage 1 of the CLLD programme, can be granted.

If you need anything further from me before 14<sup>th</sup> September, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Susan Priest'.

Dr Susan Priest  
Corporate Director – Strategic Development

# Accountable Body: Letter of Agreement from Shepway District Council

F

Ref: Folkestone CLLD Programme AB  
Direct dial: 01303 853315  
Email: [susan.priest@shepway.gov.uk](mailto:susan.priest@shepway.gov.uk)  
Date: 30/08/16



Joanna Wright  
European Social Fund Contract Manager  
Department for Work and Pensions  
Finance Group  
Bedford JCP  
Wyvern House  
53-57 Bromham Road  
Bedford  
MK40 2EH

Dear Joanna

## Folkestone CLLD Programme 2017-2022

I can confirm that Shepway District Council will be making a formal decision on 14<sup>th</sup> September 2016 at a meeting of its Cabinet to take on the role of Accountable Body for the Folkestone Community Led Local Development Programme 2017-2022. I anticipate this will be approved and that the Folkestone CLLD Programme Strategy will be endorsed.

We understand that DCLG and DWP require that there is formal approval of the above, before any approval of the Programme Strategy, required as an output from stage 1 of the CLLD programme, can be granted.

If you need anything further from me before 14<sup>th</sup> September, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Susan Priest'.

Dr Susan Priest  
Corporate Director – Strategic Development

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This Report will be made public on 6 September 2016

Report Number **C/16/35**

**To:** Cabinet  
**Date:** 14 September 2016  
**Status:** Key Decision  
**Head of service:** Ben Geering – Head of Planning  
**Cabinet Member:** Councillor John Collier

**SUBJECT: SHEPWAY PLACES AND POLICIES LOCAL PLAN – PREFERRED OPTIONS**

### **SUMMARY:**

On 29<sup>th</sup> June Cabinet agreed report C/16/13 which provided an update on the progress of the Shepway Places and Policies Local Plan, seeking cabinet approval for the formal structure of the Preferred Options document, range of proposed policies and the consultation strategy and associated arrangements, prior to consideration of the document itself.

Appendix 1 to this report provides a copy of the final draft of the Places and Policies Local Plan Preferred Options Document. Cabinet is asked to agree this draft document, subject to any minor changes delegated to the Head of Planning. Cabinet is also asked to agree to the consultation arrangements set out within the report, so as undertake a 6 week engagement process in accordance with regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

### **REASONS FOR RECOMMENDATION:**

Cabinet is asked to agree the recommendations set out below in order to allow progress to be made on the development and delivery of the Shepway Places and Policies Local Plan and the review of the Core Strategy Local Plan.

### **RECOMMENDATIONS:**

- 1. To receive and note report C/16/35.**
- 2. To agree the draft Places and Policies Local Plan Preferred Options document, subject to any minor changes delegated to the Head of Planning**
- 3. To agree to the formal consultation upon the Preferred Options document, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012**

## 1. Background

- 1.1. In September 2013 the District Council formally adopted the Shepway Core Strategy Local Plan that set the strategic planning framework for the District and included strategic site allocations at Folkestone Seafront and Shorncliffe Garrison and Broad Locations for development at Sellindge and New Romney.
- 1.2. Significant progress has been made in relation to each of the sites/broad locations since the adoption of the Core Strategy, and it is necessary to identify the smaller and medium size sites to deliver a range of homes and businesses to meet the overall requirements set out in the Core Strategy. There is also the need to provide up-to-date Development Management planning policies to guide future development.
- 1.3. On 18<sup>th</sup> June 2014 Cabinet approved the Shepway Local Development Scheme (ref C/14/10) which committed the Council to producing the Places and Policies Local Plan. On 21<sup>st</sup> January 2015 Cabinet approved the Shepway Places and Policies Local Plan Issues and Options (regulation 18) consultation document (ref. C/14/69) along with 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. The Places and Policies Issues and Options consultation ran from 29<sup>th</sup> January 2015 to 11<sup>th</sup> March 2015.
- 1.4. The six week Shepway Places and Policies Local Plan Consultation resulted in the submission of over three hundred 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. A summary of these responses was included within Cabinet report C/15/19. The individual representations received can be accessed via the following link to the Council's consultation portal:  
<http://www.shepway.gov.uk/planning/planning-policy/the-places-and-policies-local-plan>
- 1.5. On 16<sup>th</sup> September 2015 Cabinet agreed the recommendations set out in report C15/19. This report included the following:
  - the proposed content and structure of the Places and Policies Local Plan (Section 4);
  - future community and stakeholder engagement (Section 5);
  - the strategic 'duty to co-operate' issues as the basis for discussion with partners (Section 6);
  - the methodology for assessing potential sites for inclusion within the Strategic Housing Land Availability Assessment (SHLAA) (section 7); and
  - a revised timetable for the production of the document, taking into consideration all of the above (Section 8).
- 1.6. On 29<sup>th</sup> June 2016 cabinet agreed to the recommendations set out in report C/16/13. This report provided an update on the progress of the Local Plan, sought cabinet approval for the structure of the Preferred Options Document and range of proposed policies and set out a consultation strategy ahead of the formal engagement required by Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This report also provided an update to the Local Development

Scheme (LDS) setting out the revised timetable for the progression of the Plan, as well as a timetable for the Review of the Core Strategy Local Plan.

1.7 The Core Strategy Local Plan and the Places and Policies Local Plan are important tools for meeting the objectives of the Shepway District Corporate Plan. They will ensure that over the plan period, until 2026 there is a regular supply of residential building land in appropriate locations across the district. As well as meeting key Corporate Plan objectives for delivering new homes and jobs, supporting an attractive and vibrant place to live, the new Local Plan will also help generate funding via the New Homes Bonus, whilst the Community Infrastructure Levy (CIL) has now been introduced (from 1st August 2016), augmenting the use of s106 agreements to fund appropriate infrastructure to mitigate the impact of development.

1.8 The Plan also will support development of appropriate sites for employment purposes so as to create opportunities for business and strengthen local communities so that they remain sustainable and an attractive and vibrant place to live and to work.

1.9 An important component of plan making is the preparation of Preferred Options and the consultation on these options. In formulating these Preferred Options full consideration has been given to the representations received on the Issues and Options consultation which took place between January and March 2015. A response to the main issues raised is attached as Appendix 2 to this document.

1.10 Preferred Options will not be the last chance for comment, and responses received will influence the 'final draft' Publication. At this juncture, interested parties will then be able to make representations to the Planning Inspectorate. The next stage is the Submission of the Places and Policies Local Plan for the critical Examination in Public (EiP). This is when the Planning Inspectorate will consider comments, judge the 'soundness', and decide if Shepway can adopt the Places and Policies Local Plan.

## **2. Places and Policies Local Plan Preferred Options**

2.1 The Preferred Options Document, attached as Appendix 1 sets out the emerging policies for the district. The document forms 2 components '*Places*' an allocations plan and '*Policies*' which provides for updated and replacement Development Management Policies that will be used to determine all planning applications in the District.

2.2 The places component of the plan is organised via the Character Areas of the district within the Core Strategy, with allocations set out for the Urban Area, Romney Marsh and North Downs. These chapters provide policies for:

- Town Centres
- Employment Land
- Local Green Spaces
- Residential Allocations

2.3 Each Policy within the plan is preceded by supporting text, providing details of the assessment undertaken in formulating the policy. Details of the alternative

sites rejected for development are then set out within Appendix 1 of the document.

- 2.4 As set out in report C16/13 a call for sites was made in September 2015 with considerable response - approximately 140 sites being put forward for residential development. Whilst the SHLAA identifies a pool of sites that are suitable against the SHLAA methodology for development it does not take in to account wider and emerging policy criteria, to be applied on a site specific basis as part of the policy formulating process. A number of the sites within the SHLAA were also relocated to the Housing Information Audit (HIA) as planning permission had been implemented or they related to strategic sites. After considering these policy issues there are now 57 sites from both the green (50) and amber (7) list that are proposed for allocation within the Places and Policies Local Plan. These sites would provide approximately 2,531 dwellings, with 1,230 provided within the Folkestone and Hythe Urban Area, 491 provided in the North Downs and 810 within the Romney Marsh Character Area.
- 2.5 With regard to housing numbers, the Shepway Core Strategy sets out a minimum of 7,000 dwellings and an upper target of 8,000 dwellings by 2025/26. The 2015/16 Housing Information Audit identifies approximately 5,350 dwellings from completions, extant planning permissions and allocated sites since the start of the plan period (2006).
- 2.6 To meet the lower figure, the Places and Policies Local Plan would have to allocate land to accommodate 1,650 dwellings and to meet the upper figure it would need to allocate land to accommodate 2,650 dwellings. Following detailed site assessment the Places and Policies Local Plan Preferred Options will seek to allocate land for approximately 2,531 dwellings.
- 2.7 Taking in to account existing completions and allocations (5,350 units), and the proposed allocations of 2,531 units (excluding those already counted) it can be demonstrated that the Core Strategy requirement of 7,000 houses will be met, with the target of 8,000 homes by 2026 also to be met and potentially exceeded.
- 2.8 The Policies component of the plan provides for 50 policies, set out over 8 chapters, as follows

#### Housing and the Built Environment

- Quality places through design
- Cohesive design
- Development of residential gardens
- Alterations and extensions to buildings
- Internal and external space standards
- Self build and custom build development
- Replacement dwellings in the countryside
- Conversion, reconfiguration and redevelopment of residential care homes and institutions
- Development of new residential institutions
- Accommodation for Gypsies and Travellers

## Economy

- Allocated employment sites
- Tourism
- Hotels/guest houses
- Touring and Static caravan sites
- Farm diversification & Farm Shops
- Reuse of rural buildings
- Broadband provision and infrastructure

## Community

- Creating a sense of place
- Safeguarding community facilities
- Provision of Open Space (refer to 2 studies)
- Formal Play Space Provision

## Transport

- Street hierarchy and site layout
- Residential Parking
- Residential garages
- Other parking standards
- HGV parking
- Cycle parking standards

## Natural Environment

- Enhancing and managing access to the natural environment
- Biodiversity
- Protect the districts landscape and countryside
- Equestrian Development
- Light Pollution and External illumination
- Land Stability
- Contaminated Land
- Integrated Coastal Management Zones
- Development around the coast

## Climate Change

- Reducing Carbon Emissions
- Sustainable construction
- SUDS
- Wind turbine development
- Domestic wind turbines and existing residential development
- Solar Farms

## Health and wellbeing

- Promoting healthier food environments
- Reducing Health Inequalities
- Supporting healthy, fulfilling and active lifestyles
- Protecting and enhancing rights of way

## Historic Environment

- Heritage assets

- Local list of buildings (undesigned Heritage Assets)
- Communal Gardens
- Heritage Strategy

- 2.9 Further evidence, including the Heritage Strategy, Tourism Destination Management Plan, Open Space study, Play Strategy and Renewable Energy Paper is currently being completed and will further inform the draft plan. The Employment Land Review is also being finalised, however has provided input in to the preferred options policies within the plan.
- 2.10 The draft emerging findings from these studies have supported the Preferred Options Document, with further revisions to be made to the Preferred Options policies ahead of publication of the draft Places and Policies Plan.
- 2.11 In accordance with the legal requirements of the plan making process, the policies proposed within the Preferred Options document have been tested through Sustainability Appraisal (SA) and Habitat Regulations assessment (HRA). Both the SA and HRA will also be published as supporting documents for consultation.

### **3. Proposed engagement arrangements**

- 3.1. As agreed by Cabinet on 29<sup>th</sup> June 2016 (C16/13) the Council proposes to undertake a six week period of public engagement during October and early November 2016 following the publication of the Preferred Options Plan. As with the Issues and Options engagement this stage is still under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended.
- 3.2. Following this public engagement exercise the Plan will be redrafted and prepared for Submission (Regulation 22), with Cabinet approval required for the submission draft of the plan. Before submission there will have to be a six week (minimum) consultation exercise (Regulation 19), with the responses to the consultation collated by the Local Planning Authority and provided to the Secretary of State (Planning Inspectorate).
- 3.3 Officers have recently carried out cluster meetings with Parish and Town Councils, as well as the Shepway Business Advisory Board and East Kent colleagues so as to raise awareness of the upcoming public engagement.
- 3.4 Whilst local plans are prepared at the local (District) level, national planning policy recognises the need for local planning authorities (both at Officer and Member level) and other stakeholders to identify and address strategic cross boundary issues through the statutory duty to co-operate. The National Planning Practice Guidance (NPPG) describes the Duty to Cooperate as follows:

*'The duty to cooperate is not a duty to agree. But local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination. Local authority officers and councillors have an important role to play in this process'*  
and that:

*'...The duty requires active and sustained engagement. Local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies. It is unlikely that this could be satisfied by consultation alone. Local planning authorities that cannot demonstrate that they have complied with the duty will fail the independent examination process'.*

3.5 The Local Plan Examination will test whether a local planning authority has complied with the duty. If it has not, an Inspector can recommend that a Local Plan is not adopted and stop the examination.

3.6 Since September 2015 the following has been carried out to ensure we are actively engaging with partners in meeting the Duty to Cooperate:

- In December 2015 we have carried out an initial Duty to Cooperate survey;
- In October 2015 there was a joint meeting with Canterbury, Ashford, Thanet and Dover with the other bodies such as the EA and KCC;
- We have attended individual duty to cooperate meetings with KCC and Ashford, and
- We have held a discussion meeting with Ashford and Rother with regard to the Sustainable Access Strategy.
- Regular East Kent duty to co-operate meetings.

#### 4. RISK MANAGEMENT ISSUES

4.1 A summary of the perceived risks is as follows:

Perceived Risk	Seriousness	Likelihood	Preventative Action
The council falls behind in its programme for producing a new Places and Policies Local Plan.	Medium –	Medium	The Council has maintained a five year housing land supply. The updated SHLAA has provided significant evidence of available and suitable sites for development. Whilst this has led to a delay in formulating Preferred Options policy the assessment has provided appropriate sites to meet the requirements of the Core Strategy Local

			Plan.
Other local authorities do not agree the duty to co-operate has been met or don't agree to implement its provisions.	Medium	Medium	Continued dialogue with partner authorities through the various discussion forums that exist.

## 5. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

### 5.1 Legal Officer's Comments (DK)

Local plans such as the Shepway Places and Policies Local Plan must be prepared in accordance with the Council's Local Development Scheme ('LDS') in accordance with section 19 of the Planning and Compulsory Purchase Act 2004 ('PCPA'). In turn the Council, acting in its capacity as the local planning authority, is responsible for preparing and maintaining the LDS in accordance with section 15 of the PCPA. The Council must also monitor progress made in preparing its local development documents against the timetable set out in its LDS.

### 5.2 Finance Officer's Comments (DB)

This report relates to the development and delivery of the Shepway Places and Policies Local Plan and the review of the Core Strategy Local Plan.

Although there are no direct financial implications from this report, there could be a major indirect financial effect.

The report also shows that Community Infrastructure Levy (CIL) is proposed to be introduced from 1<sup>st</sup> August 2016, augmenting the use of s106 agreements to fund appropriate infrastructure to mitigate the impact of development.

### 5.3 Diversities and Equalities Implications (BG)

This report does not specifically highlight any equalities implications although future consultations will need to reach 'hard to reach groups', such as Gypsy and Travellers, and the Plan will be subjected to an Equality Impact Assessment.

## 6. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

Councillors with any questions arising out of this report should contact the following officers prior to the meeting:



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## **APPENDICES**

Appendix 1 – Draft Places and Policies Preferred Options Document  
Appendix 2 – Response to Issues and Options representations

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## 1 Foreword

## 2 Introduction

**2.1** The Shepway Places and Policies Local Plan (the Local Plan) is a planning document that will, when adopted, form part of the statutory Development Plan for the district. The allocations and policies within this plan cover the whole district and, when adopted, will be used to consider the suitability of development proposals. The Plan will cover a period starting from 2006 to 2026.

### **Shepway Development Plan**

**2.2** The Development Plan sets out the District Council's policies and proposals for the development and use of land in the district. The Development Plan for Shepway District currently includes the adopted 2013 Shepway Core Strategy Local Plan (the Core Strategy) and saved policies from the 2006 Shepway District Local Plan.

**2.3** The adopted Core Strategy is the overarching planning policy document for the district and sets out the long term vision and strategic delivery policies until 2026. It identifies the overall economic, social and environmental aims for the district and the amount, type and strategic development locations that are needed to fulfil those aims. There are three aims:

1. To improve employment, educational attainment and economic performance in Shepway;
2. To enhance the management and maintenance of the rich natural and historic assets in Shepway; and
3. To improve the quality of life and sense of place, vibrancy and social mix in neighbourhoods, particularly where this minimises disparities in Shepway.

**2.4** To meet these objectives the adopted Core Strategy sets out the target amount of development to 2025/26 (Policy SS2). For residential development it identifies a target of 8,000 dwellings (minimum of 7,000). For business uses a total of 20ha and for retail 35,000 sqm.

**2.5** The Local Plan will sit below the Core Strategy and has two functions. The first is to allocate enough land for future development to meet the requirements set out in the Core Strategy for residential, employment and community needs. The second is to set out development management policies that will be used to assess planning applications and guide future development.

**2.6** The Local Plan will, therefore, play an important role in shaping the future of the district and ensuring that the Council's aims set out in the Core Strategy are met and providing local communities, landowners, developers and infrastructure providers with certainty about the future pattern of development in the district. The policies in the Plan will ensure that new developments will be sustainable, the natural and

historic environment will be maintained and that new developments through their design will improve the quality of life of future and existing residents and help to foster healthy lifestyles.

**2.7** When the Local Plan is adopted by the District Council, it will replace the saved policies in the 2006 Shepway District Local Plan.

**2.8** The District Council will also be undertaking a partial review of the Core Strategy, which will consider the future planning requirements for a period beyond 2026. This review will be following a separate process to the Local Plan.

### Neighbourhood Planning

**2.9** In accordance with the provisions of the Localism Act 2011, neighbourhood planning allows town and parish councils to shape new development within their area through the production of Neighbourhood Development Plans or Orders. When made, they will also form part of the Development Plan.

**2.10** In Shepway a number of parishes have had Neighbourhood Areas designated. This is the area which the Neighbourhood Plan or Order will cover. The Areas that have been designated so far are:

- Hythe
- Lympne
- New Romney
- St Mary in the Marsh
- Sellindge

**2.11** Of these local councils St Mary in the Marsh have produced a draft plan that will be shortly submitted to the District Council for further consultation before it is taken forward to examination.

**2.12** The District Council will actively engage with town and parish councils who wish to prepare a Neighbourhood Development Plan or Order. Neighbourhood Plan policies can cover a variety of planning policy areas addressing issues at the local level.

### Government Policy & Legislation

**2.13** The policies included within this Plan are consistent with the National Planning Policy Framework (the NPPF) and National Planning Policy Guidance (NPPG) pertaining at the time of writing.

**2.14** Since the adoption of the Core Strategy in 2013, there have been a number of changes to government legislation and policy which have been considered when developing this Plan. Changes include:

- Starter Homes: for first-time buyers only and purchasers must be aged between 23 and 40. They will also count as 'affordable homes' in the NPPF;
- Self Build & Custom Build Housing; The District Council now holds a register of people interested in building their own homes. New legislation places a duty on Councils to have regard to the self-build and custom housebuilding register that relates to their area when carrying out their planning, housing, land disposal and regeneration functions;
- Planning in Principle (PiP) has been introduced for housing-led development which will provide developers with greater certainty of consent at an earlier stage in the development cycle. PiP will be granted on the adoption of development plan documents or a neighbourhood development plan;
- Brownfield Land Registers will provide house builders with up-to-date and publicly available information on all brownfield sites available for housing locally. PiP may also apply to such sites;
- Changes have been made to the definition of Gypsy and Travellers in Government guidance.

**2.15** The District Council has also considered Government papers such as 'Fixing the Foundations: Creating a more prosperous nation' (2015) and 'Towards a one nation economy: A 10-point plan for boosting productivity in rural areas' (2015).

### **Evidence Base**

**2.16** The Places and Policies Local Plan has been influenced by a range of evidence base documents. A full list of the evidence base is included at Appendix 3. The key evidence that supports this Plan is summarised below.

### **Shepway Corporate Plan**

**2.17** This document sets out the Council's vision for the Borough from 2013 to 2018 and how the Council intends to realise that vision.

**2.18** The vision is 'Prosperous and ambitious - Working for more jobs and homes in an attractive district'. To help achieve this vision the document sets out five strategic objectives:

- Boost the local economy and increase job opportunities
- More homes
- Listening to local people
- Support an attractive and vibrant place to live
- Deliver value for money

### **Sustainability Appraisal and Strategic Environmental Assessment**

**2.19** Sustainability Appraisals (SA) are used to test local plan policies and proposals to ensure that they are consistent with the aims of sustainable development. A Sustainability Appraisal must also incorporate the requirements of the European Strategic Environmental Assessments Directive, which ensures that significant environmental impacts are identified and taken into account. The process involves

- the assessment of current state of the environment
- the identification of likely significant effects on the environment
- the identification of possible measures to prevent or mitigate these effects.

**2.20** This document will be appraised against a set of defined criteria, in accordance with Shepway Places and Policies Local Plan Sustainability Appraisal Scoping Report.

### **Habitat Regulations Assessment and Appropriate Assessment**

**2.21** A Habitat Regulations Assessment (incorporating an Appropriate Assessment screening report) is being carried out alongside the development of the Places and Policies Local Plan to test whether the plan alone, or in combination with other plans and projects, is likely to have an adverse impact on the integrity of the designated nature conservation sites at Dungeness complex of Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites, Folkestone to Etchingill Escarpment SAC, Parkgate Down SAC, Dover to Kingsdown Cliffs SAC and Lydden to Temple Ewell Downs SAC other sites which benefit from European wildlife protection within 15km of the district boundary.

### **Equalities Impact Assessment**

**2.22** An initial Equalities Impact Assessment (EqIA) has been undertaken on the consultation document and the findings of this are available as a separate document. Undertaking an EqIA at this early stage enables us to identify actions that will help ensure that equalities issues are given proper consideration as we continue to develop the Plan and that positive impacts on target groups are enhanced as far as possible. Further Assessments will be undertaken as the development of the Plan progresses.

### **Duty to Co-operate**

**2.23** Whilst progressing through the process of producing the Places and Policies Local Plan, it will be necessary to ensure compliance with the statutory duty to co-operate - that is to engage constructively, actively and on an ongoing basis on planning matters that impact on more than one local planning area and being mindful of the requirements of neighbouring authorities and the approach they are taking to develop policies and allocations.

### **Plan Making Process**

**2.24** The Preferred Options Places and Policies Local Plan is the second draft published by the District Council to engage with the public. The first, the Issues and Options draft, was published in January 2015 and the District Council received just under 1,200 comments from just over 230 people.

**2.25** These comments, together with the changes in Government legislation and Council objectives in the Corporate Plan, have been considered when drafting this version of the Plan. The Plan presents a range of options and identifies the Council's preferred options for its Local Plan, stating why these have been chosen.

**2.26** The comments the Council receives as part of this public engagement process will then be considered and used to shape the final 'Submission' draft. This will be published for public consultation before it is submitted to the Secretary of State. All the comments received at this stage will be passed over to the Planning Inspectorate and an Examination in Public will be held. After the receipt of a favourable Inspectors Report the Places and Polices Local Plan can be adopted by the District Council.

**2.27** Once adopted, the Shepway Places and Policies Local Plan in combination with the Core Strategy will form the basis for decisions on planning applications and will replace the saved policies of the Local Plan 2006.

**2.28** The current timetable for undertaking this process is outline in the table below.

Consultation on options	January 2015
Public engagement on draft plan (Preferred Options stage)	October 2016
Publication of final draft plan for representations	May 2017
Submission to the Secretary of State	July 2017
Examination in Public	November 2017
Inspector's Report	Jan/Feb 2018
Adoption of Local Plan	April/May 2018

**Table 2.1**



## **How To Comment**

**2.29** The period to make representations on the Plan runs from the 30th September until the 11th November 2016. The District Council is keen to engage with as many people and organisations who live and work in the area during this period and will be holding six exhibitions across the district. These will be held at the following times and venues:

- Folkestone
- Hythe
- New Romney
- Lydd
- Sellindge
- Hawkinge

**2.30** You can make comments in a number of different ways. The preferred method is by using the District Council's consultation portal. Simply register your details and then you can make comments to the paragraphs and policies that are of interest to you. You can go to the consultation portal by following this link: <http://shepway-consult.objective.co.uk/portal/>

**2.31** Alternatively, you can make comments by:

- Email [planning.policy@shepway.gov.uk](mailto:planning.policy@shepway.gov.uk); or
- By completing and returning the enclosed response form; or
- Downloading additional copies of the response form at <http://www.shepway.gov.uk>

**2.32** The document can be viewed via the District Council's website - <http://www.shepway.gov.uk>; or at the District Council offices and public libraries throughout the District (see <http://www.shepway.gov.uk> for opening hours).

### 3 Introduction

**3.1** The spatial strategy for the district is set out in the Core Strategy (2013). This sets out the overarching provisions and strategic policies for the district as well as two strategic allocations and broad locations for residential development. Core Strategy Policy SS2 sets out the overall target for residential, economic and retail development in the district. Table 3.1 below sets out the requirements.

Use	Target amount of additional development 2006/7 to 2025/26 (inclusive)
Housing (Class C3)	Target approximately 8,000 (minimum 7,000) dwellings
Industrial, warehousing and offices (B Classes)	Approximately 20ha gross
Goods retailing (Class A1)	Approximately 35,000 sqm

**Table 3.1**

**3.2** The Core Strategy divides the district into three character areas, the Urban Area, the North Downs and Romney Marsh (Core Strategy Policy SS1), and sets out the Settlement Hierarchy for the district (Core Strategy Policy SS3).

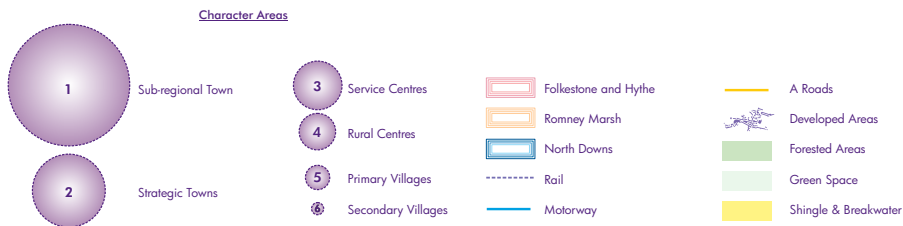
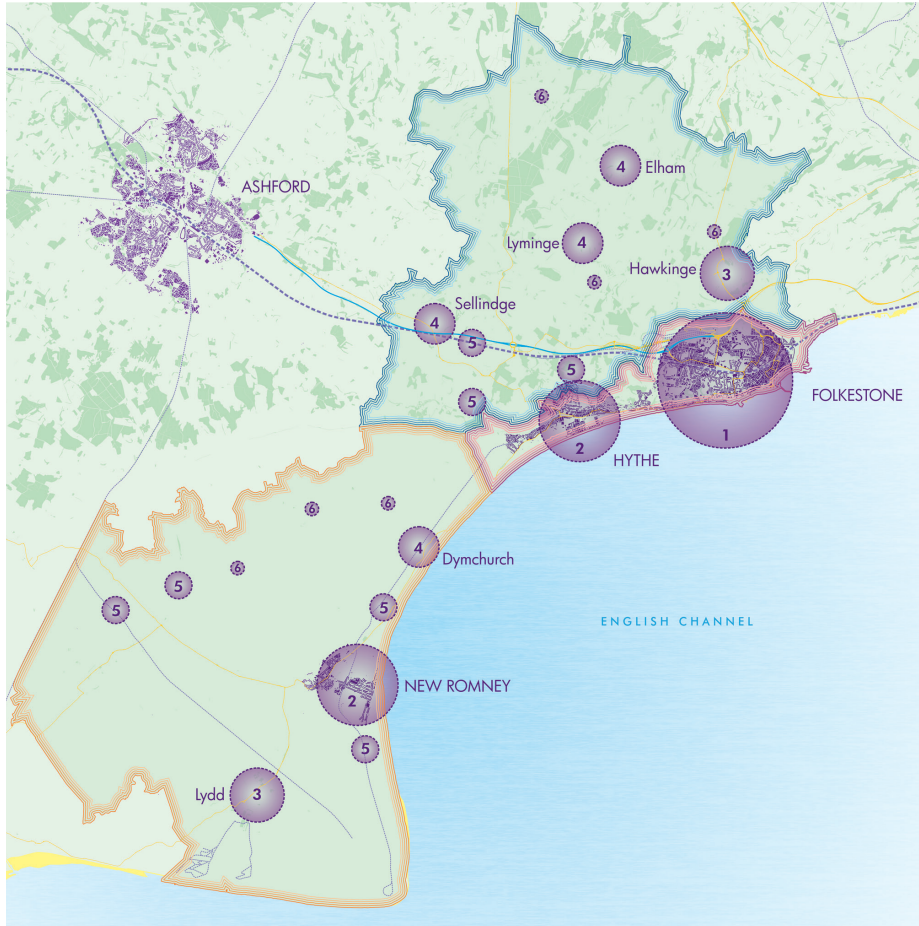
**3.3** Table 3.2 below sets out the Settlement Hierarchy for the district. Figure 3.1 illustrates the distribution of these settlements within the district and the three Character Areas.

Status and Strategic role	Urban Area	Romney Marsh area	North Downs area
<b>The Sub-Regional Town:</b> <i>To accommodate substantial residential, commercial and social development. To provide improved (inter-) national transport links, and a good choice of employment, retail, cultural/leisure and public services for the whole of Shepway, adjoining districts and visitors</i>	Folkestone		
<b>Strategic Towns for Shepway:</b> <i>To accommodate significant development - in so</i>	Hythe	New Romney Town (incorporating Littlestone-on-Sea)	

Status and Strategic role	Urban Area	Romney Marsh area	North Downs area
<p><i>far as consistent with maintaining historic character - appropriate to the needs of their wider hinterlands in Shepway, and maintaining the viability of their local transport hubs, Town Centres and higher order tourism, employment and public services.</i></p>			
<p><b>Service Centres for Shepway:</b> <i>To accommodate development appropriate to Shepway and their own needs, in order to grow and consolidate their position as District Centres serving the local hinterland with shops, employment and public services.</i></p>		Lydd Town	Hawkinge
<p><b>Rural centres:</b> <i>To develop - consistent with enhancing the natural and historic environment - in a manner that supports their role as integrated tourist and local centres providing shops and services for a significant number of residents, visitors, and also for other villages in the North Downs or Romney Marsh.</i></p>		Dymchurch	Elham, Lyminge, Sellindge
<p><b>Primary villages:</b> <i>To contribute to strategic aims and local needs; and as settlements with the potential to grow and serve residents, visitors and neighbourhoods in the locality with rural</i></p>		St Mary's Bay, Greatstone-on-Sea, Brookland, Brenzett	Lympne, Saltwood, Stanford/ Westenhanger

<b>Status and Strategic role</b>	<b>Urban Area</b>	<b>Romney Marsh area</b>	<b>North Downs area</b>
<i>business and community facilities.</i>			
<b>Secondary villages:</b> <i>To continue to provide crucial rural facilities to visitors and their own residents and workforce, in line with local needs, their environment, and role as relatively small country settlements.</i>		Ivychurch, Newchurch, Burmarsh	Stelling Minnis, Densole, Etchinghill

**Table 3.2**



**Figure 3.1 Settlement Hierarchy**

~~3.4 This Places section of the Local Plan reflects the character areas set out in the Core Strategy for the spatial distribution of allocated sites for new homes, employment and community facilities.~~

## Generic Site Policies

### Statement 1

The individual policies for each of the sites allocated in this Plan set out a range of criteria that development of the site must adhere to. There are, however, a number of other relevant policies in the adopted Core Strategy (2013) and within this Plan that will also apply, which have not been repeated in the site policies. These include, but are not limited to:

- Design and layout should take account of the design policies presented within this plan, accord with Building for Life 12 Criteria, and satisfactorily integrate into the existing built fabric;
- Development proposing 15 or more dwellings should provide 30% affordable housing in accordance with Policy CSD1 (Core Strategy 2013) and a mix of dwelling types and sizes in accordance with Policy CSD2;
- Development proposing 11-14 dwellings should provide at least two affordable dwellings on site, subject to viability and a mix of dwelling types and sizes in accordance with Policy CSD2.
- At least 20% of market housing should comply with at least Building Regulation part M4(2), or successor specification, as per Core Strategy Policy CSD2;
- **CSD4**
- A Phase 1 Habitat Survey should be undertaken by a licensed ecologist to assess the presence of Protected Species on or near the sites...
- The provision of allotments where there is the demand, if new development would result in the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a), as per Policy HW3

## Settlement Confines

### Statement 2

Settlement boundaries are shown on the Policies Map. These will be amended to take account of the Core Strategy (2013) allocations and allocations in this document, with the exception of Hawkinge which will be amended to reflect the removal of Policy CO24 (Local Plan Review 2006).

## 4 Urban Area

**4.1** The Urban Character Area consists of the towns of Folkestone and Hythe, including Sandgate and Cheriton, together with the immediate countryside around. The Urban Area is located on the eastern side of the district where the southern edge of the North Downs escarpment meets the sea, close to the district boundary with Dover.

### Urban area Diagram

**4.2** The Core Strategy set out a vision for the Urban Character Area:

*'...the towns would develop, realising the major economic opportunities, especially through High Speed 1 rail service as the bedrock of an improved low-carbon transport system. ...Through a combination of increased market confidence, public sector assistance and an active voluntary sector, central and north Folkestone's range of housing, employment opportunities and community services will match the rest of the urban area. Folkestone would be seen as a major events town with cultural and artistic festivals and regeneration will be apparent in the improved urban environment. Hythe will continue to be an attractive hub for Shepway residents and visitors, with a niche of small shops and traders in the attractive and pedestrian-friendly High Street environment.... The town will benefit from new sports facilities more attractions and leisure facilities by the sea and by the Royal Military Canal'.*

**4.3** To ensure this vision Core Strategy Policy SS1 set out the strategic priorities for the Urban Character Area as:

*'The future spatial priority for new development in the Urban (Folkestone and Hythe) Area is on promoting the development of vacant previously developed land, central Folkestone and the north of the town, and other locations within walking distance of Folkestone Central railway station; securing new accessible public green space, plus regenerating western Hythe'.*

### Retail and Town Centre Options

**4.4** The Issues and Options Draft (2015) considered options for Town Centres rather than individual towns within the District. These Options were as follows:

## Option 1

### Option E8

Town centre and shopping areas (primary and secondary) Policies that protect the vitality and viability of retailing in town centre

A: Continue to set minimum percentage thresholds for the occupancy of the shopping street by shopping uses. Where a stretch of the street is below the desired threshold, changes of use away from shops will be resisted

Or

B: Prevent all changes of use away from shopping use regardless of the occupancy levels (except in special circumstances)

Or

C: Prevent changes of use away from shopping where it would create a certain number of non-retail units adjacent to each other

Or

D: Introduce greater flexibility by allowing changes of use away from shopping into specified other uses, but risk losing valued retail units

## Option 2

### Option E9

Promoting the vitality and viability of town centres, or isolated parades, by maintaining an appropriate proportion of non-shopping uses.

A: Introduce a flexible approach to allow non-retail uses (for example crèches, leisure activities or health centres) where these would complement retail uses and contribute to vitality and viability

Or

B: Encourage the co-location of services, infrastructure facilities to create mini "hubs" and to release other land/buildings for further development



### Option 3

#### Option E10

Improving sites of poor visual amenity which detract from the appearance of town centres and stimulate beneficial redevelopment.

A: Where there is an economically feasible case for redevelopment of sites that do not contribute to the attractiveness of the town, identify an opportunity area, accepting flexibility of use in return for very high quality, historically sympathetic design and finishing materials

Or

B: Leave it entirely to the market and treat incoming proposals on a case-by-case basis

### Option 4

#### Option E11

Managing a lively, safe and social evening economy in the larger town centres which does not detract from the retail offer of town centres or harm residential amenity.

A: Encourage the provision of food, drink and entertainment uses where they are appropriately located and would not lead to an undue loss of shopping units and would not cause harm to local residential amenity.

Or

B: Not to actively promote an expansion of the night time economy and maintain the existing balance of uses.

## Sustainability Appraisal

**4.5** Most policy options have generally positive sustainability effects on the topics they address. Negative effects identified for certain policy options being considered included:

- Risking a loss of town centre vibrancy and provision of accessible services by not allowing change of use away from retail to other public services and facilities, regardless of occupancy levels.

- Risking a loss of town centre vibrancy and provision of accessible shopping by allowing too much flexibility for change of use away from retail.
- Encouraging the provision of food, drink and entertainment uses in town centres has the potential to increase crime and antisocial behaviour in town centres and reduce residential amenity if not carefully managed. Increased provision of certain hot food outlets could promote unhealthy lifestyles.

### Conclusions

**4.6** The Council has also commissioned a Town centre Study which has assisted in understanding the needs of the towns in the district. The conclusions of this are discussed below when the Plan deals with the town centres. After considering this, the representations and the Sustainability Appraisal the Council's preferred options for town centres are as follows:

- Option E8 D: Introduce greater flexibility by allowing changes of use away from shopping into specified other uses,
- Option E9 A: Introduce a flexible approach to allow non-retail uses (for example crèches, leisure activities or health centres) where these would complement retail uses and contribute to vitality and viability
- Option E10 A: Where there is an economically feasible case for redevelopment of sites that do not contribute to the attractiveness of the town, identify an opportunity area, accepting flexibility of use in return for very high quality, historically sympathetic design and finishing materials
- Option E11 A: Encourage the provision of food, drink and entertainment uses where they are appropriately located and would not lead to an undue loss of shopping units and would not cause harm to local residential amenity.

**4.7** These options have been reflected in the town centre policies below.

### Folkestone

**4.8** Folkestone is the principle town within the district with a population of approximately 46,500. Folkestone's heritage can be traced back to Prehistoric times and through the Romans, the Saxons and the Normans. However the small town and fishing port of Folkestone did not develop significantly until the 1800's with the arrival of the railway from London, which transformed the town into a successful cross-channel port and tourist destination. In the years since the first and second World Wars the town has continued to rebuild and rebrand itself, and the building of the M20 and the Channel Tunnel, has meant that Folkestone has undergone major change. Most recently the town has sort to reinvent itself as a hub for the arts and culture.

**4.9** For the purpose of this Plan the urban area includes the centres of Cheriton and Sandgate. The town has a wide range of services and facilities reflecting its function including three secondary schools, 14 Primary schools and two railway

stations served by High Speed 1, with travel times of 56 minutes to London. The town is also served by the M20/A20, which provides strategic road connections to London, Ashford and Dover.

**4.10** The Core Strategy Settlement Hierarchy identified Folkestone as the Sub-Regional Town, whose roles are *'to accommodate substantial residential, commercial and social development and to provide improved (inter-) national transport links, and a good choice of employment, retail, cultural/leisure and public services for the whole of Shepway, adjoining districts and visitors'*.

**4.11** Integral to the delivery of the aims of the Core Strategy is that development is supported by the timely provision of infrastructure. For Folkestone, the following infrastructure requirements are identified as strategically critical:

- Upgrades to improve vehicular capacity, safety, ease of use, and cycle and pedestrian movement at Cheriton High street A20/Spur junction
- Folkestone Seafront priority connections including Tram Road
- Upgrade of facilities, including pedestrian accessibility and public realm improvements for both stations
- Improve bus network
- Provision of new two form entry primary school at Shorncliffe
- Provision of public access open space/nature conservation at Seabrook/Shorncliffe

**4.12** Since the adoption of the Core Strategy many of these requirements have either been completed (priority connections) or are to be delivered through the development of strategic sites and section 106 agreements. For example, policies SS6 and SS7 of the Core Strategy Local Plan which set out the policy requirements for the delivery of Folkestone Seafront and Shorncliffe Garrison, both of which have planning permission.



Figure 5: Folkestone Policy Map



**Figure 4.1 Folkestone Area (draft diagram needs amending)**

### **Folkestone Town Centre**

**4.13** The Core Strategy (2013) Policy SS4 sets out a 'town centre first' principle for applicable uses in line with national policy and sets out a central Folkestone policy in Policy CSD6. This identifies 'arcs' within the central Folkestone area where new development should deliver investment in commercial, cultural and educational uses and contribute to public realm improvements that enhance the physical environment, create a sense of security and improve connectivity. The 'arcs' consist of Central/West Development Arc and Seafront/Creative Regeneration Arc.

**4.14** The importance of town centres and their role as the heart of the local community is recognised in Paragraph 23 of the NPPF. This states that planning policies for town centres should promote competitive environments and the management and growth of centres over the plan period and pursue policies to support their viability and vitality. The NPPF also sets out the definition of the main town centre uses <sup>(1)</sup>

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1 **Main town centre uses:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**4.15** Folkestone is the principal centre in the district for comparison goods shopping, civic facilities, tourism and arts and culture. The centre contains a number of supermarkets and therefore, also provides a convenience goods function.

**4.16** Work on the Shepway Town Centre Study (2015) (see Appendix 3) identified a number of distinct areas where the offer, mix and quality of the retail environment can be considered to differ quite substantially. The primary retail area is focused around the pedestrian element of Sandgate Road and the more recent Bouverie Place Shopping Centre. In this part of the town centre retail uses dominate, and in common with many other towns, there is a move towards more value-orientated retailers alongside established national retailers. The opening of the Bouverie Place Shopping Centre has succeeded in bringing a number of higher-profile retailers to the town, to complement the town's long established department store on Sandgate Road.

**4.17** The secondary retail areas are the peripheral areas which adjoin the primary retail areas; these include the un-pedestrianised section of Sandgate Road, Cheriton Place, Guildhall Street and Rendezvous Street. In these areas, the diversity of uses is less focused on retail, with a greater mix of services such as estate agents, cafés, pubs and bars. These areas are generally quieter, with lower levels of pedestrian activity, and some parts of these secondary areas also have higher levels of vacancy. Rendezvous Street however has significant footfall and has established itself as a vibrant area connecting the High-Street with the Creative Quarter. Here, a café culture has emerged.

**4.18** The Creative Quarter, comprised principally of the Old High Street and Tontine Street, is an area which has been revitalised under the guidance of the Creative Foundation. This Foundation started in 2002 and has overseen the restoration of over ninety buildings. Many units in the area are currently being redeveloped, and the area is being promoted as a hub for the creative industries in the town. This area offers predominantly smaller, independent retail units and includes a number of boutiques, specialist retailers and exhibition space. The Creative Foundation has also led the development of the Quarterhouse arts venue, which occupies a prominent position on Tontine Street, and provides an important cultural facility for residents of the district and the wider East Kent area, showcasing theatre, live comedy, live music and film screenings.

**4.19** The Town Centre Study concludes that, on the whole, Folkestone Town Centre is only performing adequately. The diversity of uses can be considered to be reasonable, but the focus of the retail offer is only on meeting day-to-day uses, rather than higher-order, more specialist comparison goods. The town centre benefits from good accessibility by car and public transport (although linkages between the town centre and railway station and the town centre and sea front require improvement). Environmental quality errs towards functional. The emerging Creative Quarter is a particularly important asset to the town centre, offering a good and changing mix of

independent retailers and cafés, as well as the Quarterhouse arts centre, but despite being entirely complementary to the more ‘mainstream’ offer elsewhere in the town, requires better integration with the wider central area if its potential is to be fulfilled.

**4.20** The Study has highlighted two areas which need to be addressed to ensure the long term vitality and viability of the town. These are:

- the almost-entire absence of an evening economy, particularly in respect of family restaurants and commercial leisure facilities, which reduces the attractiveness of the centre as anything other than a shopping destination: and
- The high level of vacant units - Investment in some of the areas with higher levels of vacancy, such as Guildhall Street, is required in the short term to help arrest this. Such investment may include the improvement of the shopping environment and public realm, modernisation of shop units, and investment in the promotion of the different ‘quarters’ of the town centre.

**4.21** The Study has also identified the spending patterns for the district, which are as follows:

**For Comparison Goods (non-food) Shopping:**

- The district retains just over 50% of spend, totalling around £188m per annum, of which around £105m is spent in Folkestone Town Centre;
- The vast majority of leakage of the District goes to Ashford (around £80m) and Canterbury (around £60m)

**For Convenience Goods (food) Shopping:**

- The district retains 77% of spend, totalling around £200m per annum of which foodstores in Folkestone account for £121m of spending
- The majority of leakage of the District goes to Ashford (£34m) and Dover (£9m).

**4.22** Based on the information above as well assessing trends in areas such as population and spend, the Town Centres Study highlights the following quantitative requirements in the district over the Plan period for retail floorspace needs.

	2014	2017	2021	2026	2031
<b>Comparison Goods <sup>(2)</sup>. Floorspace Requirement (sqm net, rounded)</b>	0	1,100	3,600	8,000	12,800

2 Other goods not classified as convenience goods such as clothing, fridges, televisions

	2014	2017	2021	2026	2031
<b>Convenience Goods <sup>(3)</sup>. Floorspace Requirement (sqm net, rounded)</b>	-4,400	-4,200	-3,600	-2,700	-1,600

**Table 4.1**

*NB Figures are cumulative. Figures in italics are indicative.*

**4.23** The study suggested, however, that there is a need for comparison retail quality to be improved, especially in Folkestone, towards a more mid-market offer to reduce the levels of expenditure leakage to surrounding centres, and through the provision of larger retail units to meet the needs of national retailers. This is likely to require the modernisation of existing floorspace as well as the identification of opportunity sites. The recent planning permission at the seafront includes up to 10,000 sm of commercial floorspace including A1, A3, A4, A5 B1 D1 and D2 uses, which will provide a high quality waterside location which will go some way to meeting the needs set out in the above table, alongside the cultural, tourism and leisure offer provided at the Harbour Arm.

**4.24** The Study also considered the NPPF's requirement for suitable sites to meet its town centre needs. After considering the identified potential uses each Folkestone town centre site as a short term, medium term or long term opportunities, their conclusion was that there was limited potential for development in the short-to-medium term, and therefore are unlikely to represent realistic opportunities for meeting the qualitative and quantitative needs which the study identified. The sites with the greatest potential for redevelopment are the Folkestone Bus Station site and existing retail units on Guildhall Street / Shellons Street.

**4.25** Work by the Folkestone Coastal Community Team has also raised issues in relation to connectivity between the town and the seafront, improvement to the public realm, the importance of maximising events in arts and culture, support for the hotel sector, support for a green link and improvements in café culture and the evening economy and policies in this plan, together with the Core Strategy, seek to assist with these issues.

**Primary & Secondary Shopping Areas**

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3 Broadly defined as food, drinks, tobacco, newspapers, magazines, cleaning materials, toilet articles

**4.26** The Primary Shopping Frontage has been successful in the past at resisting the loss of retail at the ground floor in the main shopping areas. The primary shopping area is compact in nature, running the extent of the pedestrianised precinct of Sandgate Road and the top end of Rendezvous Street. It also include the new Bouverie Place development. The area is characterised by a high proportion of retail shops; many of them occupied by multiple retailers. Whilst it is important to ensure that the centre retains a concentration of shops, it is considered that there are other uses town centre uses, such as, bars, nurseries or doctors surgeries, education, civic buildings, health, museums, and galleries that could help to improve the vitality and viability of town centres by drawing people in.

**4.27** Secondary Shopping Frontages have been designated at the eastern end of Sandgate Road, the northern part of Guildhall Street and The Old High Street. The designation seeks to provide an area where there is a greater mix of town centre uses to support the primary area, providing a wide range of shops, services and restaurants but also providing an area where more specialist and individual shops can locate (due to smaller and cheaper units). It is considered that these areas would also be suitable for small businesses provided that they retain the traditional shopfronts.

### **Public Realm Improvements**

**4.28** The Town Centre Study also highlighted the need for improvements to the public realm and pedestrian legibility improvements between the Harbour and the town and the railway station and the town. The Core Strategy has set out a policy requirement for public realm improvements and requires that Kent County Council, Shepway District Council, Folkestone Town Council and the Creative Council collaborate on signage around Folkestone town centre. This project will improve legibility and encourage active travel, remove clutter and help to reconnect the town with the coast as a required by Policy CSD6 of the Core Strategy, which sets out the Policy requirement for public realm improvements in Folkestone town centre.

### **Town Centre Policy**

**4.29** The purpose of the Folkestone town centre policy is, therefore, to provide the conditions to facilitate development that will add to the vitality and viability, including the encouragement of town centre uses that will enhance the evening economy. It promotes areas for future investment highlighted in the study such as the Bus Station, adjacent to Bouverie Place, and Guildhall Street / Shellons Street to meet the needs of larger retail stores. As there are no proposals as yet for such a scheme it is not possible to allocate sites but it will provide the basis for any future masterplanning work. Planning permission was granted in 2016 for the creation of a new Urban Sports Park in Tontine Street, due to open in 2017 as part of the Triennial. This event provides a significant regional, national and at times international leisure draw to



Folkestone Town Centre, which along side the significant investment in the Creative Quarter and Folkestone Seafront and Harbour, will continue to deliver considerable change in activity within the town over the plan period.

## Policy UA1

### Folkestone Town Centre

Within the designated town centre area (as identified on the Policies Map), planning permission will be granted for development that provides for a range of town centre uses that adds to the vitality and viability of the town centre, particularly where it can be demonstrated that the proposal would enhance the evening economy.

Within the Primary Shopping Frontage (as identified on the Policies Map) within the town centre, development on the ground floor will be permitted for A1 and A3 uses. Other uses will be permitted in the Primary Frontages provided that:

1. They fall within the NPPF definition of 'town centre uses'; or
2. They fall under D1 or C1 uses and provide a complimentary function to the town centre: and
3. They would not create a continuous frontage of two or more non A1 uses.

Within the Secondary Shopping Frontages (as defined on the Policies Map) proposals for development, redevelopment or change of use for Class A1, A2 and A3 (A4, A5) uses will be permitted, provided that:

1. They fall within the NPPF definition of 'town centre uses'; or
2. They fall under B1, C1, D1 or D2 uses, retain an active shop frontage and provide a complimentary function to the town centre:

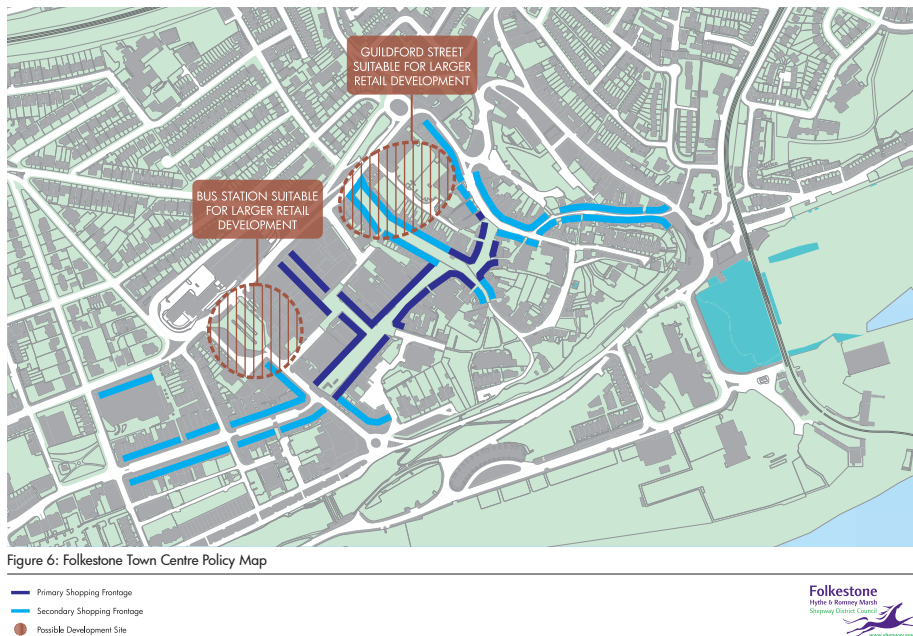
Proposals for larger retail developments will be permitted at:

1. The area around and including the bus station, providing that a suitable alternative location for the bus station can be provided; and
2. Through the consolidation of smaller retail properties in Guildhall Street, or the redevelopment of land to the north of St Eanswythe Way (including the car park).

For development proposals that fall within the town centre uses definition that cannot be located within the designated town centre area, permission will be permitted provided that:

1. the sequential approach set out in the NPPF and the NPPG has been followed;
2. A full impact assessment is provided of the impact that the proposal would have on the retail health of Folkestone Town Centre and other town centres, relating to the scale and the type of development proposed in compliance with the requirements of the NPPF and NPPG;

3. It can be demonstrated that the site is in an accessible location and well connected to the town centre enabling easy access on foot, by bicycle and public transport.
4. The overall design, including parking and landscaping, complies with Policy HB1 of this Plan and reflects the character of the streetscene in which it is located together with the wider build context;
5. Acceptable vehicular access and, if required, service yard, can be provided without harm to the living conditions of local residents.

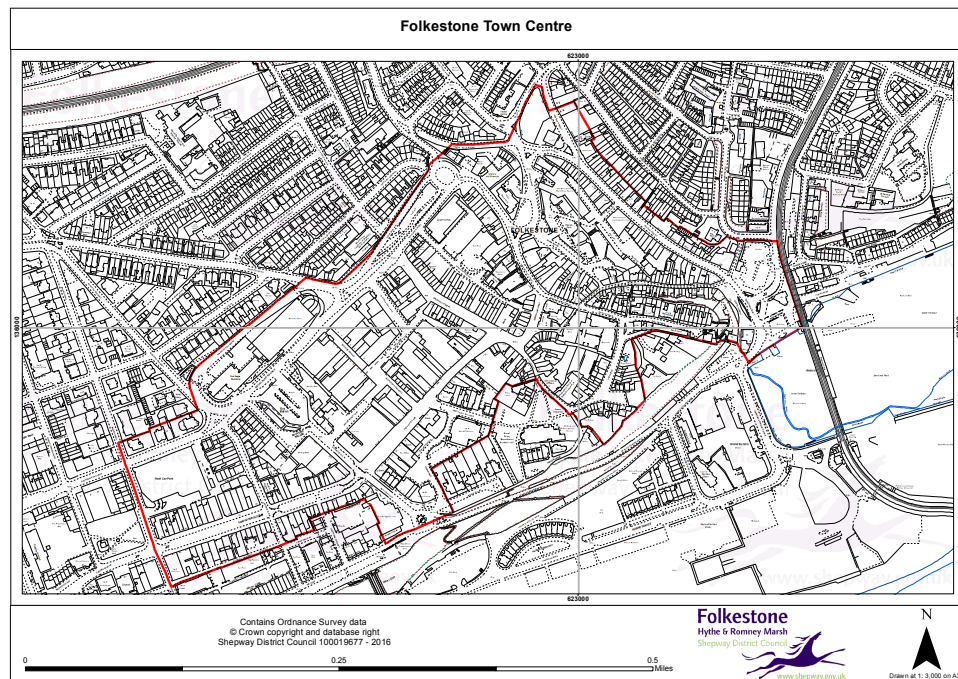


**Figure 4.2 Folkestone Town Centre (draft diagram needs amending)**

### Town Centre Boundary

**4.30** The NPPF states that Local Planning Authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre. For this the District Council needs to identify a town centre boundary so that policies can be applied affectively.

**4.31** The proposed town centre boundary has been plotted after taking into account primary and secondary frontages and areas predominantly occupied by main town centre uses within or adjacent to the frontages.



**Picture 4.1 Folkestone Town Centre Area as will be defined on the Policies Map**

### Options considered for Folkestone Town Centre

**4.32** Town centres are essential to sustainable and thriving communities and supporting their viability and vitality is crucial. The main issues that need to be addressed in Folkestone town centre to ensure their future viability and vitality are:

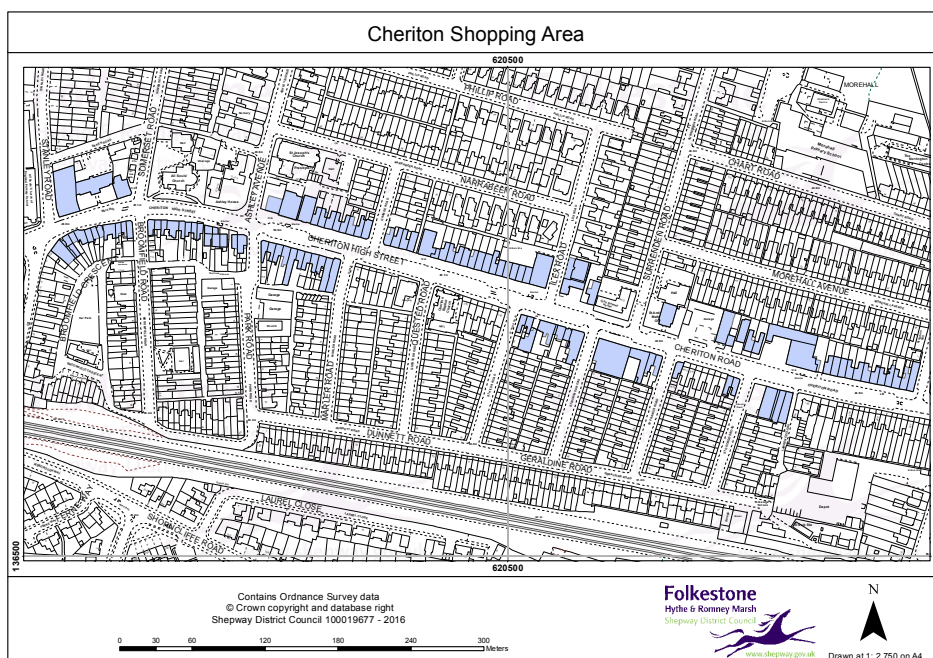
- To improve the evening economy through family restaurants and commercial leisure facilities;
- To reduce the amount of vacant properties in the area;
- To improve the quality of comparison retail in Folkestone, through the provision of larger retail units to meet the needs of national retailers (including modernisation of existing floorspace as well as the identification of opportunity sites);
- Improve the public realm and connectivity (especially to the station);
- To identify the Town Centre Area to apply the NPPF sequential test;

**4.33** The first option for the policy would allocate specific sites for development (for example the site of the bus station) and areas for the amalgamation of existing smaller shops (for example the top end of Guildhall Street). An area for the nighttime economy would also be identified. Although this would give certainty, there are no specific developers or projects identified. Multiple land ownership, particularly around

the top of Guildhall Street, would, also make implementation of any policy more difficult and less certain. There is, therefore, no certainty that such a scheme would come forward.

**4.34** The second option would identify the areas for future investment (development or amalgamation) and where to encourage new facilities, but this would not be boundary specific. More detailed work could then be carried out through an Area Action Plan (AAP).

## Cheriton



**Picture 4.2**

**4.35** Cheriton High Street is a linear district centre to the north-west of the Folkestone urban area. It comprises just under a hundred retail units along a single road. The main ‘anchor’ store to the centre is a convenience food store (although there is a large superstore to the west of the centre, outside the centre boundary). This centre enjoys an attractive mix of retail outlets including a number of traditional independent stores, chemists, a hardware store and other services such as a post office and banks as well as a number of take-away outlets and fast food retailers.

**4.36** The Town Centre Study concluded that Cheriton faces challenges to retain its present vitality and viability. It recommended that a two-stage approach is adopted to tackle this issue. A first stage is the delivery of early ‘quick wins’ to improve the physical appearance of the centre, together with the introduction of additional supermarket provision within the centre if a suitable site is available (indicatively up to 1,000 sqm net convenience goods sales area).

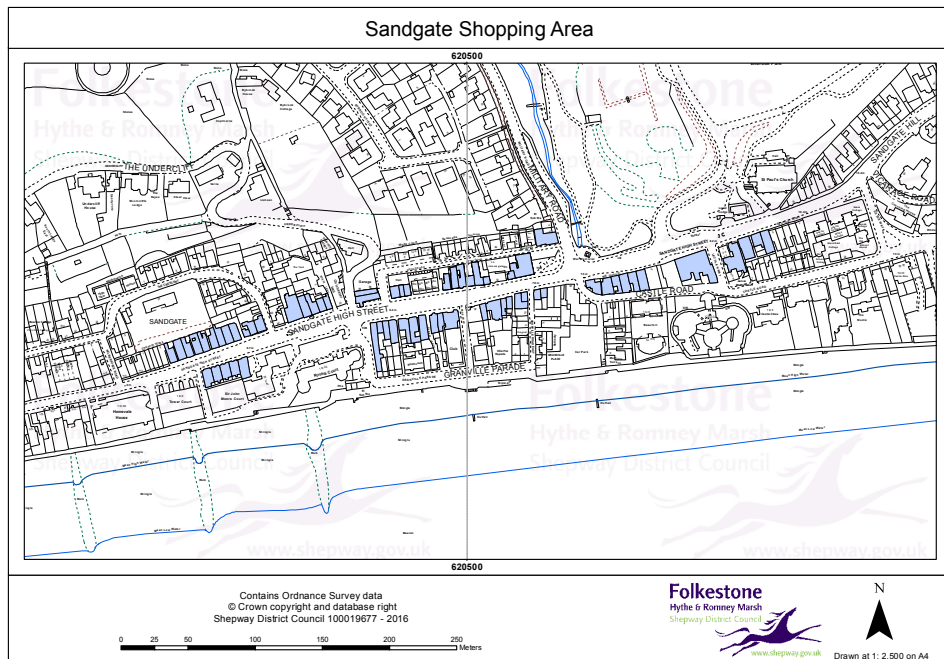
**4.37** Over the longer-term, it suggests that the District Council should monitor the empty properties and consider an appropriate contraction of the boundaries of the centre, to help build a critical mass of retail activity, and focus footfall within a more tightly-defined area. This in turn should then allow for the diversification of uses in more peripheral areas away from retail uses to be considered more favourably.

## Policy UA2

### Cheriton Local Centre

Within the Local Centre of Cheriton, as defined on the Policies Map, proposals for the development, redevelopment or change of use for Class A uses (1 to 5) will be permitted. Other uses will be permitted provided that they would not create a continuous frontage of three or more A3 units and meet the requirements in Policy HW1 Promoting healthier food environments.

## Sandgate



**Picture 4.3**

**4.38** Sandgate High Street has been identified as a Local Centre to reflect its importance to the local community. Retail units here have been under threat through the conversion to residential use, which is starting to undermine the character and economy of the Centre. The Town Centre Study has suggested that the focus should

be on supporting existing local-scale shopping facilities and that should any applications for new development come forward, they should be considered on their individual merits.

### Policy UA3

#### **Sandgate Local Centre**

Within the Local Centre of Sandgate, as defined on the Policies Map, proposals for the development, redevelopment or change of use to Class A1 and A3 uses will be permitted. Other non-residential town centre uses will be permitted provided that:

1. They fall under D1 or C1 uses and provide a complimentary function to the village centre: and
2. They would not create a continuous frontage of two or more non A1 uses.

#### **Employment Land**

**4.39** Sites identified for employment (B1, B2 and B8 uses) in Folkestone are identified in Policy E1 and are considered suitable for meeting the needs of business over the period of the Plan . The sites identified are:

- Shearway Busienss Park, Folkestone (B1 - B8)
- Cheriton Park, Folkestone (B1a)
- Ingles Manor, Folkestone (B1)

#### **Silverspring Site Park Farm Estate**

**4.40** Park Farm is situated on the northern edge of Folkestone, just to the south of Junction 13 of the M20. The 28.3ha site contains both a retail park as well as an industrial area. The industrial estate covers 12.9ha which equates to 45.6% of the total site area. The site overall has good access to the strategic road network including the M20.

**4.41** Within Park Farm Estate there is approximately 3.8ha of vacant industrial space for redevelopment, where the former Silverspring company was located. Silverspring was a soft drinks company that closed in 2013 and the buildings associated with this business have now been demolished and the site cleared. There are two issues that need to be considered for any schemes to redevelop this site. The first is a need to provide good business accommodation in Folkestone and the second is the changing nature of the Park Farm Estate.

**4.42** The Employment Land Review has identified the need to provide good quality office space in Folkestone to improve the offer in the district and encourage business to locate in the district. This site provides an opportunity to do this. The nature of Park Farm, however, is changing with a large area now retail with DIY and a large convenience store.

**4.43** The Council considers that the former Silver Spring site should be redeveloped as a mixed use scheme that reflects the changing nature of Park Farm but also provides good quality business accommodation. Other uses could include bulky retail (A1), leisure (D2) and hotels (C1) where it can be demonstrated through a full impact assessment that the uses would not impact on the viability and vitality of Folkestone or neighbouring town centres. Due to the surrounding uses, residential is not considered to be acceptable for this site.

**4.44** Due to the proposed mixed uses on the site, measures to encourage cycling, walking and the use of buses should be an integral part of any proposals.

## Policy UA5

### **Silverspring Site Park Farm**

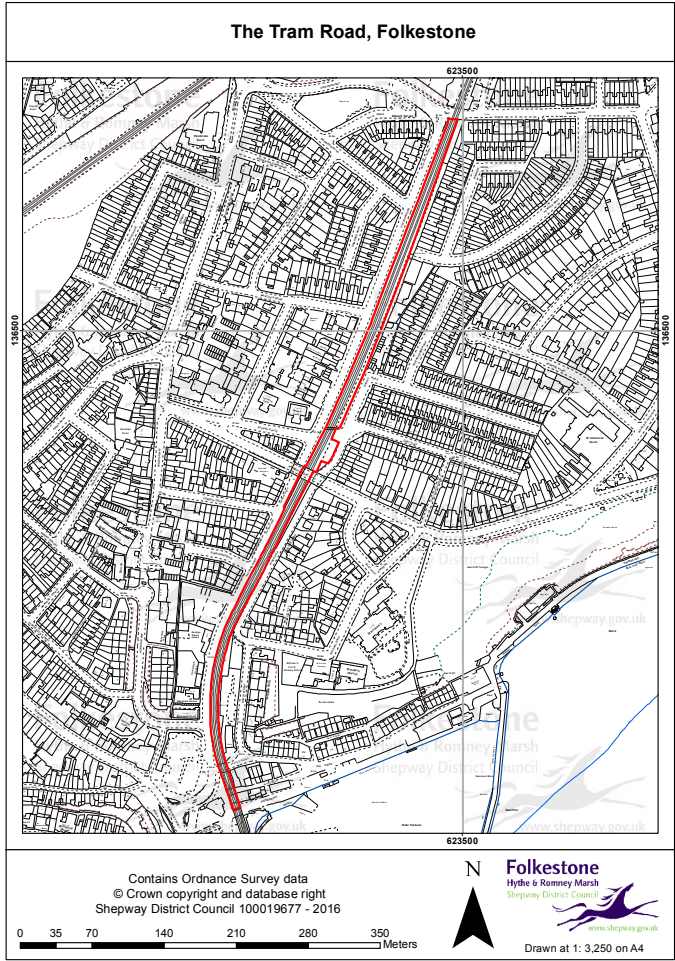
The former Silverspring site, Park Farm, as defined on the Policies Map, has been allocated for mixed use development consisting of business uses (B1), leisure (D) retail (A1) and hotel (C1).

Proposals for mixed use development will be permitted provided that:

1. There is a comprehensive approach to development of the whole site so that any individual elements would not prejudice the implementation of the whole site
2. A suitable access or accesses can be established onto the wider highway network
3. Transport improvements are made to encourage cycling and walking and to provide a bus stop
4. Any potential contamination from earlier uses is investigated and mitigated
5. A full assessment is provided outlining what the impact of any proposed town centre uses would have on the vitality and viability of Folkestone Town Centre and other town centres, relating to the scale and the type of development proposed in compliance with the requirements of the NPPF and NPPG
6. The site is investigated and evaluated to establish if it is of archaeological interest and if so an appropriate mitigation strategy is prepared and implemented.



**Harbour Railway Line**



**Picture 4.4 Former Railway Line, Tram Road**

**4.45** The former harbour railway line that runs along The Tram Road located in eastern Folkestone, is considered to be an important route for future cycle and pedestrian connectivity to the harbour development. There is also an opportunity to provide additional parking along this route to serve tourists and visitors to the harbour and seafront, particularly following the loss of car parking within the locality as the redevelopment of the seafront moves forward. The Plan therefore safeguards this former line to ensure that this is protected from any incremental development.

## Policy UA5

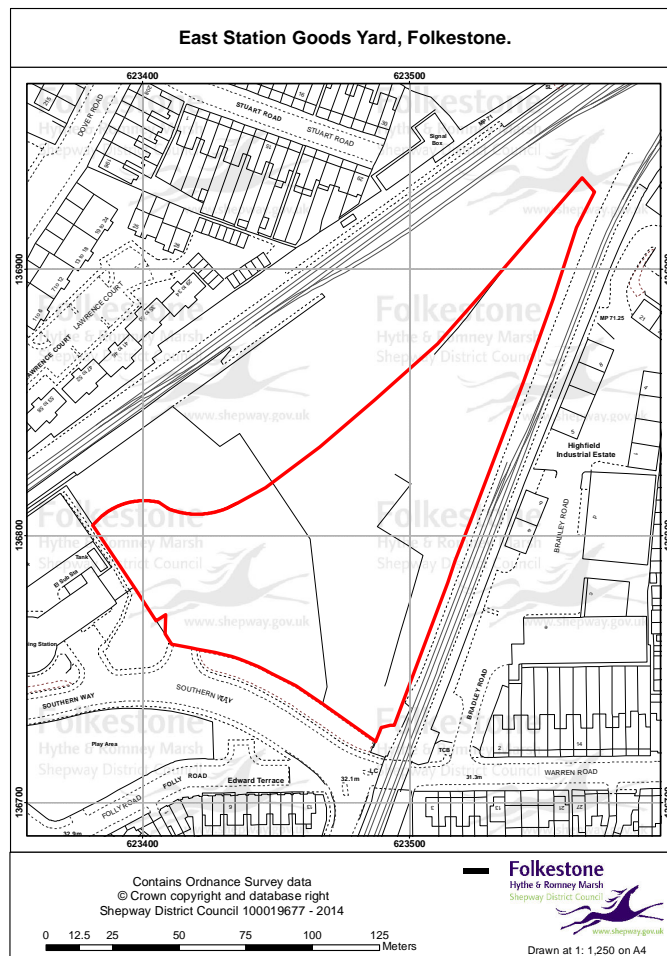
### Former Harbour Railway Line

The former Harbour Railway Line, as defined on the Policies Map, has been allocated for a linear park, promoting active travel by providing a cycle and pedestrian route to the harbour area, together with visitor car parking.

## Residential Allocations

### Folkestone Harbour

#### East Station Goods Yard, Southern Way (SHLAA ref: 382)



Picture 4.5

**4.46** East Station Good Yards amounts to approximately 1.2ha of land adjacent to the former railway spur on Southern Way, Folkestone. It was historically used as a railway goods yard until the use became redundant. Since this time, it has been occupied by a number of commercial uses, including as a builders yard, a skip storage facility and for the manufacture of paving slabs. These commercial activities have now ceased and the site has been vacant for a number of years.

**4.47** The site is broadly triangular and lies between the mainline railway line along the northwestern boundary and a disused spur on the eastern side. South of the site is the A260 Southern Way beyond which is a well-established residential area. Vehicular access to the site is via Southern Way.

**4.48** The site is approximately 2m higher than street level, with a large bund providing natural screening from the road. This characteristic could help absorb development and mitigate impact upon the wider street scene.

**4.49** There is a good range of shops, services, transport links and employment opportunities nearby that make the site well suited to a mix of both conventional housing and some supporting commercial premises compatible with residential uses.

**4.50** In respect of key constraints, it will be necessary for a thorough investigation of existing ground conditions to ensure any potential for contamination associated to be carried out in advance of any grant of permission for redevelopment in order to ensure that any potential for contamination associated with earlier uses is identified and mitigated prior to any development coming forward. In addition, it will be necessary for the archaeological potential of the land to be surveyed prior to the development in order to have adequate measures in place to respond and record to any findings of note.

**4.51** A minimum of a 50m acoustic buffer between the developable area and operational railway line should be included in any development in order to adequately mitigate against the noise and vibration associated with rail traffic.

**4.52** In summary, the site is exceptionally well positioned to be able to be developed without adverse impact on the amenities of the occupants of existing residential properties in the area. Accordingly, it is proposed to allocate the site for residential led mixed-use development. (Planning permission was granted in 2016 for a mixed use development of 41 dwellings and 1000sqm of commercial space (Y14/0928/SH)).

## Policy UA6

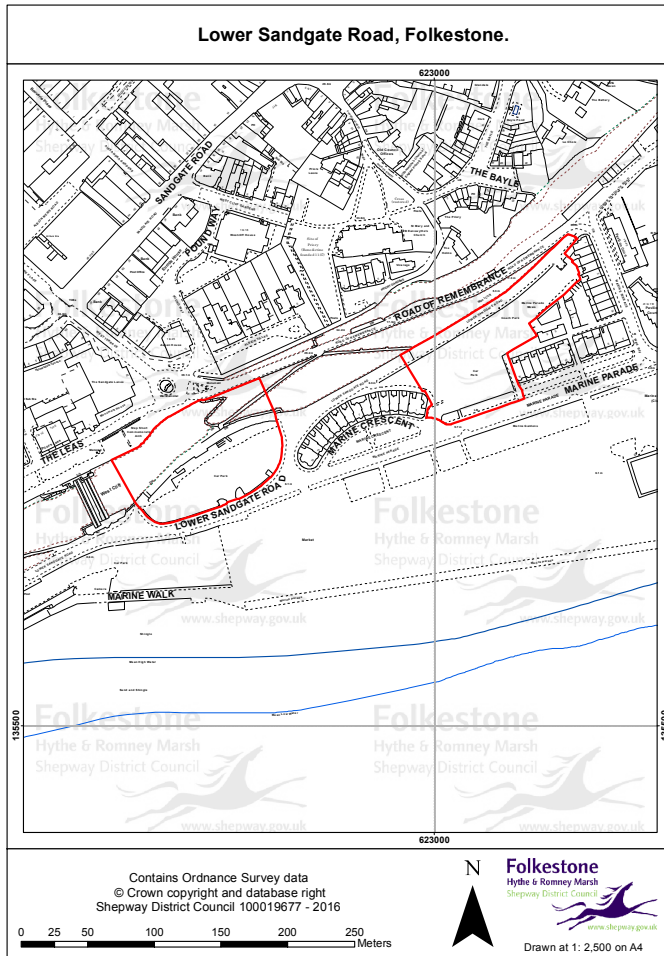
### **East Station Goods Yard, Folkestone**

The site is allocated for residential led mixed-use development with an estimated capacity of 40 dwellings and 1000 sqm complimentary Class B1/B8 commercial floorspace.

Development proposals will be supported where:

1. Approximately 1000 sqm B1/B8 commercial floorspace is provided in a way that would be compatible with new housing without having an adverse impact on the ongoing viability of the commercial uses or the amenities of future residential occupants
2. There is a comprehensive approach to development of the whole site so that if the employment and residential elements were developed separately each element would not prejudice the implementation of the whole development
3. Access is maintained from Southern Way
4. Any potential contamination from earlier uses is investigated and mitigated
5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
6. An Acoustic Survey is provided as part of any application to ensure that the noise and vibration from the adjacent railway lines can be satisfactorily mitigated against.
7. Securement of a financial contribution towards the upkeep or improvement of the existing play facilities on Folly Road

**Rotunda and Marine Parade Car Parks, Lower Sandgate Road (SHLAA ref: 342 and 45)**



Picture 4.6

**4.53** Folkestone Harbour and its immediate surroundings have been subject to various redevelopment and regeneration proposals aimed at enhancing the public realm and reconnecting the town and seafront. These changes are underpinned by Policy SS6 Core Strategy and have been granted planning permission under reference Y12/0897/SH.

**4.54** Within the heart of the policy area are two poor quality and rarely used car parks that, from a location perspective, provide an important link between the town and seafront. These sites form part of an area already indicatively identified for residential use and improved accessibility between Upper and Lower Leas.

**4.55** The Rotunda Car Park measures 1.02 hectares and extends east from the Leas Lift Funicular Railway and the Coastal Park to Marine Crescent to the west. The site's northern boundary currently forms the bottom of the cliff below Road of Remembrance. The land is on a slightly elevated position from Lower Sandgate

Road and slopes gently in a north to south direction. It is unconstrained by policy designations although the cliff to the rear of the site is identified as protected open space.

**4.56** The Marine Parade Car Park and Coach Park is situated 100m further east and covers an area of 0.7 hectares. It is situated between Marine Crescent fronting Marine Parade, extending behind properties in Marine Terrace and sharing a northern boundary with Lower Sandgate Road. The site is flat and consists of a hardstanding used for the parking of cars and coaches. Small sections of protected open space exist to the front (south) of the site. The Undercliff is also an area protected by policy LR9.

**4.57** Both sites are well served by pedestrian and cycle links to the town centre, the seafront and harbour and Sandgate, however as required by Policy CSD6 of the Core Strategy contributions towards the enhancements of existing routes will be required. The Coastal Park to the west provides excellent access to public open space.

**4.58** In respect of constraints, both car parks are situated within the Folkestone Conservation Area, close to or adjoining a series of listed buildings and within an area of archaeological potential. Accordingly, regard must be had to ensure any development preserves or enhances the character and settings of these important Heritage Assets. However, based on the low contribution currently provided to the setting of these assets at present, we see no basis to conclude that conservation matters represent an overruling constraint to development. Accordingly, both sites are considered suitable for residential redevelopment.

## Policy UA7

### **Rotunda and Marine Parade Car Parks, Lower Sandgate Road**

The Rotunda Car Park is allocated for residential development with an estimated capacity of 100 dwellings and the Marine Car and Coach Park is allocated for residential development with an estimated capacity of 65 dwellings.

Development proposals will be supported where:

1. The layout enhances the links between the town and the seafront by providing appropriate contributions to fund upgrades to the cliff paths (upgrading the slope access from the seafront site to Road of Remembrance to be step-free and provision of new or upgrades to existing pavement from Lea's Cliff Hall to the Site)
2. The existing accesses are retained with new emergency access provided via Lower Sandgate Road
3. The scheme preserves or enhances the character and setting of nearby Heritage Assets, including the Folkestone Conservation Area, the Area of Archaeological Interest and nearby Listed Buildings
4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
5. A Flood Risk assessment is provided to establish any potential risk associated from the proximity to the Pent Stream
6. Any potential contamination from earlier car parking uses is investigated and mitigated as part of the development proposal
7. Contributions are made towards improvements in connectivity between the seafront and town centre, as required by policy CSD6
8. Any net loss of open space should be provided in the immediate vicinity of the site

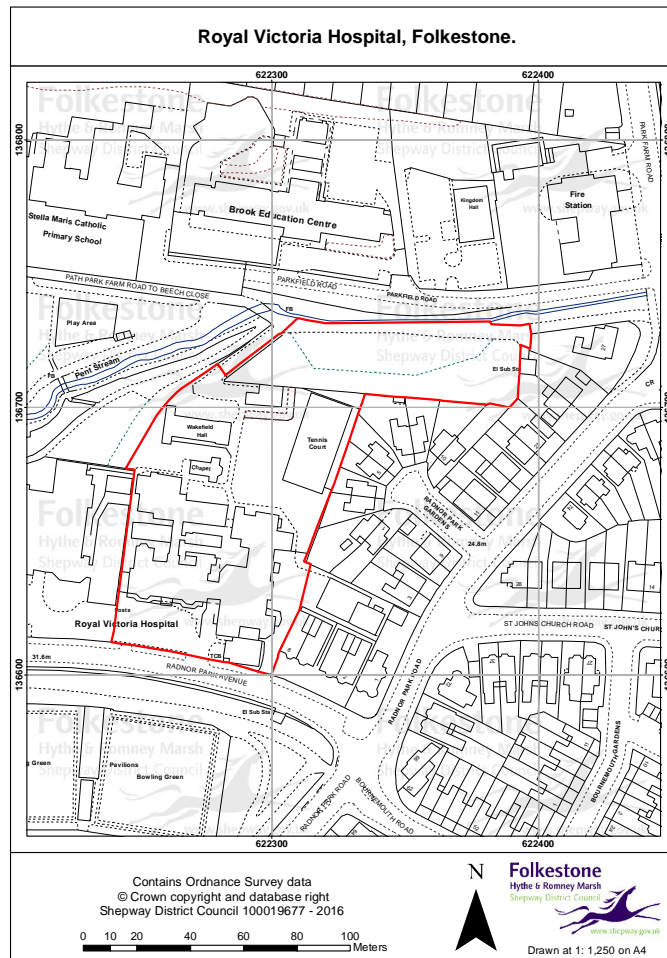
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### **Broadmead and Folkestone Central**

**Royal Victoria Hospital, Radnor Park Avenue (SHLAA ref: 103)**



Picture 4.7

**4.59** Royal Victoria Hospital was first constructed at Radnor Park in 1890. However, since the 1970s services have been scaled back as newer facilities have been provided in nearby areas. Whilst the hospital remains operational, there are large area of the existing campus that are no longer utilised and therefore it is necessary to positively plan for a future re-use.

**4.60** The hospital is effectively split into two parcels measuring 1ha. The low-rise modern element to the western extent provides a Minor Injuries Unit and general outpatient services. However, the original Victorian element no longer offers services. This area forms the basis of the site for development.

**4.61** The main Victorian building consists of a red brick and tiled external finish. There are a series of gable features and the building covers three storeys and plays a prominent role in the street scene. To the rear of the existing building is a range of outbuilding and extensions that are of no architectural interest or merit. Accordingly,



it is envisaged that a residential re-use of the site could include both conversion of the attractive existing building and redevelopment of more modern additions and surplus land to the rear.

**4.62** The site is situated in a highly sustainable location within the heart of Folkestone. It is located approximately 400m walking distance from Folkestone Central railway station and within 1km of main town centre facilities and transportation links. However, highway access is relatively constrained by the narrow nature of the surrounding streets and a one-way traffic system is in operation. Accordingly, it will be necessary to consider highway and parking mitigation measures to ensure that existing hospital parking and access is not compromised, nor traffic conditions worsened, because of the introduction of residential uses.

**4.63** The site is not within a designated Conservation Area nor is it a Listed Building but the main building is considered to be an undesignated heritage asset and should be given some weight in accordance with the NPPF when considering conversion or replacement of the buildings. However, the site is located in close proximity to an area of Flood Zone 3a and therefore flood risk activity permit requirements will apply.

**4.64** It is envisaged that the existing Victorian building could be re-used and converted into residential apartments to provide approximately 16 new homes. Beyond this opportunity exists to clear the remainder of the site and to provide approximately 26 homes suitable for family occupation. A planning application Y12/0980/SH has been submitted to the council comprising of the change of use and conversion of the main Royal Victorian Hospital building to provide 16 residential units together with planning permission for the redevelopment of the remainder of the hospital site to provide 26 residential units and is subject to ongoing consideration.

## Policy UA8

### **The Royal Victoria Hospital, Radnor Park Avenue.**

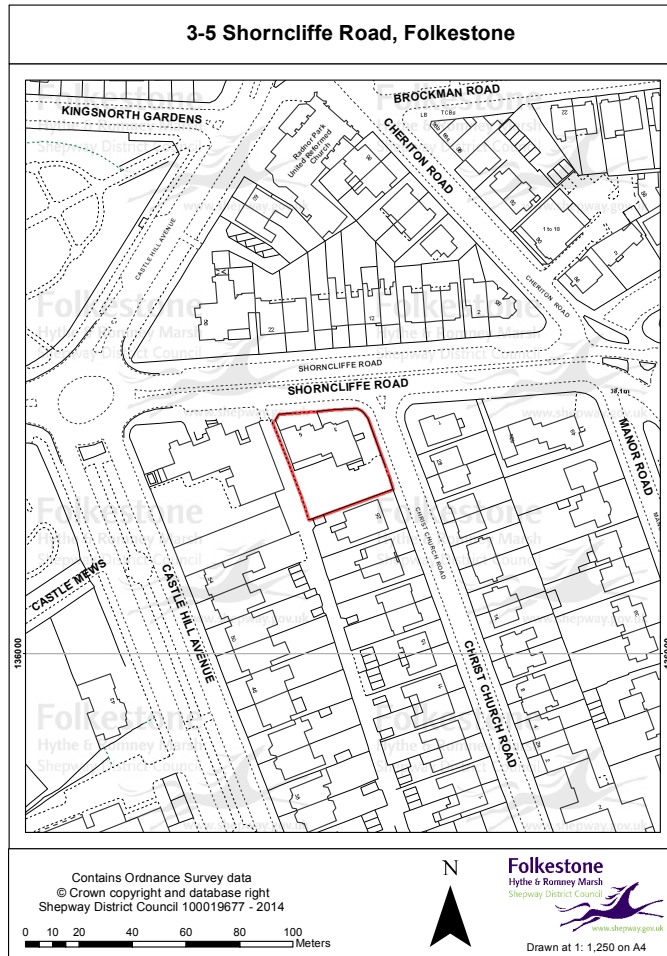
The site is allocated for residential development with an estimated capacity of 42 dwellings.

Development will be permitted for 16 new homes through residential conversion of the original Victorian building. The rear aspect of the site should be cleared to provide approximately 26 new dwellings.

Development proposals will be supported where:

1. The converted and new build elements are properly masterplanned to ensure a coherent approach to the redevelopment of this site
2. A high quality conversion is sought that preserves the character and setting of the Victorian element of the building
3. The rear aspect of the site is redeveloped in a manner that would enhance the wider setting of the area
4. Clear regard is demonstrated as to how parking and the flow of traffic will be managed to ensure that the development does not put undue pressure on the local highway network. If required, mitigation measures or parking permit restrictions should be applied to ensure the free flow of traffic
5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
6. A Flood Risk Assessment is provided as part of any planning application to assess the implications of developing in close proximity to Flood Zone 3a
7. Contributions are to be provided to enhance play and open space at Radnor Park.
8. Contaminated land onsite should be fully remediated prior to construction works

### **3-5 Shorncliffe Road, Folkestone (SHLAA ref: 625)**



**Picture 4.8**

**4.65** 3-5 Shorncliffe Road is a former Shepway District Council office complex last used by East Kent Housing, a registered social landlord, prior to the organisation vacating the premises in September 2015. Since this time it has remained unlet for commercial purposes.

**4.66** The building is three storey in height and has a red brick triple gable front façade. It is understood that the building was originally constructed for residential use, but converted to offices in the mid 1960s. Since this time, it has been used for a variety of local authority uses prior to consolidation of services to the main Council Offices on Castle Hill Avenue.

**4.67** The site is located on the outskirts of Folkestone Town Centre, which offers a wider range of shops, services, leisure facilities and employment opportunities. It is also situated in close proximity to a wide range of public transport links and is considered a highly sustainable location.

**4.68** Immediately west of the property is a Home Office facility. All other boundaries face residential properties of similar three-storey character and design. Rear of the building is an established vehicular access to Christ Church Road and a large car park providing approximately 15 car parking spaces.

**4.69** In respect of constraints, the site is free of any environmental designations, albeit it is located northeast of the Folkestone Leas and Bayle Conservation Area, which is an important Heritage Asset. Any future proposal must therefore preserve the character and setting of the nearby Conservation Area.

**4.70** Taking into account the constraints, it is considered that the 0.15 ha site is suitable for redevelopment for residential purposes. Based on the sustainability credentials and the location of the site in relation to the town centre, it is felt a single apartment block would be the most suitable form of accommodation for the re-use of the site. If the neighbouring Home Office building (7 Shorncliffe Road) became available for redevelopment the two sites should be considered together in a comprehensive scheme.

### Policy UA9

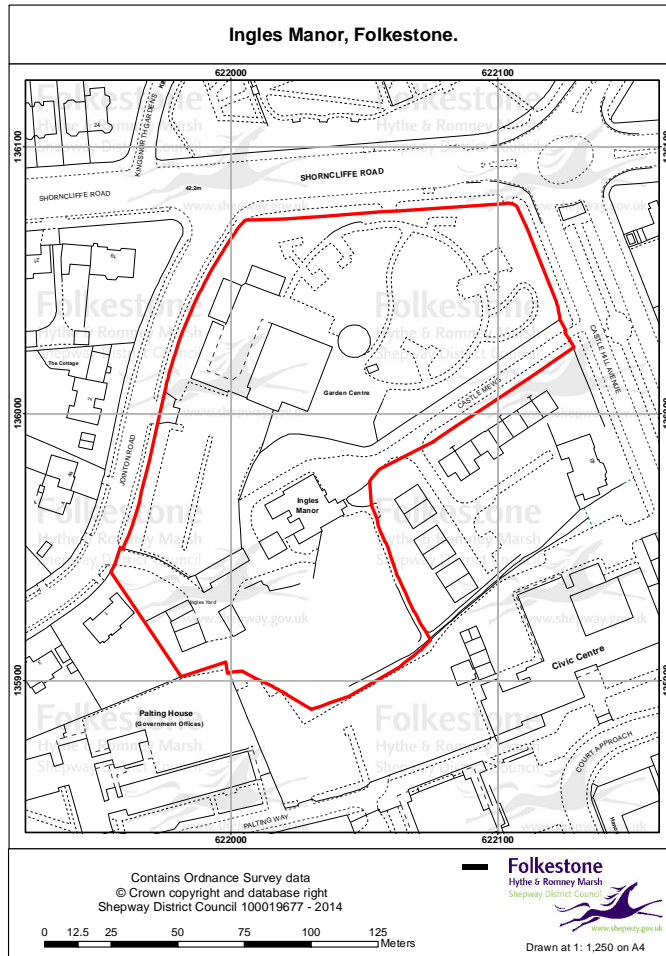
#### **3 to 5 Shorncliffe Road, Folkestone**

The site is allocated for residential development with an estimated capacity of 20 residential apartments.

Development proposals will be supported where:

1. The scale and design of the proposal would be compatible with the character of the surrounding area and would preserve or enhance the setting of the nearby Folkestone Leas and Bayle Conservation Area.
2. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

**Ingles Manor, Castle Hill Avenue (SHLAA ref: 46)**



Picture 4.9

**4.71** Ingles Manor is situated within a sustainable location with easy and convenient access to the town centre, local shops and services.

**4.72** The site is 1.9ha and situated between Shorncliffe Road to the north, Castle Hill Avenue to the east and Jinton Road to the west. To the south, the site borders the car park and curtilages of Shepway District Council’s offices and those of Palting House.

**4.73** The coverage includes a number of established trees some of which are the subject of Tree Preservation Orders. Ingles Manor itself is a grade II listed house with ancillary buildings and barn. The site falls within the Folkestone Leas and Bayle Conservation Area.

**4.74** Planning permission has already been granted in outline for the redevelopment of the site to provide for 46 new homes and 1400sqm of Class B1a commercial floorspace to be delivered in a phased manner alongside the housing development. However, on the basis that works are yet to be fully completed, the site is proposed

for allocation to ensure consistency and certainty that the land will come forward for development. Planning permission (Y12/0767/SH) has been granted for this site and phase 1 for 13 dwellings has been completed.

### **Policy UA10**

#### **Ingles Manor, Castle Hill Avenue**

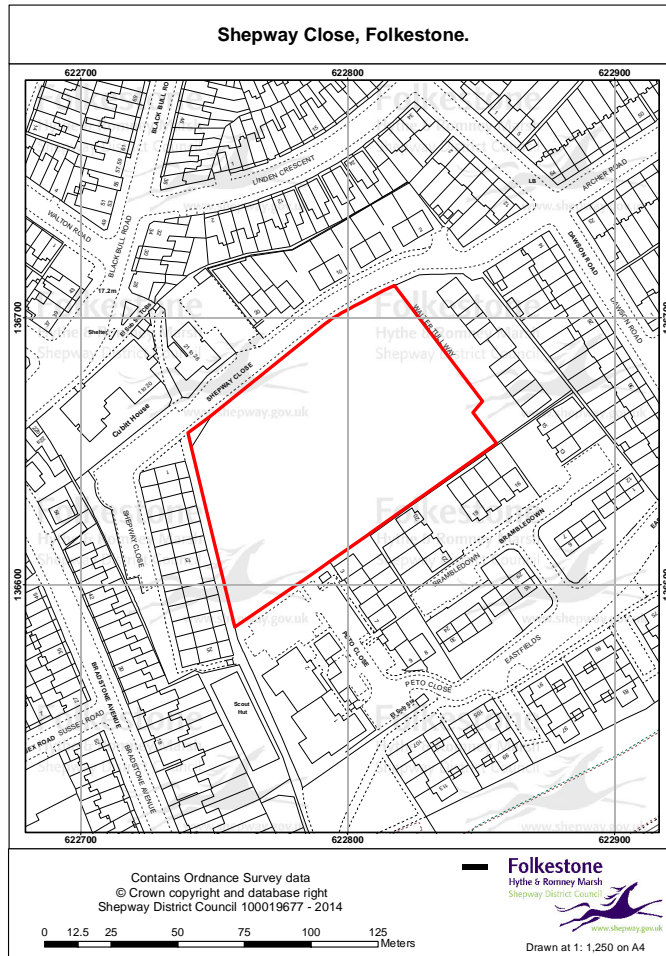
Ingles Manor is allocated for mixed development with an estimated capacity of 46 dwellings and 1400sqm of complimentary Class B1a commercial floorspace

Development proposals will be supported where:

1. The proposed design adequately takes account of the sites setting within a conservation area and tree constraints
2. An assessment is carried out of the impact on the setting of the listed buildings within the site and appropriate measures but in place to preserve or enhance the buildings and their settings
3. Approximately 1400 sqm B1a of new commercial floorspace is provided in a way that would be compatible with new housing without having an adverse impact upon the ongoing viability of the commercial uses or the amenities of future residential occupants
4. B1a Office accommodation will be delivered on the site prior to the occupation of.....
5. Retention and conversion of existing barns
6. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

### **Folkestone East**

#### **Land at Shepway Close (SHLAA ref: 27B)**



**Picture 4.10**

**4.75** Land at Shepway Close amounts to approximately 0.79ha of undeveloped scrubland situated within an established residential area of Folkestone East. It is identified as protected open space within the current Local Plan, but in real terms, it is neither accessible to, nor useable by, the public at present. Accordingly, it is proposed that a proactive approach be adopted to provide both additional new family housing and a meaningful and usable area of open space accessible to existing and future residents.

**4.76** In respect of characteristics, the site consists of overgrown grassland and a series of sporadic boundary trees. It is located within a residential area and benefits from good proximity to a range of shops, basic services, transport links and employment opportunities.

**4.77** In respect of key constraints, there is a slight north south gradient, which should be subject to careful consideration as any design evolves. Furthermore, the untouched nature of the site means it will be necessary for thorough up to date investigation of the wildlife potential prior to any development, or clearance, taking place.

**4.78** With a sensitive design, the site could be developed at a density consistent with its surroundings to provide new homes without adverse impact upon the amenities of existing occupants. In addition a minimum of 0.3ha of land should be incorporated in the design to provide a usable area of public open space for the benefit of both existing and future residents. This open space should be designed to incorporate natural play (for example boulders and recontouring to create variety in ground levels) and planting schemes which could include edible plants or fruit trees that help improve health and wellbeing of local residents. This open space should be integral to the wider design to ensure it is delivered and is not susceptible to future development pressures for housing.

**4.79** Access to the site should be provided from Shepway Close.

### Policy UA11

#### **Shepway Close, Folkestone**

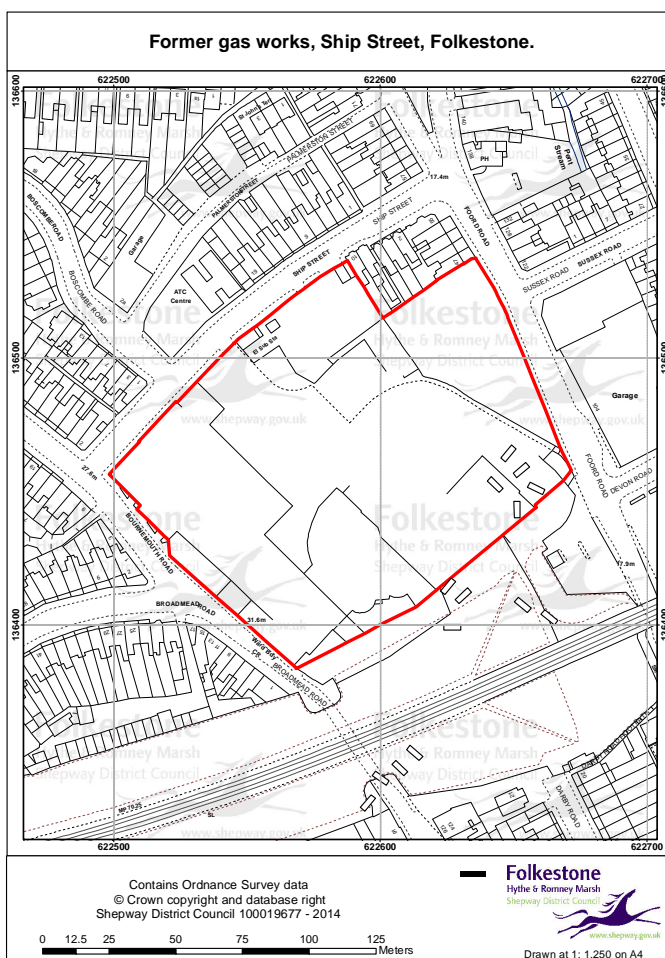
The site is allocated for residential development with an estimated capacity of 24 dwellings and 0.3ha of public open space.

Development proposals will be supported where:

1. An area of 0.3ha is provided as landscaped open space including an area for natural play, which should be integral to the overall layout to avoid the long-term pressure for it to be lost to development. A management company should be established for its long term maintenance
2. Any planning application should include a full ecological survey with the proposals incorporating biodiversity mitigation measures where necessary
3. A strategy for the management of surface water is included within the development proposals
4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

**Former Gas Works, Ship Street (SHLAA ref: 346)**





Picture 4.11

**4.80** The Former Gas Works on Ship Street is a redundant National Grid site surplus to requirements following decommission. It amounts to approximately 1.5ha of land situated within an area of largely residential properties, albeit there are a small number of non-residential uses interspersed in the nearby area, including an MOT testing facility and the Air Training Corp Centre.

**4.81** The site currently consists of scrubland with almost all of the structures relating to the former use having been removed approximately 15 years ago. Beyond the southern boundary, there is a large group of trees that provide a natural buffer to the railway line and provide a green backdrop for a future re-use.

**4.82** The site benefits from good proximity to a range of convenience shops and bus stops are available within approximately 200m walking distance from the site. Existing access to the site is via Ship Street.

**4.83** In respect of constraints, there is a raising gradient from the bottom of Ship Street to the junction with Bournemouth Road, albeit this should not be a significant restriction to development. The relatively untouched nature of the site over the last decade means it will be necessary for a thorough up to date investigation of the wildlife potential of the site. Decontamination works have been undertaken on the site but there is still a need for a program of monitoring. Flood risk will need to be investigated as a small part of the site falls within Flood Zone 3a. The site is in close proximity to the Grade II listed railway viaduct, the setting of which will need to be taken into account with any scheme for development.

**4.84** With a suitable design, it is considered that the site could be developed for residential purposes at a density consistent with its surroundings, with the opportunity for self or custom build plots. A usable area of public open space could also be included integral to the wider design although the site is within a short walking distance of Radnor Park. Due to the level changes and urban nature of this site, the development would not have to provide 10m rear gardens as required by Policy HB5 of this Plan, however it would need to demonstrate that inter and over looking will not result and that acceptable levels of amenity can be provided for occupants via an innovate design and layout.

**4.85** The site is 220 metres from Radnor Park, an identified strategic play location within the district. Therefore contributions should be made for offsite enhancements of the public open space and play at Radnor Park.

## Policy UA12

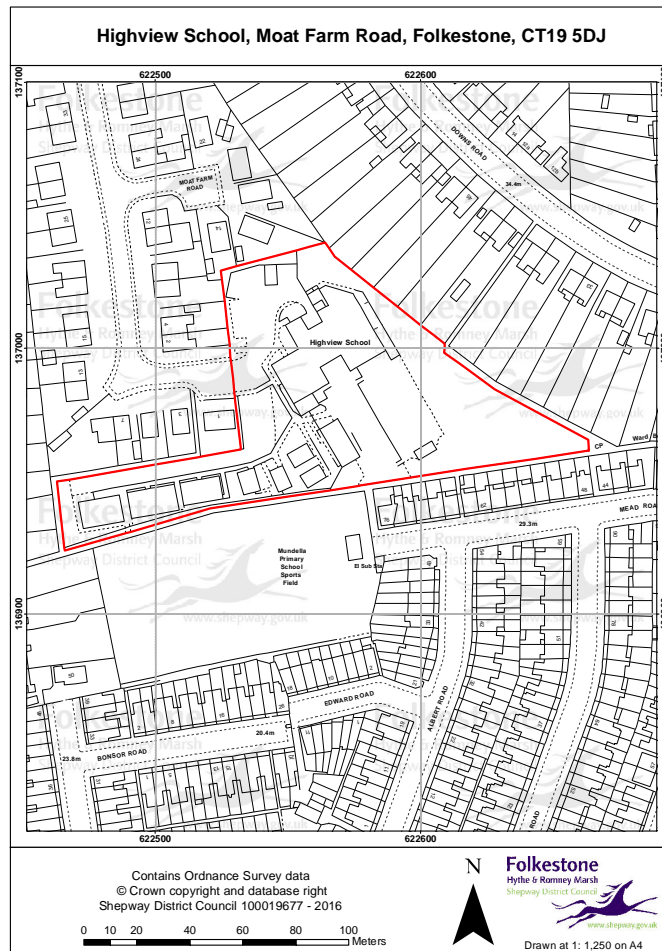
### Former Gas Works, Ship Street

The site is allocated for residential development with an estimated capacity of 100 dwellings and public open space.

Development proposals will be supported where:

1. Full ecological and arboricultural investigations are undertaken and adequate mitigation or protection measures identified where necessary
2. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
3. Contributions will be required to the offsite enhancements of the public open space and play at Radnor Park
4. Appropriate and proportionate contributions are made to Doctors Surgery in Folkestone through a site specific S106 agreement
5. The scale, design and layout of the development should seek to sustain and enhance the setting of the nearby Grade II Listed Railway Viaduct
6. Any potential contamination from earlier uses is investigated and fully mitigated as part of the development
7. A Flood Risk Assessment is provided to assess the implications of developing in and near an area designated as Flood Zone 3a
8. The design approach utilises the special characteristics of the site to deliver a high quality and innovative urban development
9. The development demonstrates how each property will benefit from acceptable private amenity space to meet the needs of occupants via innovative design and layout
10. The development has at least 5 self/ custom build plots on site
11. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

### Highview School Moat Farm Road (SHLAA ref:458)



**Picture 4.12**

**4.86** As part of its ongoing education planning, Kent County Council is in the process of merging Foxwood and Highview Schools. This merger will include the closure of both the existing facilities in Hythe and Folkestone, with a new enlarged, rebranded and purpose built school nearing completion on Park Farm Road, Folkestone.

**4.87** These education changes will leave the current facilities at Foxwood and Highview School vacant and available for redevelopment. It is understood that the new school will be operational by late 2016.

**4.88** The 0.9ha Highview site consists of an irregular shaped area of land consisting of a range of school buildings and structures. These include both single storey and two storey buildings and associated areas of hardstanding and play space.

**4.89** Housing surrounds the school campus to the north, east and south. Downs Road represents an area of predominantly family homes, whilst Moat Farm Road is characterised by smaller bungalows. To the southeast corner of the site are playing fields associated with Mundella Primary School, entirely independent to Highview School.

**4.90** Due to the nature of the established use, the site benefits from good access with bus stops available within approximately 200m walking distance from the site. A public footpath runs along the full length of the southern boundary and provides a quick and direct link to the local parade of shops on Black Bull Road making this site very accessible.

**4.91** In respect of constraints, there is a slight gradient rising upwards from the entrance of the site to the rear boundary with Downs Road. Otherwise, the site is relatively constraint free.

**4.92** Vehicular access is established from Moat Farm Road.

### Policy UA13

#### Highview School, Moat Farm Road

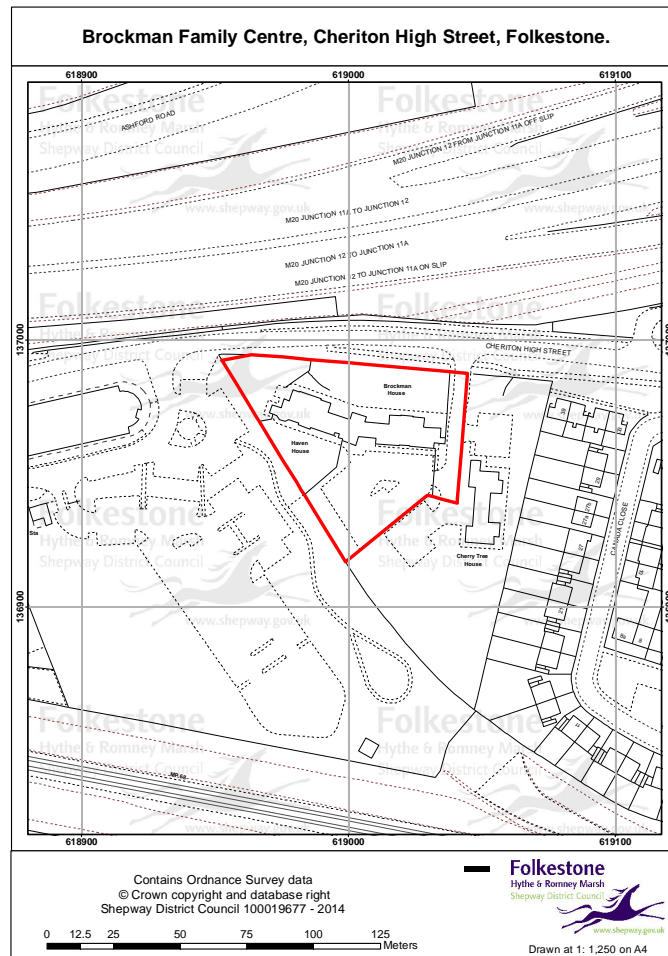
The site is allocated for residential development with an estimated capacity of 27 dwellings.

Development proposals will be supported where:

1. An appropriate mix of housing is provided at a density consistent and compatible with its surroundings
2. The design includes appropriate links to the local footpath network
3. Adequate parking provision is provided to ensure no undue parking stress is caused on Moat farm Road
4. Appropriate and proportionate contributions are made to schools in Folkestone through a site specific S106 agreement
5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

## **Cheriton**

**Brockman Family Centre (SHLAA ref: 637)**



Picture 4.13

**4.93** Brockman House and Haven House are two large linked detached properties that combined are known as the Brockman Family Centre. It was last used by Social Services as a facility for children and parents, but has since closed due to the withdrawal of funding. Despite active marketing, the site has been vacant for a number of years.

**4.94** In respect of characteristics, the 0.87ha site consists of two large linked buildings characterised by a series of hipped roof and gable features finished with a traditional brick and tile appearance. The buildings are not unattractive, but equally they are not of any architectural or historic merit, nor are they of a modern or energy efficient nature that would make them well suited to conversion. Accordingly, a comprehensive redevelopment appears to be the most suitable and positive approach to secure a better long term and sustainable future for the site.

**4.95** The buildings are set on a long linear east west axis with a large car park situated on the southern side and mature landscaping to the north. The latter provides a large degree of screening from Cheriton High Street.

**4.96** The site is considered to be in a sustainable location as it is in close proximity to a range of day-to-day services including a large superstore within a 600m walking distance. Cheriton Primary School is located 900m walk away.

**4.97** There are a reasonable degree of employment opportunities within the surrounding area, including the NHS, the Holiday Inn and Saga, whose headquarters are situated immediately to the west of the site.

**4.98** In respect of accessibility, Bus Stops are available within 250m, whilst the site also benefits from easy access to the strategic road network at Junction 12 of the M20 Motorway. The Eurotunnel terminal nearby provides easy and accessible commuter links to Europe.

**4.99** The site is relatively unconstrained. It is broadly flat, previously developed and benefits from a well-established vehicular access. The absence of any residential neighbours in close proximity of the site also means that redevelopment is unlikely to have an adverse impact upon any existing residents of the area.

**4.100** With a suitable design, the site could be developed for housing at a density of 30 dph and would not be out of character with its surroundings. Alternatively, because of the unconstrained nature of the land the site could potentially accommodate a number of apartments in a single building complex. On the basis that both forms of development are likely to be acceptable in planning terms, to a large degree it will be for the local housing market to determine the best and most appropriate form of development for the site.

## Policy UA14

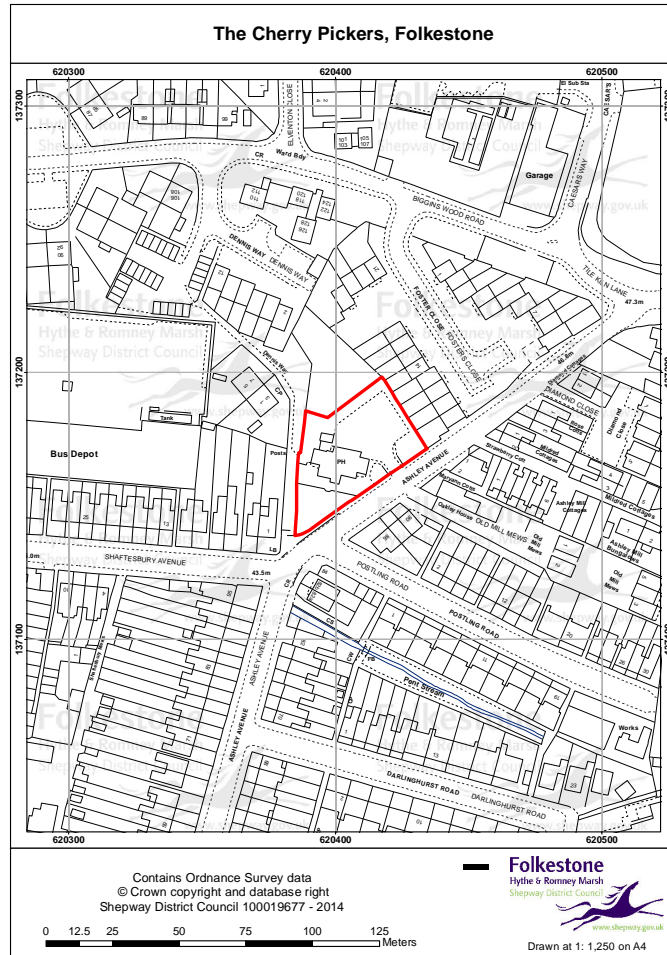
### **Brockman Family Centre, Cheriton**

The site is allocated for residential development with an estimated capacity of 26 houses or 50 apartments.

Development proposals will be supported where:

1. Full ecological investigations of the potential of the existing building and surrounding land is undertaken as part of any development submission and adequate biodiversity mitigation measures implemented if necessary
2. Existing trees and hedgerows around perimeter of site are retained and enhanced
3. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

### **The Cherry Pickers Public House, Cheriton (SHLAA ref: 687)**



Picture 4.14

**4.101** The Cherry Pickers is a derelict public house situated within a largely residential area of Cheriton. The site was badly fire damaged in May 2014 and is no longer in a safe or operational condition. Prior to the fire there had been a series of different operators who have unsuccessfully tried to make the pub financially viable without success.

**4.102** Based on the degree of building works needed to bring the site back into use, and previously identified viability issues, it is highly unlikely that a new public house operator would now be willing to invest the funds necessary to re-establish the facility. Accordingly, and given the residential character of the setting of the site, redevelopment for residential reuse seems appropriate.

**4.103** The site is broadly triangular and covers approximately 0.23 ha. It consists of a two-storey gable ended building with a single storey flat roof extension. To the front is a small area of seating, whilst a larger beer garden is located on the northern side of the building.



**4.104** To the eastern side is a 13-space car park accessed via an established vehicular crossover from Ashley Avenue. However, because of current parking arrangements visibility to the site is somewhat constrained and therefore some alterations to parking restrictions would be needed as part of any residential proposal. This is most likely to include an area of new double yellow line restrictions.

**4.105** The surrounding area is characterised by different forms of residential property with Ashley Avenue offering a mix of both old and new homes and a series of small modern infill developments.

**4.106** The site is accessible to a range of local facilities including the nearby Pent Valley Leisure Centre as well as some small-scale retail units that provide a localised service.

**4.107** There is a good access to the public transport network via both bus stops and Folkestone West Railway Station. A range of shops and services is accessible on Cheriton Road.

**4.108** In respect of constraints, the site is located on the border between Groundwater Source Protection Zone 2 and Zone 3 and is therefore in a sensitive location from a groundwater protection point of view. Any development will therefore need to adhere to Core Strategy Policy CSD5.

## Policy UA15

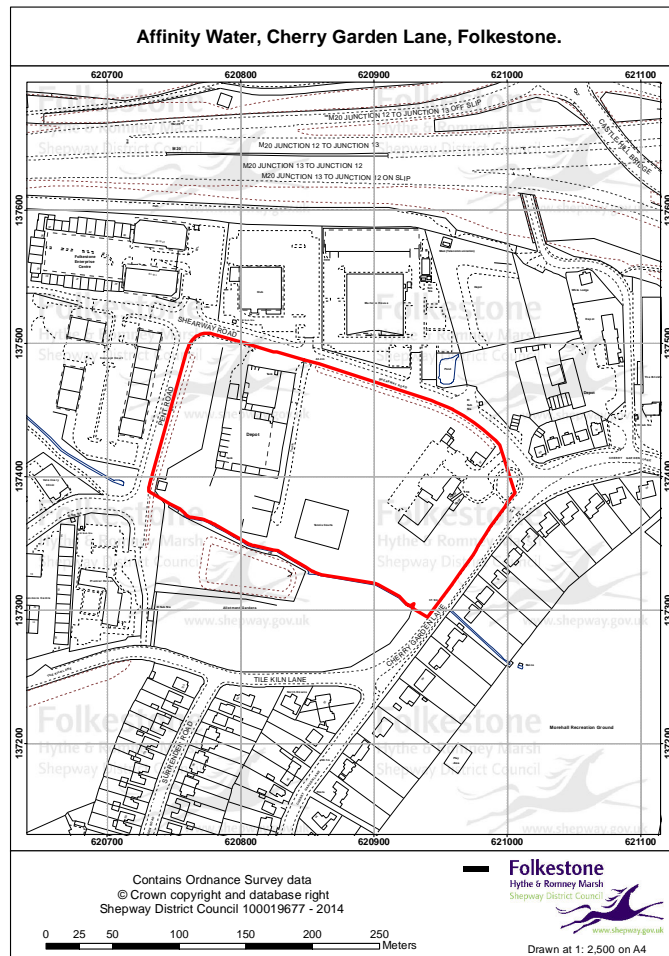
### **The Cherry Pickers Public House, Cheriton**

The site is allocated for residential development with an estimated capacity of 10 houses or 20 apartments.

Development proposals will be supported where:

1. Necessary highway mitigation measures are incorporated to ensure safe visibility and access
2. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

**Affinity Water, Cherry Garden Lane (SHLAA ref: 425C)**



Picture 4.15

**4.109** Affinity Water is the water supplier to the Folkestone and Dover Area. Its local operations are located within the Cheriton Area of the district with facilities located on both the northern and southern sides of Shearway Road, west of Cherry Garden Lane. As part of long term estate management plans, it is the Company’s intention to consolidate the existing offices, headquarters, depot and social club currently located to the south of Shearway Road, at their landholdings to the north. This would result in approximately 2.87ha of land becoming available for redevelopment.

**4.110** The site is rectangular and consists of very low-density employment use at present. To the west is a depot that consists of a small courtyard of single storey buildings with associated car parking. To the east are a small number of slightly larger two storey buildings. In between is a large extent of open green space and two private tennis courts.

**4.111** The southern boundary is tree lined and provides a landscaped buffer to the allotment provision beyond. To the north is further land in Affinity Water's ownership as well as Bannatynes Health Club and offices situated in Martello House. Shearway and Concept Court Business Parks are located to the west of the site.

**4.112** The site has excellent access to the strategic road network via Junction 13 of the M20 Motorway. Folkestone West is approximately 1km away and there is a range of local services available in Cheriton.

**4.113** In respect of development characteristics, the site is well suited for development. It is situated at slightly below road level on Shearway Road, which provides the opportunity to mitigate the visual impact of development. Adequate opportunity also exists to provide replacement areas of publicly accessible open space whilst still providing for high quality family housing.

**4.114** The site is largely free of environmental planning constraints, albeit a small area is in an area of Archaeological Potential and the site is located in Source Protection Zone 1, a sensitive location from a groundwater protection point of view. In addition any future residential use will need to be carefully planned to ensure that the amenities of future occupants are acceptable in the context of the neighbouring uses. There is an opportunity for self or custom build plots within the development.

## Policy UA16

### **Affinity Water, Shearway Road, Cheriton**

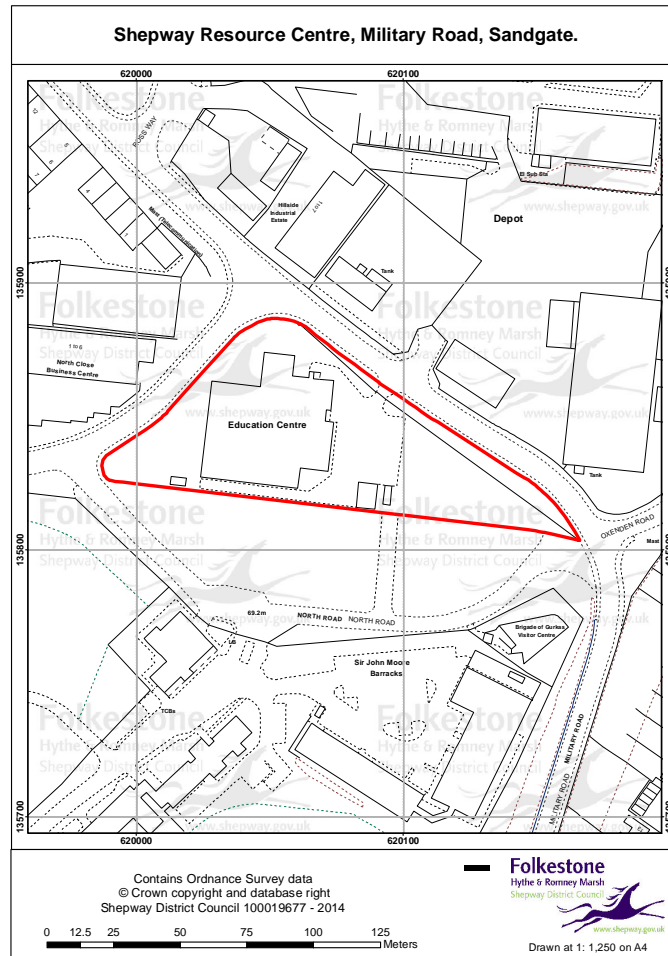
The site is allocated for residential development with an estimated capacity of 70 dwellings and an area of public open space approximately 1 ha in size.

Development proposals will be supported where:

1. The proposal forms part of a wider strategy showing how the existing facilities will be reprovided within the area north of Shearway Road
2. A masterplan of the whole site is provided that demonstrates a comprehensive approach to development
3. A new footway is provided along the southern edge of Shearway Road
4. The tree lined southern boundary is retained and protected for its amenity value
5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
6. The public open space includes publicly accessible on site play equipment and appropriate planting
7. The development has at least 4 self/ custom build plots on site

## **Sandgate and West Folkestone**

### **Shepway Resource Centre, Sandgate (SHLAA ref: 636)**



**Picture 4.16**

**4.115** The Shepway Resource Centre was last used as a Kent County Council Learning Disability Day Centre, which was vacated in June 2013. Prior to this, it was used for a variety of community uses including an Education Centre. The property has been marketed for commercial re-use since the last occupant vacated, but to date there has been insufficient interest in commercial uptake.

**4.116** The site constitutes approximately 0.64ha land focused around a single storey brick built municipal building of functional form. It was built circa 1985 in a largely commercial area. North of the site is a Waste Management and Transfer Centre. West is a well-established Industrial Estate and south is the Risborough Army Barracks and the Grade II Listed Roman Catholic Chapel. At Risborough Army

Barracks land is allocated for housing as part of the wider Shorncliffe Garrison strategic site, which will also deliver a new primary school, Doctors Surgery and other facilities within walking distance.

**4.117** The building is of a relatively poor quality and is in need of substantial repair, which is likely to be unattractive to commercial operators. Furthermore, it appears unlikely that it could be restored to a format attractive to modern commercial users.

**4.118** There is a well-established vehicular access to the site from Military Road. The land also benefits from good access to bus stops on Military Road, which provide connections to nearby services.

**4.119** In respect of constraints the site is in close proximity to the Grade II listed Roman Catholic Chapel, the setting of which will need to be taken into account with any scheme for development. In addition a small area of the site is in an area of Archaeological Potential and any future residential use will need to be carefully planned to ensure that the amenities of future occupants are acceptable in the context of the neighbouring uses. Likewise, it is important that the presence of residential uses does not prejudice the ability for the neighbouring uses to continue in a viable manner.

**4.120** Based on the characteristics of the site and the surrounding uses we consider that a mix of conventional housing and apartments would be most appropriate and a planning application (Y16/0463/SH) is currently being considered for the development of 23 dwellings and 18 flats on the site.

## Policy UA17

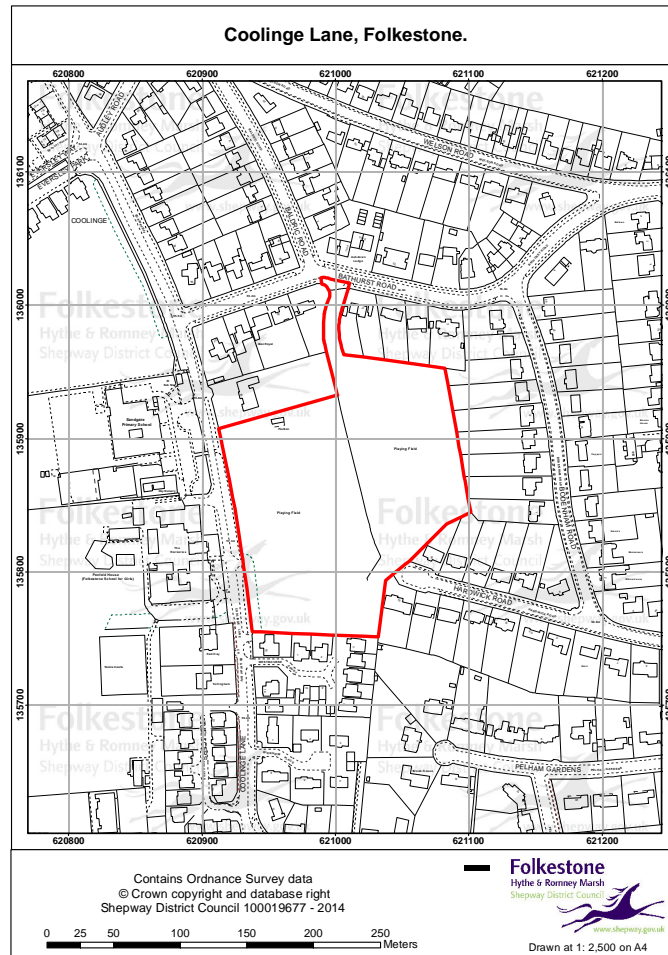
### **The Shepway Resource Centre, Military Road**

The site is allocated for residential development with an estimated capacity of 41 dwellings.

Development proposals will be supported where:

1. A high quality design and mix of dwelling types is advanced that would protect the amenities of future occupants without prejudicing the long term viability of the surrounding commercial uses;
2. The design of the development should ensure that the setting of the nearby Roman Catholic Church Grade II Listed Building is enhanced
3. Existing trees and hedgerows around the eastern boundary of site are retained and enhanced
4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

## Land East of Cooling Lane, Sandgate (SHLAA ref: 405)



Picture 4.17

**4.121** This site forms part of the wider landholding of Pent Valley Technology College, which is closing down. Accordingly, it is no longer needed in association to the educational use and has been previously identified by KCC as surplus to their needs. The Playing Pitches serve Pent Valley School however they have been identified as surplus to their needs due to the significant separation from the school itself.

**4.122** The site is a broadly square parcel of approximately 2.7 ha of undeveloped land. It consists of two former sports pitches divided by a linear group of mature trees. It is surrounded by built development on all sides, with the north, east and south boundaries all abutting residential properties. The western boundary is formed by Cooling Lane beyond which is Sandgate Primary School and The Folkestone

School for Girls, both of which benefit from their own dedicated sports and recreational provision. The wider area is largely made of traditional designed two storey detached family homes.

**4.123** The site benefits from good access opportunities from Coolinge Lane, Bathurst Road and Hardwick Road.

**4.124** The site is considered to be in a sustainable area with good access to bus stops and a basic range of day-to-day services.

**4.125** In respect of constraints, the site is largely unrestricted, however the western site boundary is within close proximity of Penfold House a Grade II Listed Building, therefore its setting should be a consideration. The mature tree belt should be retained, as it provides a good degree of separation between the two parts of the site and may have some ecological potential.

**4.126** The critical matter when considering the principle of development is whether the loss of the playing pitches can be fully justified. The loss of playing pitches (including for schools) will normally only be permitted where sufficient alternative provision exists or new sport and recreational facilities will be provided of at least the equivalent community benefit. Accordingly, it would be necessary for any developer to satisfy the Council that a wider strategy is in place to mitigate against the loss of this pitch provision or that the loss will be offset by a substantial improvement elsewhere.

**4.127** In respect of the type of development considered acceptable in this area, a mix of family scale units would appear most appropriate given the established character of the surroundings. Based on a similar density of approximately 40 dwellings per hectare, it is considered that approximately 60 dwellings could be accommodated, together with a meaningful degree of open space to be retained for public use. There is an opportunity for self and custom build plots on the development.

## Policy UA18

### **Land East of Coolinge Lane, Sandgate**

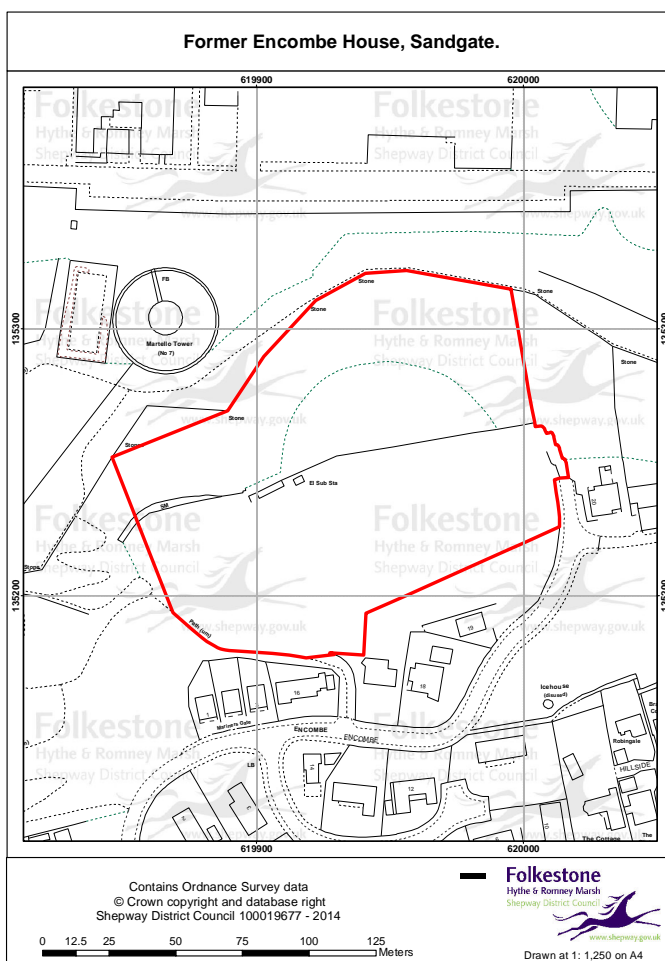
The site is allocated for residential development with an estimated capacity of up to 60 dwellings and approximately 1.2 ha of retained publicly accessible open space.

Development proposals will be supported where:

1. An area of publicly accessible open space to incorporate natural play, planting, including edible planting and high quality landscaping is provided
2. Access is provided from both Coolinge Lane and either Bathhurst or Hardwick Road, with improved cycle and pedestrian connectivity provided from the site to the surrounding area
3. The design of the development ensures that the setting of the nearby Penfold House Folkestone School for Girls Grade II Listed Building is sustained and enhanced
4. The development has at least 2 self/ custom build plots on site
5. The mature tree belt across the site is retained and enhanced
6. Existing trees and hedgerows around perimeter of site are retained and enhanced
7. The ecological potential of the site is fully investigated and mitigated (where necessary) as part of the application proposal
8. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
9. Proposals include either:
  - a. A strategy to mitigate the loss of playing pitch provision either as a like for like replacement elsewhere, on site provision or via the upgrade of existing off site facilities; or
  - b. It adequately demonstrated that there is an over provision of playing pitches in the local area and that there would not be a detrimental impact on pitch provision because of the loss of these pitches.

**Encombe House, Encombe, Sandgate (SHLAA ref: 113)**





**Picture 4.18**

**4.128** The site amounts to 1.65 hectares of land at the northern end of the Encombe cul-de-sac towards the western end of Sandgate. Encombe is an attractive residential street set into the hillside north of the Sandgate Esplanade. The topography is dramatic and rises steeply to the north.

**4.129** There is a variety of surrounding residential types, which range from contemporary timber clad dwellings to traditional coastal bungalows.

**4.130** The site is subject to a number of Tree Preservation Orders affecting the site. It is situated in close proximity to Martello Tower No 7, a Scheduled Monument, within an Area of Archaeological Importance, a Local Landscape Area and lies within the setting of the Sandgate High Street Conservation Area. Nonetheless, planning permission exists for the redevelopment of the site to provide 36 new apartments over three individual blocks. Accordingly, it is considered appropriate to allocate the site for development to ensure long-term delivery.

**4.131** Planning permission exists for the erection of 36 two and three bedroom flats in three pavilions (or blocks).

### Policy UA19

#### **Encombe House, Sandgate**

The site is allocated for residential development with an estimated capacity of approximately 36 residential apartments.

Development proposals will be supported where:

1. The ecological and arboricultural potential of the site is fully investigated and mitigated (where necessary) prior to the commencement of any development here to ensure that the biodiversity of this site is enhanced and TPOs protected
2. Proposals would enhance the setting of the nearby Scheduled Ancient Monument and the Sandgate High Street Conservation Area
3. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

#### **Alternative Housing Options Considered**

**4.132** The alternative sites considered for residential development but have been rejected are set out in Appendix 1.

#### **Hythe**

**4.133** Hythe is a coastal town on the edge of Romney Marsh. During Medieval times, the town developed as a harbour and was, during Tudor times, a member of the confederation of Cinque Ports. The town also played an important role in the defence of the country during the Napoleonic wars with the construction of the Royal Military Canal. Built to repel invasion the canal now gives central Hythe a distinctive and attractive character. Now shaded by trees, the canal, 30 feet (10m) wide, passes into the marsh from the middle of the town. Also built around the same time as a defence against possible invasion by Napoleon were the Martello Towers. In total 74 of these towers were built between Folkestone and Seaford. This history has resulted in many unique features in the town.

**4.134** Today Hythe has a population of 14,516. The town has a wide range of services and facilities reflecting its function including a secondary school and 5 Primary Schools.

**4.135** The Core Strategy Settlement Hierarchy reflects this function and has identified the town as Strategic Town to '...accommodate significant development - in so far that it is consistent with maintaining historic character - appropriate to the needs of their wider hinterlands in Shepway, and maintaining the viability of their local transport hubs, town centres and higher-order tourism, employment and public services'.

**4.136** Core Strategy Policy CSD7 seeks to attract additional employment to the town, especially within the town centre. Other measures proposed in the strategy include delivering public realm improvements that enhance pedestrian circulation within the main retail frontage area and improving the setting of historic buildings. Additional mixed use development will be focused to the west of the town and on the seafront. The strategy also calls for the expansion of Hythe's tourism and leisure industries.

**4.137** An integral part of the Core Strategy is that development is supported by the timely provision of infrastructure. For Hythe, the following infrastructure requirements are identified as strategically critical:

- Scanlon's Bridge- A259/A261- Upgrades to improve vehicular capacity, safety, ease of use, and cycle and pedestrian movement by 2016.
- Flood Defences - Hythe Ranges - Reinforcement of Defences including construction of rock revetment by 2021.

Hythe diagram

### Hythe Town Centre Policy

**4.138** Hythe is the second-largest centre in the District and has a retail offer which is significantly different to that offered in Folkestone. The focus of the town centre uses is on retail, but the offer is largely orientated towards independent retailers with a more specialist product offer, particularly in respect of comparison goods. The retail area is largely confined to the High Street with two superstores at either end. The vacancy rates are low at 7% (2015).

**4.139** The Town Centre Study (2015) indicated that the principal aim of the Council should be to protect the role and function of Hythe town centre as the District's second largest centre. The primary shopping area benefits from a good concentration of retail and other footfall-generating activities such as independent cafes and restaurants, and applications for change of use away from A1 / A3 uses should be resisted where possible, to retain the vitality and viability of the high street.

## Policy UA20

### Hythe Town Centre

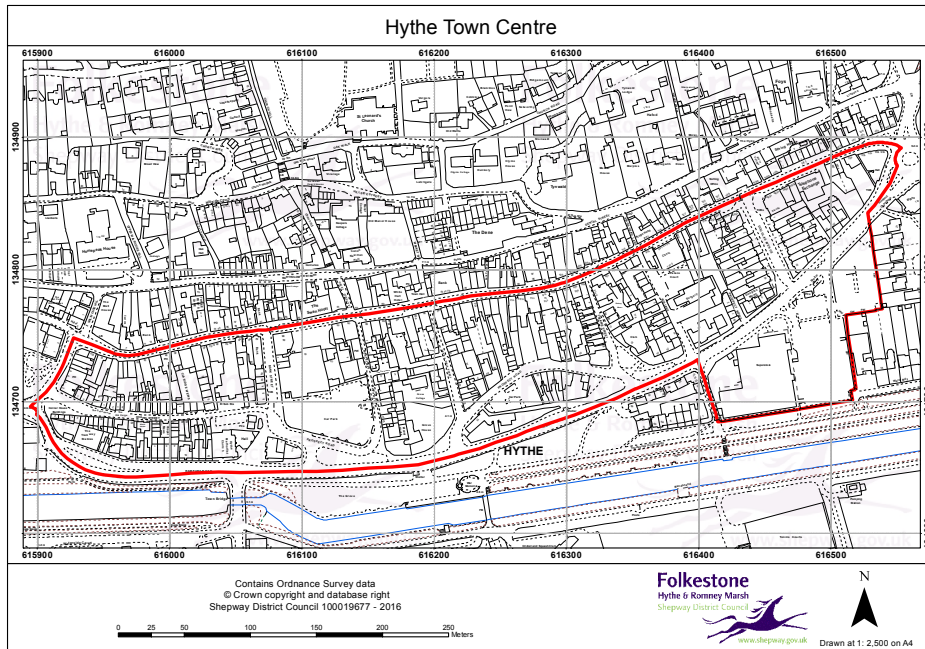
Within the designated town centre area (identified on the Policies Map), planning permission will be granted for development that provides for a range of town centre uses that adds to the vitality and viability of the town centre.

Within the Primary Shopping Frontage (as identified on the Policies Map) within the town centre, development on the ground floor will be permitted for A1 and A3 uses. Other uses will be permitted in the Primary Shopping Frontage provided that:

1. They fall within the definition of 'town centre uses' as defined in the NPPF; or
2. They fall under D1 uses and provide a complimentary function to the town centre: and
3. They would not create a continuous frontage of two or more non A1 uses.

For development proposals that fall within the town centre uses definition that cannot be located within the designated town centre area, permission will be permitted provided that:

1. the sequential approach set out in the National Planning Policy Framework and the Planning Practice Guidance has been followed;
2. A full assessment is provided of the impact the proposal would have on Hythe Town Centre and any other town centres, relating to the scale and the type of development proposed in compliance with the National Planning Policy Framework and Planning Practise Guidance;
3. It can be demonstrated that the site is in an accessible location and well connected to the town centre that would encourage people to walk, cycle and use public transport;
4. The overall design reflects the local character in which it is located and the impact of any car parking is reduced by location and appropriate landscaping; and
5. A suitable access and, if required, service yard, can be provided without detrimental impacts to any local residential amenity.



Picture 4.19 Hythe Town Centre to be defined on the Policies Map

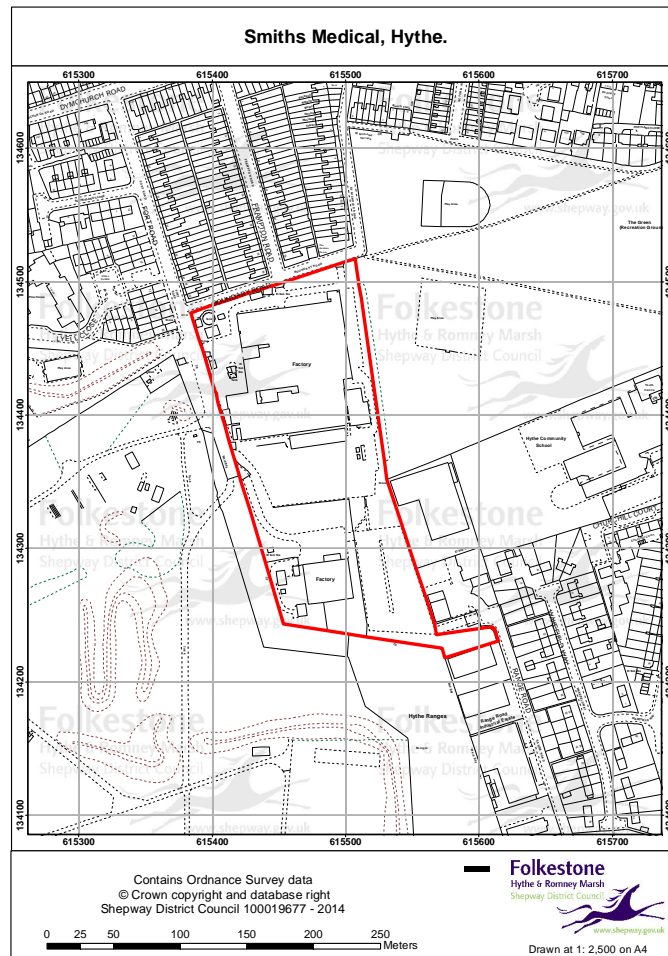
### Employment Land Policy

**4.140** Sites identified for employment (B1, B2 and B8 uses) in Folkestone are identified in Policy E1 and are considered suitable for meeting the needs of business over the period of the Plan . The sites identified are:

- Nickolls Quarry, Hythe
- Link Park (Areas A & C) Lympne Hythe

### Residential Allocations

**Smiths Medical, Hythe (Subject to ELR) (SHLAA ref: 137)**



Picture 4.20

**4.141** Smiths Medical is a 3.2 ha Class B1 and B2 commercial facility located on Boundary Road, Hythe. Historically there has been a mix of uses on the site comprising offices, research and development facilities, industrial and some manufacturing operations, which led to it being protected in employment use. However, the attractiveness of the facilities has declined in recent years, which has resulted in a decline in use of the site. Accordingly, it is necessary to consider a more positive re-use for the site.

**4.142** The site is made up of a series of different industrial uses and buildings. Predominantly the main facilities are located at the northern extent of the site and are single storey warehouses, albeit there are some two-storey office elements. The buildings vary in size and style because of the natural evolution of the site over time. However, the buildings largely no longer meet modern commercial needs. An ancillary car park is located to the south of the main buildings.

**4.143** South of the main campus is a more modern factory building and car park, which has a gated access from Fort Road. To the north of the site are established residential roads (Ford Road, Frampton Road and Nicholas Road) made up of predominantly Victorian/ Edwardian two-storey terraced houses. East is Hythe Green, a large recreation ground that contains both children's play facilities and a multi-use games area. South and west is the Hythe Ranges, Ministry of Defence land.

**4.144** The site is situated within a highly sustainable location. Within a 500m radius are a series of bus stops, local shops and services and a large Superstore. There is also good access to a range of leisure, education and community facilities.

**4.145** The site is currently a designated employment site Policy E1(h) where planning permission will normally be refused for the development of allocated employment sites to other uses. However, this allocation was included at a time where the existing facilities were in higher demand. Furthermore, paragraph 51 of the NPPF provides a fairly clear direction that employment sites should not be retained in employment use in areas of high housing need and unless there are strong economic reasons not to allow a change. Accordingly, as the site has been subject to a decline in demand, we consider it reasonable to now plan for a sustainable re-use of this previously developed site.

**4.146** In respect of environmental constraints, the whole site is located within Flood Risk 3 (Coastal Flooding). However, the higher section of the site (southern) is identified as being at lower risk of flooding in the Strategic Flood Risk Assessment.

**4.147** The southeast corner of the land forms part of the Hythe Ranges Local Wildlife Site, although the area is laid to hardstanding in the form of a car park.

**4.148** In considering future re-use, the site is sustainably located and developed in nature. It is therefore considered prudent to plan for a relatively high density of new housing along with the southern factory element being retained for commercial use. In addition there is an opportunity for self and custom build plots within the development.

## Policy UA22

### **Smiths Medical Campus, Hythe**

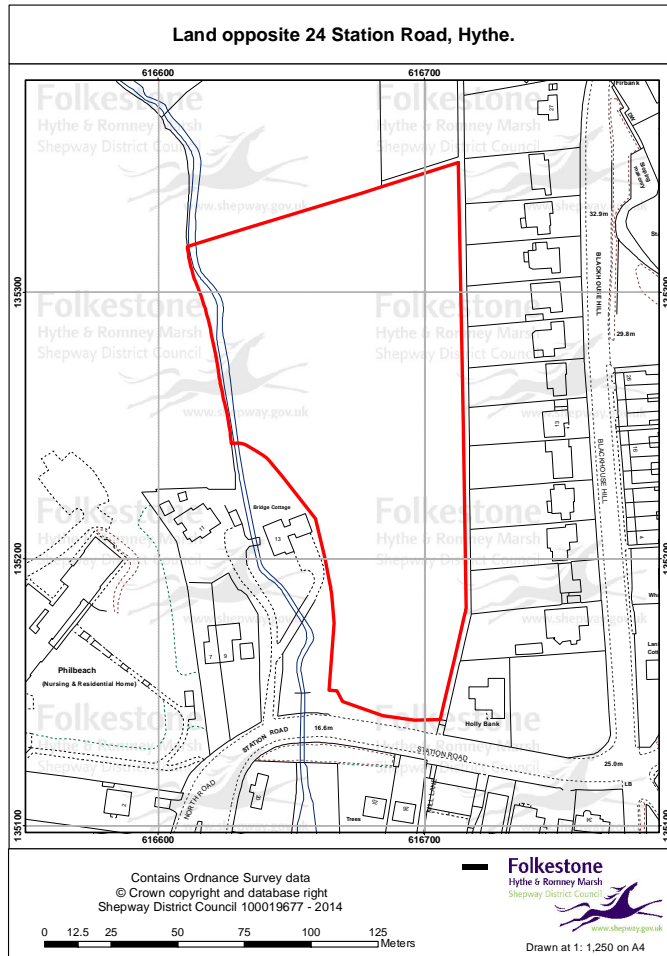
The site is allocated for mixed residential development with an estimated capacity of approximately 80 dwellings and Commercial use B1/B8.

Development proposals will be supported where:

1. Vehicular access for the residential development is from Fort Road. No vehicular access should be from Boundary Road
2. Retention of the established factory unit and car park located at the southern end of the site, to include new relief road connection to Range Road
3. The development proposal is supported by a Flood Risk Assessment that investigates the implication of poor flood defences and incorporates measures and design features to protect existing and future occupants from the risk of flooding
4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
5. Ecological investigations are undertaken and adequate mitigation measures identified (if necessary) to ensure development does not have an adverse impact upon the Hythe Ranges Local Wildlife Site
6. The development has at least 4 self/ custom build plots on site

### **Land at Station Road (SHLAA ref: 621)**





Picture 4.21

**4.149** Land at Station Road is an undeveloped parcel of grassland surrounded by an enclosed protected tree lined boundary. It falls within the built up area of Hythe in an area largely surrounded by established housing. Historically planning permission has been granted for a 24-bed hospice but this planning permission was never implemented. The characteristics of this site makes it a suitable location for providing sustainable new homes.

**4.150** The site area extends to approximately 1.25 ha of grassland. It is rectangular and benefits from strong tree lined defensible boundaries. The topography of the land changes gradually across the site. There is an established vehicular access to the land from Station Road.

**4.151** North of this parcel is a thick tree belt of protected trees beyond which is the residential curtilage of two large detached properties (Saltwood Lodge and Meadow View). East of the property is a ribbon of detached and semi-detached

properties that front Blackhouse Hill. To the south is Station Road, whilst to the western boundary the site bounds Bridge Cottage and land associated to the Saltwood Care Centre.

**4.152** Based on the characteristics and location of the site the Council considers a development scheme of mostly detached family houses, 2 storey in height with gardens, mirroring the surrounding development would be the most appropriate. Accordingly, development at a density of 30 dwellings per hectare appears the most appropriate.

### Policy UA23

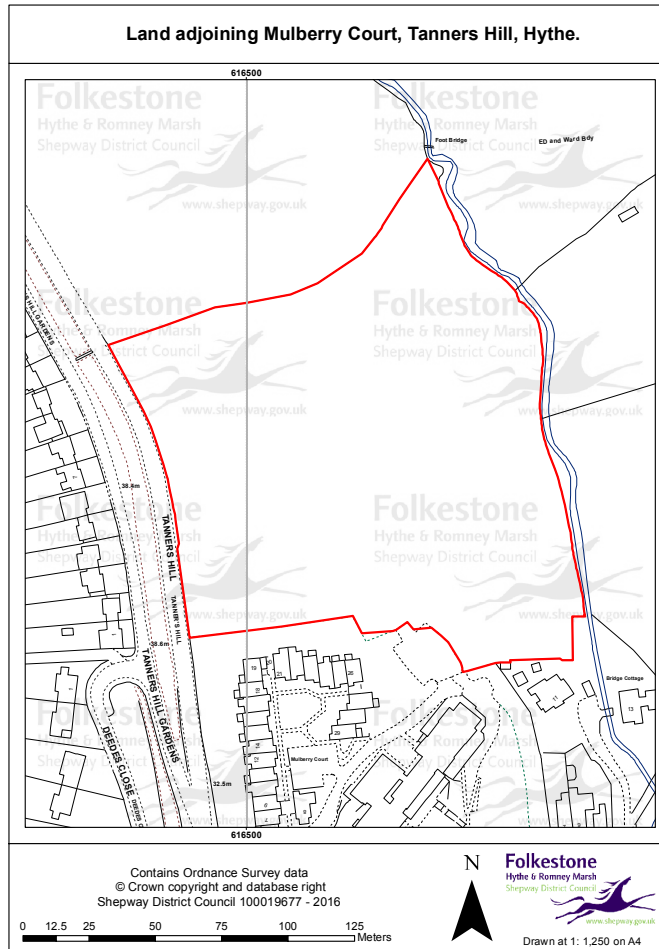
#### Land at Station Road, Hythe

The site is allocated for residential development with an estimated capacity of approximately 40 family sized dwellings.

Development proposals will be supported where:

1. Development is designed to a high quality standard that would not have a harmful impact upon the character and setting of the nearby Kent Downs Area of Outstanding Natural Beauty.
2. Ecological and arboricultural investigations are undertaken and adequate mitigation measures identified to ensure development does not have an adverse impact upon protected trees or protected species.
3. Existing trees and hedgerows within/around perimeter of site are retained and enhanced
4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

#### Land at the Saltwood Care Centre



**Picture 4.22 Land at the Saltwood Centre**

**4.153** To the west of the Station Road site is surplus land adjacent to the Saltwood Care Centre and Retirement Village which is considered a suitable location for providing further retirement living accommodation. This site is currently subject of a planning application for 84 extra care homes (Y15/0720/SH).

**4.154** The topography of the land varies and has an extensive frontage with Tanners Hill as well as an established vehicular access via the Saltwood Care Centre.

**4.155** In respect of environmental constraints, the north, east and partial west boundaries all contain trees that are subject to Tree Preservation Orders and may have some scope to be used by roosting bats. The whole site is covered by a blanket tree preservation order, albeit significant work has been carried out to identify the trees that are worthy of long-term potential. The site is located south of the Kent Downs Area of Outstanding Natural Beauty.

**4.156** The site is likely to be able to support an enlargement of the existing retirement community rather than conventional market housing, which would not be suitable due to limited pedestrian links.

### **Policy UA24**

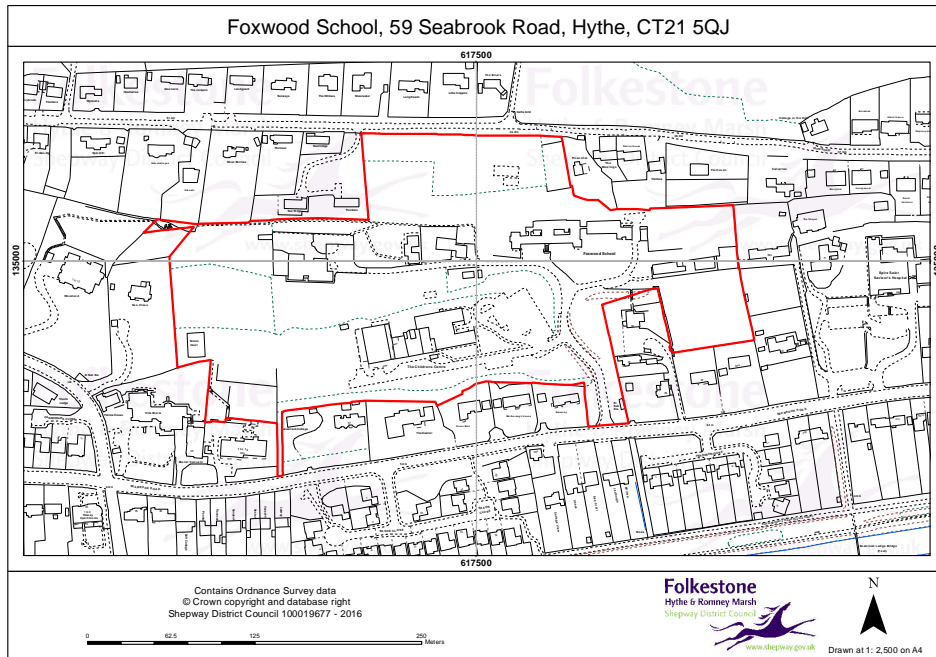
#### **Land at the Saltwood Care Centre**

The site is allocated for an appropriate quantum of Extra Care (C2/C3) housing.

Development proposals will be supported where:

1. All properties are designed to wheelchair accessible homes standards (M4(3)3 of the building regulations (check)
2. On site care provision is made via an appropriate contract that requires a minimum of 2 hours of care, to be provided by a CSCI registered provider
3. The development meets the needs of the ageing population and is restricted to occupation for those over 65
4. Appropriate communal facilities are provided to meet the needs of an elderly population
5. Proposals are landscape led and demonstrate that landscape character is protected
6. Access is provided to meet the needs of residents and to provide connectivity to the surrounding area
7. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

**Foxwood School and St Saviours Hospital, Seabrook Road, Hythe (SHLAA ref: 313 and 1018)**



Picture 4.23



Picture 4.24

**4.157** As part of its ongoing education planning, Kent County Council is to merge Foxwood and Highview Schools. This merger will include the closure of both the existing facilities in Hythe and Folkestone, with a new enlarged, rebranded and purpose built school nearing completion on Park Farm Road, Folkestone. These education changes will leaving the current facilities at Foxwood and Highview School vacant and available for redevelopment. It is understood that these changes will be implemented in full by late 2016.

**4.158** Similarly St Saviours Hospital, located immediately east of Foxwood School, is a former private hospital that closed in late 2015. Since this time, the premises have been vacant so a future new use needs to be planned.

**4.159** Both Foxwood School and St Saviours Hospital are on large plots fronting Seabrook Road. Due to the nature of the street and the significant rising topography the built form of both sites are located at a higher level to that of the street. In the

case of the hospital, this means that the main building is prominent from the street scene. In comparison, Foxwood School is generally more screened due to the position of housing in front and significant tree planting.

**4.160** The hospital includes three buildings. The original building dates from the 1850's with substantial extensions in the 1960's to accommodate a hospital. West of the main building is the oldest element of the site, the Dutch House (71 Seabrook Road), an early 20<sup>th</sup> Century dwelling that pre-dates the hospital use. The third building, situated in the eastern extent is an annexe added to extend the hospital. An established vehicular access from Seabrook Road exists on the southern boundary.

**4.161** Foxwood School constitutes a much larger area of land that covers approximately 6.3 ha of land. It is also accessed via Seabrook Road, via a private driveway. There are approximately eight buildings spread across the site in two distinct parcels. These buildings vary from traditional pitched roof school buildings to more modern flat roof facilities. The site also benefits from a well-established tree lined driveway.

**4.162** Both sites are deemed to be sustainable with good access to public transport links and a range of basic services and community facilities.

**4.163** In respect of constraints there are Tree Preservation Orders that apply to both sites and that may have some wider ecological potential. The sites are located immediately south of the Kent Downs Area of Outstanding Natural Beauty, a landscape of national importance. The sites are within an Area of Special Character and are prominent on the hillside. The sites are also located near the Royal Military Canal a Scheduled Monument and Local Wildlife Site.

**4.164** In considering future proposals, St Saviours Hospital is considered suitable for residential development at a density of approx. 30 dwellings per hectare to provide additional family accommodation. Foxwood School could be redeveloped at a higher density because of its position behind properties on Seabrook Road and for self and custom build development plots on site. Furthermore, opportunity exists to provide a mix of conventional housing and apartment blocks that replicate the large-scale buildings already found on the site.

**4.165** The limited school capacity in the locality will put significant pressure on pupil places, with the developments proposed likely to require further local provision to mitigate the impact of housing. At present, Seabrook Primary School is located on a small, constrained site with limited facilities to serve a 0.5FE school. The school does however have a separate playing field, where planning permission has previously been granted for a replacement facility. KCC Education have confirmed that there is a capacity within the Eversley Road playing field site to provide for a new 1FE Primary School, together with retained playing pitches, subject to further investigation. The requirement for development in Hythe, as allocated by policies 23, 24 and 25

will be further explored ahead of publication of the plan. Should a new school require funding appropriate contributions alongside those provided by the redevelopment of the existing sites to mitigate the impact of the development could be funded via payments received in the Community Infrastructure Levy.

### Policy UA25

#### **Foxwood School and St Saviours Hospital, Seabrook Road, Hythe**

Foxwood School is allocated for a landscape led residential development with an estimated capacity of approximately 150 dwellings.

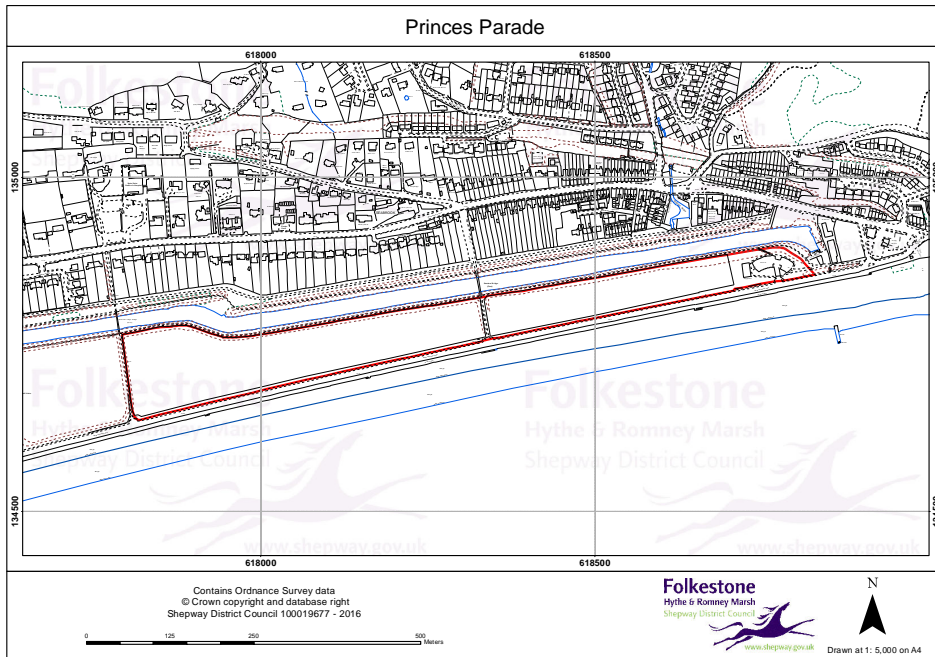
St Saviours Hospital is allocated for a landscape led residential development with an estimated capacity of approximately 35 dwellings.

Development proposals will be supported where:

1. The design proposals are genuinely landscape led to take account of the environmental and topographical features of the sites and to ensure important long and short distance views are retained and the proposal preserves the character and setting of the Kent Downs Area of Outstanding Natural Beauty, the Area of Special Character and the Local Wildlife Site
2. The design of the development should seek to enhance the setting of the nearby Grade II Listed Building The Black Cottage and Scheduled Monument the Royal Military Canal
3. An appropriate mix of housing and/or apartments is provided that respects the constraints of the sites
4. The archaeological potential of the land is properly considered and measures are agreed to monitor and respond to any finds of interest
5. Access is derived from Seabrook Road with no vehicular access via Cliff Road
6. Ecological and arboricultural investigations are undertaken and adequate mitigation measures identified to ensure development does not have an adverse impact upon protected trees or wider established habitats
7. The provision of open space and children's play space being provided and a management company is established for its long term maintenance
8. The Foxwood School site has at least 6-8 self/ custom build plots on site
9. The Dutch House (71 Seabrook Road) must be retained and incorporated in to any design

#### **Princes Parade, Hythe (SHLAA ref: 153)**





**Picture 4.25**

**4.166** The site is the former landfill waste disposal site, which is located in a prominent position on the coast along Princes Parade, a 2km seafront promenade that links the Esplanade and Sandgate to the West Parade of Hythe. It is located between the road and seafront promenade to the south and the Royal Military Canal, a Scheduled Monument, which directly abuts the site to north. To the west of the site is lower, open land, which is used as a golf course.

**4.167** The site amounts to 7.2 hectares of land covering a length approximately 1km, with a width of between 130 metres in the west and 55 metres in the east.

**4.168** The land itself has limited recreational value and is overgrown and contaminated due to its former landfill use which has significantly raised the levels within the site by approximately 4 meters. The site is well located in a sustainable urban location. It is appropriate to plan positively for a new use, whilst also maintaining the integrity of the important heritage asset and seafront location.

**4.169** Along the entire northern boundary runs the Royal Military Canal. This was a coastal defence system constructed between 1804 and 1809 with the purpose to separate the expected landing and deployment of Napoleon's troops. The canal runs a total of 28 miles from Shorncliffe Camp via Hythe inland to Appledore, to join the Eastern River Rother at Iden lock, from where it became part of first the Rother and then the River Brede, turning into a canal again from Winchelsea to Cliff End on the coast.

**4.170** The Canal was an important element in the Napoleonic defences of southeast England and is the only military canal in the country. It is a unique defensive work and provides a modern day reminder of a period when nineteenth century Britain faced the most serious threat of invasion prior to the major conflicts of the 20th century. Accordingly, it is well acknowledged by the Council that the important Scheduled Monument is worthy of long-term protection and enhancement. As required by the National Planning Policy Framework, local authorities should set out in their local plan a positive strategy for the conservation and enjoyment of the historic environment. Such a strategy should recognise that conservation is not a passive exercise. In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets. This could include, where appropriate, the delivery of development within their setting that will make a positive contribution to better reveal the significance of the heritage asset.

**4.171** Nonetheless, the Council is also committed to provide the homes, community facilities and local services necessary to support the needs of current and future generations of its residents. A careful balance is therefore needed when considering potential re-use of sustainably located land which has been previously used for waste disposal purposes which has resulted in contamination.

**4.172** Adjacent to the canal is a public walkway with a pedestrian crossing point provided around the midway point of the site. Beyond the canal to the north is the rear gardens of properties that front Seabrook Road. Immediately west of the site is the Imperial Hotel Golf Club and Spa. The grounds of the hotel have recently been developed for residential homes, which have funded significant investment in the hotel. These properties are located within the setting of the Canal and are not considered to be of significant harm to its setting.

**4.173** The site is highly sustainable and has good access to a range of shops, services and community facilities.

**4.174** Approximately 1.5km to the west of the site the Council owns and operates Hythe Swimming Pool. The facility was opened in 1975 and is used by a number of individuals, schools and clubs, with Hythe Aqua Club having over 700 members. The existing facilities have exceeded their natural life and now requires considerable and almost constant intervention to remain open. At times the pool has to close and because of this, its future availability beyond short term is unlikely. A detailed feasibility study has been completed, considering alternative sites for a replacement facility. This included consideration of the current site (found to be too small), the Green and South Road (both unavailable), Nikolls Quarry (unlikely to be deliverable in an acceptable time line) and Princess Parade, which the report concluded was the most appropriate, available and developable site for a viable replacement facility.

**4.175** As such, it is proposed that the site should accommodate a replacement leisure facility to provide a sustainable and efficient facility to meet the needs of the present and future generations. Any development proposals will need to demonstrate the need for additional facilities beyond those to be replaced, however it is envisaged the following will be provided:

- *A six lane swimming pool and a learner pool with viewing area*
- *An 80 station/equivalent gym*
- *Studio space*
- *Appropriate café/vending area and changing facilities*
- *An appropriate sized hall or multi-use space*

**4.176** Due to the visual prominence of the site and the relationship with the Royal Military Canal it is essential that a well considered, innovate design solution is delivered which minimises the impact of the building upon the setting of the canal. The building should also, incorporate on site energy generation and be designed so as to minimise environmental impact.

**4.177** In addition, there is further potential for a greater mix of uses on site to enhance the vibrancy, leisure and recreational use. Discussions are being held between the landowner, Hythe and Saltwood Sailing club, as well as Seapoint Canoe Centre to relocate facilities on to the site as part of a comprehensively masterplanned development that incorporates significant areas of public open space that enhance the use and enjoyment of the Royal Military Canal and improve connectivity and public accessibility between the canal and coast. There may be opportunities for these two clubs to share facilities.

**4.178** In addition to the improvements to open space and recreational facilities, the development will provide an opportunity to enhance key aspects of the Royal Military Canal and open up its former relationship to the sea. Key aspects include enhancing the areas around the 'kinks', which were the location of gun emplacements, and the redoubt towards the far eastern point where the the the Canal meets the sea. Any development should be landscape lead, retaining the linear character of the Canal, its relationship with its undeveloped character along its southern bank and identify key views from and to the site as part of any proposals.

Diagram illustrating the main considerations of Princes Parade area

**4.179** An opportunity also exists to deliver much needed new housing, which will also help fund the community and leisure facilities. Early assessment has suggested that the site has the potential to deliver around 150 new homes but any new development will have to fully consider the constraints of the site, specifically the Scheduled Monument. Whilst detailed proposals have not yet been advanced, it is envisaged that any such development would need to be masterplanned to ensure an appropriate mix of homes and to retain the openness of the coastline landscape within the site. There would be an appropriate mix of flats, terraced town houses

and 'pavilion' housing along the seafront. There is opportunity for self and custom build at the site, with a policy requirement for 8 self/custom build plots within the development.

### **Policy UA26**

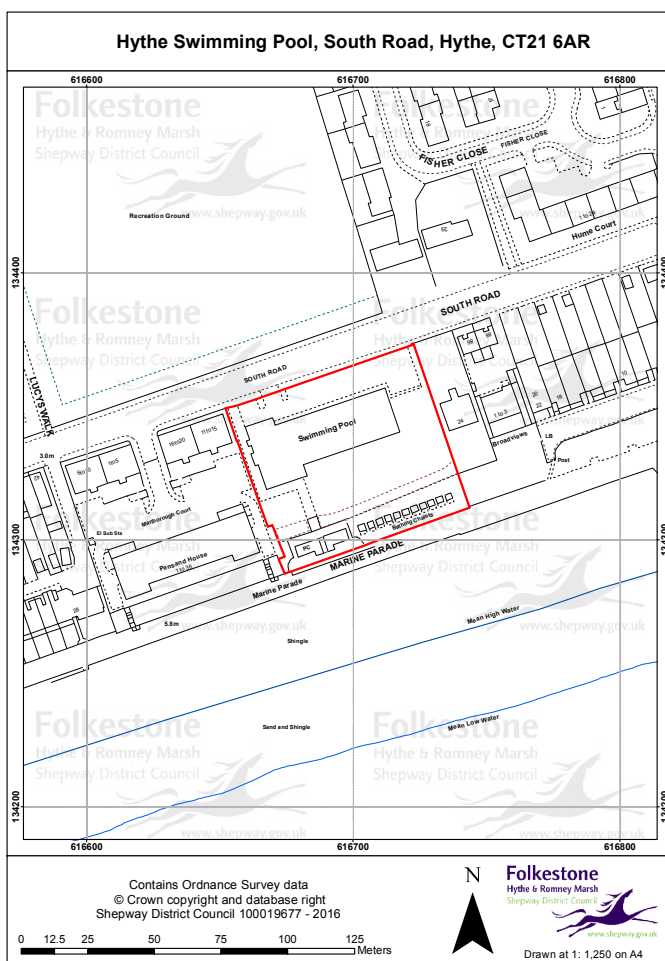
#### **Princes Parade, Hythe**

The site is allocated for mixed use redevelopment to include public open space, leisure, small scale commercial uses and up to 150 residential dwellings.

Development proposals will be supported where:

1. They form a single comprehensive masterplan of the entire site which meets with the policy requirements of this plan and the Core Strategy (2013). The mix of uses shall include -
  - A substantial community recreation and leisure offer including an appropriate replacement for Hythe Swimming Pool, with further investigation of the inclusion of other facilities.
  - High quality public open spaces incorporating the enhancement of and linking between the canal and beach front and accessibility east to west along the canal and coast
  - An appropriate mix of well designed homes within a landscape led setting, including appropriate accommodation for the elderly, affordable housing and self/custom build
2. They are accompanied by a detailed heritage assessment demonstrating that key features and the setting of the Royal Military Canal Scheduled Monument would be enhanced and that the overall scheme would not result in substantial harm to the heritage asset.

#### **Hythe Swimming Pool (SHLAA ref: 142)**



Picture 4.26

**4.180** Hythe Swimming Pool is situated on South Road within Central Hythe. It remains in operational use at present, but ultimately the pool has become outdated and no longer represents a viable community facility. Accordingly, the Council is currently looking at opportunities to provide a modern new replacement swimming pool facility at nearby Princes Parade. In turn, this would release the existing site for development.

**4.181** The site is rectangular and covers 0.5ha of previously developed land. The pool building itself is housed in a single storey pitched roof building, with a low flat roofed extension to the western side. A car park for approximately 22 cars is provided to the front of the building and a 1920's café, public toilets and beach huts are located to the south.

**4.182** North of the site is an open recreation ground, whilst immediately south is the seafront. To the east and west sides of the site are established residential properties. To the west, a mix of two and a half storey houses front South Road and

apartments facing the seafront. To the east is a range of dwelling types of both family types and apartments. Marine Parade runs along the southern boundary and represents a pedestrian promenade, with the beach beyond this.

**4.183** The site is sustainable in nature with easy pedestrian access to the town, a range of facilities and to local bus stops, all of which are located within an 800m walking radius.

**4.184** When the site becomes available for development it is envisaged that development could take a similar form to that of the land to the west with conventional housing fronting South Road and apartments adjoining the seafront, while retaining and enhancing the existing café, public toilets and beach huts within any scheme.

### Policy UA27

#### **Hythe Swimming Pool, Hythe**

The site is allocated for residential development with an estimated capacity of approximately 50 dwellings.

Development proposals will be supported where:

1. Adequate flood protection measures are incorporated within the design
2. There are off site play and open space contributions to the South Road Recreation ground
3. It can be demonstrated that a replacement facility is to be provided or is to be delivered
4. The café, public toilets and beach huts are retained and enhanced
5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

### Option 5

Do you have any other sites you wish to be considered within the Urban Character Area?

### **Alternative Housing Options Considered**

**4.185** The alternative sites considered for residential development but that have been rejected are set out in Appendix 1. Comments on the rejected sites can be made in Appendix 1.

## 5 Romney Marsh

**5.1** With flat, open and exposed landscapes formed by human activity and its relationship to the sea, Romney Marsh is different to the rest of the district. The twelfth century saw the start of a reclamation project, where embankments were built to enclose large blocks of land, and the start of drainage organisation there. For a long part of its history, this was a benighted part of the county, where *Marsh Fever*, decimated the local population. As a result of a lack of manpower to undertake more labour intensive forms of agriculture, the Marsh became famous for sheep farming. This form of animal husbandry has, in turn helped to shape the landscape. The open and remote qualities have inspired many writers and artists.

**5.2** The Marsh is home to some of the UK's rarest species and a large proportion of the area is designed as a National Nature Reserve, Special Area of Conservation, Special Protection Area and Site of Special Scientific Interest. In addition to this, a Ramsar site was officially designated in early 2016. Dungeness and Rye Harbour comprise the largest cusped shingle foreland in Europe, one of the few such large examples in the world. The extensive marshes of the hinterland, now a mixture of arable and grazing land dissected by an extensive network of ditches and watercourses, support a rich flora and fauna and form a striking contrast to the coastal habitats of sandy and shingle beaches, freshwater pits, sand dunes, saline lagoons and flooded gravel pits. The open water network is a vital component of the marshes' irrigation and drainage network. The coast continues to evolve; pressures of sea level rise and climate change will result in coastal change. Informed decision making will be critical in helping coastal communities and habitats adapt to change. Much of the area is well below the high tide level and as such, is at risk of flooding.

**5.3** Scattered settlements are linked by long, straight, open roads. They have a distinctive architectural character, whilst some have weatherboarding and hung tiles many have medieval churches at their core. However, overall, urban areas account for a small proportion of this rural area. The transport links are sparse and this; coupled with the nature of the landscape, rural isolation and lack of employment, means that the area suffers from issues of social and economic deprivation.

**5.4** Dungeness Point is dominated by the nuclear power station sites and their associated transmission lines that extend inland from the coast, forming the backdrop to many a view both within and outside the area. The military has historically been an important presence in the area, and today the Ministry of Defence is a major landowner on the shingle foreland at Lydd and Hythe ranges. In addition, commercial fishing on Dungeness Point, Lydd Airport's presence, the military firing ranges at Lydd, ongoing gravel extraction from the shingle and the Little Cheyne Court Wind Farm all make their mark on the landscape.

**5.5** A big impact on the area's economy will be the decommissioning of the "B" nuclear power station at Dungeness, now scheduled for 2028. The nuclear power stations at Dungeness have been central to the Romney Marsh's economy for many



years contributing some £50 million to the local economy annually. It employs some 1,500 people, many of whom live on the Marsh, in Shepway, Ashford and Rother districts. In response to this, and supported by Magnox and the Nuclear Decommissioning Authority, Shepway District and Kent County Council produced a socioeconomic action plan for Romney Marsh to ensure the area has a sustainable economic future and remains a great place to live. The RMP was established in 2012 to lead the delivery of the Romney Marsh Socio-Economic Plan an economic strategy targeted at mitigating the negative consequences of decommissioning at Dungeness.

**5.6** The Core Strategy sets out the aspirations for the area. At the heart of this vision for New Romney is improving day to day life for the residents through access to well paid employment, improved infrastructure, transport and essential services. At the same time the special coastal ecology and wildlife sites, particularly the unique Dungeness, will continue to be a special haven for rare species and actively managed to ensure sustainability. Another key theme is that the natural assets, coastal habitats and key infrastructure will show greater adaptability to climate change. Given that the Marsh has a history of reclaiming land from the sea and trying to stop the sea reclaiming it, this theme will remain a challenge.

**5.7** As per the Core Strategy Policy SS1, "The future spatial priority for new development in the Romney Marsh Area is on accommodating development at the towns of New Romney and Lydd, and at sustainable villages; improving communications; protecting and enhancing the coast and the many special habitats and landscapes, especially at Dungeness; and avoiding further co-joining of settlements and localities at the most acute risk to life and property from tidal flooding."

**5.8** Development proposals should pay attention to the following factors

- Retain the rural character of villages, ensuring that any new development is sensitively sited and screened with native trees to minimise its impact in views. Materials should be carefully chosen to blend with the existing built environment, and to minimise the visual intrusion of large structures.
- Ensure that new development is of an appropriate scale and massing, so that existing vernacular buildings are not dwarfed.
- Protect the settings of historic sites and buildings, paying particular attention to the visual impacts of structures which appear on the horizon in views.
- Take into account the linear landscape pattern and traditional tree species when integrating any new development into the landscape.

**5.9** The Core Strategy set out that land exists for approximately 10% of new Shepway dwellings developed by 2030/31 <sup>(1)</sup> to be located in this area in accordance with the plan's Spatial Strategy. Allocations are made broadly according to the Settlement Hierarchy as presented in and guided by the Core Strategy to ensure the

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1 To the nearest 5% SDC (2012) Modifications Technical Note

achievement of growth requirements. The purpose of the Settlement Hierarchy is to guide and distribute development in particular locations whilst taking into account existing facilities and where future investment will be needed.

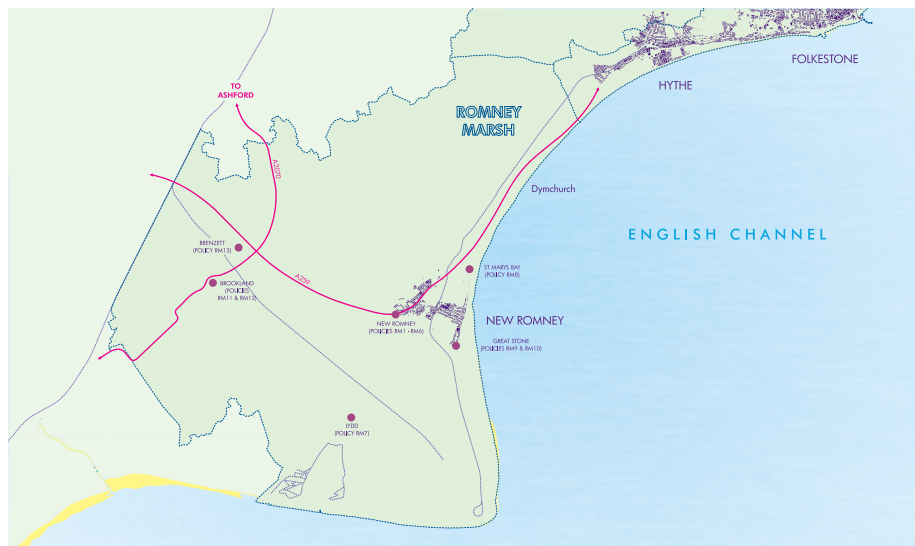


Figure 2: Romney Marsh Policy Context Map



### Picture 5.1 Romney Marsh Character Area

#### Strategic Town -

#### New Romney Town (incorporating Littlestone-on-Sea)

**5.10** New Romney is a late Anglo-Saxon (850-1066AD) settlement, which grew into a small trading town. By the 8th century the coastline had changed dramatically and New Romney became a prominent port on the new harbour that had formed. A Royal Charter of 1155AD names New Romney as one of the five original Cinque Ports. They were originally formed for military and trade purposes and were at the height of their influence from 1150 to 1350AD. New Romney and Hythe were important suppliers of salt to London, but in the latter part of the thirteenth century a series of severe storms weakened the coastal defences of Romney Marsh. The storm that hit the southern coast of England in 1287 changed the coastline and the landscape of Romney Marsh definitively. New Romney, still an important harbour at the time, became surrounded by land and suddenly found itself a mile from the sea.

**5.11** Today the town of New Romney retains a range of historic buildings. These include the ruins of St John's Priory, a medieval Cistercian Priory established in the thirteenth century. Early fourteenth century high-status domestic buildings are found at 3 and 4 West Street. The imposing Norman St Nicholas Church, once adjacent to the harbour, is only survivor of six parish churches once serving the town.

**5.12** New Romney has a range of shops, eating places and services along its High Street, a petrol station and a supermarket, as well as a primary school and a secondary school. The town extends to the north-east and south-east, with mainly residential dwellings extending down to the communities of Littlestone and Greatstone on the coast. These dwellings are interspersed with business premises, many of which are residential and care homes.

**5.13** As per Core Strategy Policy SS1, "The strategic growth of New Romney is also supported to allow the market town to fulfil its potential to sustainably provide for the bulk of the housing, community infrastructure and commercial needs of the Romney Marsh Area."

**5.14** Policy CSD8 establishes New Romney as a key market town in Romney Marsh. The policy seeks to enhance New Romney's High Street by improving the public realm. As a result this will improve pedestrian circulation. Some of the measures advanced include improving the setting of historic buildings within the High Street, minimising the environmental impact of traffic and investing in community facilities.

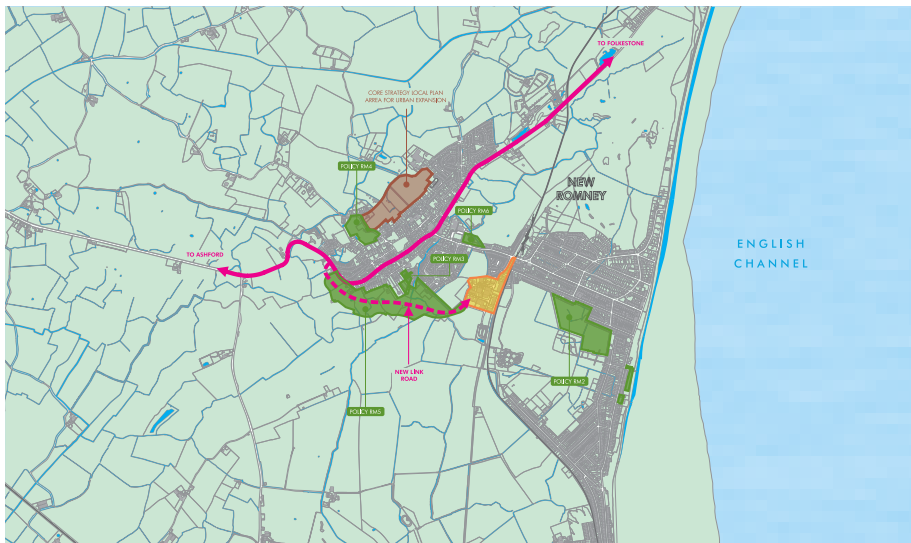
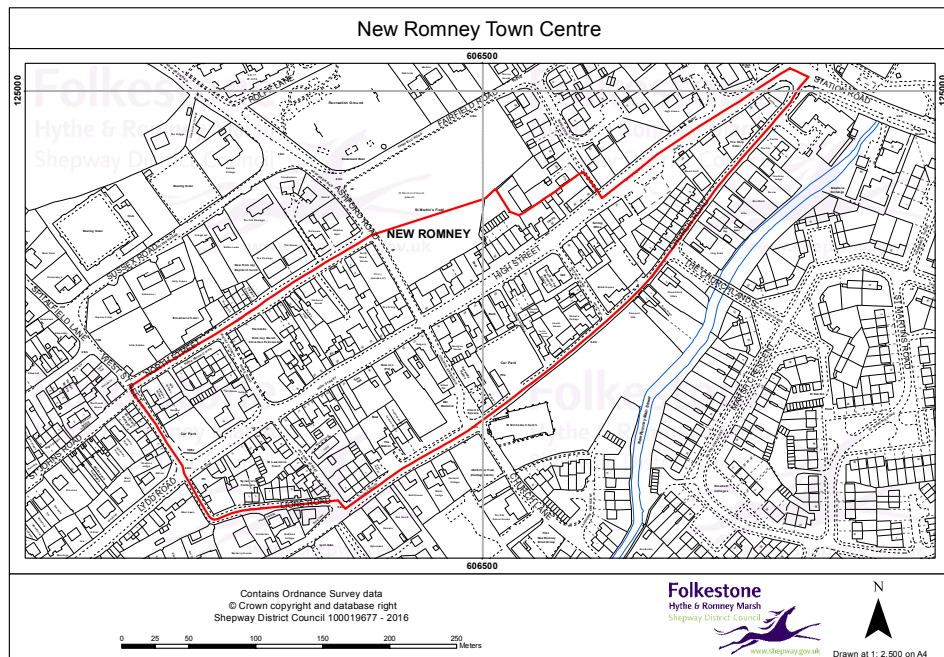


Figure 3: New Romney Policy Map



**Figure 5.1 New Romney Policies**

### **Town Centre Policy**



Picture 5.2

**5.15** The High Street is linear and comprises of mainly comparison retail and service units. There is a large Sainsbury's foodstore at the eastern end of the town centre, whilst the offer along the High Street comprises of a range of predominantly-independent convenience, comparison and services retailers, including a small number of specialist retailers such as a delicatessen, crafts shop and tea rooms.

**5.16** The Town Centre Study suggests that the town has a significantly lower vacancy rate than the UK average, and just one vacant unit was observed in the centre. The centre is attractive and well-maintained with a generally agreeable retailing environment. The study concluded that it was performing well at present against vitality and viability criteria.

**5.17** It is proposed that New Romney, incorporating Littlestone and Greatstone, can support a relatively high level of development over the plan period. Core Strategy Policy CSD8 established a broad location for residential development to the north of the present settlement. In addition to this, complementary development is proposed at several other locations in relation to the town.

## Policy RM1

Within the designated town centre area (identified on the Policies Map), planning permission will be granted for development that provides for a range of town centre uses that adds to the vitality and viability of the town centre.

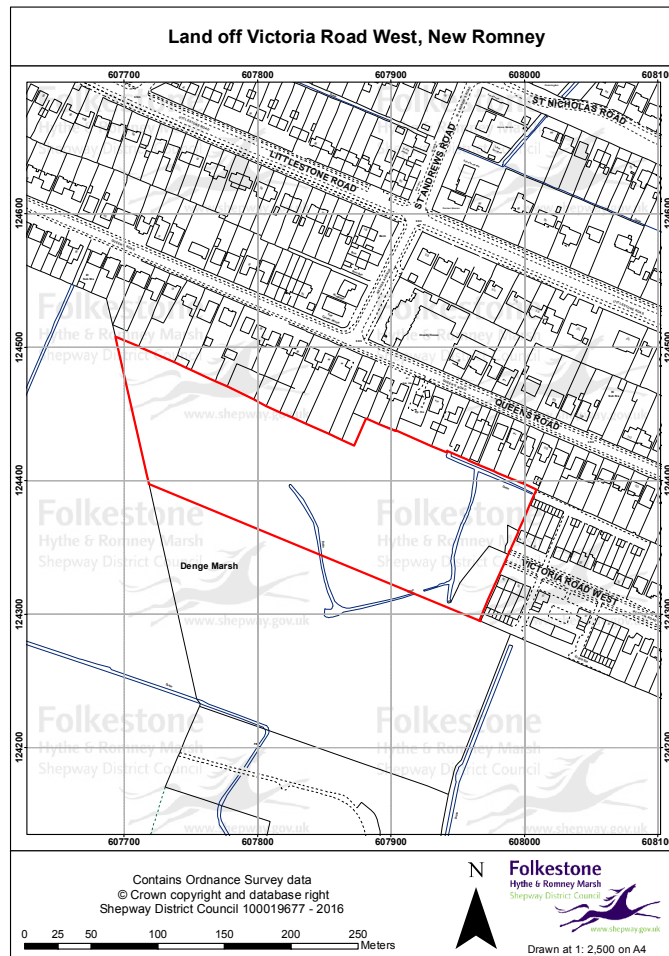
Within the Primary Shopping Frontage (as identified on the Policies Map) within the town centre, development on the ground floor will be permitted for A1 and A3 uses. Other uses will be permitted in the Primary Shopping Frontage provided that:

1. They fall within the definition of 'town centre uses'; or
2. They fall under D1 uses and provide a complimentary function to the town centre: and
3. 3. They would not create a continuous frontage of two or more non A1 uses.

For development proposals that fall within the town centre uses definition that cannot be located within the designated town centre area, permission will be permitted provided that:

1. the sequential approach set out in the National Planning Policy Framework and the Planning Practise Guidance has been followed;
2. A full assessment is provided of the impact the proposal would have on New Romney Town Centre and any other town centres, relating to the scale and the type of development proposed in compliance with the National Planning Policy Framework and Planning Practise Guidance;
3. It can be demonstrated that the site is in an accessible location and well connected to the town centre that would encourage people to walk, cycle and use public transport;
4. The overall design reflects the local character in which it is located and the impact of any car parking is reduced by location and appropriate landscaping; and
5. 5. A suitable access and, if required, service yard, can be provided without detrimental impacts to any local residential amenity.

**Land off Victoria Road West, Littlestone (SHLAA ref: 379)**



Picture 5.3

**5.18** This site is located to the south west of Littlestone, at the northern end of Victoria Road West and to the rear of properties fronting on to Queens Road. The site is open countryside and appears to be part of a larger grassed site used for grazing animals, with limited features. The site adjoins the settlement boundary and would be a logical continuation of the existing pattern of urban development in the area, which predominantly consists of long, wide, linear roads running to the coast. Although it is on the edge of development the site is in a sustainable location and within walking distance of the facilities and services of New Romney and Littlestones.

**5.19** Adjoining the site to the north are the residential gardens of properties fronting on to the south side of Queens Road, with a boundary featuring a mixture of hedgerow and fencing. Development here is predominantly modern but with a mixture of dwelling types and sizes. To the east is Victoria Road West, separated from the site with a farm gate and fencing, development here is very uniform being predominantly two storey and neo Georgian in appearance. Immediately to the south and west is open grazing land with no existing boundaries.

**5.20** The site includes land with archaeological potential, and development should ensure that it avoids or significantly mitigates the impact of 'significant' flood risk as raised by the Strategic Flood Risk Assessment on part of the site.

**5.21** The site is 2.9ha in size and is considered suitable for 70 dwellings with the opportunity for some self and custom build plots, depending on the size and layout. While a larger site than this was submitted for consideration in the SHLAA, this area was significantly reduced to avoid encroachment into open countryside.

## Policy RM2

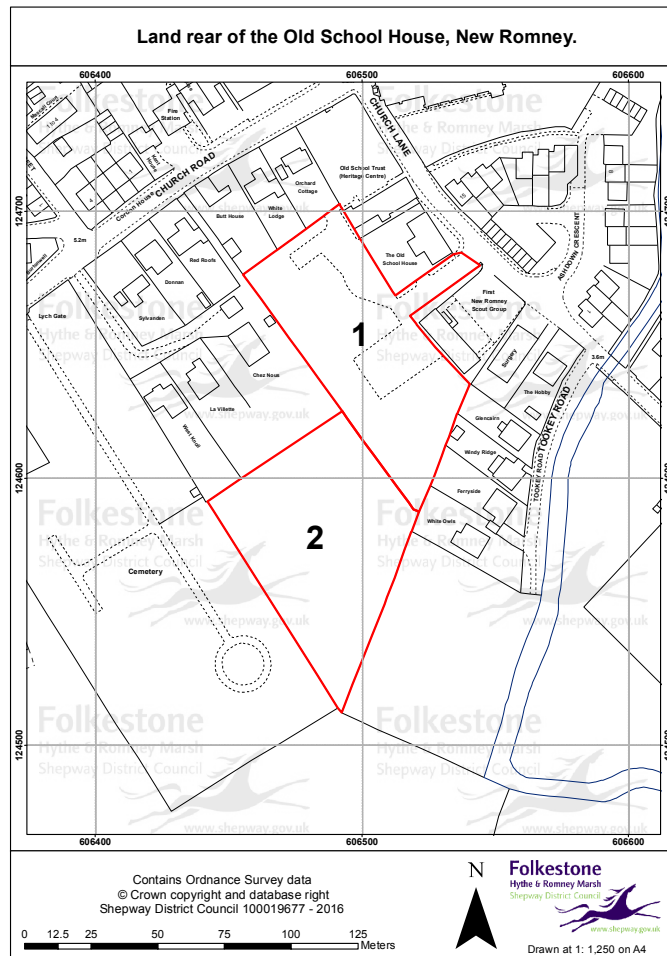
### Land off Victoria Road West, Littlestone

Land off Victoria Road West, Littlestone is allocated for residential development with an estimated capacity of 70 dwellings.

Development proposals will be supported where:

1. Vehicular access to the site is from Victoria Road West, and solutions to parking issues along this road are forthcoming
2. The development has at least 4 self/ custom build plots
3. The application is accompanied by a detailed flood risk assessment which ensures finished floor levels and sleeping accommodation are provided at appropriate levels to mitigate any potential flood risk and that development can be accommodated on site without increasing flood risk elsewhere
4. Existing watercourses on site are integrated into the development
5. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority
6. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
7. Provision is made for open and play space on site or nearby, and reinforces the integration and connectivity of green infrastructure as per Core Strategy Policy CSD5
8. Mitigation measures should be employed to prevent adverse effects on the nearby Ramsar, SAC and SSSI, and where possible provide biodiversity enhancements
9. Appropriate and proportionate contributions are made to medical facilities in New Romney through a site specific S106 agreement or CIL

**Land rear of the Old School House, Church Lane (SHLAA ref: 230 and 436)**



Picture 5.4

**5.22** The two sites are located south of the commercial centre of the town, within the settlement boundary and can provide small-scale infill development in a sustainable location a few steps from a surgery and within walking distance of a range of local shops and services. They also benefit from a location outside of flood zones 2 and 3, which is reasonably rare for the whole marsh area. Part of site 1 consists of hardstanding which is used for car parking, the remainder is scrub land with fairly dense vegetation. Site 2 is a more open, grassed area, which appears to be in use as a garden/ recreation area.

**5.23** Site 1 is surrounded by development on all sides, to the north east the site adjoins the old school building, the Scout Headquarters hut and the doctors surgery on Church Lane. Site 2 adjoins New Romney Cemetery to the west, residential development on Church Road to the north, open countryside to the south and site 1 to the north.



**5.24** These two sites have indicative capacities of 10 dwellings each, creating an overall capacity across the adjacent sites of 20 dwellings. Site 1, which accesses from Church Lane, measures 0.4ha, while Site 2, adjacent to the cemetery, measures 0.44ha. It is important that both of these sites come forward for development as a single unified masterplan and proposal.

### Policy RM3

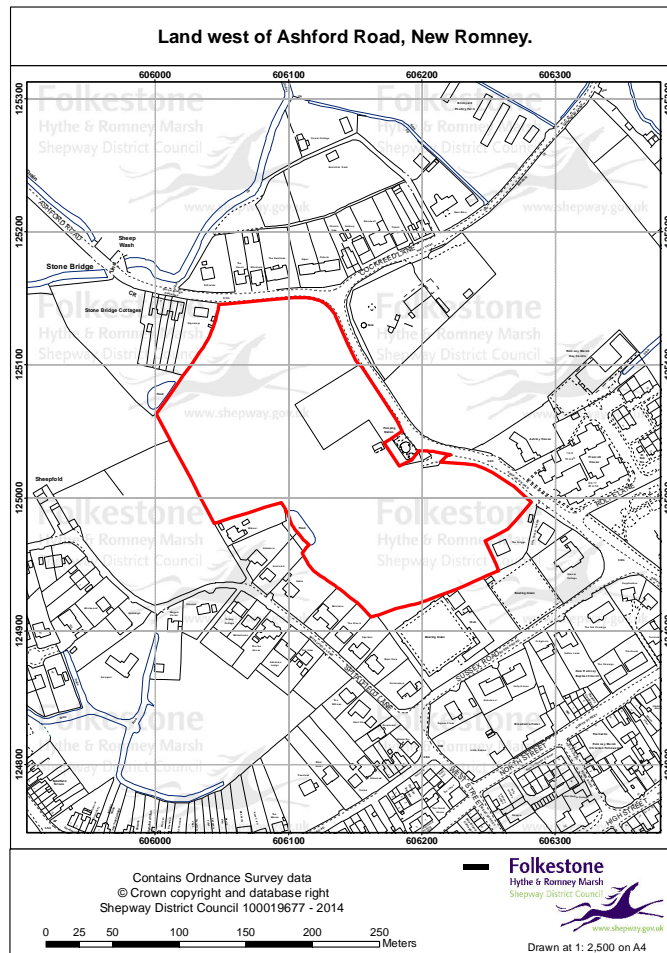
#### **Land rear of the Old School House, Church Lane, New Romney**

Land rear of the Old School House, Church lane is allocated for residential development with an estimated capacity of 20 dwellings.

Development proposals will be supported where:

1. Vehicular access to the site is from Church Lane
2. Both sites are integrated in a unified masterplan, and come forward for development together as per the masterplan
3. Pedestrian permeability is ensured within and beyond the site
4. A Site Specific Flood Risk Assessment is required, and it will need to be demonstrated that development can be achieved on this site that does not increase on site or local flood risk
5. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority
6. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
7. The design of the development should seek to minimise the effects on the setting of the nearby Listed Buildings and Scheduled Monument.
8. A Phase 1 Habitat Survey should be undertaken by a licenced ecologist to assess the presence of Protected Species on or near the site
9. Existing trees and hedgerows around perimeter of site are retained and enhanced
10. The design of the development should take into account the setting of the cemetery directly adjacent, softening the south and western edge of the development with a strong focus on landscaping
11. Appropriate and proportionate contributions are made to medical facilities in New Romney through a site specific S106 agreement

**Land west of Ashford Road (SHLAA ref: 403)**



Picture 5.5

**5.25** The Core Strategy (2013) highlighted a Broad Location for the strategic direction of New Romney's expansion in its Policy CSD8. This area comprises a linear block to the north-west of the centre of the town, between Rolfe Lane and Cockreed Lane. To complement and extend this allocation, an area of land to the south-west of this broad location has been allocated, rounding-off this part of the settlement. It is not envisaged that there will be a further requirement to extend beyond this site in this plan period. The site is in a sustainable location close to New Romney High Street, and is adjacent to the broad location allocation in Policy CSD8 of the Core Strategy and the settlement boundary.

**5.26** The site currently consists of fields which are used to graze horses and a couple of small structures/ sheds that appear to be related to horse keeping. The site is bounded by a mixture of mature hedgerow and fencing, with further mature hedgerow cutting the site in two running from east to west. Ashford Road runs along the east of the site and beyond this is land allocated for development in the Core Strategy. In addition there is a Sewage Pumping Station immediately adjoining the site, the implications of this on the development will require further investigation with

Southern Water. To the south of the site is residential development and the New Romney Bowls Club. To the south west the site adjoins the gardens of residential properties on Spitalfield Lane, a mixture of modern, detached dwelling types and to the west further open grazed fields. Ashford Road also runs along the north of the site and across from this are further residential properties, once again they are mostly modern, detached and either bungalows or two storey dwellings.

**5.27** The site is 3.22ha in size and is considered suitable for 60 dwellings, with the opportunity for some self and custom build plots, depending on the size and layout.

## Policy RM4

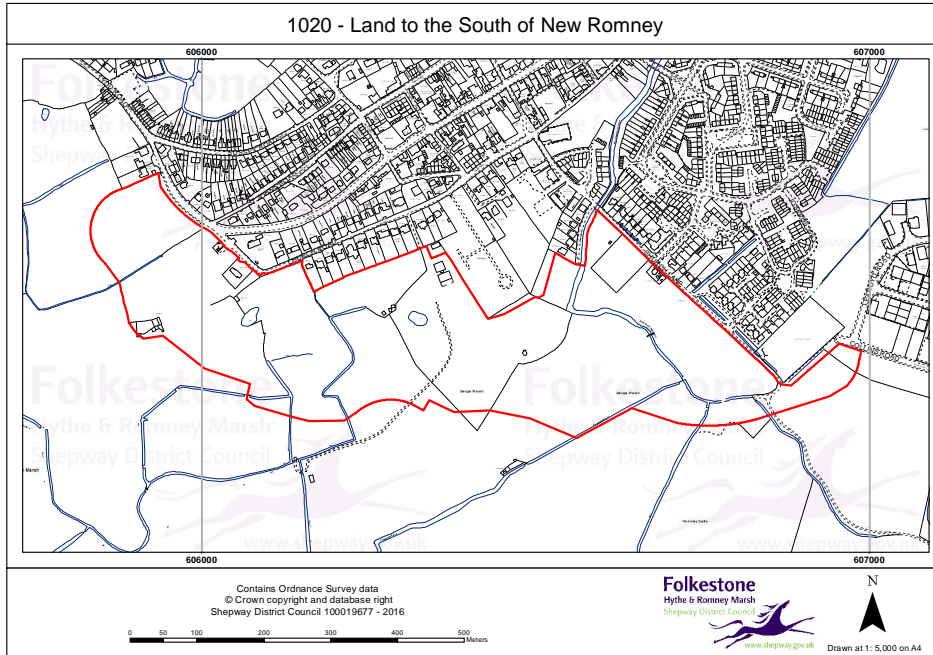
### **Land west of Ashford Road, New Romney**

Land west of Ashford Road, New Romney is allocated for residential development with an estimated capacity of 60 dwellings.

Development proposals will be supported where:

1. A footpath and appropriate lighting is provided along the road frontage with Ashford Road
2. Access is through the existing site access on Ashford Road, with an additional emergency access provided at the north of the site
3. A pedestrian crossing point, to the satisfaction of the local highway authority, is provided across Ashford Road, to include dropped kerbs and tactile paving
4. A Traffic Assessment is required to take account of the cumulative impact of development on the local road network, and contributions will be sought for any required improvements to mitigate the impact of this development
5. The development has at least 3 self/ custom build plots
6. Within dwellings, no sleeping accommodation is provided at ground floor level due to this site's location within Flood Zones 2 and 3
7. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority
8. Existing trees and hedgerows within/ around perimeter of site are retained and enhanced
9. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
10. The design of the development should seek to minimise the effects on the setting of the nearby Listed Buildings and Scheduled Monument
11. Provision is made for open and play space on site or nearby, and reinforces the integration and connectivity of green infrastructure as per Core Strategy Policy CSD5
12. The rural western edge of the development should be fragmented and softened with a strong focus on landscaping to form a buffer
13. A Phase 1 Habitat Survey should be undertaken by a licenced ecologist to assess the presence of Protected Species on or near the site. The pond on this site should be assessed for ecological importance and, if appropriate, compensation for its loss (if it occurs) will be required
14. Appropriate and proportionate contributions are made to medical facilities in New Romney through a site specific S106 agreement
15. Access to the Sewage Pumping Station must not be restricted and this adjoining use should be mitigated in the site design

**Land to the south of New Romney (SHLAA ref: 1020)**



**Picture 5.6**

**5.28** The Core Strategy Local Plan supports a positive approach to the development of New Romney’s strategic role as a location serving the Romney Marsh area through new housing, community facilities, employment and business opportunities. In this regard, Mountfield Road Industrial Estate can provide a significant contribution to the sustainable development of the town and wider area, given the number of businesses and jobs located on the estate, and a 6.1ha undeveloped area earmarked to meet future employment and business needs.

**5.29** However it has been identified that the main arterial route through the town centre, and in particular the intersection at the junctions of Church Road, High Street, Station Road and Dymchurch Road present challenging permeability issues for traffic. This presents the dual economic challenges of limiting the success of the Mountfield Road Industrial Estate, and making the High Street a rather hostile environment for pedestrian shoppers. Subsequently given the identified need for a strategic route to bypass traffic pinch points, and the will to alleviate heavy vehicular movements through the commercial heart of New Romney, a land area to the south of the settlement is proposed to accommodate this new strategic route.

**5.30** The road should be constructed as the central component of development at this southern site, along with enabling residential development. The road would allow improved access to the Industrial Estate and its undeveloped area, thereby enhancing

its attractiveness as a key location for jobs and business growth. The whole site will need to be masterplanned, to include well integrated residential development clear pedestrian permeability both through the site and in terms of establishing links to the wider area, as well as large amounts of publicly-accessible open space to benefit the whole community.

## Policy RM5

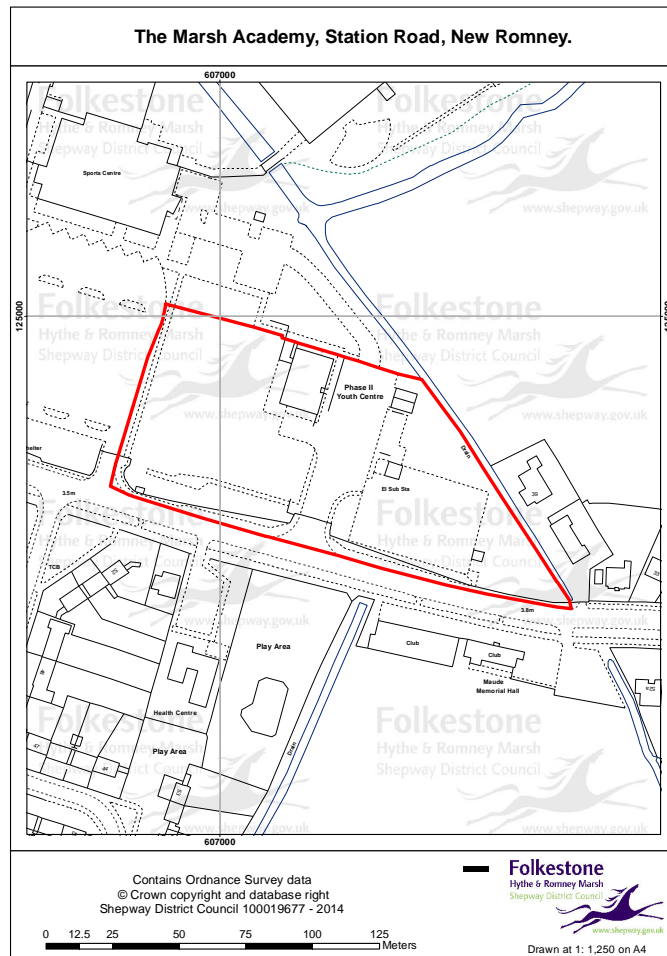
### Land to the south of New Romney

Land to the south of New Romney is allocated for residential led, mixed use development to provide up to 400 homes, improved access to Mountfield Road Industrial Estate, health care and other community facilities, high quality open space and appropriate on and off site transport infrastructures improvements.

Development proposals for this site shall:

1. Form a single comprehensive masterplan
2. Provide for an appropriate distributor road, connecting between Mountfield Road Industrial Estate and Lydd Road so as to reduce congestion through the High Street and open up Mountfield Road as an enhanced employment location
3. Have an integrated approach that takes note of the nearby Mountfield Road Industrial Estate and its future growth proposals
4. Provide an appropriate design response to the Romney Marsh local Landscape Area, utilising Landscape and Visual Impact Assessment to inform master planning
5. Provide for on site medical facilities that provide for an appropriate healthcare hub to serve the town of new Romney and the wider rural area
6. Include consideration of extra care housing and C2 residential carehome facilities
7. Be accompanied by a detailed flood risk assessment which ensures finished floor levels and sleeping accommodation are provided at appropriate levels to mitigate any potential flood risk and that development can be accommodated on site without increasing flood risk elsewhere
8. Sustainable Urban Drainage and surface-water management should be integral to the good urban design principles adopted for the development of the site
9. Include assessment of archaeology, habitat and ecology and seek to ensure that open space provision seeks to reinforce the integration and connectivity of green infrastructure
10. The design of the development should seek to reduce effects on the setting of the nearby Listed Buildings and Scheduled Monument
11. Provide for significant and meaningful open space, incorporating appropriate play space, sports pitches and facilities and allotment provision to meet the identified needs of the development

**The Marsh Academy, Station Road, New Romney (SHLAA Ref: 638)**



Picture 5.7

**5.31** Following the redevelopment of the school site, the footprint of the school building has been greatly reduced. This land, which borders existing residential properties, has been put forward for housing development. While an existing community facility is located on the site, the majority is previously developed scrub and grassland.

**5.32** This site is brownfield and adjacent to the New Romney settlement boundary. Given these facts, and that other constraints on the site are minimal in relation to other sites in the vicinity, there is potential for the development of housing on this location. The site is well-bounded to the north and north-east so that further encroachment into the countryside in the locality is unlikely, and it is well placed to access local services.

**5.33** The site is 0.98ha in size and is considered suitable for 29 dwellings, depending on the size and layout.



## Policy RM6

### The Marsh Academy, Station Road, New Romney

Land at the Marsh Academy, Station Road is allocated for residential development with an estimated capacity of 29 dwellings.

Development proposals will be supported where:

1. Appropriate and proportionate contributions are made to medical facilities in New Romney through a site specific S106 agreement
2. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority.
3. The north, north-east edge of the development should have a strong focus on landscaping to form a buffer
4. Existing trees and hedgerows within/ around perimeter of site are retained and enhanced
5. It can be demonstrated that a replacement community facility is to be provided or is to be delivered elsewhere or is no longer required
6. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

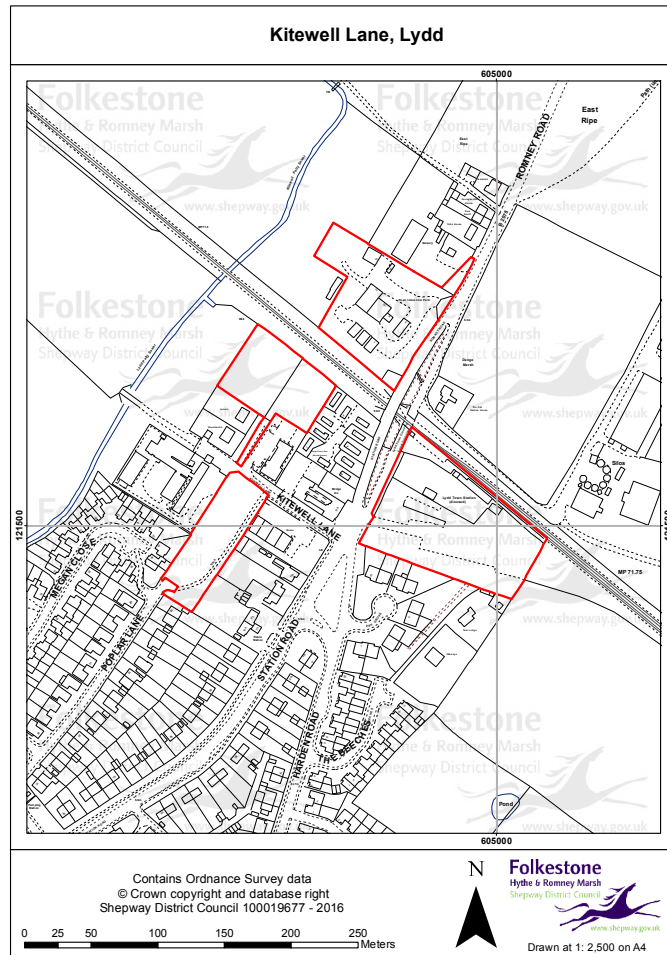
### Service Centre -

#### Lydd

**5.34** Lydd developed as a settlement during the Romano-British period on a shingle island when the coast at the time cut off Lydd from the mainland. The settlement continued into the Saxon period, with the Saxon church using Roman materials as part of its construction. All Saints church has been described as the 'Cathedral of the Marsh' and the town has the greatest number of medieval houses on the Marsh. Lydd reached the height of its prosperity during the 13th century, when it was a corporate member of the Cinque Ports. As with much of the Marsh, the town was a base for smuggling in the 18th and 19th centuries. Lydd is the second largest centre of population on the Romney Marsh, with a population of about 5,500. The airport north of the town is well established and has attracted significant investment proposals. Lydd is within the "Dungeness Shingle" landscape character area, a definition of which can be found below.

**5.35** The Core Strategy priority in Policy SS1 is for development which helps to maintain and support the local role of the market town of Lydd, and otherwise seeking to address its regeneration needs.

## North Lydd sites



Picture 5.8

**5.36** The northern part of Lydd centres on the railway line that traditionally connected Appledore and Dungeness. However, passenger services at Lydd station ceased on 6 March 1967, with freight services going the same way on 4 October 1971.

**5.37** Since then, various light industrial uses emerged flanking the railway line, while residential uses filled the gap between the historic centre and the railway. Light industrial uses remain, but there is a need to consolidate the locality into a coherent place and a strong need for some provision of local services for residents. A masterplanning exercise with a strong focus on access and connectivity is therefore encouraged that involves all Lydd's allocated sites to ensure a cohesive plan for the area. There is an opportunity for self and custom build development plots across the entire development.

**Kitewell Lane, R/O Ambulance Station, Lydd (SHLAA ref: 451b and 306b)**

**5.38** This site lies immediately south-west of the railway line in north Lydd. The site is currently unused scrubland lying behind the Ambulance station and two residential properties (Lenern and Greenlands) on Kitewell Land. The site adjoins a Local Wildlife Site

**5.39** The site is 0.39ha and is considered suitable for 8 dwellings, depending on the size and layout.

**Land South of Kitewell Lane, Lydd (SHLAA ref: 306a)**

**5.40** This site is located between Kitewell lane and Poplar Lane in north Lydd, within the settlement boundary. It is an oblong strip of unoccupied scrub land currently allocated for employment uses. Development of this type has not come forward and, given the adjacency of residential use, can be considered suited for housing. It is a broadly uneven site, with an informal track running between Poplar Lane and Kitewell Lane. While pedestrian permeability should be maintained, vehicular access should only be derived from Poplar Lane.

**5.41** The site is 0.51ha and is considered suitable for 9 dwellings, depending on the size and layout.

**Station Road, Lydd - site of the former Lydd Railway Station (SHLAA ref: 195)**

**5.42** This site is located to the south east of the other north Lydd sites, within the settlement boundary. Previously the Council has sought to encourage employment uses on this site. However, since this allocation the market has not delivered any feasible proposal, and housing uses can now be considered suitable and deliverable for the future of this site and the retention of its historic assets. There remain two buildings relating to the station on the site, and their reuse will anchor a sense of place, character and history to any new development on the site. To this end, a character analysis of this site will be sought prior to development. Given the general lack of services in this part of Lydd, the creation of a local shop would be encouraged utilising the existing buildings.

**5.43** The site is 0.87ha and is considered suitable for 30 dwellings, depending on the size and layout.

**Peak Welders, Lydd (SHLAA ref: 390)**

**5.44** This site is located to the north of the other sites in Lydd, the far side of the railway line. It is currently used as a car mechanics and car sales, with a number of buildings and hardstanding on site.

**5.45** While this site is beyond the settlement boundary, in other respects it is suitable for development as it is previously developed land and with relatively few other constraints. However as part of any masterplan development pedestrian and other routeways to Lydd core town area, across the railway line should be improved. There is limited capacity for footway improvements along Station Road, but alternatives should be explored.

**5.46** In respect of constraints there is a prospect of land contamination and a small part of this site to the north is designated as a local wildlife site therefore there can be no built development on this part of the site. In addition the site is surrounded by a SSSI- so it will be essential that the development avoids any adverse effects on the SSSI and where possible incorporates additional biodiversity enhancement measures

**5.47** The site is 0.7ha and is considered suitable for 18 dwellings, depending on the size and layout.

## Policy RM7

### Development at North Lydd

These sites are proposed for residential development with an estimated capacity as follows:

1. Kitewell Lane, R/O Ambulance Station, Lydd, - 8 dwellings
2. Land South of Kitewell Lane, Lydd, - 9 dwellings
3. Station Yard, Station Road, Lydd, - 30 dwellings
4. Peak Welders, Lydd, -18 dwellings

Development proposals will be supported on these sites, either together or separately, where:

1. A masterplan is produced showing all four sites and a vision for their integration with each other and the surrounding settlement
2. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority
3. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
4. Provision is made for open and play space on site, and reinforces the integration and connectivity of green infrastructure as per Core Strategy Policy CSD4. At least a third of the land area on this site should be set aside as publicly-accessible open space
5. The development should avoid adverse effects on the Dungeness, Romney Marsh and Rye Bay SSSI and incorporate biodiversity enhancement measures
6. A Phase 1 Contaminated Land Assessment is required and, if necessary, mitigation measures enacted to the satisfaction of the responsible statutory body.
7. Appropriate and proportionate contributions are made towards education and health through a site specific S106 agreement
8. The development has at least 3 self/ custom build plots within the entire development

The site wide masterplan will need to create a unified development ensuring that:

- Within the Kitewell Lane, R/O Ambulance Station site appropriate protection, preservation and integration of the Local Wildlife is provided.
- Within Land South of Kitewell Lane vehicular access is achieved via Poplar Lane only, as advised by Kent County Council.
- Within the Station Yard, Station Road site
  1. The up-platform, main station building, goods shed, and loading dock, are all retained and returned to use ideally for retail or other compatible use to provide the locality with missing services and to maintain the link with North Lydds past. An assessment of these historic assets is undertaken
  2. A Traffic Regulation Order is sought to close access from Station Road onto Harden Road next to the application site, and ensure that traffic accesses the site from the junction slightly further south. This is due to the existing private access onto Station Road having limited visibility due to the railway bridge. This part of Harden Road would then become two-way for vehicular traffic
  3. A footpath connection is delivered by the scheme to link up with Ash Grove to enable sustainable journeys to and from the site
- Within the Peak Welders, Lydd site:
  1. Suitable pedestrian and cycle routes are created across the railway line to the south, enabling sustainable access to local services. This can be achieved in a variety of ways at the discretion of the applicant, but will most likely require negotiations with third party landowners
  2. Appropriate protection, preservation and integration of the Local Wildlife is provided

## Rural Centre -

### Dymchurch

**5.48** Dymchurch gets its name from the Anglo Saxon place '*Deman Ciric*' meaning 'Judges Burial ground' and was probably a place of execution at that time. The sea wall was originally built by the Romans and the settlement is mentioned in the Domesday Book. Dymchurch was the main centre of the marsh where the governors

administered justice from the New Hall on New Hall Close which dates from 1575. The area was run by twenty-three Lords of the Manors of Romney Marsh (aka The Lords of The Levels). The Lords of the Level, jurats and bailiffs met to discuss and rule the marsh area and this group still meets annually although they no longer have any powers. The court was always busy as smuggling was rife in the area because of its remote location. Dymchurch is the setting for the Dr Syn novels, involving smuggling, in which the protagonist attempts to help the people of Dymchurch and the surrounding area evade excise tax. Naturally, such activity no longer occurs in the town.

**5.49** Dymchurch has been the frontline against threats of invasion, both by enemy forces and by the sea. The Martello Towers provided security from foreign powers, and the great sea wall from the risk of flooding.

**5.50** While residential development would generally be encouraged in a rural centre with access to a range of services, and is supported in the Core Strategy, the Strategic Flood Risk Assessment indicated that the vast majority of undeveloped sites related to this settlement are subject to 'significant' flood risk. In addition to this, local infrastructure would require upgrading to allow substantial development. For these reasons, no sites have been allocated in Dymchurch for this plan period. However, windfall sites could come forward in this locality if they are made acceptable to the Environment Agency in mitigating against flood risk, and provide appropriate accessibility.

## **Primary Villages -**

### **St Mary's Bay**

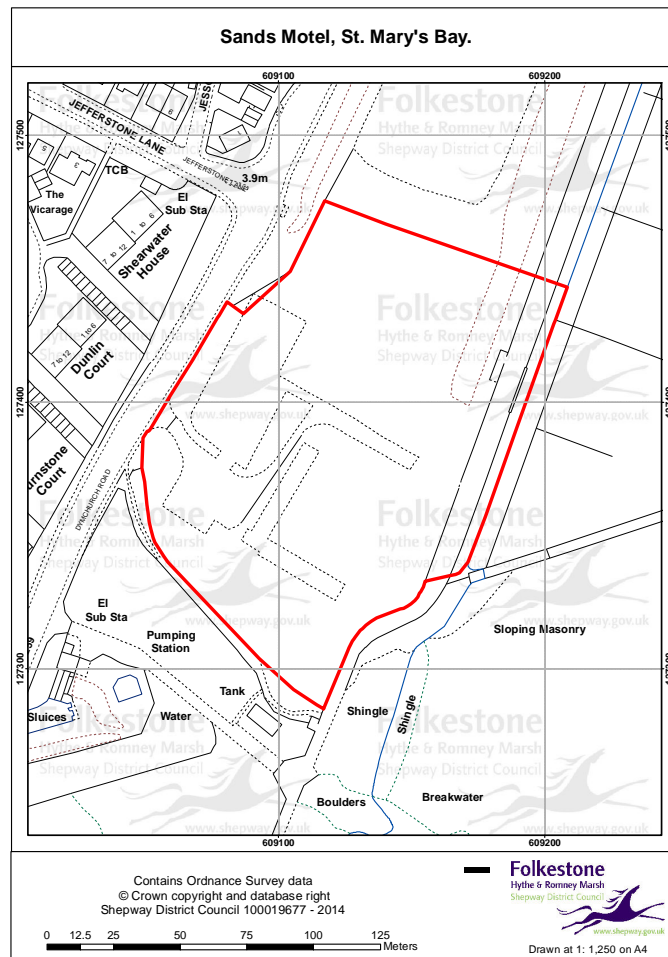
**5.51** St Mary's Bay is a relatively new development in the area, it was created as a seaside village to cater for the 1920s boom in seaside holidays. The area had its heyday in the 1960s and today contains a number of static caravan and holiday parks as well as a number of second homes alongside permanent residences.

**5.52** St Mary's Bay, Dymchurch, and much of New Romney, including Littlestone and Greatstone, are situated within the "Romney Marsh Coast" landscape character area. This comprises a strip of developed east-facing coastline, including shingle, sandy beaches and sand dunes. Settlements are connected by the Romney, Hythe and Dymchurch Railway, and small-scale steam engines are a regular sight. This stretch of coastline needs constant defence from the sea, as much of the development is at or below sea level. The Dymchurch wall was started in 1288 to supplement the protection provided by natural banks of shingle. Today, the sea wall runs for much of the length of the character area, and in the northern part is a highly-engineered structure, defended on the seaward side with rock armour. As well as invasion from the sea, Romney Marsh has also been threatened with invasion by armies crossing the channel. Consequently, the coastline contains a number of defensive structures,

including distinctive Martello Towers from the Napoleonic Wars. The area is also a popular holiday destination, and contains many caravan parks and associated tourism development.

**5.53** The settlement offers a reasonable level of service provision yet, like Dymchurch, suffers from 'significant' flood risk on many of its undeveloped sites. For this reason, only one site is considered suitable for designation in this plan period.

**Former Sands Motel, Land adjoining pumping station, Dymchurch Road, St Mary's Bay (SHLAA ref 4)**



**Picture 5.9**

**5.54** The site is located to the east of St Mary's Bay, fronting the Dymchurch Road (A259) on the coast. The site is previously developed and within the settlement boundary. Part of the site was once the location for a motel but the structures for this former use are no longer evident, today the site consists of scrubland with some hardstanding.



**5.55** The site is considered a sustainable location as the village facilities and services are within close walking distance, including bus stops, the village hall, post office and public house.

**5.56** To the north of the site is a grassed area used for seasonal car parking and a building containing public toilets. Immediately to the east of the site the land rises up to the seawall and promenade with the sandy beach beyond. To the south is a pumping station and the Rugby Club Campsite land and buildings beyond. The west of the site is bounded by hedgerow and trees, with Dymchurch Road and a bus stop past this. The area beyond the road is residential, closest to the site are Shearwater House and Dunlin Court which are two three storey blocks of flats, set back from the road with a large grassed area.

**5.57** In respect of constrains to the south the site adjoins the designated Dungeness, Romney Marsh and Rye Bay SSSI and is located 2km away from a Special Protection Area and wetland of international importance, known as a Ramsar site. In addition a large part of the site is recognised for its archaeological potential.

**5.58** The site is 1.6ha in size and is considered suitable for 85 dwellings, depending on the size and layout. Planning permission was granted (Y07/1566/SH) in June 2016 for the erection of 85 dwellings and formation of new access.

### Policy RM8

#### **Former Sands Motel, Land adjoining pumping station, Dymchurch Road, St Mary's Bay,**

Land at the former Sands Motel site is allocated for residential development with an estimated capacity of 85 dwellings.

Development proposals will be supported where:

1. Highway improvements to serve the development should include the widening of the A259 by 1.2m from the north side of Jefferstone Lane southwards over a distance of approximately 135m, allowing right turn lanes into both Jefferstone Lane and the new development
2. Existing vehicle access from Dymchurch Road is upgraded to serve the development
3. Contributions are forthcoming to lengthen and widen the bus stop on the east side of the A259
4. The existing pelican crossing will be upgraded to a puffin crossing.
5. Development should ensure pedestrian permeability throughout and beyond the site
6. The existing seasonal car park to the north of the site should be upgraded and enlarged to provide 205 parking spaces, 29 of which should be disabled. Surfacing should make provision for surface water drainage
7. The site must be raised to provide a base platform at 5.5m ODN to make the development safe from flood risk
8. Within dwellings, no sleeping accommodation should be provided at ground floor level due to this site's location within Flood Zones 2 and 3
9. A public coastal park and play area alongside the public car park are provided together with the future management of these areas
10. The public coastal park and play area are to be no less than 0.82ha in size
11. The development avoids adverse effects on the Dungeness, Romney marsh and Rye Bay SSSI and Special Protection Area, incorporating biodiversity enhancement measures
12. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

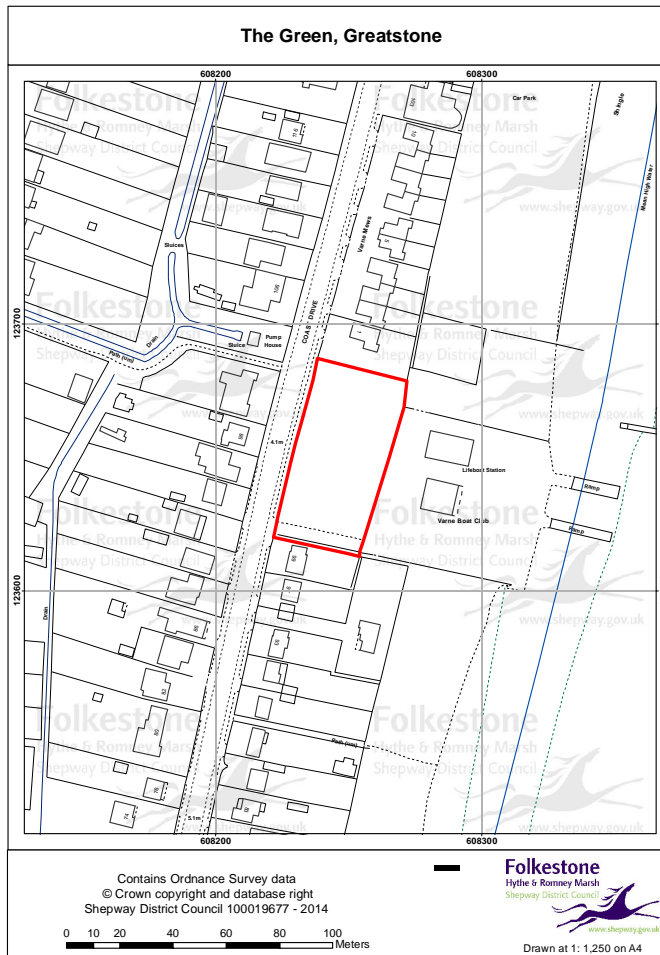
### **Greatstone-on-Sea**

**5.59** Greatstone is described as a village situated between farmland and a nature reserve to the west and the English Channel to the east. Forming a linear extension of Littlestone southwards down the coast. It has a fine sandy beach popular with bathers and wind surfers alike. Greatstone is centered around Dunes Road, extending,

generally parallel to the coast, to Clark Road to the north, adjacent to Littlestone. To the south it extends to the south end of Leonard Road, adjacent to Lydd-on-Sea. Nearly all its properties are residential with a few shops, local pubs, restaurants, holiday homes and two holiday parks. In the 1920s the area was predominantly covered by sand dunes and consisted of just a few properties mainly used as holiday homes. There was widespread development in the 1960s and 1970s, however, leading to the sizable community it is today.

**5.60** Two modest infill allocations are proposed for Greatstone in this plan period.

**Land rear of Varne Boat Club, Coast Drive, Greatstone (SHLAA ref: 462)**



**Picture 5.10 Land rear of Varne Boat Club**

**5.61** The site is a gap in the development which runs along Coast Drive a road near the coast in Greatstone. The site adjoins the settlement boundary and is previously developed land having been previously occupied by public conveniences however a concrete base in a grassed area is now all that remains.

**5.62** The site is surrounded on three sides (north, south and west) by mostly modern residential dwellings. To the north and south these are prominently 2 storey detached or semi detached properties, however to the west the properties are predominantly bungalows. To the east the site adjoins the Varne Boat and Social Club and Lifeboat Station. Beyond this is the beach which is designated as a SSSI (Dungeness, Romney Marsh and Rye Bay) and Special Protection Area and wetland of international importance, known as a 'Ramsar site.

**5.63** The site is 0.23ha in size and is considered suitable for 5 dwellings, depending on the size and layout. Planning permission (Y15/1132/SH) has been granted for an outline application for the erection of four detached dwellings.

### Policy RM9

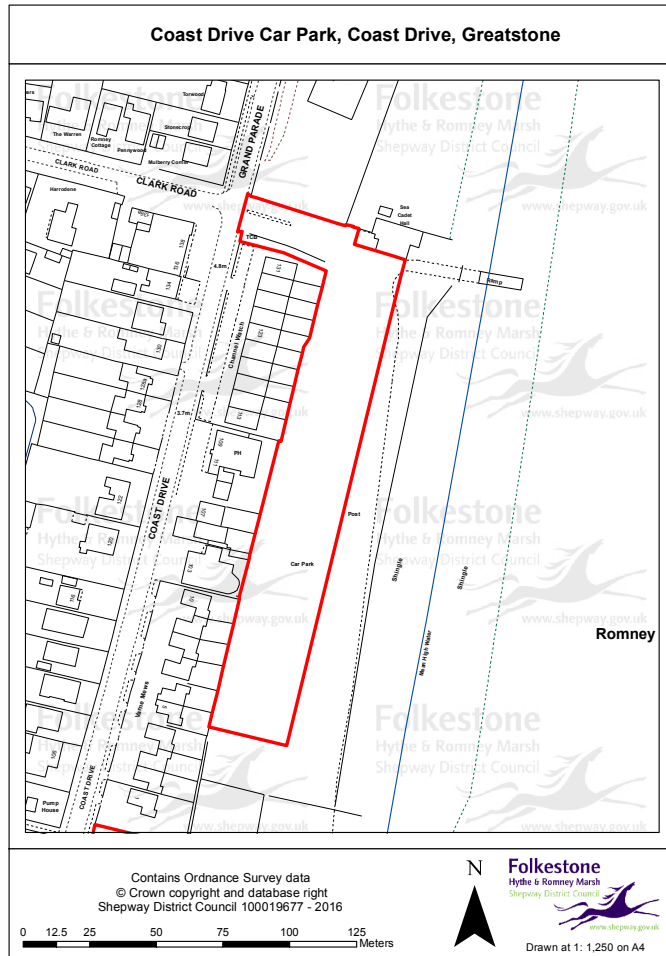
#### **Land rear of Varne Boat Club, Coast Drive, Greatstone**

Land rear of Varne Boat Club, Coast Drive is allocated for residential development with an estimated capacity of 5 dwellings

Development proposals will be supported where:

1. Within dwellings, no sleeping accommodation is provided at ground floor level due to this site's location within Flood Zones 2 and 3
2. A buffer zone of 15m is provided around the existing Environment Agency river culvert that traverses the site
3. Development fronts Coast Drive, respecting and maintaining the established building line along this road
4. A Site Specific Flood Risk Assessment is required, and it will need to be demonstrated that development can be achieved on this site that does not increase on site or local flood risk.
5. Biodiversity enhancement measures should be investigated to minimise any effects on the Special Protection Area and wetland of international importance and Dungeness, Romney Marsh and Rye Bay SSSI.
6. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

**Car park, Coast Drive, Greatstone (SHLAA ref: 1013)**



Picture 5.11

**5.64** This site is to the north of Varne Boat Club, accessed off Coast Drive and is currently used as a car park.

**5.65** The site is a narrow strip running behind residential dwellings and a restaurant which front on to Coast Drive, these properties all lie to the west of the site and are predominantly two storeys in height and modern in construction. To the south of the site is a boat store and grassed area, with the Lifeboat Station beyond. To the north is the Seawatch Hut which is used by the Sea Cadets, beyond this is a recreation and play area and a parade of beach huts. To the east is the beach which is designated as a SSSI (Dungeness, Romney Marsh and Rye Bay) and Special Protection Area and wetland of international importance, known as a Ramsar site.

**5.66** The site is 0.47ha and is proposed for allocation with an indicative capacity of 16 dwellings depending on the size and layout, incorporating a number of public car parking spaces.

## Policy RM10

### **Car park, Coast Drive, Greatstone (SHLAA ref: 1013)**

Car park, Coast Drive is allocated for residential development with an estimated capacity of 16 dwellings

Development proposals will be supported where:

1. A Traffic Assessment is required to assess the loss of part of the car park on this site. This should demonstrate the impact on local roads in the vicinity. There must be a commitment to retention and improvement of the access to the eastern part of the existing car park for continuing public use and a further 50 public car parking spaces within the allocation site
2. Within dwellings, no sleeping accommodation is provided at ground floor level due to this site's location within Flood Zones 2 and 3
3. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority
4. A Site Specific Flood Risk Assessment is required, and it will need to be demonstrated that development can be achieved on this site that does not increase on site or local flood risk
5. Biodiversity enhancement measures should be investigated to minimise any effects on the Special Protection Area and wetland of international importance and Dungeness, Romney Marsh and Rye Bay SSSI
6. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

## **Brookland**

**5.67** Perhaps the earliest reference to Brookland comes from the 1252/3 Calendar of Charter Rolls of the Reign of Henry III, but a century earlier a custumal noted the expansion of 80 acres of Christ Church tenant land, *de brocland*.

**5.68** Today's village is a small community of some 200 dwellings, with a primary school, church, cemetery, two pubs and a village hall. St Augustine Church has the unusual, if not unique, feature of an entirely wooden spire being separate from the body of the church.

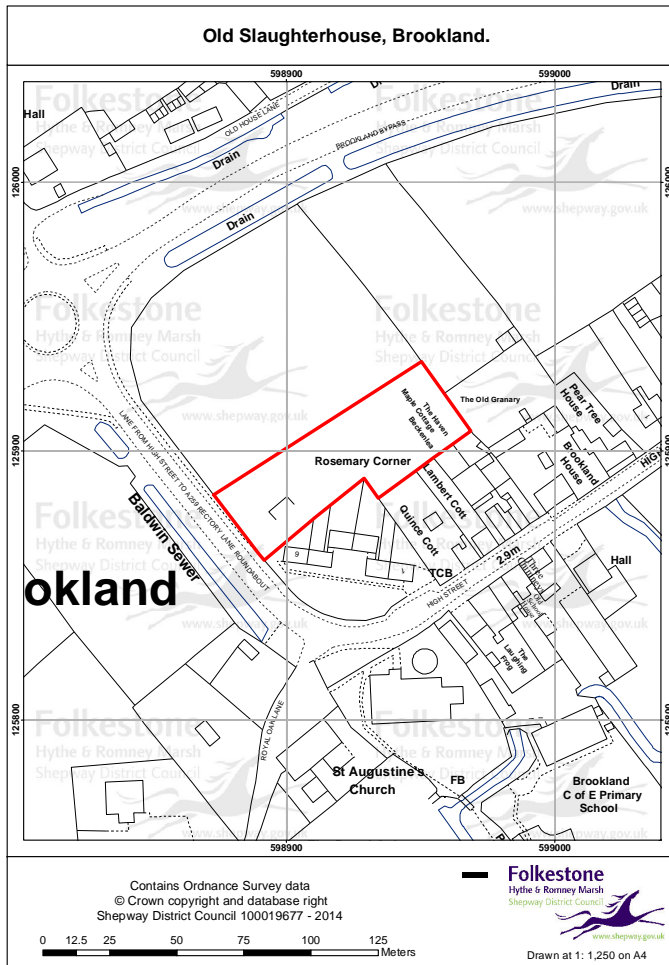
**5.69** The landscape character area is labelled "Brookland Farmlands". It is constituted by an area of marsh which was reclaimed from the sea and settled in the early medieval period. This process was undertaken systematically, creating a strongly linear landscape, with parallel lanes and field boundaries, although the pattern is stronger at the western end of the LCA. The historic pattern of strip-shaped

parish boundaries also shows how the reclaimed land was divided between existing parishes located in Romney Marsh Proper. The only village within this character area is Brookland, although there are scattered farms (mostly along roads) and the ruin of Midley church. This is the most densely-treed area on the marsh, and parallel lines of trees (mostly willow) and hedgerows are a distinctive feature of this area. The area is predominantly arable land, although there are some small areas of surviving sheep pasture.

**5.70** The settlement of Brookland is physically divided between its older and newer parts, with the older part covered by a Conservation Area designation. The newer part is over 200m to the west, beyond the Brookland Bypass, as is formed entirely of late twentieth century residential development.

**5.71** A moderate amount of growth is proposed in Brookland in this plan period.

**The Old Slaughterhouse, 'Rosemary Corner', Brookland (SHLAA ref: 431)**



Picture 5.12

**5.72** The site is located off Straight Lane, on the edge of the older part of Brookland village, adjoining the settlement boundary. This site constitutes previously development land contiguous with the existing built area of Brookland and its conservation area. Today there is not much remaining on site to show the sites former use, there is some brick work and fencing but it is mostly scrubland. This location is seen as sustainable as it is within a very short walking distance of the local services and facilities, such as the primary school, church and public house.

**5.73** To the south the site adjoins residential development, namely Rosemary Corner which is a cluster of modern 60's/ 70's bungalows on the corner of Straight Lane and High Street, appearing to be out of keeping with this part of the village. Also bordering the site to the south east are a number of residential gardens for dwellings that front on to High Street, the majority of these are listed and are in the historic core of Brookland. The west of the site fronts directly on to Straight Road. The north and east adjoin agricultural fields, at present there is no obviously boundary between the site and the fields to the north.

**5.74** The site is 0.27ha in size and is considered suitable for 5 dwellings depending on the size and layout.



## Policy RM11

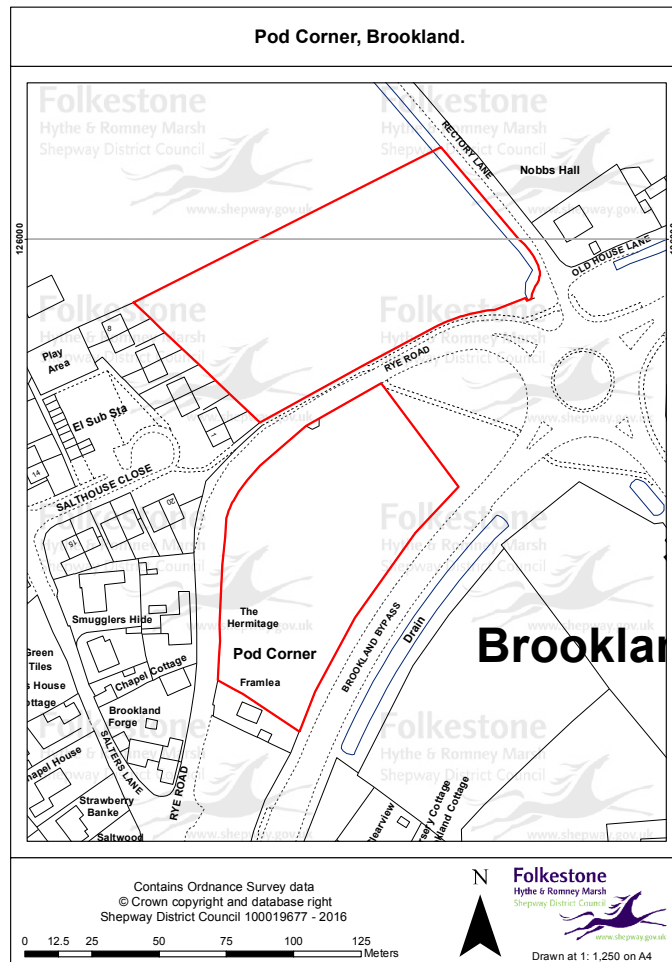
### **The Old Slaughterhouse, 'Rosemary Corner', Brookland**

The site is allocated for residential development with an estimated capacity of 5 dwellings.

Development proposals will be supported where:

1. The design and layout of the development should avoid adverse effects on the setting of the nearby conservation area and listed buildings and heritage features, and where possible make enhancements
2. Within dwellings, no sleeping accommodation is provided at ground floor level due to this site's location within Flood Zones 2 and 3
3. A Site Specific Flood Risk Assessment is required, and it will need to be demonstrated that development can be achieved on this site that does not increase on site or local flood risk
4. A Phase 1 Habitat Survey should be undertaken by a licenced ecologist to assess the presence of Protected Species on or near the site
5. The development preserves or enhances the character and setting of the nearby Brookland Conservation Area and Listed Buildings
6. The north west and north east boundaries are softened with a strong landscape buffer
7. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

**Land north and south of Rye Road, Brookland (SHLAA ref: 407a and 609)**



Picture 5.13

**5.75** The aspirations for Brookland for this plan period also include two sites which relate to the newer part of Brookland, both are situated north of the Brookland Bypass. These sites can come forward for development together or individually, but in the first instance they should be masterplanned together to achieve a coherent design. This location is, in principle, a relatively sustainable one for a rural setting.

**5.76** Framlea, Rye Road, Pod Corner, Brookland, has recently been dismissed at appeal based on existing policies, however it is considered that this site is suitable for development if masterplanned coherently with the site to the south to meet the future housing needs identified within the Core Strategy (2013).

**5.77** Land north of Rye Road is a field to the north of Brookland at the cross roads of Rye Road to the south and Rectory Lane to the east. To the north are further open fields, with no boundary at present separating the site from the field beyond. To the west the site adjoins the gardens for residential dwellings on Salthouse Close, these dwellings are modern, two storey semi detached properties.

**5.78** Land south of Rye Road is an agricultural field lying between the Brookland Bypass (A259) to the east and Rye Road to the west. To the south is a 2 storey house and the site faces further modern two storey dwellings to the west of Rye Road. The majority of the site is bounded by a mixture of mature hedgerow and trees, with a particularly strong boundary running along the A259. To the north west across Rye Road is the other site Land north of Rye Road.

**5.79** Land north of Pod Corner, Brookland, has a site area of 0.72ha, and an indicative capacity of 20. To the south, land adjacent to Framlea, Rye Road, Pod Corner, Brookland, has a site area of 0.63ha and can sustain approximately 15 dwellings dependent on the size and layout.

## Policy RM12

### **Lands north and south of Rye Road, Brookland (SHLAA ref: 407a and 609)**

These sites are allocated for residential development with an estimated capacity of 15 dwellings for land north and 10 dwellings for land south of Rye Road.

Development proposals will be supported where:

1. A masterplan is produced showing how the two sites integrate with each other and the existing settlement
2. Substantial planting/ landscaping should be included along the northern boundary of Land North of Pod Corner, and on the south-eastern boundary of Land adjacent to Framlea. This is, respectively, to inhibit encroachment into open countryside, and to protect resident amenity from a significant road
3. Existing trees and hedgerows around perimeter of sites are retained and enhanced
4. Development on either site should create a strong frontage to Rye Road, and ensure the developments 'talk to' existing residential development in the locality, and to each other
5. Within dwellings, no sleeping accommodation is provided at ground floor level due to this site's location within Flood Zones 2 and 3
6. Existing watercourses on site are integrated into the development
7. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority
8. A Site Specific Flood Risk Assessment is required, and it will need to be demonstrated that development can be achieved on this site that does not increase on site or local flood risk
9. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
10. The design of the development should be sensitive to the setting of the nearby Grade I and II Listed Buildings and Conservation Area
11. Provision is made for open and play space on site or nearby, and reinforces the integration and connectivity of green infrastructure as per Core Strategy Policy CSD5
12. A Phase 1 Habitat Survey should be undertaken by a licenced ecologist to assess the presence of Protected Species on or near the site

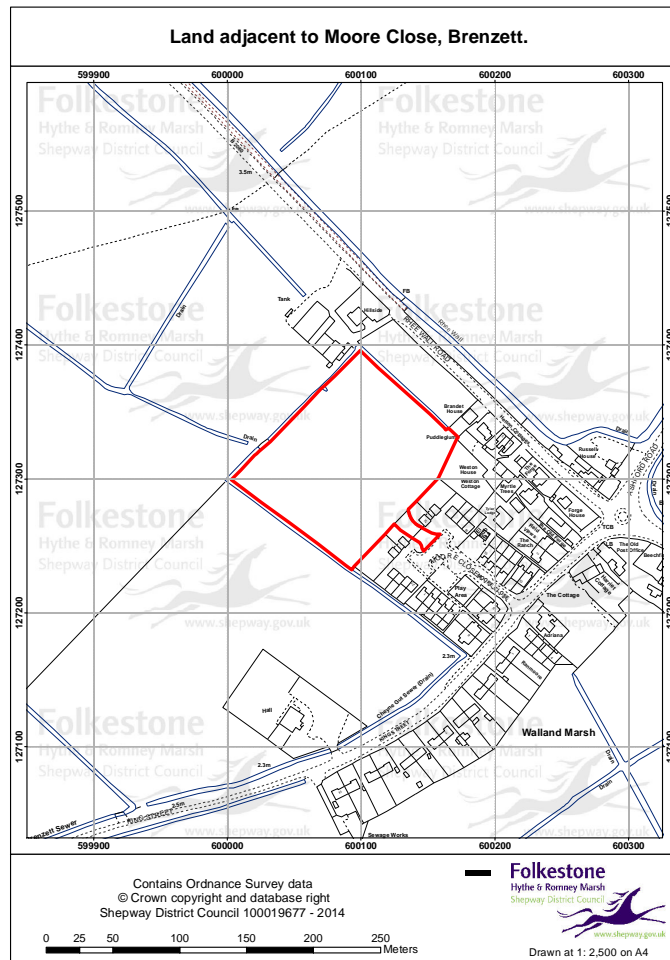
## **Brenzett**

**5.80** The name Brenzett means 'burnt stable', and its agricultural origins echo to this day with its situation towards the centre of the Romney Marsh, surrounded by open land. The old Roman road from Appledore to New Romney runs through the village. This was a causeway known as the Rivi Vellum or Rhee Wall, which was built to hold back the river Rother, and today it remains a transport hub at the crossroads of the A2070 to Ashford and the A259 to Hastings and Folkestone.

**5.81** Brenzett benefits from a limited range of services, including its primary school, having served the community for over 150 years, as well as a petrol station and associated shop.

**5.82** A small amount of growth is proposed in Brenzett, both to meet local need and to hopefully provide an expanded level of service provision in the settlement.

### **Land adjacent to Moore Close, Brenzett (SHLAA ref: 612)**



Picture 5.14

**5.83** The site is located in the north west of Brenzett, accessed from the cul de sac Moore Close, where there is a gap in development to enable access to the site beyond. The site current use is an open agricultural field, behind development.

**5.84** The south east of the site adjoins residential gardens for dwellings on Moore Close, the properties here are predominantly two storey, modern terrace housing. It also adjoins a residential garden for a dwelling on Rhee Wall Road (B2080) to the south, here there is a Grade II Listed Building (Weston Cottage) within close proximity. The north east of the site is next to an area of scrubland, which separates the site from Rhee Wall Road. To the north are some agricultural buildings and to the north west and south west open agricultural land. The site appears to have a boundary made up off a mixture of hedgerow and trees.

**5.85** The site is 2.07ha in size and is considered suitable for 20 dwellings depending on the size and layout.

## Policy RM13

### Land adjacent to Moore Close, Brenzett

The site is allocated for residential development with an estimated capacity of 20 dwellings.

Development proposals will be supported where:

1. Vehicular access to this site should be from Moore Close
2. Existing trees and hedgerows around perimeter of sites are retained and enhanced
3. Within dwellings, no sleeping accommodation is provided at ground floor level due to this site's location within Flood Zones 2 and 3
4. Existing watercourses on site are integrated into the development
5. A surface water drainage strategy forms a fundamental constituent of the design concept for the site, and is submitted to the satisfaction of the statutory authority
6. A Site Specific Flood Risk Assessment is required, and it will need to be demonstrated that development can be achieved on this site that does not increase on site or local flood risk
7. A Phase 1 Habitat Survey should be undertaken by a licenced ecologist to assess the presence of Protected Species on or near the site
8. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
9. The design of the development should be sensitive to the setting of the nearby Grade II Listed Buildings

### Secondary Villages -

**5.86** Brenzett and the Marsh's Secondary Village are situated within the "Romney Marsh Proper Farmlands" landscape character area. This comprises the area of Romney Marsh which was drained and settled by the end of the Saxon period, although in Roman times it comprised salt marsh surrounding a tidal lagoon. Today it is mainly arable farmland (with pockets of sheep pasture) but until recent years it had been used predominantly for grazing sheep. Fields are usually divided by a network of drainage ditches, although there are some hedgerows alongside roads. The predominance of ditches (which are often not visible from roads and paths) as field boundaries creates an open feel to the landscape. Nevertheless it feels relatively settled, with evenly-spaced historic villages interspersed with farms. The towers of village churches are distinctive features within the landscape, and there are some trees, particularly around villages. The villages are connected by a network of distinctive narrow lanes. Many of these lanes are sinuous in form and raised above

the surrounding fields, reflecting their origins as salt-marsh creeks which were embanked as part of the process of reclaiming land from the sea over a thousand years ago.

### **Ivychurch**

**5.87** The Parish of Ivychurch is substantial, stretching down the marsh to the East Sussex border. It follows parcels of land down to the south-west which were progressively 'inned' from the twelfth century. However, Ivychurch itself is a small place with a population of only 170. Ivychurch has only a public house as a local service. Trains can be caught from Hamstreet about 5 miles north which give access to Ashford and London.

### **Newchurch**

**5.88** Newchurch has its name derived from the Anglo Saxon 'Niwe Circa' meaning 'new burial ground' and is mentioned in the Domesday Book. Historically, the village was the centre of the sheep and wool trade on Romney Marsh and the surrounding areas. In the village there is a restaurant, the Newchurch Social Club and the Village Hall.

### **Burmarsh**

**5.89** Burmarsh, one of the most easterly communities on Romney Marsh, has been established since the Anglo Saxon period. The name refers to this area of marshland having traditionally belonged to the Burghers of Canterbury - the '*burh-merisc*', or "marsh of the town dwellers". It is a pretty settlement with some more recent late twentieth century residential development. However, it does not benefit from access to services, and it is situated in an area of 'significant' flood risk more or less in its entirety. For this reason, further development in the plan period would be a challenge to achieve.

**5.90** Given the relative size of these settlements, development options would always be small, but over this plan period no sites have been allocated in any of these villages.

### **Dungeness**

**5.91** Having evolved over centuries of isolation, interrelations and harsh lifestyles, the culture of Dungeness is extremely unique. Traditionally, there was no road onto the spit and people had to move around by using contraptions called backstays, which were attached to a person's feet creating a large surface area, therefore, making walking across shingle much easier.

**5.92** The "Dungeness Shingle" landscape character area includes the settlement of Lydd. Dungeness is a unique environment within the UK, comprising extensive deposits of shingle, interspersed with smaller areas of farmland, wetland and



settlement. Shingle ridges further inland are well-established, whilst those at the sea's edge are very mobile, and the landform is constantly evolving. The earliest evidence for settlement on Romney Marsh has been found here, including prehistoric tools and pottery associated with Roman salt production. The area is of international importance for its wildlife and habitats, including its bird life, and the rare and often colourful plants which colonise the shingle, including low-lying prostrate vegetation. Much of the area is a National Nature Reserve, and is popular with visitors.

**5.93** This is an extraordinarily evocative and powerful landscape, its mood constantly changing in response to light, weather and season. The landscape is dominated by a combination of natural shingle (and associated vegetation) with a strong horizontal form, and large man-made vertical structures including lighthouses, Dungeness nuclear power station, pylons, and sound mirrors. There are also structures associated with ongoing military use of the area. The historic town of Lydd has strong visual and cultural connections with Dungeness. On Dungeness itself, settlement comprises fishermen's huts and temporary buildings, which give it a sense of impermanence, a quirky character and a very strong sense of place.

**5.94** This area, despite its well-established designations, is a victim of its own success. Drawn by the romanticism of the bleak, desolate fishing shed on the coast, the 'weekender' is gradually imposing order on the wilderness with smart, careful landscaping. There are still more permanent residents at Dungeness than there are temporary, but this small change has caused a shift in the landscape towards something bordering well kept.

**5.95** Given the uniqueness of Dungeness, planning applications should take into account and respect the following important designations and design advice:

1. Dungeness Conservation Area, and guidance in the Conservation Area Appraisal.
2. Article 4 direction over the settlement
3. International, European and National wildlife and biodiversity guidance, including Ramsar.
4. Landscape Character Assessment
5. Heritage Strategy

## Option 6

Do you have any other sites you wish to be considered within the Romney March Character Area?

### **Alternative Housing Options Considered**

**5.96** The alternative sites considered for residential development in the Romney Marsh Character Area but which have been rejected are set out in Appendix 1. Comments on the rejected sites can be made in Appendix 1.

## 6 North Downs

### The North Downs Character Area

**6.1** The North of the district has its own distinct character, forming almost half of the land area of Shepway it has been identified as the North Downs Character Area in the Shepway Core Strategy (2013) and is predominantly but not exclusively designated as Kent Downs Area of Outstanding Natural Beauty (AONB). The countryside outside of the AONB to the south has a more open aspect with a major transport corridor running through, with the M20, high speed rail link and Eurotunnel connecting the district to London and France. The North Downs Area accounted for 19,800 of the district's population in the 2011 census.

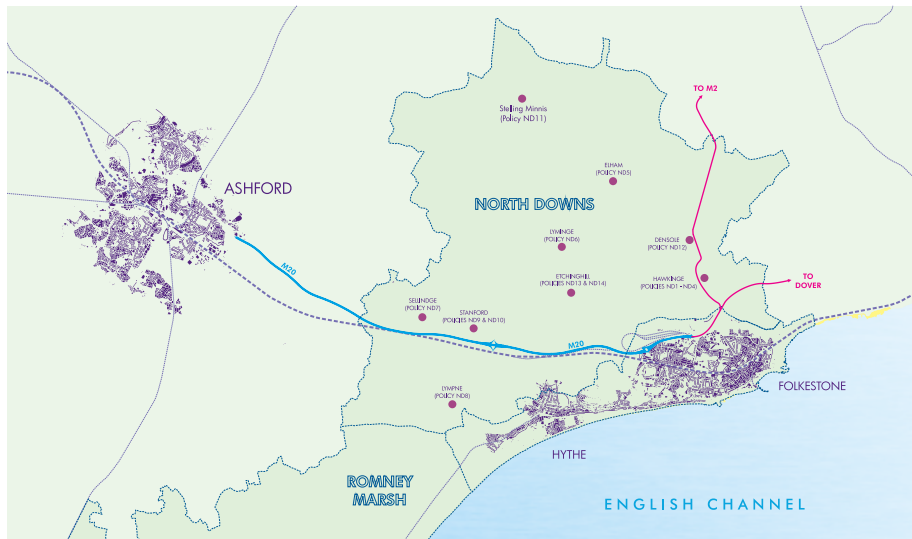


Figure 1: North Downs Policy Context Map



### Figure 6.1 North Downs Character Area

**6.2** The AONB within the North Downs Character Area is a landscape of drama and intimacy, characterised by rolling topography, steep escarpments and attractive valleys covered by a mix of woodland and open areas of farmland consisting of patchwork field patterns and mature hedgerows. This area nestled between Folkestone and Canterbury is centred on traditional, attractive rural villages such as Elham, Lyminge and Stelling Minnis and encompasses Hawkinge the largest settlement in the North Downs, which has been the focus of considerable housing growth in recent years. There are historically good connections to Canterbury and the coast with the attractive Elham Valley Way, the disused Elham Valley railway line and the Roman road Stone Street all running through and shaping the area over the years. Development in the AONB is restricted and the National Planning Policy

Framework (NPPF) (para 115) confirms that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.

**6.3** The Kent Downs character is formed out of the relationship of its towns, villages and individual buildings with 13 different landscape character areas identified across the AONB. Making the correct planning decisions on development both within the AONB and within its setting are crucial to ensure that the AONB is conserved and enhanced in accordance with the Countryside and Rights of Way Act 2000 (the CROW Act). The Kent Downs AONB acts as an advisor to Local Authorities on planning and development to help authorities carry out their 'duty of regard' as set out in that Act.

**6.4** Planners within the AONB are encouraged to refer to the AONBs Management Plan and supporting guidance when making their decisions on both planning applications and planning policy formulation. Natural England (NE) is the Statutory consultee for the AONB and the Kent Downs works closely with NE on all applications on which we are consulted. The AONB Unit only responds to planning consultations when requested in accordance with an agreed protocol and the comments of the AONB relate only to the impact of the application or the policy on the components of natural beauty as set out in the Management Plan, and not all planning issues.

**6.5** A number of documents have been produced by the Kent Downs AONB unit and should be referred to by the LPA for guidance in policy making and decision taking and by promoters and developers in formulating proposals.

- Kent Downs Landscape Design Handbook
- Rural Streets and lanes, a design handbook
- Renewable Energy
- Kent Downs Farmstead Guidance
- Managing Land for Horses

**6.6** Most of the villages within the North Downs AONB are relatively prosperous with good rural transport connections to a range of urban centres; resulting in these villages playing an important role in providing services and facilities to the smaller more inaccessible hamlets which are a characteristic of the downs. Other key characteristics of the North Downs in addition to the beauty of the natural environment are attractive villages with a reasonable level of facilities including popular local primary schools, welcoming public houses, health care provision and good recreational facilities, which underpin vibrant village communities. These positive characteristics make it popular with tourists and locals and have resulted in the location attracting some of the highest house prices in East Kent. This desirability has implications for home ownership and the provision of affordable housing in the villages within the AONB.

**6.7** The southwest of the North Downs Character Area is located outside of the AONB, with the parishes of Sellindge and Stanford and part of Lympe and Saltwood located within the 'Postling Vale' Landscape Character Area located between the Downs to the north/north east and the Hythe escarpment to the south, with the fringes of Folkestone to the east.

**6.8** Part of this area is bisected west to east by the major transport infrastructure of the M20 motorway, HS1/Eurostar train line, domestic rail and the eurotunnel terminus. This infrastructure provides a relatively recent addition to the landscape and has impacted on existing rural communities. Whilst these major routes now largely replace the historic coaching route (the A20) it's legacy remains, with sporadic, ribbons of development and linear or fragmented communities along it's length. In recent years Operation Stack has also further impacted significantly on this area, with vehicles re-routing along the A20 and adhoc lorry parking affecting the amenity of residents within local communities.

**6.9** This part of the district is popular for its active village communities, access to services and close proximity to the countryside and coast, with the nearby transport opportunities opening up wider travel to work options for residents. The Core Strategy has previously allocated strategic development at Sellindge, with planning permission now granted for the development of 250 homes alongside a new village green, extensions to the primary school and doctors surgery, new parish offices and facilities and works to the highway to reduce the speed and dominance of vehicles.

**6.10** The area has significant heritage assets, including castles at Westenhanger, Lympe and Saltwood, whilst Port Lympe reserve, surrounding a grade II\* house is the districts most popular tourism destination, with over 300,000 visitors a year. Folkestone Racecourse, which closed in 2012 is located within this area and has recently hosted annual events, also bringing significant tourism to the area.

**6.11** Hythe provides the nearest town to this part of the North Downs, with Ashford to the north west and Folkestone to the south East.

**6.12** The Spatial Strategy in the North Downs (Core Strategy, 2013) seeks development of a hierarchy of sustainable, integrated and well-served villages that will meet housing, employment and social needs; and to secure sustainable management of the environment, recognising opportunities and the context of infrastructure and nearby towns. In addition the Core Strategy set out that land exists for approximately 15% <sup>(1)</sup> of new Shepway dwellings developed by 2030/31 to be located in this character area as well as potential employment sites and tourist facilities with significant growth potential.

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1 To the nearest 5%. SDC (2012) Modifications Technical Note

**6.13** The Core Strategy set out a Settlement Hierarchy which guides the distribution of development to particular locations taking into account existing facilities and where future investment will be focused.

### **Service Centre**

**6.14** The role of a Service Centre is to 'accommodate development appropriate to Shepway and their own needs, in order to grow and consolidate their position as district centres serving the local hinterland with shops, employment and public service.' Hawkinge is the only service centre in the North Downs Character Area.

### **Hawkinge**

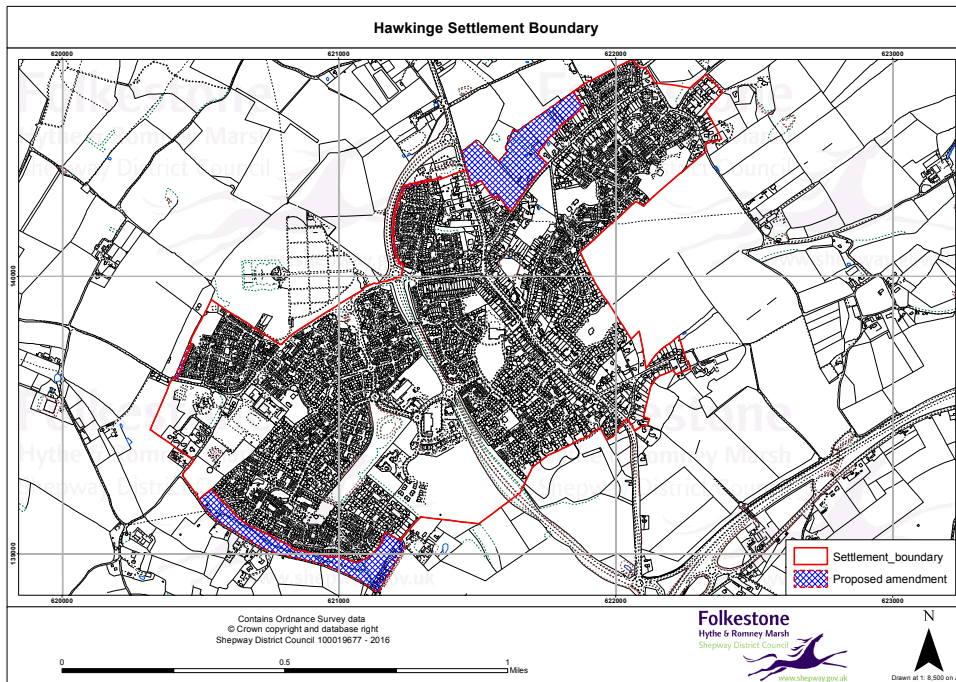
**6.15** Hawkinge is located in the Kent Downs AONB, 3 miles from Folkestone and over the last two decades land here has been the focus of major housing growth in the district. The area has grown significantly from a small village into a town. It is now by far the largest settlement in Shepway's North Downs Character Area. The Parish of Hawkinge (and Paddlesworth) had a population of 8,002 in the 2011 Census, which is a significant increase from the Census carried out 10 years previous. Hawkinge benefits from a community centre, village hall, sports pavilion, a variety of retail outlets, two primary schools, modern care facility at Hawkinge House and good transport links to both Folkestone and Canterbury. The town also has significant links to the Battle of Britain and hosts the Battle of Britain Museum which attracts local visitors and those from further afield.

**6.16** The Core Strategies Strategic Priority for Hawkinge is consolidating the settlement through local services and improving the utilisation of community facilities, allied with expanding the availability of employment and effective transport options.

#### **Statement 3**

##### **Settlement Boundary**

The settlement boundary for Hawkinge will be amended to reflect the removal of Policy CO24 (Local Plan Review 2006). The areas hatched in blue will be outside the settlement boundary



Picture 6.1

## Hawkinge Employment Land

**6.17** Hawkinge West was designated as a new employment opportunity (Saved Policy E2(e)) in the Shepway Local Plan Review (2006). Planning permissions have since been granted and implemented for a supermarket, a public house, a neighbourhood centre and a care home. There are also a number of planning permissions that have been granted and are yet to be implemented including a retirement village and a mixed use development with 47 residential dwellings and 2366sqm of commercial space (Y15/1035/SH).

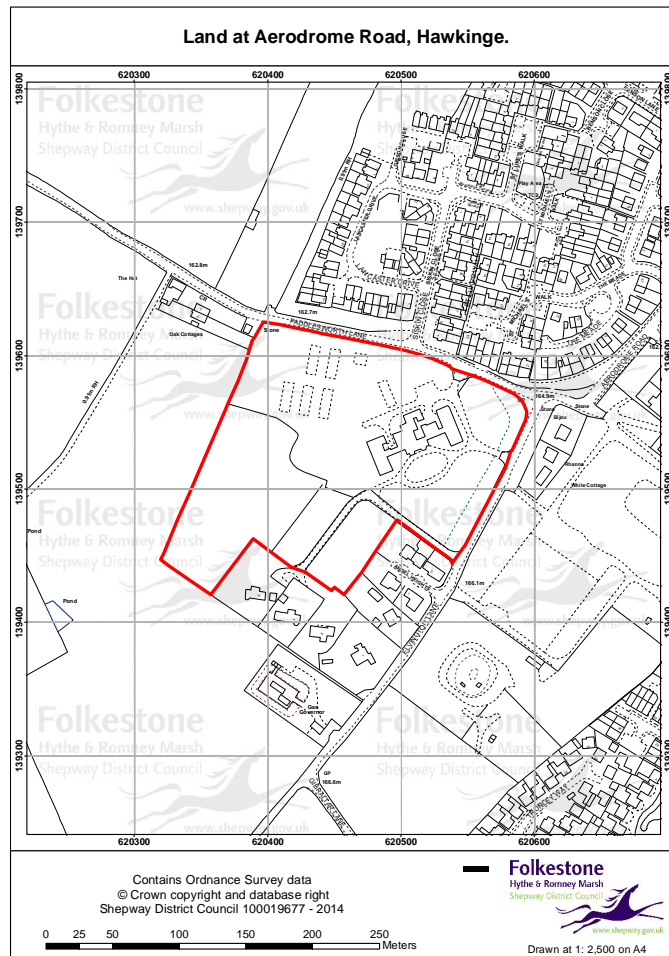
### Policy ND1

Awaiting ELR- Need to ensure B1 is delivered in case of future applications.

## Residential Allocations

**6.18** Reflecting the Core Strategies objective of consolidation the following sites are being considered for residential allocation:

**Former Officers Mess, Aerodrome Road, Hawkinge (SHLAA ref: 244)**



Picture 6.2

**6.19** The Former Officers Mess site is 3.75ha and located on the corner of two rural lanes, Paddlesworth Lane and Elvington Lane, on the western edge of the town. The site is well contained by landscape features and within the settlement boundary. It is now a vacant brownfield site where the remains and footprints of a number of buildings are still visible. Formerly the site was the location for a WWII Officers Mess, in more recent years the buildings were used to accommodate the Hawkinge Youth Adventure Centre. The site is on the rural edge of Hawkinge but within walking distance of many of the towns facilities and services.

**6.20** The site was previously safeguarded (Local Plan Review (2006)) for a new secondary school, but the Local Education Authority (Kent County Council) have confirmed they no longer require the site. Therefore maintaining this allocation is unnecessary and allocating this brownfield site within the settlement boundary for residential development is an appropriate alternative use and consistent with the objectives of the Core Strategy (2013).



**6.21** The north and south of the site is predominantly modern residential development with a mixture of dwelling types but mainly terraced houses to the north and detached houses to the south in larger plots. They are all two or two and half storey properties. To the east and south east on the opposite side of Elvington Lane is the Battle of Britain Museum and former airfield, which is another site being considered for residential development in this document. The area immediately to the west of the site is open countryside with fields that appear to be in agricultural use.

**6.22** At 3.75ha in size, the site is considered suitable for 70 dwellings, depending on the size and layout. Development here is proposed at a low density because of its setting in the Kent Downs AONB on the edge of the town. The design of proposals coming forward should reflect the guidelines set out in the Kent Downs AONB Landscape Design Handbook and Rural Streets and Lanes Design Handbook. An outline planning application (Y15/0030/SH) is currently under consideration.

## Policy ND2

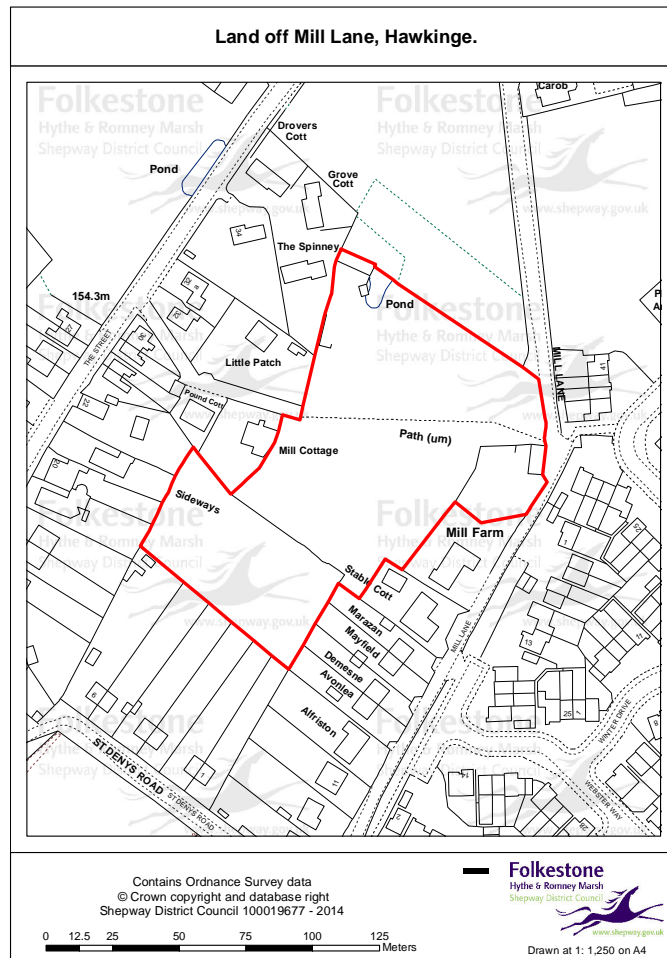
### **Former Officers Mess, Aerodrome Road, Hawkinge**

The site is allocated for residential development with an estimated capacity of 70 dwellings.

Development proposals will be supported where:

1. The proposal achieves the highest quality design of both buildings and surrounding space and reinforces local rural distinctiveness through layout, design, scale and the use of high quality materials to help maintain the Kent Downs AONB as a special place
2. Proposals enhance the western boundary through the use of extensive landscaping
3. Existing trees and hedgerows within/around perimeter of site are retained and enhanced
4. Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development
5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
6. Measures are taken to avoid pollution to groundwater

**Mill Lane R/O Mill Farm, Hawkinge (SHLAA ref: 334)**



Picture 6.3

**6.23** The site is a 1.1ha parcel of land located between The Street and Mill Lane, in an older part of the town. The site is well related to the existing settlement as it is in a central location within the settlement boundary of Hawkinge a short walking distance from facilities and services. Despite the sites central location it has a semi rural character and was formally fields for Mill Farm. The site consists of open land and disused agricultural buildings with a public footpath crossing the site to link The Street and Mill Lane. This site is bounded by trees, scrub and fencing which provides good screening.

**6.24** The site has residential development on three sides. To the west of the site on The Street there are large two storey detached dwellings. To the south west of the site there are older semi detached dwellings and then semi detached bungalows. South of the site the houses in St Denys Road are two storey semi detached dwellings with long rear gardens. To the east of the site, Mill Lane predominately comprises detached and semi detached bungalows and chalet bungalows. On the opposite

side of Mill Lane is a higher density, modern residential development of two storey semi detached and terraced houses. To the north is an area of woodland which is covered by a group Tree Preservation Order.

**6.25** At 1.1ha in size, the site is considered suitable for 14 dwellings, depending on the size and layout. Development here is proposed at a low density because of the semi rural character of this part of Hawkinge and its wider setting within the Kent Downs AONB. The design of proposals coming forward should reflect the guidelines set out in the Kent Downs AONB Landscape Design Handbook and Rural Streets and Lanes Design Handbook. Outline planning permission (Y15/0741/SH) was granted in May 2016 for residential development.

### Policy ND3

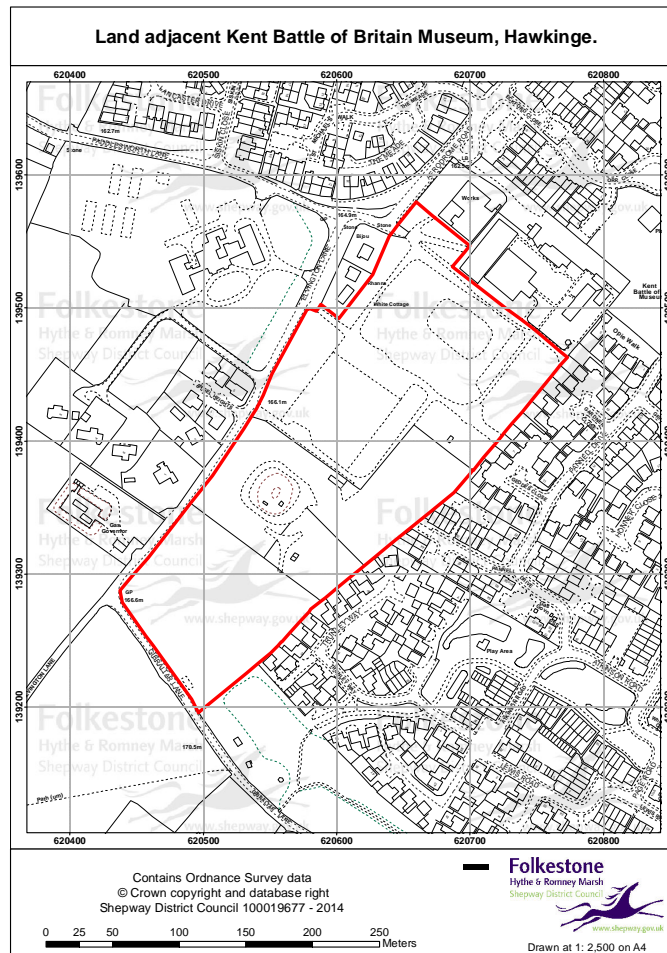
#### **Mill Lane R/O Mill Farm, Hawkinge**

The site is allocated for residential development with an estimated capacity of 14 dwellings.

Development proposals will be supported where:

1. The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness through layout, design, scale and the use of high quality materials to help maintain the Kent Downs AONB as a special place
2. Existing trees and hedgerows within/around perimeter of site are retained and enhanced
3. Primary vehicle access can be provided on to Mill Lane with suitable visibility splays
4. Footpaths are provided to link in with the existing network
5. The public right of way retained and enhanced
6. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
7. Measures are taken to avoid pollution to groundwater

**Land adj Kent Battle of Britain Museum, Aerodrome Road, Hawkinge (SHLAA ref: 404)**



Picture 6.4

**6.26** The site is located on Aerodrome Road and Elvington Lane, on the western edge of the town. The site is currently a vacant part of the former WWII airfield, comprising of demolished hangars, a taxi-way, a refuelling area and a fuel store. This site is bounded by scrub and fencing and is a large site within the settlement boundary. The site has previously been allocated for tourism use in connection with the Battle of Britain Museum in the Shepway District Local Plan Review (2006) however nothing tangible has ever arisen from this, therefore maintaining this allocation is unnecessary. The site is on the edge of Hawkinge however it is within walking distance of the main facilities and services such as primary school, public house and supermarket.

**6.27** Immediately to the north of the site lies the privately operated Battle of Britain Museum. The museum is the oldest established and largest collection of Battle of Britain artifacts on show in the country. Adjoining the site to the east and south east are a number of residential closes, whose gardens back on to the site, there are a mixture of dwelling types (detached, semi and terrace) but they are all mainly two or two and half storey. The site is well contained by existing built development.

**6.28** At 5.5ha in size, the site is considered suitable for 100 dwellings, depending on the size and layout. Development here is proposed at a low density because of its setting in the Kent Downs AONB on the edge of Hawkinge. The design of proposals coming forward should reflect the guidelines set out in the Kent Downs AONB Landscape Design Handbook and Rural Streets and Lanes Design Handbook.

## Policy ND4

### **Land adj Kent Battle of Britain Museum, Aerodrome Road, Hawkinge**

The site is allocated for residential development with an estimated capacity of 100 dwellings.

Development proposals will be supported where:

1. The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness to help maintain the Kent Downs AONB as a special place
2. The proposal acknowledges surrounding street patterns and urban grain, with a greater density of housing against the existing built edge
3. Development should ensure pedestrian permeability within and beyond the site
4. Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development
5. The rural edge of the development should be fragmented and softened with a strong focus on landscaping
6. The primary vehicle access is located on Aerodrome Road with appropriate visibility splays
7. Contaminated land is fully remediated prior to construction
8. Assessment of non-designated heritage assets has been carried out and used to inform the design work
9. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
10. Measures are taken to avoid pollution to groundwater

Development proposals must be able to demonstrate survey work has been carried out with the Kent Battle of Britain Museum to establish parking requirements for the museum. These requirements must be fully met and incorporated into any scheme.

## Rural Centres

**6.29** The status and strategic role of a Rural Centre as defined within the Core Strategy (2013) Settlement Hierarchy is to develop- consistent with enhancing the natural and historic environment- in a manner that supports their role as integrated tourist and local centres providing shops and services for a significant number of residents, visitors and also for other villages in the North Downs. There are three rural centres within the North Downs Area; Elham, Lyminge and Sellindge.

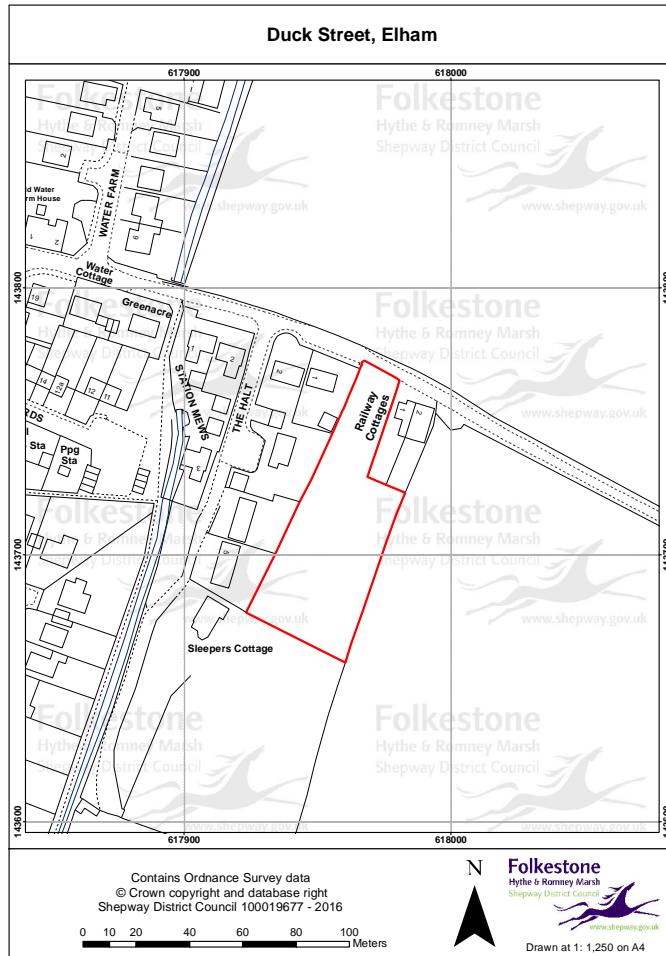
### Elham

**6.30** Elham is a historic and picturesque village in the heart of the Kent Downs AONB. It is located approximately half-way along the Elham valley, 5 miles north east of Folkestone and 9 miles south of Canterbury. The Parish of Elham has a population of 1,509 (2011 Census) and comprises of the village of Elham, as well as several smaller outlying hamlets. The village benefits from a good number of facilities and services including two traditional village public houses, a restaurant, primary school, village store, farmers market, an active village hall, cricket club and tennis courts. Elham is one of the most historically interesting and picturesque villages in East Kent and as a result is a key centre for the visitor economy in the North Downs.

**6.31** Elham retains a strong historic core with 43 listed buildings in a large conservation area, with fine buildings from its late medieval and Tudor heyday, including the large Grade 1 listed church of St Mary, a number of fine timber-framed houses of the 15th, 16th and 17th century, and two market places in the picturesque village square and at the bottom of the High Street where the road widens out.

### Residential Allocation

#### Land at Duck Street (SHLAA ref: 1004)



Picture 6.5

**6.32** The site is located on the eastern edge of Elham on Duck Street, adjoining the settlement boundary. The site is bounded by residential properties to the west and east (in part). To the west is a private road called The Halt with a number of modern (90's), predominantly two storey, detached dwellings. To the east lies two semi detached, 2 story properties at the front of the site and then open agricultural land as you move further in to the site. Opposite the sites entrance to the north is open fields which are used for agriculture. To the south of the site is open land which appears to be fallow in nature and beyond this a further single detached dwelling. The sites boundary is made up of a mixture of fencing, hedgerows and scrub.

**6.33** The site is on the edge of Elham but within close walking distance of the villages facilities and services including the primary school, church and public house.

**6.34** The site is 0.3ha in size and is considered suitable for 5 dwellings, depending on the size and layout. Development here is proposed at a low density because of its setting in the Kent Downs AONB on the edge of the village. The design of proposals coming forward should reflect the guidelines set out in the Kent Downs AONB Landscape Design Handbook and Rural Streets and Lanes Design Handbook.

### Policy ND5

#### Land at Duck Street, Elham

The site is allocated for residential development with an estimated capacity of 5 dwellings.

Development proposals will be supported where:

1. The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness through layout, design, scale and the use of high quality materials to help maintain the Kent Downs AONB as a special place
2. Existing planting along south and east boundaries must be retained
3. Mitigation is provided for views from higher ground to the east
4. A suitable access can be achieved with visibility splays
5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

### Lyminge

**6.35** Lyminge is a historic village which lies in the Elham Valley within the Kent Downs AONB, about five miles north of Folkestone and 12 miles south of Canterbury. It is the second largest settlement in the North Downs with a parish population of 2,717 (2011 Census, Lyminge Parish also contains Etchinghill and Rhodes Minnis) and is considered an important settlement in the future strategy for the character area.

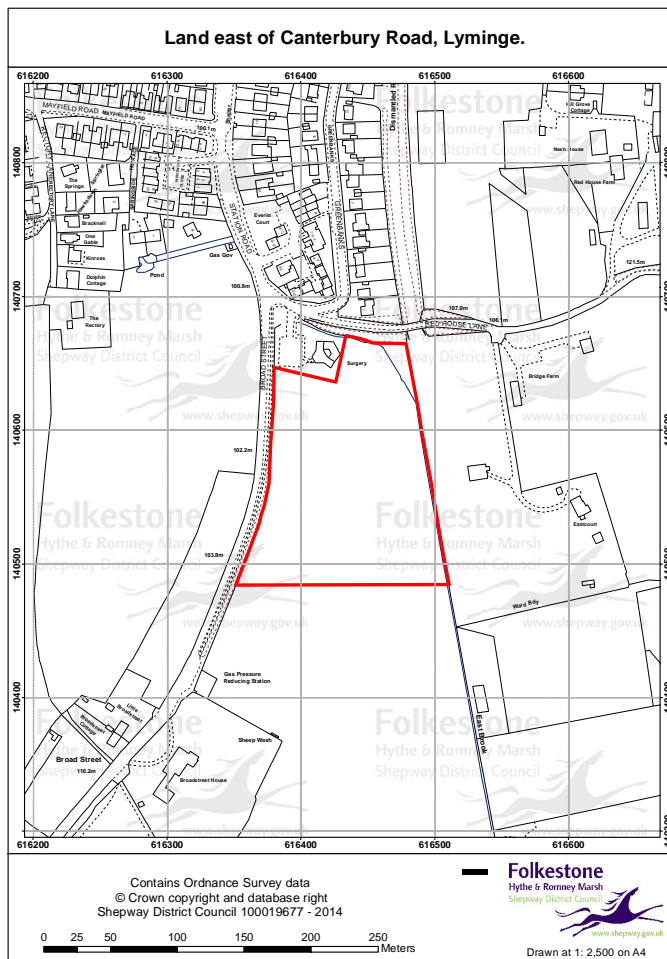
**6.36** Lyminge has a broad range of retail outlets, as well as local services including a primary school, two doctors surgeries, pharmacy, village store with integrated post office, local Age UK Day Centre, library, hairdressers and various sports clubs including Sibton Park Cricket Club. Lyminge also has a very socially active community with a residents association and village hall that hosts many clubs and groups. The Elham Valley Railway ran from Canterbury to the port at Folkestone through the village from 1887 until eventually closing in 1947. The station building remains in the village and is today used as the library, the only permanent library in the North Downs Character Area.



**6.37** An understanding of the history of Lyminge has been helped by a strong local focus on archaeological work which has taken place in the village for over half a century. Many discoveries have been made, including a 6th-century Jutish cemetery and the foundations of an Anglo-Saxon feasting hall on the village green is regarded as one of the best preserved monastic sites in Kent. In addition the church of St Mary and St Ethelburga occupies the site of a former abbey, dating from the 7th century, with the current building having been constructed from the 10th century.

**Residential Allocation**

**Land south of Canterbury Road, Lyminge (SHLAA ref: 605)**



**Picture 6.6**

**6.38** The site is located to the south of Lyminge, on Canterbury Road, the main route into the village from the south. The site is currently part of the Etchinghill Golf Course.

**6.39** To the north the site adjoins the New Lyminge Doctors Surgery, Surgery Car Park and Red House Lane, with mature hedgerow and trees along the boundary with Red House Lane. To the east the site is bounded by mature hedgerow and trees, the other side of this is the cutting for the now disused Elham Valley Railway with a detached residential dwelling and farm beyond. To the south lies Etchinghill Golf Course and the nearby Grade II Listed Building Broadstreet House. The west has more mature hedgerow and trees separating the site from Canterbury Road and open fields to the far side of the road.

**6.40** The site is on the edge of Lyminge but is considered a sustainable location as Canterbury Road has a footpath and the village facilities and services are within close walking distance including the Doctors Surgery, primary school and church. In terms of constraints the site is located within Source Protection Zone 2 and is therefore in a sensitive location from a groundwater protection point of view.

**6.41** The site is 2.1ha in size and is considered suitable for 30 dwellings, depending on the size and layout. Development here is proposed at a low density because of its setting in the Kent Downs AONB on the edge of the village. This is an opportunity for self or custom build plots. The design of proposals coming forward should reflect the guidelines set out in the Kent Downs AONB Landscape Design Handbook and Rural Streets and Lanes Design Handbook.

## Policy ND6

### Land south of Canterbury Road, Lyminge

The site is allocated for residential development with an estimated capacity of 30 dwellings.

Development proposals will be supported where:

1. The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness to help maintain the Kent Downs AONB as a special place
2. The development has at least 2 self/ custom build plots on site
3. An assessment is carried out of the impact on the setting of the nearby listed building and appropriate measures put in place to mitigate any effects by preserving or enhancing the setting
4. Existing trees and hedgerows within/around perimeter of site are retained and enhanced
5. A strong landscape buffer is provided along the southern boundary in order to maintain the sense of openness and avoid settlement coalescence
6. Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development and separation from the golf course
7. Primary vehicle access is on to Canterbury Road, with suitable visibility splays provided
8. Traffic calming measures are provided along the site boundary adjoining Canterbury Road to slow traffic to 30mph, this will include the relocation of the village entrance sign and gates
9. The public right of way is enhanced between Lyminge and Etchinghill
10. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
11. Appropriate mitigation measures are employed to prevent pollution to groundwater

## Sellindge

**6.42** Sellindge is a rural village in the west of the district, lying on the A20, the historic coaching route linking Folkestone with London. Sellindge is not located in the Kent Downs AONB. The village is in close proximity to the major transport infrastructure that crosses the district, with junction 11 (M20) and Westenhanger station close by. The parish has a population of 1,601 (2011 Census), making it the third largest settlement in the North Downs Area. Sellindge is a socially active community and the parish has one of the greatest range of facilities in the North

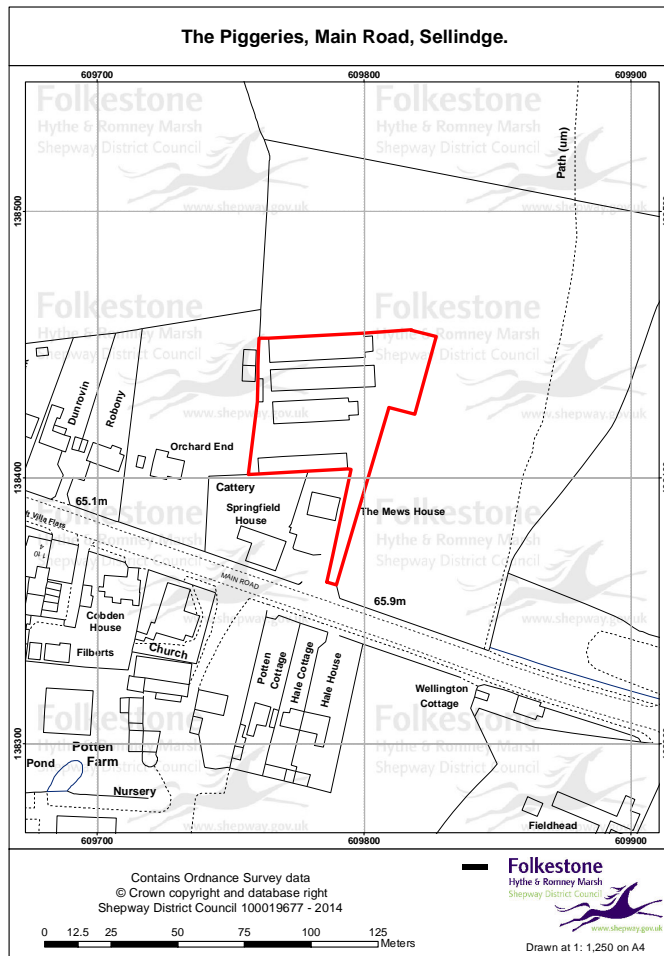
Downs Area including a doctors, primary school, village shop with integrated post office, busy village hall, residents association, sports and social club, a few shops and a public house. The parish is made up of a number of pockets of development, the majority are linear in pattern and appear sporadically along the A20, which connects Hythe and Ashford. Subsequently Sellindge has a fragmented character made up of many parts but with the main unifying feature being the A20 around which they have historically developed.

**6.43** The Core Strategy (2013) sort to create a central village core (Policy CSD3) through allocating a broad location for development and planning permission has now been granted for a scheme that meets the original objectives of the policy, with development due to commence in 2016 (Y14/0873/SH). This development will provide for a village green, parish offices and shop, expansion of the primary school and doctors surgery and will also deliver highway works that reduce traffic speeds through the village.

**6.44** 8.40 Given the scale of the Core Strategy Broad Location and the process undertaken to identify a suitable site for the expansion of the village further large scale development is not proposed.

### **Residential Allocations**

#### **The Piggery, Main Road Sellindge (SHLAA ref: 402)**



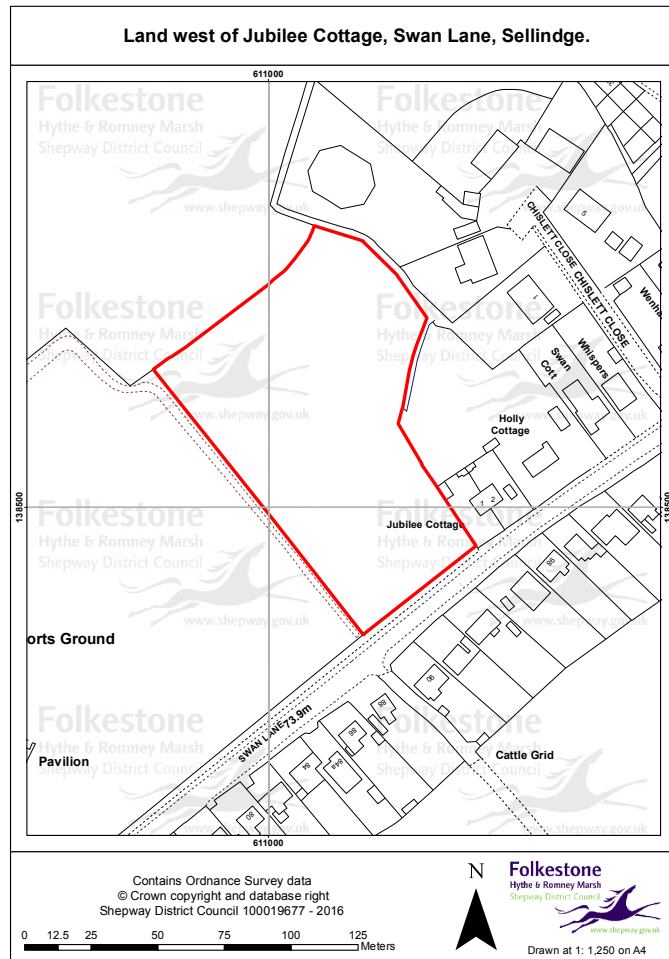
Picture 6.7

**6.45** This site is located on the A20, past the central village but adjoining a settlement boundary. As the name suggests the site is a former piggery, which now lies vacant and derelict. This site has a tight focus on the existing piggery buildings and its immediate curtilage. It wraps tightly around the back of ‘Springfield’ and extends parallel to land associated with ‘Orchards End’. Its therefore well integrated to these properties which are part of a small ‘island’ of defined settlement between the designated parts of Sellindge i.e. the central village and Stone Hill. Its location on the eastern side of this means it is more walkable then some other locations outside the central Sellindge area to the village facilities, most immediately the Public House and the farm shop opposite.

**6.46** The nearby properties to the west and south are predominantly one or two storey detached dwellings in sizable plots all fronting the A20. To the north and east of the site is open scrub land with views to the North Downs AONB. Beyond this is a nearby Ancient Woodland, the development should avoid any direct effects on this woodland.

**6.47** The site is 0.3ha in size and is considered suitable for 8 dwellings, depending on the size, layout and if a suitable access point can be achieved.

**Land West of Jubilee Cottage, Swan Lane, Sellindge (SHLAA ref:618)**



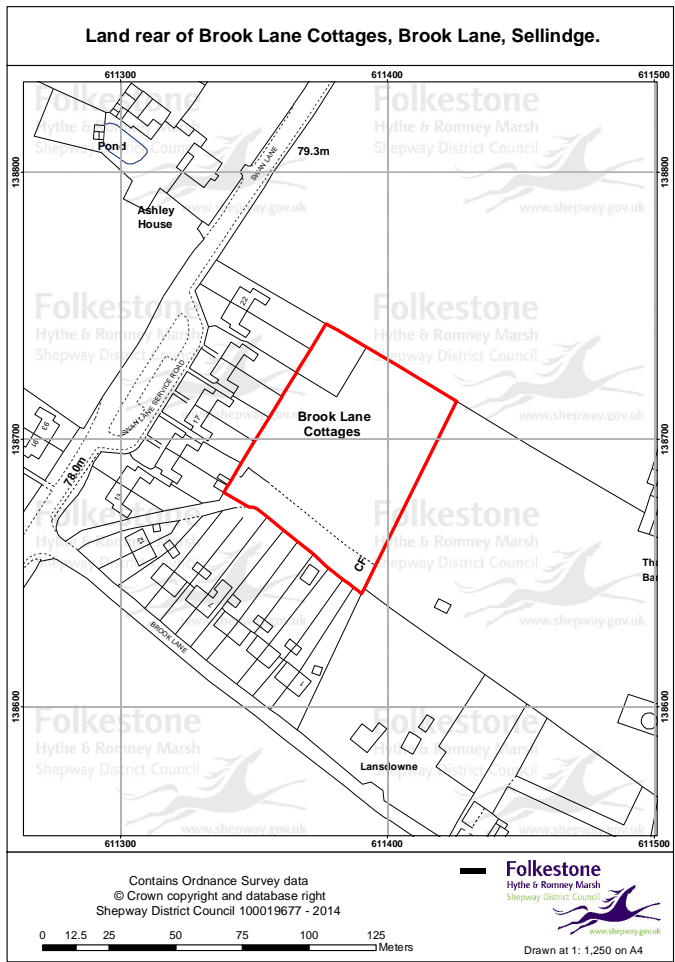
**Picture 6.8**

**6.48** This site fronts on to Swan Lane located on the north east edge of the central core of Sellindge village. The open site adjoins the settlement boundary and is currently leased out for agricultural purposes, appearing to be ploughed for crops. The site is in close proximity to the Grade II Listed Building Holly Cottage and is bounded with hedgerows and trees. Swan lane has a pavement on the western side of the road which runs to the main facilities in Sellindge, in addition there is a bus service that runs along Swan Lane, subsequently although this site is towards the edge of the village it is a reasonable sustainable location and would integrate well with the existing built form.

**6.49** To the north east and south east of the site lie residential dwellings. The properties to the north east directly adjoin the site with the garden of Jubilee Cottage sharing a boundary, the properties, including Holly Cottage, are predominantly two storey, detached dwellings. The properties to the south east are separated from the site by Swan Lane, here the properties are slightly raised and predominantly, one or two storey, detached dwellings. To the south west lies the Sellindge Sports and Social Club and to the north west open farm land.

**6.50** The site is 1.9ha in size and is considered suitable for 15 dwellings, depending on the size and layout.

**Land rear of Brook Lane Cottages, Brook Lane, Sellindge (627)**



**Picture 6.9**

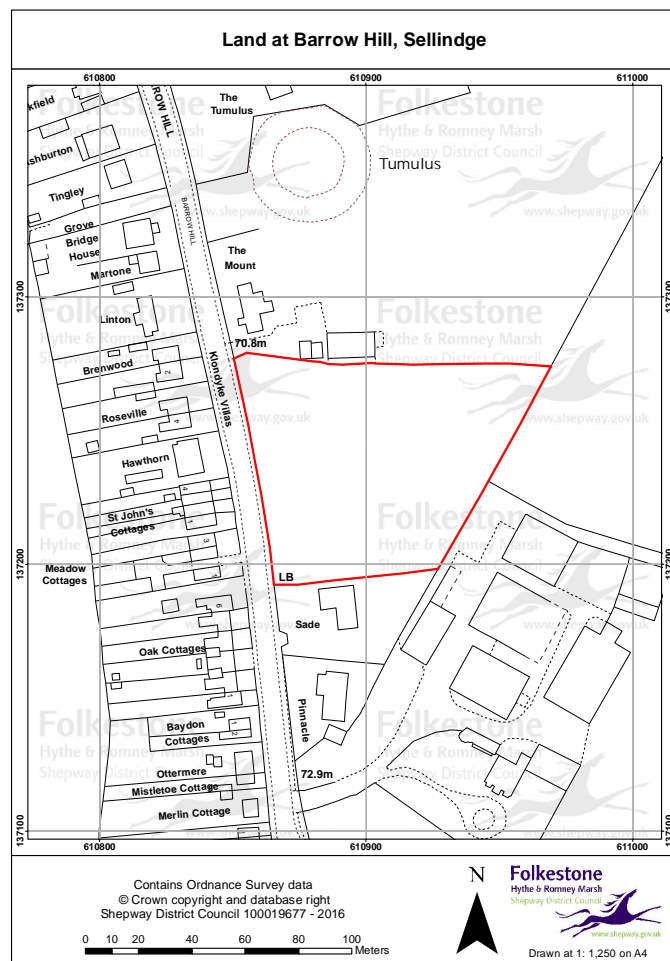
**6.51** This site is located behind houses fronting on to Swan Lane (Service Road) and Brook Lane. The site adjoins the settlement boundary on the north east edge of Sellindge. Part of the site has hard standing and is used for parking cars and the

remainder is scrub land, with trees and hedgerow to the eastern boundary. As mentioned with the previous site, the far end of Swan Lane is considered to be a reasonable sustainable location, however it is more rural in character than the heart of the village.

**6.52** This site is bounded on two sides by residential properties, on both the north west and south west, which are all predominantly two storey, semi detached properties. To the north east and south east immediately lies open farm land, beyond this are three detached properties on Gibbons Brook and the Gibbons Brook SSSI.

**6.53** The site is 0.45ha in size and is considered suitable for 11 dwellings, depending on the size and layout.

**Land at Barrow Hill, Sellindge (1005)**



**Picture 6.10**

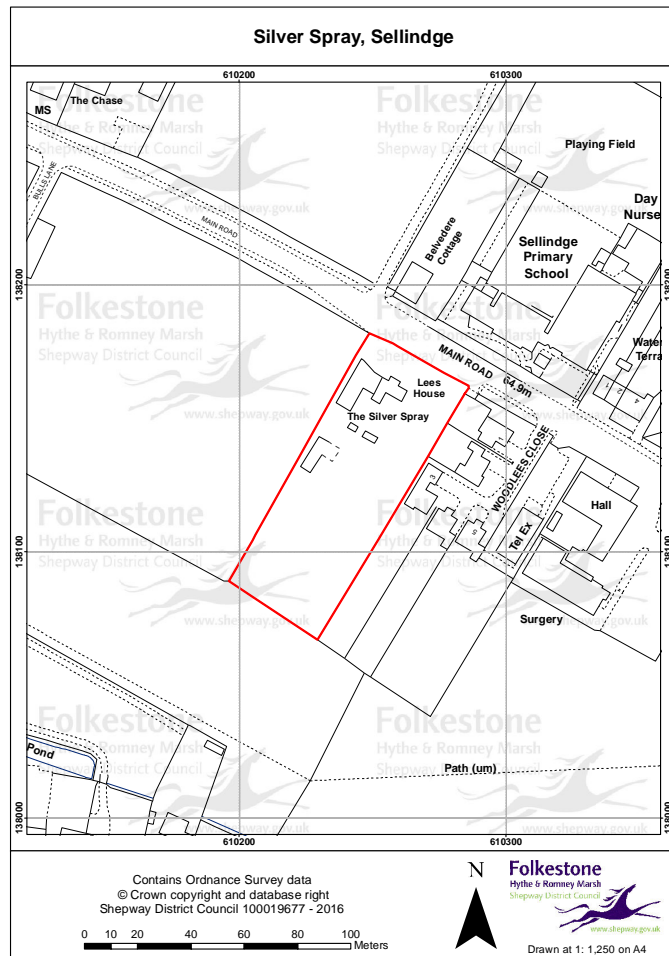


**6.54** The Barrow Hill part of the parish is physical divided from the main village, by the motorway and rail line bridge. This site is located in Barrow Hill to the south of Sellindge, adjoining the settlement boundary and fronting on to the A20. Barrow Hill has a footpath along both sides of the road therefore the facilities in the central area are considered walkable, in addition there are bus stops on both sides of the road.

**6.55** The land is a grassed field, bounded by hedgerow, trees and fencing in part. The west of the site fronts on to the A20 and residential properties across from this, the properties are mostly two storeys with a mixture of housing types and ages. There is also limited residential development to the south although they are more modern detached bungalows, with Barrow Hill Farm lying beyond to the south east. To the north is The Mount a two storey detached dwelling on a sizeable plot with a Bronze Age burial mound in the grounds. To the east lies farm buildings and agricultural fields. The site has residential development on either side of it as well as on the opposite side of the road, it is therefore a gap in the built form.

**6.56** The site is 0.69ha in size and is considered suitable for 15 dwellings, depending on the size and layout.

### **Silver Spray, Sellindge (1007)**



Picture 6.11

**6.57** This site is centrally location close to the facilities in Sellindge and fronting on to the A20. The site consists of a residential dwelling, out buildings and garden which is bordered by hedgerow, trees and fencing in part.

**6.58** The site adjoins the broad location identified in the Core Strategy (2013) on two sides, to the north west and south west. To the south east is a small cluster of residential dwellings, predominantly two storey, detached properties, the village hall, doctors surgery and telephone exchange building. To the north east is the A20 with further residential dwellings and the primary school on the opposite side of the road.

**6.59** The site is 0.45ha in size and is considered suitable for 5 dwellings, depending on the size and layout.

**6.60 General Sellindge Policy**

## Policy ND7

### Sellindge

These sites are proposed for residential development with an indicative capacity as follows:

- The Piggery, Main Road Sellindge- 8 dwellings
- Land West of Jubilee Cottage, Swan Lane, Sellindge- 15 dwellings
- Land rear of Brook Lane Cottages, Brook Lane, Sellindge- 11 dwellings
- Land at Barrow Hill, Sellindge- 15 dwellings
- Silver Spray, Sellindge- 5 dwellings

Development proposals will be supported where:

1. The design incorporates adequate landscaping to mitigate impact on the setting of adjoining countryside
2. Existing trees and hedgerows around the site boundary are retained and enhanced
3. The proposal acknowledges surrounding street patterns and the urban grain, fronting dwellings on to existing streets and following the existing built edge where possible
4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

#### Site Specific Criteria:

The Piggery, Main Road-

1. The development should avoid direct effects on the nearby ancient woodland

Land West of Jubilee Cottage-

1. An assessment is carried out of the impact on the setting of the nearby Grade II Listed Building and appropriate measures but in place to preserve or enhance the setting
2. The north west building edge is fragmented and softened with a strong landscape buffer

Land rear of Brook Lane Cottages-

1. The design, layout and landscaping of the site should seek to reduce adverse effects on the character of the AONB
2. Appropriate mitigation/enhancement measures should be incorporated into the design to reduce effects on the nearby SSSI

## Primary Villages

**6.61** The status and strategic role of a primary village within the Core Strategy (2013) Settlement Hierarchy is to contribute to strategic aims and local needs; and as settlements with the potential to grow and serve residents, visitors and neighbourhoods in the locality with rural business and community facilities. There are three primary villages located in the North Downs Area, Lympne, Saltwood and Stanford/ Westenhanger.

### Lympne

**6.62** The village of Lympne lies on the edge of the Kent Downs AONB, in the south west of the character area, about 7 miles west of Folkestone, 2 miles west of Hythe and 8 miles east of Ashford. The village has a parish population of 1,575 (2011 Census) and a few services including a village shop with integrated post office, primary school, village hall and public house.

**6.63** Lympne is mainly centred around the Roman road of Stone Street (now the B2068), linking the coast with Canterbury. Today Lympne has good connections and is seen as very accessible, with Westenhanger Station approximately 3 miles to the north of the village and the M20 motorway junction just beyond this, Subsequently Ashford, London and even mainland Europe are within commuting distance.

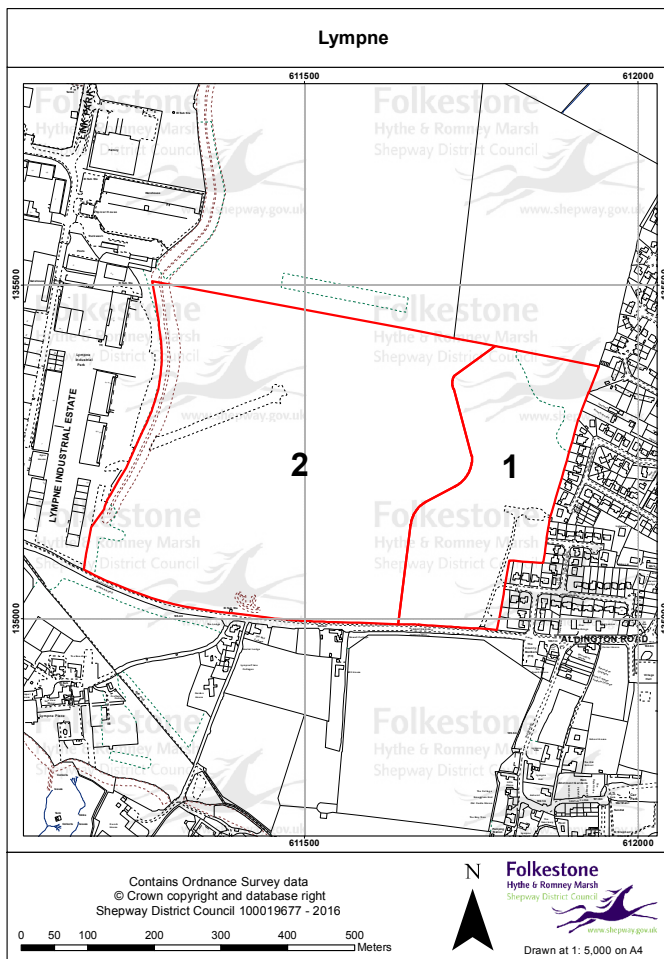
**6.64** The AONB wraps around Lympne incorporating its historic core, immediately to the south and east of the village. It is the area outside the AONB that has predominantly seen most recent modern residential growth over the last half century, with a number of cul de sacs created running off Stone Street and Aldington Road. To the west of the village, lies the Lympne Industrial Estate and Link Park. Beyond this on the edge of the village is Port Lympne Reserve, an award winning wild animal park set in over 600 acres and the largest visitor attraction in the district.

**6.65** Historic Lympne and the Lympne conservation area is situated around the church of St Stephen which dates from the early Norman times AD1100. The remains of the original tower can be seen in fragments on the south side of the present church. The church abuts Lympne Castle, which is a beautiful 13th century, grade 1 listed building, The church and castle enjoy a secluded setting back from the B2067, occupying an impressive vantage point on top of a shallow gradient cliff know as the

Hythe Roughs. Wide ranging views overlook the English Channel, with Hythe to the east and the Royal Military Canal and Romney Marsh spreading out below towards Dungeness in the south. On clear days France can be seen in the far distance.

**Residential Allocation**

**Former Lymgne Airfield (209)**



**Picture 6.12**

**6.66** This site is located to the west of the village, adjoining the AONB and the settlement boundary. The site is on the former Lymgne airfield which was a military and later civil airfield, ceasing operation in 1984, some limited hardstanding remains. Much of the former airfield is open land, with views to the motorway and AONB beyond this. This location is seen as sustainable as it is within walking distance to the local services, facilities and employment opportunities at Lymgne Industrial Estate.

**6.67** For the purpose of this allocation the site has been divided in to two separate parcels, site 1 and site 2. Site 1 is allocated for residential development with the opportunity for some self and custom build plots, where as site 2 is to remain undeveloped in order to avoid settlement coalescence, but with the addition of a suitable public right of way.

**6.68** Site 1 is bounded by hedgerow, trees and fencing in part. On its eastern side it adjoins the village of Lypne and a number of residential properties in Beacon Way, Tournay Close, Harman Avenue and Belcaire Close. The properties on these roads are predominantly detached bungalows in a cul de sac arrangement built in the late 20th century. To the west of the site is the Lypne Industrial Estate, to its north a large area of land, Link Park, which will be developed for industrial and business uses. To the south is the Aldington Road and the start of the AONB, here there are thick hedgerows and trees with fields beyond and the occasional detached property.

**6.69** Site 1 is 7ha in size and is considered suitable for 125 dwellings, depending on the size and layout. Development here is proposed at a low density because of its setting on the edge of the village, adjoining the Kent Downs AONB. However the size of the site in this location will require proportionate contributions to improvements at the Newingreen Junction, a specific issue in the area, as well as school, doctors and public transport contributions, made via S106 or CIL. Site 2 is 33ha and will remain undeveloped.

## Policy ND8

### Former Lympne Airfield

The site is allocated for residential development with an estimated capacity of 125 dwellings to be located on site 1.

Development proposals will be supported where:

1. Existing trees and hedgerows within/around perimeter of site are retained and enhanced as part of a comprehensive landscaping scheme
2. The northern building edge is fragmented and softened with a strong landscape buffer
3. Open spaces and planting are used to provide a visual link to the countryside and North Downs Scarp and an attractive backdrop to development
4. The development has at least 6 self/ custom build plots on site
5. Appropriate and proportionate contributions are made to improvements at the Newingreen Junction
6. A new public right of way across Site 2 is provided in parallel with the development of Site 1
7. The proposal acknowledges the surrounding urban grain, fronting dwellings on to existing streets and following the existing built edge where possible
8. Footpaths are provided to link in with the existing network
9. A primary vehicle access is provided on to Aldington Road
10. An assessment of non-designated heritage assets and an archaeological survey is carried out and appropriate mitigation measures put in place if required
11. Adequate waste water infrastructure has been provided
12. Contaminated land is fully remediated prior to construction works
13. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

### Saltwood

**6.70** Saltwood village is located immediately to the north of Hythe on high ground, with picturesque views over the Romney Marsh and the English Channel. The AONB wraps tightly around the built edge of the village to the north, east and west, giving the village a rural feel. To the south Saltwood merges with the Town of Hythe and the coast. Saltwood parish contains two other settlements: Pedlinge and Sandling; which are both small hamlets, the parish has a population figure of 850 (Census 2011).

**6.71** The village has a well defined centre around the village green, where a number of roads branch off from. Within the centre of the village or within a short distance are a range of services and facilities including a village shop, restaurant, public house, primary school, active village hall, play ground and cricket club.

**6.72** To the north and north east of the built edge of the village lie Saltwood Castle and the church of St Peter and St Paul. Saltwood Castle, once owned by the Archbishops of Canterbury, was the overnight resting place of four knights on their journey to Canterbury to murder Thomas Becket. To the north west of the village is Brockhill Park Performing Arts College, a 11-18 academy which is located within Brockhill Country Park and is the only secondary school in the North Downs Character Area.

**6.73** Saltwood has good transport connections. To the north is the M20 motorway, with Folkestone and Ashford easily accessed within a short journey time. Sandling Train Station, also to the north, is a short walking distance from the centre of the village, with connections to Folkestone, Ashford and London. In addition there is a regular bus service.

### **Stanford and Westenhanger**

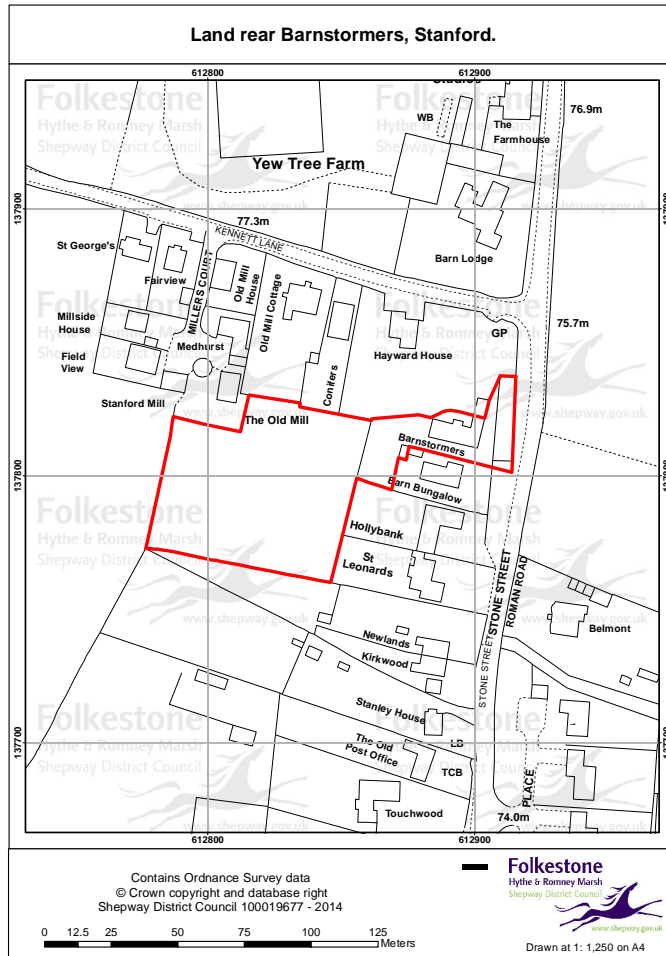
**6.74** Stanford is located to the south west of the character area in close proximity to Westenhanger and Lympne but physically separated from the south by major transport infrastructure. Stanford lies about 3.5 miles from Hythe, out of the AONB and is divided by the M20 into Stanford North and Stanford South. The parish population is 429 (2011 Census) this includes Westenhanger.

**6.75** Despite its close proximity to the motorway and rail line, Stanford still remains rural in character, with the majority of development having taken place on Stone Street in a linear fashion. The facilities in the village are limited, but this includes a public house and church.

### **Residential Allocation**

#### **Land rear of Barnstormers, Stone Street, Stanford (613)**





Picture 6.13

**6.76** This site is located in North Stanford, accessed from the western side of Stone Street, on land to the rear of properties fronting on to Stone Street and Kennett Lane. The site is currently a residential house and large garden, the front of the site is within the settlement boundary.

**6.77** The site is bounded by residential development and gardens with hedgerows and trees on three sides, to the north, east and south. The properties here are predominantly detached family houses on good sized plots, with a variety of ages and styles ranging from modern bungalows to historic two or three storey houses. To the north west the site immediately adjoins the Grade II Listed Stanford Windmill, which has seen residential development in recent years on the site of old industrial buildings within its curtilage, known as Millers Court. The west of the site adjoins open farm land.

**6.78** The site is 0.5ha in size and is considered suitable for 5 dwellings, depending on the size and layout. Development here is proposed at a low density because of the sites proximity to a listed building and its within the setting of the AONB. The site would be suitable for a small residential scheme with the buildings designed to reflect the rural/ agricultural nature of the area.

### Policy ND9

#### **Land rear of Barnstormers, Stone Street, Stanford**

The site is allocated for residential development with an estimated capacity of 5 dwellings.

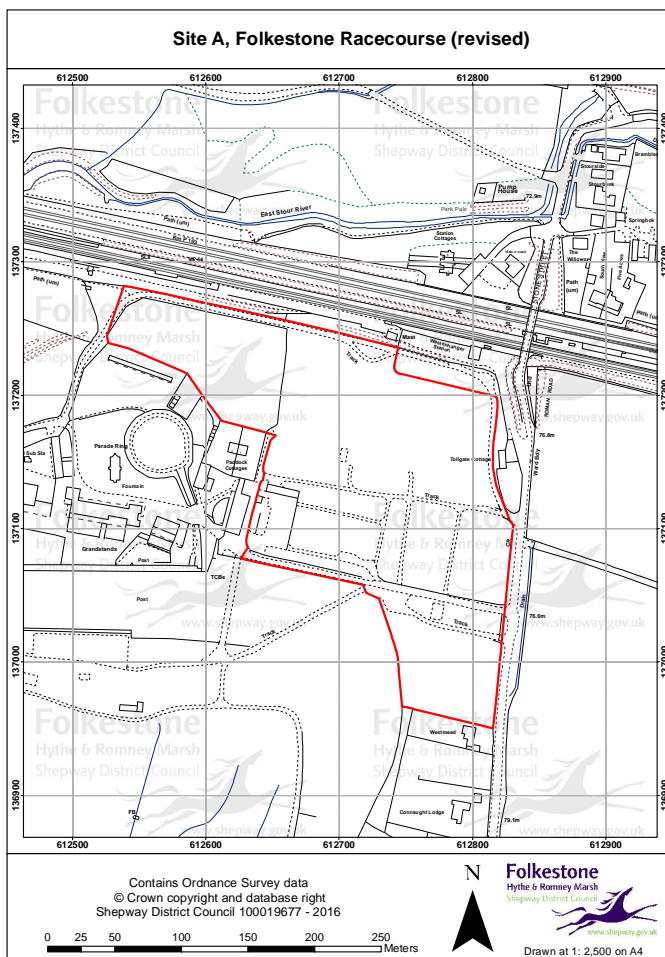
Development proposals will be supported where:

1. The proposal achieves the highest quality design of both buildings and surrounding space and reinforces local rural distinctiveness
2. Existing trees and hedgerows within/around perimeter of site are retained and enhanced
3. An assessment of the impact on the setting of Stanford Windmill must be carried out and the setting preserved or enhanced
4. Planting is used to provide a visual link to the countryside and an attractive backdrop to the development
5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

**6.79** Westenhanger village lies approximately 3 miles from Hythe, immediately to the south of highway and rail infrastructure, which separates the settlement from Stanford South. In common with Stanford development here is focused on Stone Street and the settlement in outside of the AONB.

**6.80** Westenhanger has limited community facilities but it is home to Westenhanger Castle, a Scheduled Ancient Monument, located adjacent to the grandstands of the Folkestone Racecourse. Within its moat and walls sits a Grade I listed fortified Manor House which is now used as a venue for weddings, conferences and other tourist and community events. Folkestone Racecourse closed in December 2012 with no plans to reopen, but now hosts the occasional large event such as the Kent War and Peace Show. The village also has its own railway station, served by Southeastern trains.

## Land at Folkestone Racecourse (204A)



**Picture 6.14**

**6.81** This site is located on Stone Street in close proximity to the station, to the north of Westenhangar. The site is currently unused open space within the racecourse grounds. The site adjoins racecourse buildings immediately to the west with Westenhangar Castle beyond this. To the south is the racecourse, with residential development running along Stone Street, backing on to racecourse land. To the east is Stone Street and to the north lies Westenhangar Station and car park.

**6.82** In this location stone street is narrow and suffers from significant on street parking due to the close proximity to westenhanger station. This land provides the most suitable opportunity to improve parking at the station and should therefore include the delivery of improved parking facilities or safeguard land for this purpose.

**6.83** The site is 4.6ha in size and is considered suitable for 11 dwellings, depending on the size and layout, plus car parking for the station. Development here is proposed at a low density because of the site's proximity to Westenhanger Castle and as it's within the setting of the AONB, so not all of the identified site will be suitable for residential allocation.

### Policy ND10

#### **Land at Folkestone Racecourse**

The site is allocated for residential development with an estimated capacity of 11 dwellings.

Development proposals will be supported where:

1. The proposal achieves the highest quality design of both buildings and surrounding space and reinforces local rural distinctiveness
2. Existing trees and hedgerows within/around perimeter of site are retained and enhanced
3. Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development
4. Adequate off street parking must be provided
5. An assessment of the impact of development on the setting of nearby Scheduled and Grade I Listed Westenhanger Castle has been sort and adhered to ensuring the layout of development protects its setting
6. The proposal acknowledges surrounding street pattern and urban grain, fronting dwellings on to Stone Street and following the existing built edge
7. The development includes or safeguards appropriate land for the expansion of parking facilities at Westenhanger Station as part of a masterplan and includes measures to reduce on street parking congestion along Stone Street
8. The development ensures that there is no adverse impact on water quality from wastewater overflow
9. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

## Secondary Villages

**6.84** The status and strategic role of a secondary village within the Core Strategy (2013) Settlement Hierarchy is to continue to provide crucial rural facilities to visitors and their own residents and workforce, in line with local needs, their environment, and role as relatively small country settlements. There are three secondary villages within the North Downs Area, Stelling Minnis, Densole and Etchinghill.

### Stelling Minnis

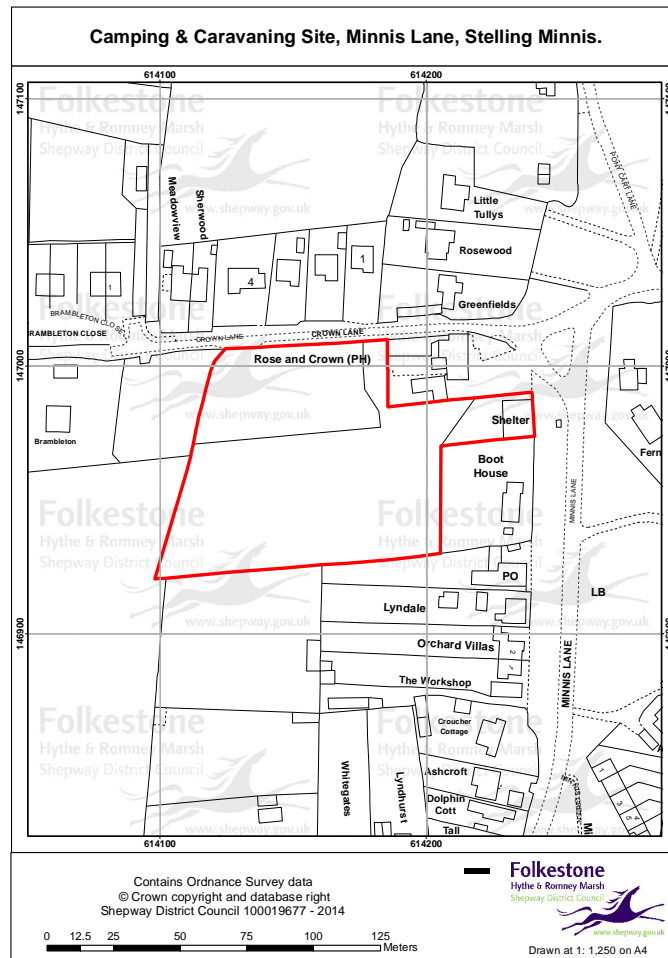
**6.85** The village lies 7 miles to the south of Canterbury within the Kent Downs AONB, to the east of Stone Street (B2068), the Roman road linking Lympne and Canterbury. A minnis was ancient common pasture land cleared from the wooded upper slopes of the Kent chalk downland. Stelling Minnis Common is a large tract of privately owned land of 50ha and is one of the last remaining manorial commons in Kent. It was originally used by cottagers to graze their animals, collect bracken, hay and fallen or dead wood. Today the Minnis is managed by volunteers drawn from the local community to act on behalf of the owners. Their work is guided by a management plan to enhance the biodiversity of the Minnis and promote the well-being of local residents and the wider community.

**6.86** The Minnis does not have a settlement boundary or core area, but ribbon development has taken place along the network of roads that criss cross the open land. Stelling Minnis has limited facilities and services but these do include a primary school, village store with integrated Post Office, Public House and village hall. It has a parish population of 578 (2011 Census).

**6.87** A popular tourist attraction within Stelling Minnis is the Grade I listed wooden smock mill, built in 1866 and restored to full working condition in 2003. Alongside the windmill is a museum exhibiting the history of the mill, and of the common as a whole. The windmill and associated museum attracts many visitors.

### Residential Allocation

#### Camping and Caravan Site, Minnis Lane (635)



Picture 6.15

**6.88** The site is located behind the Rose and Crown Public House on the corner of Minnis Lane and Crown Lane. The site is used as a camping and caravan site. The site is in close proximity to the limited services with the village including the Public House and village store and development here could fit in well with the surrounding built form.

**6.89** The site is bounded to the north, south and west by mature trees and hedgerows. To the north is Crown Lane with predominantly detached one and one and half storey residential bungalows on the far side of the road, adjoining the site. To the east, sharing a boundary is the Public House, the Boot House and the Village Store, these are all two storey detached properties. Beyond this but still nearby to the site lies a Local Wildlife site. To the west and south west lie open fields and scrub land.

**6.90** The site is 0.47ha in size and is considered suitable for 11 dwellings, depending on the size and layout. Development here is proposed at a low density because of the sites setting in the Kent Downs AONB and to reflex the existing

settlement pattern of Stelling Minnis. The design of proposals coming forward should reflect the guidelines set out in the Kent Downs AONB Landscape Design Handbook and Rural Streets and Lanes Design Handbook..

## Policy ND11

### Camping and Caravan Site, Stelling Minnis

The site is allocated for residential development with an estimated capacity of 11 dwellings.

Development proposals will be supported where:

1. Design and lay out take account of the residential amenity of neighbouring dwellings
2. At least two affordable dwellings are provided on site in accordance with Policy CSD1 and a mix of dwelling types and sizes in accordance with Policy CSD2
3. The proposal achieves the highest quality design of both buildings and surrounding space and reinforces local rural distinctiveness to help maintain the Kent Downs AONB as a special place
4. Existing trees and hedgerows within/around perimeter of site are retained and enhanced
5. The west and south west building edge is fragmented and softened with a strong landscape buffer
6. Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development
7. Biodiversity enhancement measures are incorporated into the design of the development.
8. The proposal acknowledges surrounding street patterns and urban grain, fronting dwellings on to existing streets and following the existing built edge where possible
9. A primary vehicle access is provided on to Minnis Lane
10. Replacement car parking for the Public House is provided
11. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest

## Densole

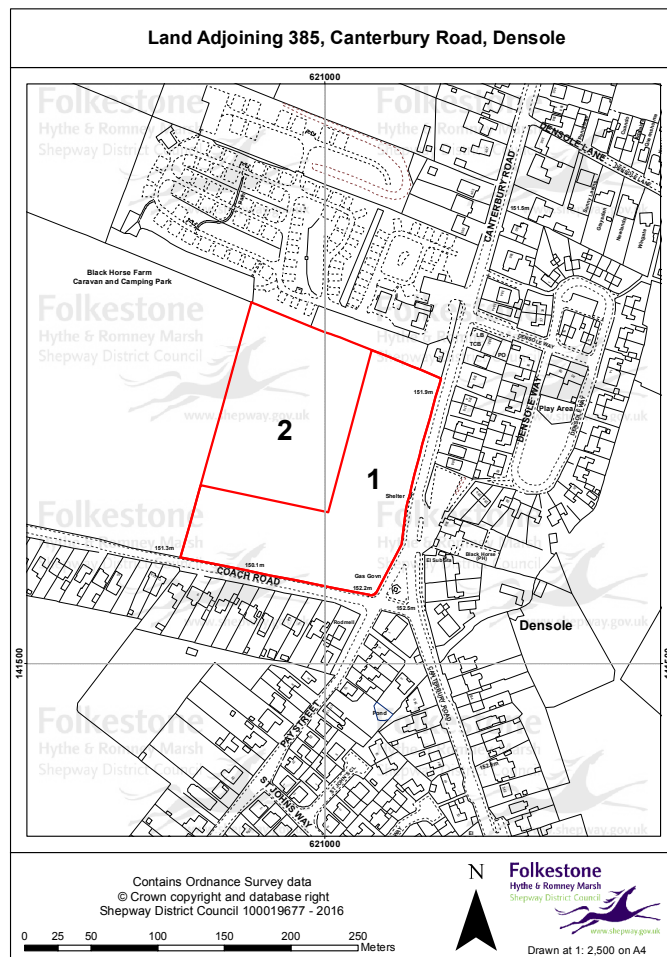
**6.91** Densole is a small village located in the Kent Downs AONB just north of Hawkinge, 3 miles from Folkestone and 12 miles from Canterbury. The majority of housing in Densole appears fairly modern and is focused around the A260 and a

cross-roads network where three roads meet and development runs from it in a linear fashion. Two further pockets of development to the north east and south west of the central cross-roads contain a network of cul de sacs.

**6.92** The village has limited facilities which include a public house, caravan park and shop with integrated post office, however the wider services and facilities in Hawkinge are only 1km away. The village has good transport links, with both Canterbury, Hawkinge and Folkestone being easily accessible by public transport.

### Residential Allocation

#### Land adjoining 385 Canterbury Road, Densole (1003)



Picture 6.16

**6.93** This site is located on the corner of two roads Coach Road and Canterbury Road (A260) on the western side of Densole, adjoining the settlement boundary. It is a centrally location and development here could fit in well with the existing built form of Densole.



**6.94** The site is an open field bounded by mature hedgerows and trees. Adjoining the site to the north is Black Horse Farm Caravan Park, a popular site accommodating many visitors to the area. Immediately to the south and east lie roads and across these roads existing modern housing, predominantly semi detached bungalows, one or one and half storeys. To the west of the site is open farm land.

**6.95** The site is divided in to two parcels; Site 1 is 1.5 ha in size and is considered suitable for 25 dwellings, depending on the size and layout. Development here is proposed at a low density because of its setting in the Kent Downs AONB. The design of proposals coming forward should reflect the guidelines set out in the Kent Downs AONB Landscape Design Handbook and Rural Streets and Lanes Design Handbook. Site 2 is proposed for an allotment, subject to demand and discussions with the parish council. If there is no demand for an allotment then site 2 should remain as agricultural land.

## Policy ND12

### Land adjoining 385 Canterbury Road, Densole

Site 1 is allocated for residential development with an estimated capacity of 25 dwellings, site 2 is considered suitable for allotments if there is demand or to remain as agricultural land.

Development proposals will be supported where:

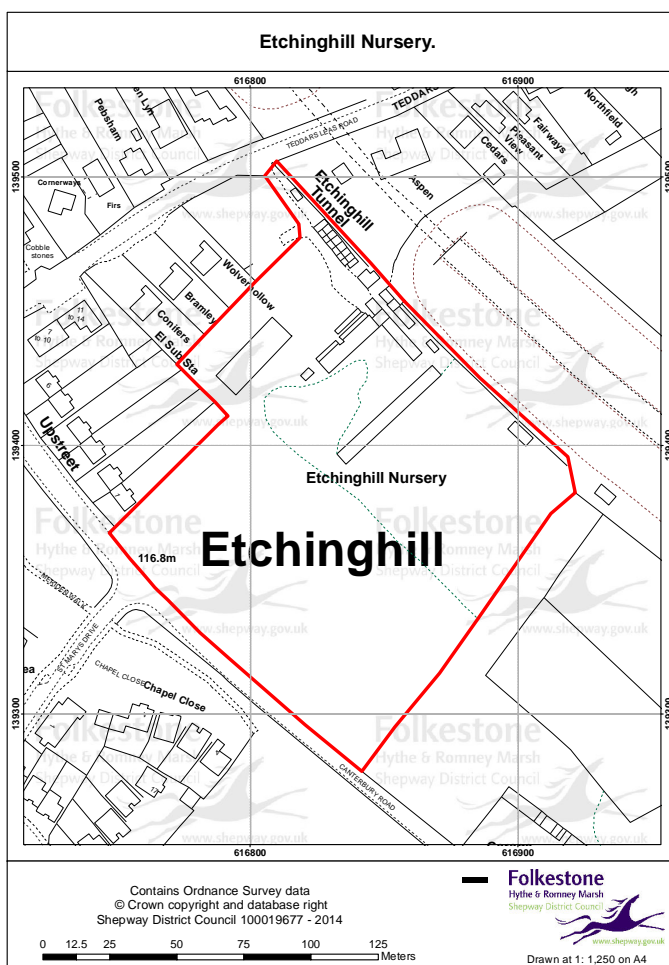
1. The proposal achieves the highest quality design of both buildings and surrounding space and reinforces local rural distinctiveness to help maintain the Kent Downs AONB as a special place
2. Existing trees and hedgerows within/around perimeter of site are retained and enhanced
3. The western building edge is fragmented and softened with a strong landscape buffer
4. Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development
5. The proposal acknowledges surrounding street patterns and urban grain, fronting dwellings on to existing streets and following the existing built edge
6. A primary vehicle access is provided on to Canterbury Road with suitable visibility splays
7. New footpaths and crossing points are provided to link in with the existing network
8. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
9. Measures are taken to avoid pollution to groundwater

## **Etchinghill**

**6.96** The village of Etchinghill lies within the Parish of Lyminge, within the AONB about 5 km north of Hythe and 2 miles south of the village of Lyminge. Lyminge and Etchinghill are separated by the Etchinghill Golf Course, a popular hilly golf course with the club house complex and entrance based in Etchinghill. Etchinghill has limited services and facilities but these do include a public house, active residents association, village hall, recreation ground and cricket club. To the east of Etchinghill are the remains of the Elham Valley Railway, which previously ran through the area, the majority of development has taken place to the west of the railway cutting, focused around a central cross-road. During the 1990s the St Marys hospital site, a former workhouse in Etchinghill to the west of the hamlet was demolished with the creation of 52 new dwellings, a new village hall and amenity space.

### **Residential Allocation**

#### **Etchinghill Nursery (418)**



Picture 6.17

**6.97** This site is located to the south east of Etchinghill, adjoining the settlement boundary and in a central location with the facilities and services a short walk away. The site consists of a former plant nursery, with disused horticultural buildings and an adjoining field which was used for horticultural purposes in its entirety but now only partial used. The site fronts on to Canterbury Road the main route through Etchinghill and as you enter the hamlet from Hythe the site is on the left and the modern St Marys Hospital development is on the right. The site would fit in well with the established urban grain.

**6.98** The north west of the site is bounded by residential development, along Canterbury Road and Teddars Leas Road. The housing here is a mix of fairly modern detached and semi detached two storey dwellings with large gardens backing directly on to the site, there is also a small development of flats on the corner of Teddars Leas Road that does not directly adjoin the site. In addition there is a small plot of land with recent permission for two detached dwellings on Teddars Leas Road which

does share a boundary with the site. Beyond this is the village's historic core and a number of listed buildings, the design of the development will need to be mindful of the setting of these buildings.

**6.99** To the north east is the former railway embankment, with extensive mature hedgerows and trees. The south east of the site is bounded by hedgerows and trees with a field immediately beyond. To the south west is further hedgerows and trees with Canterbury Road running along this side of the site, with St Marys Drive and the recreation ground on the opposite side of the road.

**6.100** The site is 1.6ha in size and is considered suitable for 30 dwellings, depending on the size and layout. Development here is proposed at a low density because of its setting in the Kent Downs AONB on the edge of the village. The design of proposals coming forward should reflect the guidelines set out in the Kent Downs AONB Landscape Design Handbook and Rural Streets and Lanes Design Handbook

## Policy ND13

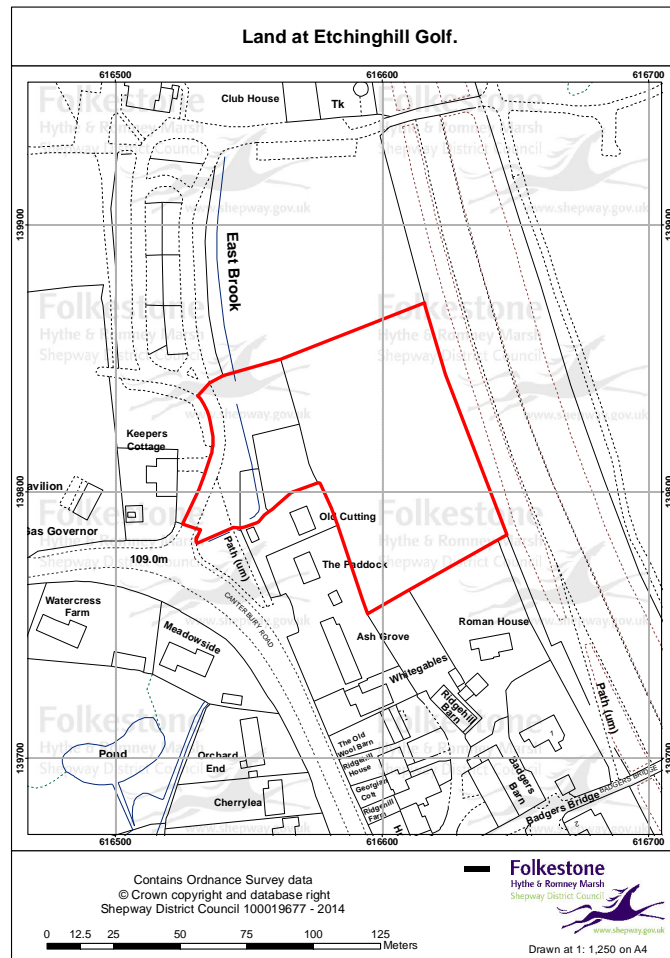
### **Etchinghill Nursery, Etchinghill**

The site is allocated for residential development with an estimated capacity of 30 dwellings.

Development proposals will be supported where:

1. The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness to help maintain the Kent Downs AONB as a special place
2. Existing trees and hedgerows within/around perimeter of site are retained and enhanced
3. A strong landscape buffer is provided along the southern and south east boundary
4. Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development
5. Primary vehicle access is on to Canterbury Road, with suitable visibility splays provided and widening where appropriate
6. New footpaths and crossing points are provided to link in with the existing footpath network
7. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
8. The design of the development should seek to minimise effects on the setting of the nearby Listed Buildings
9. Mitigation/ enhancement measures are investigated to avoid adverse effects on the Folkestone to Etchinghill Escarpment SSSI

### **Land adjacent the Golf Course, Etchinghill (419)**



Picture 6.18

**6.101** This site is located to the north of Etchinghill, partly adjoining the settlement boundary and within the Etchinghill Golf Course complex. The site is currently a open, flat, vacant field not used by the golf course, located within walking distance to the limited services and facilities within the hamlet. The access for this site is from the existing access road serving the golf course, as you enter the golf complex the site is on the right.

**6.102** The majority of the site is bounded by mature trees and hedgerow. The south and west of the site is predominantly residential, single storey, detached bungalows. Beyond this is the village’s historic core and a number of listed buildings, the design of the development will need to be mindful of the setting of these buildings. The area immediately to the north of the site is further open land within the golf complex and to the east is the formal Elham Valley Railway cutting and with extensive vegetation.

**6.103** The site is 0.74ha in size and is considered suitable for 11 dwellings, depending on the size and layout. Development here is proposed at a low density because of its setting in the Kent Downs AONB on the edge of the village. The design of proposals coming forward should reflect the guidelines set out in the Kent Downs AONB Landscape Design Handbook and Rural Streets and Lanes Design Handbook.

### Policy ND14

#### Land adjacent the Golf Course, Etchinghill

The site is allocated for residential development with an estimated capacity of 11 dwellings.

Development proposals will be supported where:

1. The proposal achieves the highest quality of design of both buildings and surrounding space and reinforces local rural distinctiveness to help maintain the Kent Downs AONB as a special place
2. The highest quality materials are used and traditional building techniques are employed
3. Existing trees and hedgerows within/around perimeter of site are retained and enhanced
4. Open spaces and planting are used to provide a visual link to the countryside and an attractive backdrop to development
5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest
6. The development avoids adverse effects on groundwater

### Option 7

Do you have any other sites you wish to be considered within the North Downs Character Area?

#### Alternative Housing Options Considered

**6.104** The alternative sites considered for residential development for the North Downs Character Area but which have been rejected are set out in Appendix 1. Comments on the rejected sites can be made in Appendix 1.

## 7 Introduction

**7.1** The preferred policies in this section include general development management and more specific issues that are material considerations when considering planning applications such as, design, amenity, and ground conditions. These are issues that contribute to achieving sustainable development but are also crucial to the wellbeing of residents and local communities. The Local Plan is the main basis for making decisions on planning applications. It gives local communities, developers and investors greater certainty about the types of applications that are likely to be approved. When adopted, planning decisions must be made in accordance with the Local Plan, unless material considerations indicate otherwise. The policies in this section provide a basis for the consideration of planning applications for development within the whole Plan area. They complement the area based policies in the first half of this document, and contribute to effective development management. The new development proposed in the Core Strategy will only be permitted if it's design is of a high quality and sustainable.

**7.2** It is important to read the plan as a 'whole' – i.e. with reference to all the policies that may be relevant. Policies should not be taken out of context and will not be applied in isolation. They reflect local circumstances and are in addition to national guidance set out in the National Planning Policy Framework.

## 8 Housing and Built Environment

### Quality Places Through Design

**8.1** The National Planning Policy Framework places quality design at the heart of the planning system, making it clear that good design is a key aspect of sustainable development and place making, indivisible from good planning (para 56 of the NPPF). This requirement is further endorsed throughout the Core Strategy Local Plan 2013, whilst this plan seeks to build on the requirement for 'robust and comprehensive' design policies in local plans that establish a strong sense of place (para 58 of the NPPF).

**8.2** Quality design can help to meet community aspirations for development, including assisting sociability, encouraging a range of uses and activities, promoting active and healthy modes of travel and leisure and creating comfortable and characterful environments.

**8.3** Development should be led by sound urban design principles, set out in documents such as the government endorsed Building for Life 12 assessment tool, the adopted Kent Design Guide and the Kent Downs Area of Outstanding Natural Beauty (AONB) Landscape Design Handbook. Wider guidance is provided in documents such as 'Manual for Streets' whilst local level design guidance is provided via Village Design Statements, Conservation Area Appraisals and Neighbourhood Plans.



**8.4** The Council has a strong record of working with partners in assessing design quality and in particular has worked with Design South East to increase in-house skills and knowledge and implemented Design Review for a number of strategic and smaller applications. The Council will continue to promote and require Design Review via Planning Performance Agreements where required.

**8.5** Achieving good design is about creating places, buildings or spaces that work well for everyone, look good, last well and will adapt to needs of future generations. Good design responds in a practical and creative way to both the function and identity of place.

### Box 1

Key principles of good Urban Design include:

1. Functionality
2. Mixed uses and tenures
3. Includes or supports successful public spaces
4. Adaptability and resilience
5. Distinctive Character
6. Attractive places
7. Ease of Movement

Key matters for consideration:

1. Layout – The way in which buildings and spaces relate to each other
2. Form - the shape of buildings
3. Scale – the size of buildings relative to the surrounding context
4. Detailing – the important smaller elements of buildings and spaces
5. Materials – What a building is made from

**8.6** Research has shown that good urban design adds economic, social and environmental value. It increases retail rents, commercial trading, footfall and average residential value yet does not cost more or take longer to deliver. Furthermore, good design has intrinsic benefits to health and well being; with active journeys on foot or bicycle decreasing obesity, blood pressure and stress levels whilst increasing social interaction and creative play. Evidence shows that good design reduces the perception and risk of crime whilst the integration of green space within a development provides carbon storage, biodiversity and wildlife habitats. It can also lower surface water run off and reduce the 'urban heat island' effect.

**8.7** The Building for Life 12 Toolkit, in particular, should be used throughout the design process and is a useful tool for the Council, developers and the community to assess proposals and articulate thoughts and assessment in a structured manner.

All major developments will include BfL12 assessments as part of planning applications as per local list requirements, whilst BfL12 should form the basis for engagement with communities prior to the submission of applications.

**8.8** Reference and detailed consideration of these documents will help to ensure an holistic approach is taken to the design of developments. Design and Access Statements as well as plans will be scrutinised to ensure proposals deliver development of the highest quality inclusive design and layout, whilst large scale development proposals should include appropriate masterplanning documentation, parameter plans and development specification/code documents where required. The objective of good design is not necessarily to copy local vernacular, creating pastiche development; but to reference local character, layout, scale and materiality within a proposal to ensure it can positively contribute to and build on the continuing story of a place.

## Policy HB1

### Quality Places Through Design

Planning permission will be granted where the proposal:

1. Makes a positive contribution to its location and surroundings, enhancing integration whilst also respecting existing buildings and land uses, particularly with regard to layout, scale, form, density and materiality so as to ensure all proposals create places of character
2. Facilitates and enables circulation and ease of movement within the locality for all users, promoting low vehicle speeds, integrated resident and visitor parking and prioritising active forms of travel with roads, footways and paths appropriately located to allow for natural surveillance whilst maximising legibility
3. Creates, enhances, improves and integrates areas of public open space, green infrastructure, biodiversity and other public realm assets
4. Does not lead to an adverse impact on the amenity of future occupiers, neighbours, or the surrounding area and avoids the creation of single aspect north facing dwellings
5. Provides clear definition between the public and private realm, incorporating high quality landscaping and boundary treatments and delivering quality public spaces, inclusive of details of their future maintenance and management
6. Complies with other relevant policies within this plan and the Core Strategy Local Plan, responding positively to the design policies and guidance listed and within relevant Village Design Statements and Neighbourhood Plans.

**8.9** A design guide for Sandgate Village was adopted as a Supplementary Planning Document (SPD) in 2013. Proposals should have regard to the advice it contains and the policies therein. The Council may consider the introduction and use of other appropriate guidance, such as design codes. Where adopted, these will be a material consideration.

**8.10** Proposals should demonstrate a holistic approach to design that has taken into account the above issues, thus avoiding the need for retrofitting as much as possible. Design and Access statements will be scrutinised to understand how the chosen scheme has been developed.

**8.11** A high standard of layout, design and choice of materials will be expected for all new development. Materials should be sympathetic to those predominating locally in type, colour and texture.

**8.12** Building for Life 12 is the latest iteration of a government-endorsed industry standard for well-designed homes and neighbourhoods. It was developed by a consortium led by Cabe at the Design Council, Design for Homes and the Home Builders Federation, with support from Nottingham Trent University. The Council supports this document and will seek to achieve all its recommendations within new major development as far as is reasonably practicable.

**8.13** Planning applications for development with an element of public use will be assessed as to their provision for access for disabled persons in respect of site layout and the relationship between buildings and their car parking areas and other public access points.

## Policy HB2

### Cohesive Design

Development will be permitted if it accords well and/or 'speaks to' the existing locality, where the site and surroundings are physically and visually interrelated in respect of building form, mass, height and elevational details. Any proposals should also ensure that the local character is protected, particularly with regards to sky and tree lines, and the protection of spaces between the buildings. An explanation of the rationale behind siting, massing and proposed elevation as well as spatial treatments will be required for all applications.

For major developments, complex or sensitive sites, a design statement will be required which demonstrate compliance with *Building for Life 12*. This should contain consideration of the following:

### Integrating into the Neighbourhood

- **Connections:** Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones; whilst also respecting existing buildings and land uses along the boundaries of the development site?
- **Facilities and services:** Does the development provide (or is it close to) community facilities such as shops, schools, workplaces, parks, play areas, pubs and cafés?
- **Public transport:** Does the scheme have good access to public transport to help reduce car dependency?
- **Meeting local housing requirements:** Does the development have a mix of housing types and tenures that suit local requirements?

### Creating a Place

- **Character:** Does the scheme create a place with a locally inspired or otherwise distinctive character? How does it relate to the local landscape character or any distinctiveness?
- **Working with the site and its context:** Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and micro-climates?
- **Creating well defined streets and spaces:** Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are the buildings designed to turn street corners well?
- **Easy to find your way around:** Is the scheme designed to make it easy to find your way around?

### Street and Home

- **Streets for all:** Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?
- **Car parking:** Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?
- **Public and private spaces:** Will public and private spaces be clearly defined and designed to be attractive, well managed and safe?
- **External storage and amenity space:** Is there adequate external storage space for bins and recycling as well as vehicles and cycles?

### Development of Residential Gardens

**8.14** Residential gardens have played an important role in providing sustainable development opportunities in the past. Gardens, however, play an important role in the towns and villages in our district. They add character of our urban areas, providing breaks in development and softening the built form, they provide amenity and recreational areas that improve the health and wellbeing of the local population and they provide local wildlife habitat, particularly where gardens are well established. The uncontrolled loss of residential gardens can lead to a piecemeal and inappropriate pattern or style of development and lose the benefits to health and wellbeing and wildlife.

**8.15** The Council, therefore, considers it important to control the development of residential gardens in the district through the use of the following policy, which should be considered together with the Cohesive Design and External Space Standards policies in this chapter.

### Policy HB3

#### Development of residential gardens

Development proposals involving the complete or partial redevelopment of residential garden land will be permitted provided that:

1. The proposal responds to the character and appearance of the area, taking into account the views from streets, footpaths and the wider residential and public environment
2. The size of plot to be developed is of an appropriate size and shape to accommodate the proposal, taking into account the scale, layout and spacing of existing and surrounding buildings, the amenity of adjoining residents, and the requirements for living conditions set out in Policies HB5
3. Any loss of biodiversity value on the site will be mitigated, and where practicable measures to enhance biodiversity through habitat creation or improvement are incorporated.

#### Design guidance for householder applications

**8.16** The majority of planning applications will involve extensions and alterations to existing buildings. Given that it is important that people are able to adapt existing accommodation to suit their needs and lifestyle, it is equally important that any changes in the fabric and footprint of a property can benefit the locality. However a series of changes and adaptations of dwellings has the cumulative potential to transform the character of an area, the following policies aim to ensure that this transformation is managed to retain and improve local character and style.

**8.17** Householder applications will have to abide by certain broad principles, including amenity, outlook, proportion and scale, balance and harmony. These are explored in turn.

**8.18** Amenity is usually understood to mean the effect of a development on visual and aural factors in the immediate neighbourhood or vicinity of a site. Factors relevant to assessment of amenity in householder applications include any potential for impact on privacy, loss of light or overshadowing, loss of outlook or parking, a loss of landscaping or open space, or overbearing / sense of enclosure to adjoining properties.

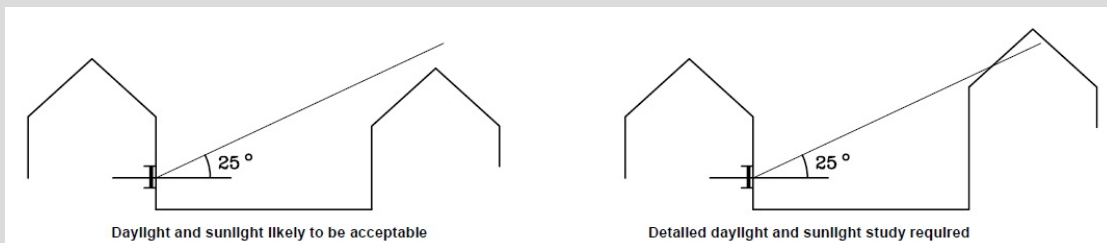
**8.19** Neighbouring projections and extensions can affect the outlook and light provision to a neighbour's habitable rooms. Natural light is an important element in a good quality living environment. Effective daylighting can reduce the need for

electric lighting, while sunlight can contribute towards meeting some of the heating requirements of our homes through passive solar heating. Two storey rear extensions to semi-detached and terraced dwellings are usually very prominent in views from adjoining dwellings and can dominate outward views from adjoining ground floor windows, appearing excessively large and dominant.

**Box 2**

**The 25° and 45° tests**

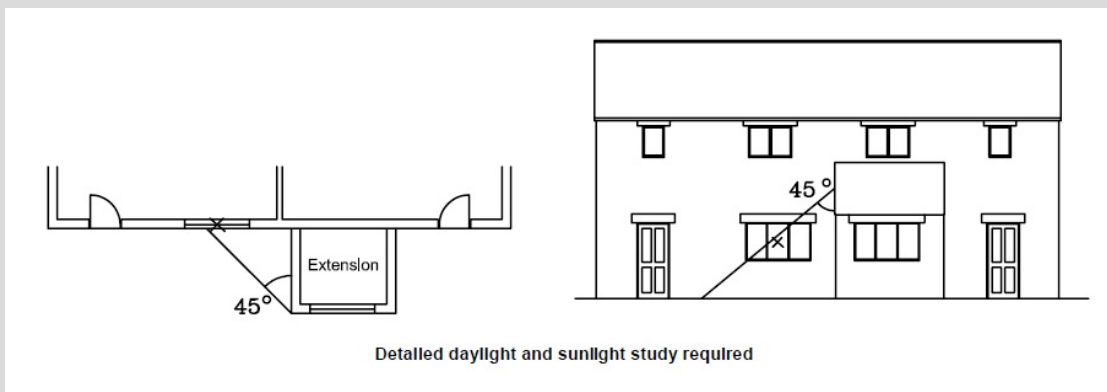
The Building Research Establishment (BRE) document ‘Site Layout Planning for Daylight and Sunlight: A guide to good practice’ (2011) sets out two helpful tests for determining the acceptability of an extension in terms of its potential for impact on neighbouring dwellings. The 25° test is used where development is opposite a window as per the drawing below:



**Picture 8.1 25 degree test**

If the whole of the proposed development falls beneath a line drawn at 25° from the horizontal, then there is unlikely to be a substantial effect on daylight and sunlight. However, if the proposed development goes above the 25° line, further checks will be required.

The 45° test is used for extensions that are perpendicular to a window as per the diagram below:



**Picture 8.2 45 degree rule**

Where the 25° or 45° tests are breached, it may still be shown that natural light levels are acceptable, subject to checking using the BRE’s detailed tests to include:



- Vertical Sky Component
- Daylight Distribution / No Sky Line (where room layouts are known)
- Average Daylight Factor
- Annual Probable Sunlight Hours

**8.20** In the maintenance of proportion and scale, whichever design is proposed, extensions and alterations should generally be subordinate or subservient to the original house; it should be in proportion in relation to the original building and in its own right, and its height should generally be lower than that of the original building (both eaves and ridge).

**8.21** Balance and harmony can aid legibility of a streetscene, thereby encouraging spaces to be treated well. Proposed extensions should generally respect and reflect the form, scale and architectural style with the original building and area. This can be achieved by respecting the proportions, integrity and character of the original house; using an appropriate roof form; matching or reflecting materials and details; and matching and reflecting window styles and positions.

#### **Alterations and extensions to existing buildings**

**8.22** Careful design of home extensions can enhance both the aesthetic of the individual property and the overall character of a locality, creating desirable places.

**8.23** There are circumstances where extensions or annexes are required to accommodate dependant relatives, such as the elderly, which will help maintain a separate lifestyle but allow relatives or carers to be close for help and assistance if needed. Whilst the District Council is supportive of such extensions and annexes, there is concern that these will become separate dwellings after the use has ceased. These will be permitted where a Section 106 Agreement has been negotiated to ensure that such extensions and annexes are used only in conjunction with the existing dwelling.

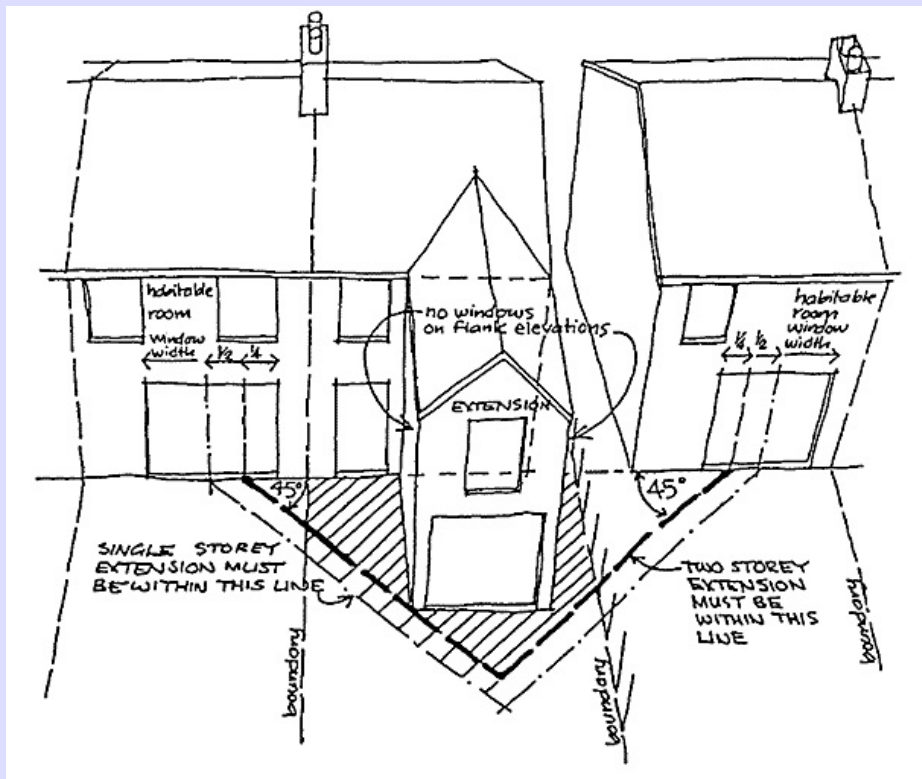
## Policy HB4

### **Alterations and extensions to existing buildings**

Alterations and extensions to existing buildings should reflect the scale, proportions, materials, roofline, and detailing of the original building and should not adversely affect the amenity enjoyed by the occupiers of neighbouring properties or have a detrimental impact upon the streetscene, either in itself or on a cumulative basis.

Applications for extensions to existing residential buildings will be permitted in the following cases:

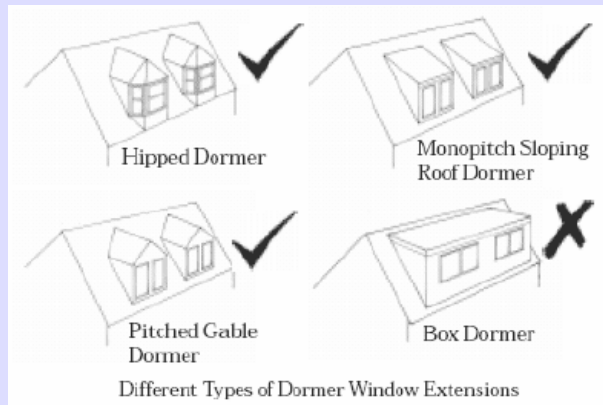
1. The extension does not cause undue overshadowing of neighbouring property and allows adequate light and ventilation to existing rooms within the building. Single storey extensions should be designed so as to fall within a 45-degree angle from the centre of the nearest ground floor window of a habitable room or the kitchen of the neighbouring property. In the case of two-storey extensions, the 45-degree angle is taken from the closest quarter point of the nearest ground floor window of a habitable room or kitchen
2. Side extensions may be added to detached or semi-detached dwellings where space is available. Care should be taken to avoid creating a terracing effect which could result by extending up to the boundary. A minimum distance of 1 metre should be maintained from the boundary and any part of the extension above single storey level including the roof.



Picture 8.3

3. Single storey flat-roofed extensions will be permitted only if they are well-designed, and the proposed extension would not be generally visible from a public place and would serve only as an adjunct to the main building. Use of 'green' or 'brown' roofs is to be encouraged. Two storey flat-roofed extensions cannot be considered acceptable.

4. Loft conversions requiring dormer extensions will be in proportion to the existing roof, thus maintaining overall building proportions. This will avoid presenting a top-heavy and flat-roofed appearance. Planning applications for extensions in roof spaces which front a highway will ensure that the proposed structure avoids damage to the architectural and aesthetic character of the existing building, and maintains the integrity of the overall streetscene.



**Picture 8.4**

5. Alterations or extensions should protect the residential amenity of the occupants of neighbouring properties and ensure avoidance of unacceptable overlooking or interlooking.
6. Garages should be set back 5.5 metres from the highway boundary. This will enable a vehicle to stand clear of the highway whilst the doors are being opened or for cleaning or maintenance purposes.
7. The following additional criteria for extension should be met in addition to the above, to maintain the visual quality of the street:
  - a. The width of the extension should be less than or equal to half the width of the original frontage of the property.
  - b. The depth of the extension should be less than or equal to half the depth of the garden.
  - c. The extension should respect the building line to all streets onto which the property faces.
  - d. The extension should be subservient to the property.
  - e. The extension should maintain the open character of the plot, where this is a feature of the streetscene.

In addition to the above, proposals for alterations and extensions (including annex accommodation) to buildings in the countryside should be proportionate to the size and scale of the exiting dwelling and would not adversely impact on the quality and character of the landscape or be detrimental to the rural setting.

Extensions or annexes for dependants accommodation, especially in the countryside, should be attached and have access to the existing dwelling and revert back to one dwelling when the use has ceased.

### Internal and External Space Standards

**8.24** Space is a fundamental organising principle of society. The dichotomy between public and private spaces denotes different types of activities and, as such, private space offers the physical space for personal and individual activity. While the ideas of the “right to the city” and public space for some time, the right to personal space is a growing concern. CABE’s (2010) report, “Space standards: the Benefits” summarises the seven main categorical benefits of sufficient internal space as follows:

- Wellbeing: Improved health and wellbeing resulting from privacy and social activity.
- Family life: Enhanced family life and the opportunity for children to study uninterrupted.
- Work: Opportunities for home working, increased productivity and therefore wider economic benefit
- Flexibility: The flexibility of space within the home and adaptability to changing needs.
- Inclusivity: The ability to respond to occupants' changing physical requirements over their lifetimes.
- Content communities: The benefits to society from reduced overcrowding, which can result in anti-social behaviour.
- Housing market stability: A more stable housing market driven by an understanding of long-term need rather than short-term investment.

**8.25** Nationally described space standards are currently a discretionary Government standard that local authorities can choose to implement. They aim to ensure new developments provide adequate space for residents to undertake everyday activities comfortably. Locally, while many new developments do meet or exceed the levels at which the standards have been set, there is evidence to suggest that 1- and 2-bed dwellings are falling short of these standards. To ensure the quality of Shepway’s accommodation, proposals for the creation of new dwellings will be assessed against the requirements, which are set out in Appendix X.

**8.26** For flats, it is expected that usable balconies or terraces are provided for all units in new build developments. In the case of conversions of existing buildings, these should be provided wherever feasible and where they would not take away from the character of the existing building or streetscene.

**8.27** For houses, a larger area of private external space is considered necessary to accommodate a storage shed, a sitting out area, washing line/rotary drier, play space, trees, shrubs and borders that make a garden an edifying experience for people, thus supporting the policies around health and wellbeing, and providing valuable urban habitats and corridors for wildlife.

## Policy HB5

### Internal and external space standards

Planning permission will be granted for all new development and conversions where the proposed scheme:

1. Meets, and wherever viable exceeds, the nationally described internal space standards;
2. Provides an area of private open space for each new or converted dwelling as one or more of the following:
  - a. A private usable balcony area with a minimum depth of 1.5m.
  - b. An area of private garden for the exclusive use of an individual dwellinghouse of at least 10m in depth and the width of the dwelling.
3. Demonstrates consideration of the acoustic environment of outside spaces so they can be enjoyed as intended.
4. In the case of certain types of conversions, including those in Conservation Areas, an area of private garden for the exclusive use of the residents of a set of flats, provided *pro rata*, may be acceptable in place of individual balconies or terraces. For example, a building containing seven flats, three of which have 4 bedspaces; four of which have three bedspaces, should seek to provide a private amenity area of at least 45m<sup>2</sup> ((3\*7)+(4\*6)). In exceptional cases, on particularly constrained sites, commuted sums to provide off-site amenity areas may be paid.

The District Council will consider variation to the external space standards if it can be demonstrated through the Design and Access Statement.

**8.28** A private outdoor space is one which is not overlooked from the street or other public place. Private balconies on the front elevation of flats may be acceptable if the building is set back from the street onto which they face. If the building is sited

on or close to the back edge of the pavement, a balcony on the front elevation, where the activities of the occupants can be observed by passersby, is not likely to provide an acceptable private outdoor space. However, recessed balconies may provide sufficient privacy.

### **Conversions of sensitive buildings**

**8.29** It will be expected that applications for conversion of existing buildings into living accommodation would conform to the above standards. The only exception to this would be the conversion of listed buildings, for which some dispensation can be appropriate. The advice of the local planning authority should be sought for development relating to all potentially sensitive development.

### **Self build/custom build development**

**8.30** The Self-build and Custom Housebuilding Act 2015 placed a duty on local authorities to keep a register of individuals and associations of individuals who wish to acquire serviced plots of land to bring forward self-build and custom housebuilding projects and to place a duty on certain public authorities to have regard to those registers in carrying out planning and other functions.

**8.31** Shepway District Council's register can be found by following this link <http://www.shepway.gov.uk/self-build-information> whilst further information is available via the Government endorsed self build portal <http://www.selfbuildportal.org.uk/custombuild>.

**8.32** Self-build and custom housebuilding registers provide valuable information on the demand for self-build and custom housebuilding in a relevant authority's area and should form a key part of a relevant authority's evidence base of demand for this type of housing. The registers that relate to their area may be a material consideration in decision-taking. Relevant authorities with plan-making functions should use their evidence on demand for this form of housing from the registers that relate to their area in developing their Local Plan and associated documents.

**8.33** The Council is keen to support the principle of self and custom build development to meet the needs of local people and increase choice and opportunity within the housing market to deliver more high quality homes that meet the needs of individuals.

**8.34** The NPPF states that Local Planning Authorities should identify and make provision for the housing needs of different groups in the community such as people wishing to build their own homes. The NPPG also makes it clear that the Government is keen to support and encourage individuals and communities who want to build their own homes, and is taking proactive steps to stimulate the growth of the self build market. One measure to help self builders has been to grant them an exemption from the Community Infrastructure Levy.

**8.35** The exemption will apply to anybody who is building their own home or has commissioned a home from a contractor, house builder or sub-contractor. Individuals claiming the exemption must own the property and occupy it as their principal residence for a minimum of three years after the work is completed.

**8.36** This policy will contribute to the availability of self and custom build plots to meet the needs of those registered with the Local Planning Authority, increasing housing supply and supporting local small and medium sized businesses.

**8.37** Further evidence of need for Self and Custom Build will be informed by future SHLAA's and SHMAs, as well as the Register itself. Using the policy criteria below it is calculated that the site allocations proposed within this document will provide for approximately 85 self and custom build plots within the district by 2026 which will be further supplemented by windfall development of smaller sites below 5 units.

**8.38** The Council will also support qualifying bodies in delivering Self and Custom build projects through the neighbourhood plan process, subject to the wider policy requirements set out within this document and the Core Strategy Local Plan.



## Policy HB6

### Self build/custom build development

The Council will support self and custom build development by requiring all sites within the Folkestone and Hythe Urban Area delivering more than 40 dwellings to supply no less than 5% of dwelling plots for sale to self or custom builders on the districts Register.

Within the North Downs and Romney Marsh Areas sites delivering more than 20 dwellings must supply no less than 5% of dwelling plots for sale to self or custom builders on the districts Register.

Subject to the following criteria:

1. Design parameters for custom and self build shall be included within any outline planning application
2. Plots shall be appropriately marketed as self and custom build for a period of at least 12 months before consideration is given to a return to open market units
3. Self and custom build shall be appropriately integrated within the wider development, in accordance with overarching policy requirements and contribute towards the maintenance and management of the public realm

### Local Housing Needs in Rural Areas

**8.39** The viability of local communities and support for local facilities such as shops and schools can be threatened if local people, particularly young families, are unable to afford to stay. The NPPF supports local housing needs through Para 54 which states that LPA's should 'be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate...'.

**8.40** Such sites will be in addition to the allocation of land to meet general housing demand, and would be laid on land which would not normally be released for housing. They will have to meet the criteria described below. Land allocated to meet general housing demand will not be reserved for local needs only.

**8.41** In assessing local needs, the requirements of the following groups of people resident in the parish of the proposed development, or adjoining parishes, will be considered. The requirement for local needs housing will be demonstrated by the inability of households to gain access to accommodation, suited to their needs at an

affordable cost, and within the limits of their disposable income. A parish survey will need to show that a significant number of households are in this position. The survey should also include the following information:

- Households currently resident in accommodation unsuited to their circumstances for physical, medical or social reasons, and which is incapable of being improved.
- Persons who are dependants of households resident in the parish.
- Households including persons employed full-time in the parish on other than a short term basis or who will be taking up such employment, or who provide an important service requiring them to live locally.
- Persons who are not currently resident but have retained long standing links with the local community or who have moved away due to lack of affordable housing.
- Other cases of local need if considered justified by the District Planning Authority.
- For the purposes of this Policy "resident" is interpreted as three years continuous residence in the parish or alternatively, any five out of the last ten years.

### Policy HB7

Planning permission will be granted for proposals for local needs housing development within or adjoining villages of a suitable scale and type to meet identified needs provided that:-

(a) The need cannot satisfactorily be met on sites with planning consent for housing or through an allocated site in this Local Plan or from redevelopment, infill or conversion in line with other policies in the Plan.

(b) The local need has been clearly identified by a detailed parish survey. It may be necessary to take into account the needs in adjacent parishes so as to relate catchment areas to settlements.

(c) There is no satisfactory alternative means of meeting the identified needs.

(d) The development has been designed and will be available at a cost capable of meeting the identified local need.

(e) The site is well related in scale and sitting, to the village and its services and is capable of development without significant adverse countryside, conservation, environmental or highway safety impact.

(f) The proposal does not involve cross subsidy. In allowing local needs housing it will be necessary to ensure that the subsequent occupancy of the housing is controlled, by condition or agreement, so that the accommodation remains available to meet local needs.

## Residential Development in the Countryside

**8.42** Paragraph 55 of the National Planning Policy Framework states that local planning authorities should avoid isolated new homes in the countryside unless there are special circumstances, such as they are essential for rural worker accommodation; would provide a viable use of a heritage asset; would involve the re-use of redundant buildings that would lead to an enhancement of the immediate setting; or is a development of exceptional quality.

**8.43** Where proposals are to redevelop dwellings in the countryside but do not meet the requirements set out in the NPPF and are outside the settlement confines, the Council will require these to be carefully managed to protect the character of the rural area. This will also apply to other residential associated development, such as stand alone annexes or garages. To avoid overbearing and bulky dwellings or associated development in isolated locations, particular attention on the design, scale and materials used will be important considerations. This is particularly important in the north of the district where most of the countryside is within the Area of Outstanding Natural Beauty and to the south in the Romney Marsh, which is flat, open and exposed. Proposals for replacement dwellings will, therefore, be required to justify the design approach and will have to meet the design policies in this Plan.

**8.44** Where proposals are for replacement dwellings that are not located on the original footprint of the existing, the Council will seek through condition or agreement the demolition of the existing dwelling within 3 months of the occupation of the replacement, in order to prevent two dwellings remaining on site.

**8.45** Where planning permission is granted for replacement dwellings that is larger than the existing dwelling, this will be subject to a condition withdrawing permitted development rights for residential extensions. This is to ensure that the integrity of the policy's intentions to protect the countryside from intrusive built form and bring future alterations to the scale and nature of the new property within the control of the planning system.

## Policy HB8

### Residential Development in the Countryside

Planning permission will be granted for replacement dwellings located in the countryside provided that:

1. The existing dwelling has a lawful residential use;
2. It can be demonstrated that the scale, bulk, massing, location within the site, and materials used does not harm the wider landscape, the functioning of neighbouring uses or the amenities of nearby residents; and
3. It can be demonstrated that a suitable access can be achieved.

Where permission is granted, Permitted Development Rights will be removed in order to control future alterations or extensions that may impact on the landscape and rural character of an area.

Where permission is granted and an alternative location is proposed, planning conditions will be imposed to ensure that the existing dwelling is removed within 3 months of the occupation of the replacement dwelling.

Planning permission for residential related outbuildings, such as annexes or garages, will be granted provided that it can be demonstrated that the scale, bulk, massing, location within the site, and materials used does not harm the wider landscape, the functioning of neighbouring uses or the amenities of nearby residents

### Accessible Dwellings and Water Efficiency - Building Regulations

**8.46** With the abolition of the Code for Sustainable Homes and Lifetime Homes Standards, and the insertion of their requirements into the building regs, additional clarification is needed in this plan to define the Council's approach to these changes.

**8.47** Building Regulations Part G address water efficiency. Shepway's Core Strategy highlights that the district falls within a designated Water Scarcity Status Area, and therefore water efficiency measures are required for new development. This has created a requirement for a maximum consumption of 105L water per person per day as per Policy CSD5, except for the strategic developments in Policies SS6 and SS7 which require a lower maximum consumption of 90L water per person per day. These have been proven to be viable and achievable, and these requirements will be 'passported' across in this plan period. The requirement applies to new-build and those formed by Change of Use, and will be ensured through use of Planning Conditions.

**8.48** Building Regulations Part M address access to and use of buildings. The regulations contain a basic minimum standard for access and use which should be applied to all new dwellings, and two optional requirements for increasing accessibility for those with lower levels of mobility. Policy CSD2 of Shepway's Core Strategy requires all developments of 10 dwellings (Class C3) or more to include 20% of market dwellings meeting Lifetime Homes standards, unless demonstrated to be unfeasible in design or viability terms. The Council will now require all developments of 10 dwellings or more to include a minimum of 20% of market dwellings meeting M4(2) Category 2 (Accessible and Adaptable Dwellings), which can include units of M4(2) Category 3 (Wheelchair user dwellings) if desired. This requirement will apply to new-builds only, and will be ensured through use of Planning Conditions.

**8.49** For non-residential development, there are no such restrictions in place to limit water consumption. Evidence suggests that it is non-residential uses that are responsible for the greatest increases in local water consumption (agriculture in particular). Therefore the Council require more stringent water efficiency requirement for non-residential development in attaining BREEAM certification for all new non-residential developments (as appropriate). In viability terms, however, it is not appropriate to seek to achieve 'maximum' water credits in this regard, but development must achieve at least a 40% improvement in water consumption against the baseline performance of the building (Wat1, 3 credits).

### **Affordable Housing & Starter Homes**

**8.50** The District Council's requirement for the provision of affordable homes is set out in the adopted Core Strategy (2013) Policy CSD1. Since this policy was adopted, the Government has introduced two important changes to the legislation relating to planning obligations and Starter Homes.

**8.51** The Government has introduced legislation that limits the affordable homes obligations to developments of 11 or more dwellings or, when in the AONB, 5 or more. Policy CSD1 will still be used in the consideration of planning applications but the requirement for affordable housing contributions on developments of 10 or fewer dwellings will not be enforced as this is now superseded by the changes made by Government and set out in the PPG.

**8.52** The Government has also introduced the Housing and Planning Act 2016, which has introduced Starter Homes. The Government's Starter Homes exception sites policy seeks to help meet the housing needs of young first time buyers, by allowing Starter Homes to be offered to them at below their open market value. The exception site policy enables applications for development for Starter Homes on under-used or unviable industrial and commercial land that has not been currently identified for housing. It also encourages local planning authorities not to seek section 106 affordable housing and tariff-style contributions that would otherwise apply. Local

planning authorities are also encouraged to work in a positive and proactive way with landowners and developers to secure a supply of land suitable for Starter Homes exception sites to deliver housing for young first time buyers in their area.

**8.53** A Starter Home is expected to be well designed and suitable for young first time buyers. The District Council will work with developers to determine what size and type of Starter Home is most appropriate reflecting the local housing market and sites. Starter home provision will be in line with the government's current consultation on the implementation of the national starter homes policy. This is currently at a level of 20% on sites of 10 units or more (and 0.5 hectares or more), across the district.

**8.54** The District Council will update the Affordable Housing SPD to reflect the new legislation for Affordable Housing obligations and Starter Homes.

### **Residential care homes and institutions**

**8.55** Given the demographic profile of Shepway and the historic development of its coastal settlements, there are a significant number of care homes and institutions in the district. Given the changing nature of the industry, however, and the requirement for improved service provision and for larger sites to aid business viability, the Council expects to see a significant spatial change in these over the plan period. It is expected that larger Victorian properties that have hitherto supported residential care in the district will become overly costly to reconfigure to modern standards, and that these will revert to other uses.

**8.56** Residential care homes/institutions take a number of different forms. They are, depending on circumstances, likely to fall into one of two use classes as set out in the Town & Country Planning (Use Classes) Order 1987 (as amended): C2, Residential Institutions, or C3, Dwelling Houses. Hostel accommodation is considered to be *sui generis* under the Order.

**8.57** Residential Institutions are defined in Use Class C2 of the Order. This definition covers residential institutions and other non-custodial institutions where a significant element of care is provided for the residents. This can cover a range of uses such as nursing and convalescent homes; children's homes; community care and care homes for the elderly; centres for those with severe disabilities; and residential schools.

**8.58** In relation to Use Class C3b Dwelling Houses, this is defined as up to six people living together as a single household and receiving care. For example, this could include supported housing schemes such as those for people with learning disabilities or mental health problems.

**8.59** Based on this, the policy set out below can only be applied to those proposals that fall under Use Class C2, whether it is a new development or a change of use.

**8.60** At the national level, the policy and regulatory framework for residential care and nursing homes is the responsibility of the Department of Health and the Care Quality Commission (CQC). The CQC is the independent regulator for health and social care in England. It is responsible for the making sure that health and social care services provide people with safe, effective, compassionate, high-quality care and encourage care services to improve. It monitors, inspects and regulates services to make sure they meet fundamental standards of quality and safety and publish their findings, including performance ratings to help people choose care. Details of the National Standards for residential care homes can be found at [www.cqc.org.uk/content/care-homes](http://www.cqc.org.uk/content/care-homes).

**8.61** Kent County Council, the body responsible locally for Adult Health and Social Care, has changed its procedures for commissioning and care recently in response to the Health and Social Care Act 2012, the Care Act 2014 and the squeeze on local government finances. Kent County Council's Strategic Statement 2015-2020 outlines a commitment to enabling more people to remain in their homes, thus reducing the need for transfer to residential institutions. In its Community Support Market Position Statement (February 2016) it notes, *"plans to facilitate a continued decrease in the number of publicly funded care home placements, as we look to develop more personalised housing options, including Extra Care Housing, supported living and Shared Lives."*

**8.62** The Kent County Council Accommodation Strategy notes of the district that the average care home is 27 beds, and that this is one of the lowest average sizes in the County. It states that *"Shepway will need more fit for purpose residential and nursing homes in future. There are a high number of converted Victorian properties that are unable to accommodate the more complex individual that we are seeing in today's care homes."* There is, therefore, a pressing need to provide policy guidance for the likely scenario of these substantial buildings becoming vacant in this plan period.

## Policy HB9

### **Conversion and reconfiguration of residential care homes and institutions**

There will be an increased need over this plan period for the relocation and reconfiguration of existing residential care homes and institutions (C2 or *sui generis* use class) in the district. Where this cannot be achieved with the existing building, there will be a need for the building's conversion to other uses, or else an impetus for the demolition and reconstruction.

Planning permission will be granted for the conversion of a residential care home / institution (C2) to residential (C3), hotel/b&b (C1) or non-residential institution (D1) use if the following are satisfied:

1. Applicants should provide a report demonstrating that the building is no longer viable for the use.
2. The applicant has provided a viability report demonstrating that institutional use is not economically sustainable.
3. Design and layout take account of the design policies presented within this plan, and sustainable construction and Building for Life 12 criteria are observed as far as is reasonably practical.
4. Conversion demonstrates acceptable level of traffic movements.
5. Conversion does not result in increased noise or disturbance which impacts upon neighbouring residential amenity.
6. In the case of C3 use, the development provides affordable housing in accordance with policy CSD1 (Core Strategy 2013).

The local planning authority will seek to avoid the demolition of an existing residential care home or institution in a Conservation Area or where the building contributes to the character of the area.

**8.63** Given the expected loss of existing residential institutions for older people, there is expected to be a need for replacement accommodation built to the Care Quality Commission's (CQC) Fundamental Standards. The CQC is the independent regulator of health and adult social care services in England. The role of the CQC is to ensure that health and social care services provide people with safe, effective, compassionate, high quality care and encourage care services to continually improve.



**8.64** The Kent Social Care Accommodation Strategy highlights that there will be a particular demand for quality residential accommodation in Shepway. In particular, this will be focused in Folkestone, Hythe, New Romney and Lydd. Already, the district has among the highest proportions of people who live in residential care in the county, and this need is unlikely to diminish.

**8.65** As noted, both the district and county councils support provision of accommodation to meet the requirements of those in special need of supervision so that they are fully integrated into existing communities and located in sustainable locations.

**8.66** The principles of sustainability for the development of residential institutions apply equally as to general residential development.

## Policy HB10

### **Development of new or extended residential institutions (C2 use)**

Planning permission will be granted for the development of new residential institutions, or the conversion of existing properties, subject to the following requirements:

1. Accommodation will be designed and built to the Care Quality Commission's (CQC) Fundamental Standards.
2. They will be situated in sustainable locations with access to local services, leisure and community facilities, to include shops, healthcare and public transport as per Core Strategy Policy DSD and SS3.
3. They are located in areas at lower risk of flooding, as per Core Strategy Policy SS3.
4. Consideration has been given to compatibility with surrounding land uses, so that such development does not cause substantial disturbance or detrimental impact to neighbours. Similarly, the development should not be located in an area subject to significant noise or other disturbance, or reasonably likely to be so as a result of the expansion of existing neighbouring businesses, as per NPPF paragraph 123.
5. Design and layout are to take account of the design policies presented within this plan, as well as sustainable construction and Building for Life 12 criteria.
6. Sufficient open and defensible amenity space should be provided and retained around the property for use by residents, staff and visitors.
7. The site and immediate surroundings should have a gentle topography to facilitate pedestrian movement and access to services.
8. The application demonstrates local need for the expansion, or new facility.

## Gypsies and Travellers

**8.67** The Department for Communities and Local Government publication, “Planning policy for traveller sites” (August 2015) redefines “Gypsies and travellers” as: *Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

**8.68** It advises that, planning policy should consider:

- a. *whether they previously led a nomadic habit of life*
- b. *the reasons for ceasing their nomadic habit of life*
- c. *whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

**8.69** The East Kent GTAA (2014), following the previous PPTS (2012), recommended a need of seven pitches for the period 2013-2027, to include an immediate need in the first five years of five pitches. However, the new definition of Gypsies and Travellers has significantly reduced the number of households in the district conforming to this category, and advises that Travelling Showpeople sites should be assessed under general housing policies.

## Policy HB11

### Accommodation for Gypsies and Travellers

Planning permission will be granted for Gypsy and Traveller accommodation which will contribute to meeting the needs of those households conforming to the above definition, and which can also be demonstrated to meet all the following criteria:

1. The development will safeguard the health of occupiers and provide a satisfactory level of amenity for them, by reference to a range of factors including but not limited to the space available for each family, noise, odour, land contamination, other pollution or nuisance, flood risk and the disposal of refuse and foul water;
2. The site is in a sustainable location being adequately accessible to main transport routes and within a 10 minute walk of local services and facilities along a formal pedestrian footway;
3. The development will not give rise to an unacceptable impact on amenity for residents in the vicinity of the development, or, in the case of nearby commercial users, result in the imposition of new constraints on the way in which such users can operate their business; and
4. If the proposal involves the development of land originally identified in this Local Plan for another purpose, the loss of such land is justified by the desirability of providing additional Gypsy and Traveller accommodation, and represents the appropriate planning balance in the circumstances.
5. There is no adverse effect on the visual or other essential qualities of the AONB, SSSI, national or local nature reserve or conservation area.

The exception to the above criteria relate to applications for the expansion of existing permitted Gypsy and Traveller sites, in which case only criteria 1 and 3 will apply. However, it must be demonstrated that those households still conform to the DCLG Gypsy and Traveller definition, and that expansion will result in additional Gypsy and Traveller pitches.

**8.70** In the Issues and Options document the alternatives consisted of two separate policies:

## Option 8

### **H3 Providing for the accommodation needs of specific sections of the community**

A: Explore the possibility of providing additional pitches for Gypsies, Travellers and Travelling Showpeople on existing sites within the District

And/or

B: Allocate new sites for Gypsies, Travellers and Travelling Showpeople in accordance with the sequential approach and environmental assessment criteria set out in the Core Strategy

And/or

Set a site size threshold and a proportion of traveller pitches/plots for large housing developments

### **H4 To provide a criteria based policy that can be applied to applications for sites for Gypsies, Travellers and Travelling Showpeople that are not designated.**

A: In considering applications for seasonal, temporary or permanent use of land by Gypsies and Travellers, or the extension of existing sites, planning permission will only be acceptable within or adjoining the settlement boundary and subject to the following criteria being met:

- a. Compatible with national flood risk policy
- b. Appropriately screened or capable of being so through additional measures
- c. No adverse impact on the residential amenity or existing buildings or uses
- d. Access should not be detrimental to highway safety
- e. Established personal need
- f. No adverse effect on the visual or other essential qualities of the AONB, SSSI, national or local nature reserve or conservation area.

Or

B: In considering applications for seasonal, temporary or permanent use of land by Gypsies and Travellers, or the extension of existing sites, planning permission will be acceptable both inside and outside of the settlement boundary subject to the following criteria being met:

- a. Compatible with national flood risk policy
- b. Appropriately landscaped or capable of being so through additional measures

- c. No adverse impact on the residential amenity or existing buildings or uses
- d. Access should not be detrimental to highway safety
- e. Established personal need
- f. Accessible to local services and facilities
- g. No adverse effect on the visual or other essential qualities of the AONB, SSSI, national or local nature reserve or conservation area.

## Sustainability Appraisal

**8.71** H3 - All of these policy options are likely to improve the provision of sites for accommodating the needs of Gypsies, Travellers and Travelling Showpeople and in doing so provide an appropriate mix of temporary and permanent housing sites for these communities (SA5). In addition by setting aside a proportion of homes in larger developments for Gypsies, Travellers and Travelling Showpeople, option C could provide opportunities to increase access to local services and could support efforts to increase levels of integration and cohesion while reducing inequality (SA3). This approach is supported in Paragraphs 4.8 to 4.10, Planning Policy For Traveller Sites, which supports the enabling of the provision of suitable accommodation from which travellers can access services, reduce tensions between settled and traveller communities and increases the number of traveller sites in appropriate locations with planning permission.

**8.72** H4 - The inclusion of the development criteria in options A and B is likely to reduce the risk of flooding (SA1), as well as protect landscape and townscape (SA8), wildlife (SA9) and cultural and historic assets (SA7). By restricting development to within or adjoining the settlement boundary, option A provides opportunities to increase access to local services (SA3, SA10) and could support increases integration and cohesion while reducing inequality (SA3). By allowing development more remote from existing settlements but accessible to local services and facilities, option B may have negative effects on integration, cohesion and reduction of inequality (SA3) and the landscape (SA8), notwithstanding the requirement for appropriate landscaping.

## Conclusion

**8.73** Since the publication of the Issues and Option document, new national Planning Policy for Traveller Sites has come forward for dealing with such applications, which now requires Travelling Showpeople accommodation applications to be differentiated from Gypsy and Travellers. In addition to this, the definition of Gypsies and Travellers has been made stricter, requiring evidence of demonstrative nomadic activity from such households.

**8.74** The Council is positive about the provision of appropriately located sites for members of the Gypsy and Traveller community. Given the low overall requirements for provision of pitches in the GTAA and, now given the even lower requirement as a result of the change in definition of this group, a criteria-based policy is appropriate

to allow for greater flexibility in the location of the small amount of development required. It is expected that some pitches will be provided on and adjoining existing permitted sites in the district, and such development will be supported by the local planning authority.

## 9 Economy

**9.1** The District Council's Corporate Plan and the Core Strategy set out the importance of the boosting the local economy, increasing job opportunities and educational attainment in Shepway. The District Council through the Economic Development section and Planning, together with business partners such as The Kent Local Enterprise Partnership and Locate in Kent, will assist new investors to the area and help existing businesses to develop and expand.

**9.2** The economy for the district has recorded relatively strong employment growth over recent years when benchmarked against the regional and national growth levels <sup>(1)</sup> The Shepway Economic Development Strategy 2015 - 2020 indicates that the economy of the district has improved over the years with the number of jobs increasing by 24% between 2000 and 2012, full time earning have increased and unemployment has fallen. The jobs forecast is also predicted to grow more quickly than the South East average to 2031.

**9.3** There are a number of key sectors in the district that are well represented in the local economy which provide a particular advantage for growth. These are:

- Financial and Insurance services;
- Creative Industries (including media and IT);
- Business and Professional Services (including engineering-related scientific consultancy and R&D);
- Transport & Logistics;
- Energy;
- Tourism, Culture, Retail and Recreation; and
- Advanced manufacturing.

**9.4** Nevertheless, there are still some issues with the overall health of the economy in the District:

- Jobs are generally lower paid, lower skilled;
- There is a deficit of opportunities and workers in the knowledge industries;
- Relatively low economic activity and employment rates;
- Claims for Jobs Seekers Allowance is higher than the South East average;
- Full time earnings are lower than the South East average and national wages;
- Productivity (as measured by GVA per job) has been running increasingly behind the South East over the 12 years.

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1 ELR 2016

**9.5** The Employment Land Review 2016 indicates that there is also shortage of skilled labour in the district to support the requirements of local businesses; that there is a lack of good quality commercial space to meet modern occupier needs and an absence of a strategic road access to much of the district outside of Folkestone.

**9.6** The Shepway Development Strategy sets out the ambitions for economic growth. This considers four priorities to achieve their ambitions:

- To build on the current and emerging economic strengths,
- To boost productivity and supporting business growth,
- Promote further investment by maximising the value of our assets and stimulating confidence, and
- Improve education and skills attainment.

**9.7** The Government has also published 'Towards a one nation economy: A 10-point plan for boosting productivity in rural areas', and this has been considered for the rural economy.

### **Employment Sites**

**9.8** The Core Strategy sets out under 'Strategic Need A' that one of the key aims is "to deliver a flexible supply of employment land in terms of location, size and type". Policy SS2 specifically identifies a target of approximately 20 hectares (gross) to be delivered between 2006/7 and 2025/26 inclusive, with approximately 7ha being delivered in the first 4 years of this plan period.

**9.9** The Employment Land Review (ELR) 2016 indicates that the overall policy approach by the Council should aim to positively plan to support the employment needs in the district so that the economy is not unduly constrained but also recognise the issues around limited land supply and the competing pressure on available development sites.

**9.10** The ELR has identified that there is sufficient employment land for both industrial and office requirements for the remaining plan period but this is heavily reliant on a small number of larger undeveloped land allocations in the District with Link Farm and Cheriton Park providing a high proportion of the land for industrial and office space respectively. In addition, the demand for employment land is at Folkestone but the offer in the town is limited.

**9.11** There has been some progress in meeting some of these requirements, such as the opening of the Factory Floor on Tontine Street and permission for a mixed use scheme (residential and employment) at Ingles Manor. However, other areas are unlikely to be addressed in the short to medium term such as the provision of office and industrial space at Nickolls Quarry.



**9.12** The Shepway Economic Development Strategy (2015-2020) seeks to bring forward appropriate sites for commercial development and that assessments indicate that employment land allocations are in the wrong locations to meet the current business demands in the identified sectors for future growth. This Strategy will consider the suitability of land around the three M20 junctions for employment use.

**9.13** To support the requirements of local businesses, the Local Plan will ensure a good range of industrial sites and premises are delivered across the district. The total amount of employment land identified to meet the requirements in the Core Strategy are set out in Policy E1 below:

## Policy E1

### Employment Sites

The sites identified below are protected for business uses under use classes B1, B2 and B8, unless otherwise stated.

Site	Floorspace (m2)	Uses
Shearway Busienss Park, Folkestone	14,700	B1 - B8
Cheriton Park, Folkestone	15,000	B1a
Ingles Manor, Folkestone	2,000	B1
Hawkindge West, Hawkindge, Folkestone	30,000	B1 & B8
Nickolls Quarry, Hythe	21,000	B1
Link Park (Areas A & C) Lympne Hythe	73,175	B1, B1c, B2 & B8
Mountfield Road Phase 3 & 4, New Romney	9,000	B1, B1c, B2 & B8
Harden Road, Lydd	840	B1 & B1a
Dengemarsh Road, Lydd	11,725	B1 Mixed

**Table 9.1 1**

A proportion of non-business class uses (up to 25%) will be permitted provided it can be demonstrated that:

1. The use will add to the attractiveness and function of the employment site; and
2. There is full justification of its the location within the overall employment site.

## **Tourism**

**9.14** There is a wide variety of tourist attractions within the Shepway District that includes water related sports along the stunning coast line; destination attractions such as Port Lympne Safari Park and the Romney Hythe and Dymchurch Railway; numerous heritage assets; expansive wild landscapes; and new initiatives, such as the Creative Quarter in Folkestone.

**9.15** This tourism offer is an important aspect of the economy of the district. The value of tourism on the local economy was recently estimated at £235,213,000 in 2013 and believed to employ over 4,500 people (12% of the workforce)<sup>(2)</sup>.

**9.16** The District Council would like to ensure that the tourism economy is provided with the conditions that enable further investment in new facilities and attractions, such as the new accommodation at Port Lympne in the form of tree houses, that broadens the overall offer, ensures visitors stay longer and helps diversify the overall economy of the district.

**9.17** Proposals should be compliant with the locational policies in the NPPF and adopted Core Strategy (2013) and be located within the settlements in the hierarchy (Core Strategy Policies SS3 and SS4). Where proposals are located outside the settlements (in the countryside) they should utilise existing buildings, especially if it would bring a viable use to historic assets. Any other new forms of tourist related development in the countryside will need to provide clear justification for the schemes requirement to be in such a location.

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2 COOL Activity 1.2 Economic Impact Research The Economic Impact of the Kent Visitor Economy 2013 Shepway District Feb 2015

## Policy E2

### Tourism

Proposals that will provide new, or an upgrade to, sustainable tourism facilities including; hotels, guesthouses, bed and breakfast, self catering accommodation and new visitor attractions will be permitted provided that:

1. The location is well related to the highway network and is accessible by a range of means of transport including walking and cycling and by public transport
2. The massing, materials and overall design of the proposal does not have a detrimental impact on the wider landscape, heritage assets or surrounding built form
3. There is no detrimental impact on neighbourhood amenities
4. There is no detrimental impact on biodiversity assets
5. Evidence is provided that demonstrates how the proposal contributes to the diversification of tourist attractions in the District and the need for it.

In exceptional circumstances, permission will be granted for new tourist proposals in the countryside where there is evidence that justifies the requirement of the location and meets the criteria 1 to 5 above.

### Hotel & Guest Houses

**9.18** The Council wishes to retain a range of good quality accommodation in the District, which will appeal to all types of tourist and seeks to resist the loss of visitor accommodation where this would be detrimental to the tourism role of the District. The upgrading of existing stock or conversion to other tourist related uses would be supported subject to environmental considerations.

**9.19** In the operation of this Policy the District Planning Authority will have regard to the views of the local hotel and tourist organisations concerning tourist demands and requirements. Supplementary Planning Guidance has been produced which provides further detail and information for applicants.

**9.20** The Council is currently commissioning evidence base to support this policy.

## Policy E3

### Hotels/Guest Houses

Applications for the change of use or redevelopment of hotels/guest houses or self-catering units which would result in a loss of visitor accommodation will only be permitted where it can be shown that it is no longer practicable to use the premises as holiday accommodation by reason of one of the following criteria:

1. The standard and type of accommodation that is, or could be provided at reasonable cost, is unsuited to meet visitor demands
2. In the case of hotels and guest houses, the premises or site are poorly located in relation to the areas of main tourist activity or tourist routes, and uses in the immediate vicinity are predominantly unrelated to tourism or incompatible with continued tourist use of the premises.

### Touring and Static Caravan Sites

**9.21** Touring and static caravan facilities play an important part for tourism in the district by providing long and short stay self-catering accommodation. Most sites are, however, located along the coastline and can have an unacceptable visual impact on the wider landscape and be detrimental to the special environment that draws people into the area. The District Council will, therefore, seek to consolidate and improve existing caravan sites through minor expansions, limited infill and the diversification to other forms of self-catering accommodation, rather than the establishment of new sites.

## Policy E4

### **Touring and Static Caravan sites**

Proposals for upgraded touring and static caravan sites will be permitted where they can meet the following criteria:

1. The proposal would not harm the character or appearance of the countryside or coastline or conflict with other countryside and environmental protection policies
2. Sites should have good access via a local distributor road to the primary road network, and any local roads involved in gaining access to the site should be capable of accommodating the extra traffic generated without undue hazard or inconvenience to local residents or other road users
3. Minor expansions should be situated so as to minimise their effect upon local amenity, and should as far as possible, be screened from public roads, open spaces or footpaths and where necessary a scheme of landscaping should be submitted with the proposal to achieve this
4. The proposal should not significantly affect the best and most versatile agricultural land
5. The proposal should not substantially interfere with the amenities of residents in nearby dwellings
6. That the upgrading is compliant with the holiday use
7. The demand for the upgrading can be demonstrated

Proposals for change of use to residential use will only be permitted where:

1. the site is within an existing settlement boundary and is well related to the built up area
2. the site is acceptable in terms of highway access
3. The site does not have a significant impact on the wider landscape
4. It can be demonstrated that the accommodation is no longer required for holiday accommodation

## **Rural Economy**

**9.22** The rural area plays an important economic role and over the past few decades they have become more economically diverse. According to the governments 'a 10 point plan for boosting productivity in rural areas' the trend towards greater diversification is continuing and economic activity is becoming more dynamic, facilitated in part by improved information communications.

**9.23** The Government has pledged that it will put in place the right conditions to ensure that productivity in the rural areas is improved, including extensive, fast and reliable broadband services, modern transport connections, expanded apprenticeships and providing strong conditions for rural business growth. Through this plan the District Council would like to ensure that this district can benefit from the Governments plan.

### **Farm diversification**

**9.24** The Government encourages diversification of the rural economy through the development of new farm enterprises to sustain and develop farm businesses, thereby supplementing farmers' incomes and providing new and more varied employment opportunities for local people to replace jobs lost through structural changes to the agricultural industry.

**9.25** Examples of farm diversification include packing and processing of farm produce, farm shops, craft workshops, sporting facilities and holiday accommodation. Proposals to diversify will be considered acceptable where there is no detrimental impact on the character, appearance and nature conservation value of the countryside.

## **Policy E5**

### **Farm Diversification**

Planning permission will be granted for the diversification of farm businesses provided that:

1. The proposal is compatible with surrounding buildings and the location in a rural area in terms of scale and design
2. There would be no detrimental impact on local amenity or the character, appearance or nature conservation value of the rural landscape. This criterion will be given additional weight in the Kent Downs Area of Outstanding Natural Beauty, and nature conservation designations
3. Adequate provision can be made to meet access, servicing and parking requirements
4. The proposal would not prejudice the agricultural working of the farm unit
5. Where practicable, the proposal re-uses an existing agricultural building.

### **Farm shops**

**9.26** Retail uses should generally be well related to the residential areas that they serve and are normally considered to be an urban or village use. The creation of new retail outlets in the countryside is therefore generally discouraged. Increasingly

however, farmers have been diversifying and setting up farm shops to take advantage of passing trade and demands for local produce, which can improve the viability of individual farm units and diversity of the rural economy generally through providing new jobs and services.

**9.27** Farm shops that sell unprocessed farm products from an existing building on the farm from which they originated are considered to be incidental to the main use and do not require specific planning permission. Permission is, however, required for a new building from which to sell such products. Shops on farms that sell produce bought from wholesalers or neighbouring farm units also need permission and can result in a commercial operation inappropriate to the rural area. Retail uses selling farm produce will be appropriate in an acceptable scheme of farm diversification and where it can be shown that the shop would not impact on nearby shopping facilities.

## Policy E6

### Farm Shops

Planning permission for retail use on a farm will be permitted where:

1. The retailing proposed relates to the sale of farm produce and would not harm the viability of retail facilities in nearby rural towns and villages
2. The proposal is acceptable as part of farm diversification scheme
3. In considering proposals, a condition may be attached to planning permission to limit the range and / or source of goods sold.

### Reuse of Rural Buildings

**9.28** Add something about tourism to policy (BG)



## Policy E7

### Reuse of Rural Buildings

Planning applications for the re-use or adaptation of rural buildings to alternative uses will be approved where proposals would meet the following criteria:

1. The building is of permanent and substantial construction, is of a form, bulk and general design which is in keeping with its surroundings and, is capable of conversion without substantial rebuilding
2. The proposed conversion is sympathetic to the building's intrinsic character, appearance and setting and is capable of being implemented without significant extensions or alterations to the existing building
3. Development would not prejudice the agricultural working of a farm unit or the vitality and functioning of nearby rural towns and villages
4. Adequate provision can be made to meet access, servicing and parking requirements without detriment to the visual or other amenities in the locality
5. Where a rural building can accommodate a business reuse in accordance with criteria 1-4 above, proposals for conversion to a residential use which is not ancillary to a scheme for business reuse will require to be justified by the applicant through a statement detailing the efforts made to secure a business reuse in the first instance
6. For residential, including holiday use, the proposal would involve the re-use of a traditional building of architectural or historic merit
7. The proposal will not damage the fabric or character of any traditional building or the historic character and significance of the farmstead and in the case of a Heritage Asset, whether designated or not, the proposal will not damage the architectural, archaeological or historic interest of the asset or its setting.

### Provision of Superfast Broadband

**9.29** In light of changing work patterns, the increase in remote office working, and the need for local businesses to maintain an online presence, the Council is aware of the need for all development to ensure sites are serviced to be able to provide the fastest available broadband speeds.

**9.30** The NPPF (paragraph 42) supports the provision of infrastructure in achieving sustainable economic growth, stating that "the development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services." It also asks that, "in preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband" (paragraph 43). In addition to this, a recent government letter to English local authorities advised them to consider this, "through Local Plans and when considering planning applications to ensure whenever possible commercial and residual new builds are able to access superfast broadband".

**9.31** It is clear that reliable broadband internet access is essential for homes throughout the country to benefit from online services, and for businesses to compete globally. The national aim, as highlighted in the Defra publication, "Towards a one nation economy: A 10-point plan for boosting productivity in rural areas", is to achieve a transformation in the country's broadband access. It seeks everyone in the UK to be able to access broadband speeds of at least 2 megabits per second (Mbps) and 95 percent of the UK receiving far greater speeds (at least 24Mbps) by 2017.

## Policy E8

### **Broadband Provision**

Planning permission will be granted on sites where it can be demonstrated that the highest broadband speeds available for the locality will be achieved, and has been 'designed in' to the development. Provision of a fully serviced and future-proofed site in terms of broadband infrastructure will be secured by planning condition.

### **Options for Employment, Tourism and the Rural Economy.**

**9.32** The Issues and Options draft document set out seven options for the economy these were:

## Option 9

### Option E1

Making the best and most sustainable use of existing employment land

A: Retain existing employment land unless there is clear evidence that it is surplus to requirements, the continued use of the land for employment purposes would have a significant deleterious effect on residential amenity, the redevelopment of the site for a suitable alternative use would enable another more suitable employment site to come forward or that continued allocation for commercial use is demonstrated not to be viable

And/or

B: Identify alternative non-employment uses for surplus employment land, accompanied by policies to manage the release of these sites for housing or other suitable uses.

## Option 10

### Option E2

Directing business to sustainable locations, in particular office uses to town centre /edge of centre areas

A: Incorporate Areas for Small Business and/or Town Centre Business Areas into Town Centre designations and promote a more flexible approach to economic development in these areas

Or

B: Specifically define areas within or near town centres where business/office uses will be located

## Option 11

### Option E3

E3 Ensuring that economic development contributes to climate change avoidance and mitigation (energy efficiency/ renewable energy)

A: Include specific criteria to secure provision of renewable energy, and energy efficiency measures, in new economic/employment development

Or

B: Apply generic design and sustainability criteria in considering proposals for new economic development

## Option 12

### Option E4

Securing new economic development on designated employment land with good transport connections to meet identified needs and encourage inward investment

A: Identify specific designated employment sites where particular types or sizes of unit should be provided

Or

B: Identify specific designated employment sites where a less prescriptive approach to future economic development would be appropriate, allowing the market to determine the exact nature of commercial provision on those sites

Or

C: Allow a more flexible approach to future economic development on all designated employment sites

### Option 13

#### Option E5

Managing economic development outside designated employment sites

A: Encourage new economic development outside designated employment sites provided it meets an identified need and policy criteria

And

B: Allow existing employment land outside designated employment sites to be redeveloped for other uses subject to identified policy criteria

Or

C: Apply more general development management criteria to assessing proposals for creation or loss of employment land outside designated areas.

### Option 14

#### Option E6

Offices and employment areas supporting economic innovation and the knowledge economy

A: Encourage mixed used development in all town centres, including start up or live-work units

And/or

B: Focus new office development in Folkestone and Hythe Town Centres

And

C: Identify opportunities for small and start-up business units in New Romney Town Centre

## Option 15

### Option E7

Providing for the needs of small and medium sized businesses

A: Set maximum size thresholds in certain town centre areas to ensure business units remain small and employment areas develop different specialities

Or

B: Do not set size thresholds to allow maximum flexibility

And/or

C: Encourage provision of smaller units on other designated employment sites

## Option 16

### Option E13

Tourism and tourist facilities

A: Supporting proposals for new visitor accommodation provided that:

- (i) They are well related to the primary road network and/or have good public transport accessibility
- (ii) Will not create parking congestion in the area they are located
- (iii) Do not impact upon the character and amenity of neighbouring buildings and the surrounding area

And/or

Encouraging extensions and improvements to existing visitor accommodation subject to other development management policies

And/or

Where a loss of visitor accommodation is proposed within the district it will need to be demonstrated that:

- (i) The existing use is no longer viable or feasible. It will also need to be demonstrated that other visitor accommodation types are not feasible or viable at the site
- (ii) The proposal provides an alternative use that meets the strategic needs of the Core Strategy Local Plan
- (iii) The new use does not impact upon the character or amenity of the area and neighbouring uses or adversely impact upon the transport network

Or

Consider proposals for redevelopment or change of use of existing visitor accommodation on a site by site basis but without the presumption that the existing use should be retained.

## Option 17

### Option E14

#### E14 Caravan and camping sites

Support the upgrade, expansion of existing touring caravan and camping sites and the provision of new touring caravanning in sustainable locations where specific criteria are met including there being no harm to the character of the countryside and the undeveloped coast, the amenity of nearby residential property and there being no risk from flooding

Or

That other than small enhancements and additions there be a presumption against the expansion and development of additional touring camping and caravanning sites

And/or

That there be a presumption against the provision and expansion of static caravan and holiday chalet sites

Or

That additional static holiday caravans and chalet uses be supported in sustainable locations that meet specific criteria relating to location, transport, flood risk and environmental impact

And/or

That existing static caravan and chalet parks be permitted to open all year around subject to safeguards relating to flood risk, prevention of residential uses establishing and suitable on site management arrangements being in place

And/or

Planning permission will be granted for development designed to enhance facilities within existing caravan sites, including accommodation and the replacement of static caravans by chalets, provided that the above criteria is adhered to and:

(a) It would not be visually intrusive

(b) It would not unacceptably affect the living conditions of nearby residents



(c) there being no risk from flooding.

### **Sustainability Appraisal**

**9.33** The Issues and Options appraisal concluded that most policy options have generally positive sustainability effects on the topics they address. Negative effects identified for certain policy options being considered included:

- Risking economic development in unsustainable locations or those likely to suffer from traffic congestion by allowing a flexible approach to economic development (potential negative effect on SA10).
- Risking inefficient use of land, hindering urban regeneration and increasing potential impacts on the countryside by encouraging economic development outside designated employment sites (potential negative effects on SA3, SA8, SA11).
- Risking an insufficient supply of employment land by allowing it to be redeveloped for other uses (potential negative effect on SA 6).
- Failing to maximise the potential for growth of the knowledge economy by not focusing office development in settlements with the greatest potential to become knowledge industry clusters (potential negative effect on SA6).
- Failing to support start-ups and other small and medium sized businesses by not setting size thresholds on business units in certain town centre areas (potential negative effect on SA6).
- promoting the expansion and improvement of tourism facilities in the District could have an adverse effect on the integrity of biodiversity assets that are sensitive to visitor pressure. Conversely, failure to protect existing visitor accommodation could have an adverse effect on the sustainability of the tourism industry in the District (potential negative effects on SA6, SA9).
- Promoting the expansion and improvement of caravan and camping sites in the District has the potential for negative effects on the setting of heritage assets and landscapes. They would also be likely to attract more tourists to the area, which could have a negative effect on the integrity of biodiversity assets that are sensitive to visitor. Conversely, restricting such development could have an adverse effect on the sustainability of the tourism industry in the District (potential negative effects on SA6, SA7, SA8, SA9).

### **Conclusions**

**9.34** The NPPF states that local planning authorities should set out a clear vision which positively and proactively encourages sustainable economic growth (the strategy is set out in the adopted Shepway Core Strategy). The Framework also states that planning policies should avoid long term protection of sites allocated for

employment use where there is no reasonable prospect of a site being used for that purpose and should consider applications for alternative uses to support sustainable local communities.

**9.35** The Employment Land Review has considered these issues and has concluded that the sites identified above have a reasonable prospect for development and to meet all the business requirements. It is, therefore, concluded that the allocated and existing sites identified above should be protected for the duration of the plan to ensure the objectives of the Core Strategy could be implemented.

**9.36** With regard to the Tourism policies the preferred options set out policies to encourage new tourism offer in the district. The District Council will be undertaking a further study to ensure that the policies enable the development of new tourism facilities in the correct locations. To meet the concerns of the SA, criteria has been added to mitigate the issues raised.

**9.37** It is considered that the Rural Economy policies will enable diversification and help to meet the Governments rural productivity ten pint plan to assist rural areas. The rural economy policies were not specifically considered at the Issues and Options stage of the SA.

## 10 Community

### Community

**10.1** The National Planning Policy Framework (NPPF) in paragraph 69 states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. The Council recognises the benefits of a healthy community and with the expected growth in the district's population, existing community facilities that serve their current and future needs should be retained and new facilities provided. To use the Core Strategy's definition of community infrastructure, these are facilities available for use by all the community, such as church or village halls, doctor's surgeries and hospitals. Community facilities could also include nursing homes, public houses, children's playgrounds and sports facilities.

**10.2** Shepway's population as it grows will put increasing pressure on community facilities. Consequently a changing approach towards locating services and facilities is needed, especially to ensure they are provided in sustainable locations. The use of a building and the needs of communities can change over time. Therefore, new community facilities should be designed to be flexible and adaptable to changing circumstances including being capable of multi-use and expansion. As set out in Section 7, the NPPF allows local authorities to designate green space for special protection as Local Green Space. The Government states in paragraph 76 and 77 of the NPPF that this designation should not be applied to most green areas or open space.

**10.3** Good quality open space and recreational facilities are also intrinsic to achieving quality new development, as well as contributing to people's health and wellbeing. The Council will base its requirements upon the Benchmark Standards produced by Fields in Trust (formerly the National Playing Fields Association), that are contained in the publication "Planning and Design for Outdoor Sport and Play". They are recommended as a tool for assisting in the development of local standards for example the Benchmark Standard for children's playing space is 0.80 hectares per 1000 population; distance criteria are also provided.

### Creating a Sense of Place

**10.4** A key feature of a successful place is ensuring people identify with it on an emotional level. Successful places have often established themselves through history and are associated with particular events and buildings. Many people associate new development as soulless and characterless. Part of addressing these concerns is ensuring the design and landscaping is as good as possible, enabling people to emotionally, as well as economically, 'buy in' to the place. However it is often the experiences people have of a place that leaves lasting impressions.

**10.5** Public art (which can include landscaping or lighting and not just installations) has been increasingly advocated on the basis of a series of supposed contributions to urban regeneration since the 1980s. A wide range of advocates have claimed that public art can help develop senses of identity, develop senses of place, contribute to civic identity, address community needs, tackle social exclusion, possess educational value and promote social change. As an extreme example of how community building through public art can foster a new settlement identity, major new buildings in Medellín, Colombia, are required to include public art, thus a unifying theme connects public infrastructure, and permeates the vast mixes of tenures throughout the city, and has healed the scars of recent troubles. Barcelona, too, is defined by its artistic public realm and has become a successful tourist and business destination due to its cohesive art-based regeneration.



**Picture 10.1** Examples of effective community building public art

**10.6** Within Shepway, Folkestone's Triennial has raised the national profile of the town and has encouraged a 'creative economy'. The Council is of the opinion that all neighbourhoods and settlements in the district can and should become associated with positive experiences and visual appeal, and that the sterility of many new developments does not help establish social ties. This needs to be helped along through establishing the right environment and encouraging people to make

meaningful connections through local events, to 'kick start' social life in these communities. An outcome of this process could be a piece of public art with special relevance to, and having been shaped by input from the new local community.

## Policy C1

### Creating a Sense of Place

The council will expect all new major development to demonstrate a deliverable and fully resourced project for fostering a sense of place through such methods as landscaping, public art, water features and/or lighting. This programme and its logic will be fully outlined in the Design and Access Statement submitted as part of the application.

This will apply to the following:

1. Residential developments comprising 10 or more dwellings
2. Other developments where the floor area to be built is 500m<sup>2</sup> gross or greater, including office, manufacturing, warehousing and retail developments.

In larger, phased development, it is acceptable for this to come forward in later phases so that it involves a critical mass of population.

**Developer doesn't have to lead - who decides who leads? Public should decide and produce public art brief if that is what's being delivered.**

Any programme for community-building and placemaking **must** engage the local community and could be community-led, having regard to the local circumstances of the site and/or local aspirations. Where physical public art is provided on a permanent basis, it needs to form part of managed open space or, if transferred to Town or Parish Councils, contributions and commuted maintenance sums for up to 10 years will be required to include the cost of decommissioning where appropriate.

**10.7** The policy options considered in the Issues and Options document were:

### Option 18

GD5 Incorporating public art in new development

A: To secure a contribution for art to improve the public realm.

The Council will support the inclusion of public art and require all major schemes to include public art that:

- a. Is integrated into proposals at an early stage of the design process
- b. Enhances and creates local distinctiveness and reinforces a sense of place
- c. Responds to local character
- d. Makes a positive contribution to the public realm
- e. Engages the local community in its creation

Or

B. No new policy is introduced beyond the requirements of national guidance

**10.8** The Sustainability Assessment noted both policy options could help encourage local vibrancy through enhancing the physical environment which could promote social infrastructure and in doing so bring different communities together (SA3 and SA8). Policy option A should help to protect and promote local distinctiveness and a sense of place (SA8). It may also help provide opportunities to improve the environment, public space and promote passive surveillance which could help reduce crime and the fear of crime (SA4). Option B relies on existing policies and therefore has no effect relative to the SA baseline.

### Conclusion

**10.9** The Sustainability Assessment expresses a need for intervention to promote local vibrancy, community development, and engendering local distinctiveness and sense of place, and so Option A would be the preferred approach to this policy area. The Council concedes that public art for public art's sake can often prove contentious and does not necessarily live up to local aspirations. Therefore, the preferred policy emphasises the *process* of community building rather than simply the private commission and acquisition of a nondescript installation. The preferred policy provides flexibility, and reflects the Council's aspiration for quality and distinctive places while reflecting the existing cultural character of Shepway's distinctive settlements.

**10.10** The preferred policy is supported by the NPPF (paragraph 57), which notes that "it is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes." It is further supported by the district's Core Strategy policy SS3, which advises that "proposals should be designed to contribute to local place-shaping and sustainable development." The policy recognises the intrinsic value of the intangible aspects of community building.

### **Safeguarding Community Facilities**

**10.11** Community facilities, such as local pubs, are one of Britain's oldest and most popular social institutions. However, they are currently under pressure, with 16 pubs closing every week according to a report by the Institute for Public Policy Research (2012).

**10.12** While alcohol is linked to problems around crime and disorder, very little of this comes from community pubs serving residential areas. Pubs provide a meeting place where social networks are strengthened and extended, pubs host a wide variety of community-oriented events and activities that add considerably to local civic life, and pubs are becoming hosts for a range of important public services, including post offices and general stores, and providing broadband internet access. Community pubs, or at least pubs with certain characteristics, also have a cultural as well as a practical community value. This is because pubs are felt to offer things such as tradition and authenticity that are becoming rarer in a world transformed by global commercial pressures.

**10.13** In addition to pubs, many communities are losing other vital services in the current commercial environment, such as post offices, banks or newsagent's. Brookland, for example, has lost almost all local services from its High Street.

## Policy C2

### **Safeguarding Community Facilities**

Planning permission for development leading to the loss of an existing community facility will be granted, where it can be demonstrated that all the following criteria have been met:

1. There is no longer a demand for the facility within the locality supported with evidence that the premises have been actively marketed for a period of 12 months
2. The sale price is realistic for the existing use, supported with a written valuation from a commercial estate agent
3. The proposed development would provide an alternative beneficial facility to the local community
4. There is provision for new or replacement facilities to meet an identified need in locations which are well related and easily accessible to the settlement or local community.

**10.14** The policy options considered in the Issues and Options document were:



## Option 19

### C1 To safeguard existing community facilities

A: The Council will ensure the provision of a network of community facilities, providing essential public services throughout the district by protecting existing community sites that still serve, or have the ability to serve, the needs of the community.

And/or

B: The Council will only permit the loss of existing community facilities where:

- i. It can be demonstrated that there is no need for the existing premises or land for a community use and that it no longer has the ability or flexibility to serve the needs of the community
- ii. The existing use is located on the ground floor within a Main Retail Frontage, a Secondary Retail Frontage, a Shopping Parade or other major commercial frontage; or
- iii. Community facilities of equivalent floor space or benefit (either on site or off site as part of a comprehensive redevelopment) that meets the current or future needs are provided.

**10.15** The Sustainability Assessment noted that the District has a number of deficiencies in local services and deficiencies, particularly in rural areas. Both policy options safeguard existing community facilities in the District, retaining access to local facilities, services and environmental assets (SA3), including open spaces (SA14) in the District. Both policy options safeguard existing community facilities in the District, which is likely to restrict the stock of existing buildings that can be converted for residential (SA5) and employment development (SA6). Comparing the two policy options, Policy B is likely to have a less significant adverse effect as it provides useful criteria outlining the exceptional circumstances in which existing community facilities can be converted or demolished.

## Conclusion

**10.16** The NPPF (paragraph 70) requires local authorities to "plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments", and to "guard against the unnecessary loss of valued facilities and

services". This aim is supported in the Core Strategy's policies SS3, SS5, and CSD3. Such measures are particularly encouraged in the district's aspirations for New Romney in policy CSD8 and Sellindge in policy CSD9.

**10.17** The preferred option takes its lead from Option B in that, while the policy seeks to protect valuable and useful community facilities, it recognises that there will be times at which the loss is economically unavoidable and that there must be established parameters for the conversion of an asset that is no longer required. In the main, however, any application involving the loss of a community facility via this route will have to be accompanied by extensive evidence to support its case.

### **Provision of Open Space**

**10.18** Parks and other areas of public open space provide local destinations for people to walk, play and cycle, providing space for physical activity and contributing to the health and well-being of communities. They provide exposure to nature which can be restorative and provide positive mental health benefits; and places for social interaction which is critical for creating and maintaining community cohesion and building social capital. For children and young families, parks provide a place to meet and for children to participate in physical and social play. The provision of public open spaces is thus a key factor in promoting active living and providing important physical, psychological and social health benefits for individuals and the community.

**10.19** The importance of open space is recognised in the NPPF (paragraphs 73-74) and PPG, noting that open space of public value can take many forms, from formal sports pitches to open areas within a development, linear corridors and country parks.

**10.20** Paragraph 74 of the NPPF clearly states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements;
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

## Policy C3

### Provision of Open Space

The Local Planning Authority considers it appropriate that development of five or more dwellings contributes or provides for the provision of open space, unless there is sufficient existing open space within close proximity that can accommodate the additional demand. This open space is expected to be in accordance with the standards set out by Fields in Trust as a benchmark guide for informal open space. It is to be noted that provision of or contributions towards each category will be sought as per this national guidance, with major development expected to provide to the standard of 3.2ha per 1,000 population.

	<b>Minimum quantity guidelines (ha/1000 people)</b>	<b>Walking guidelines</b>
Parks and gardens	0.80	710m
Amenity green space	0.60	480m
Natural and semi-natural	1.80	720m
<b>Total / Average</b>	<b>3.2</b>	<b>637m</b>

**Table 10.1**

It is to be noted that this gross open space calculation may include provision of sustainable urban drainage systems (SuDS) provided they do not compromise the safety of open space users; informal sports pitches; and formal play spaces providing they are made accessible to all.

Any new open space should be transferred to and maintained in perpetuity by a management company or, in certain cases, the local Town or Parish Council subject to payment of a commuted sum.

In some cases, it may be appropriate for existing off-site open space enhanced in accordance with a priority list of projects prepared by the Council's open spaces team with responsibility for leisure. This would be in lieu of on-site or alternative off-site provision. Contributions will be assigned to particular projects to directly benefit the residents of the development. The priority is to provide or improved open space that is strategically located, accessible and usable. Contributions will be combined where appropriate in order to achieve this, but accord with the Community Infrastructure Levy Regulations 2010 regulations 122 and 123. The priority list will

be reviewed at least annually and more regularly if other needs arise as a result of safety or risk management issues, opportunities for matching funding and/or strong community support.

The district Council is undertaking a study for open space requirements, which will update the requirements in this policy in the next draft of the plan.

### **Child play space**

Play is an essential part of a child's life, and is considered vital for the enjoyment of childhood as well as social, emotional, intellectual and physical development.

In assessing the type and size of children's play space to be provided, regard will be had to the number of child bed spaces proposed and to existing deficiencies in local provision. The standard of 5sqm per child bedspace indicates a minimum level of provision. This will not preclude negotiations with developers to secure a provision above the minimum where local circumstances warrant it, e.g. where an environmental justification for a more generous provision may be pertinent. This could include ensuring that areas are provided to meet minimum size and distribution standards for the different types of play space in order to meet the needs of young people and avoid disturbance to surrounding residents.

It is recommended that formal play spaces take one of the following forms:

- Local Areas for Play (LAPs) aimed at young children;
- Locally Equipped Play Areas (LEAPs) aimed at children who can play independently;
- Neighbourhood Equipped Areas for Play (NEAPs) aimed at older children.

These can be complemented by other facilities such as Multi Use Games Areas (MUGAs), skateboard parks, etc.

Fields in Trust guidance recommends that formal play areas are provided at a rate of 0.25ha per 1,000 people. It advises that LAPs are provided on average 100m from dwellings; LEAPs up to 400m from dwellings; and NEAPs 1km from dwellings. It also advises that other facilities, such as MUGAs, are provided at a rate of 0.30ha per 1,000 people, and are located up to 700m from dwellings. The District Council is currently undertaking a Play Strategy and this will inform the Play Space policy in the next draft of the plan.

## Policy C4

### Formal play space provision

The Council will seek the provision of an adequate level of public open space for leisure, recreation and amenity purposes.

Areas should be set out and located so as to minimise annoyance to nearby occupiers, maximise children’s safety and be visible from neighbouring properties. Play areas should be within walking distance of all dwellings containing child bed spaces.

Planning permission for new residential or mixed-use development will be granted subject to the provision or contribution towards formal play space as per the following table:

	Local Area for Play (LAP)	Locally Equipped Area for Play (LEAP)	Neighbourhood Equipped Area for Play (NEAP)	Multi-Use Games Area (MUGA)
10-200 dwellings	‡	‡		£
201-500 dwellings	‡	‡	£	‡
Over 500 dwellings	‡	‡	‡	‡

**Table 10.2**

‡ = Provided on site

£ = Contribution required

A deferred contribution may be acceptable towards the improvement of an existing equipped/designated play space in lieu of on site provision.

In addition to the above, the following specifications must be observed so that a play space of an appropriate size is created and that disturbance to neighbouring residential properties is minimised:

	Minimum sizes (ha)	Minimum dimensions	Buffer Zone
<b>LAP</b>	0.01	10 x 10m (min activity zone 100sqm)	5m separation from residential curtilage
<b>LEAP</b>	0.04	20 x 20m (min activity zone 400sqm)	20m minimum separation from habitable room facade
<b>NEAP</b>	0.1	31.6 x 31.6 (min activity zone 1,000sqm <sup>(1)</sup> )	30m separation from residential curtilage
<b>MUGA</b>	0.1	40 x 20m	30m separation from residential curtilage

**Table 10.3**

1 comprising an area for play equipment and structures, and a hard surfaced area of at least 465sqm as a minimum for 5-a-side football

**Commuted sums for open space and play space - Are we going to accept these, or are all new open and play spaces going to other bodies? (MN) (check with Ben)**

**Statement 4**

**Financial contributions for open and play space**

	<b>Rate applied (£)</b>	<b>Number of dwellings</b>	<b>Capital or Commuted sum due (£)</b>	<b>Total financial contribution due (£)</b>
In lieu of on site open space (combined capital and commuted maintenance)				
In lieu of on site play space (capital)				
In lieu of on site play space (commuted maintenance)				

**Table 10.4**

The Issues and Options document presented the following policy alternatives:

**Option 20**

Providing open space, informal recreation provision and other green infrastructure to meet the current and future needs of the District, addressing deficiencies and taking into account planned development

A: Allocate new sites for open space and informal recreation facilities in accordance with the proposals set out in open spaces: sports and recreation report 2011 and the emerging play strategy

Or

B: As above but the emphasis being to provide new open space and informal recreation facilities as part of the redevelopment of larger sites

The Sustainability Assessment noted that both policy options make provision for new sites for new open space and informal recreation facilities (SA3 and SA14). Such improvements are likely to result in indirect benefits for the District, helping promote healthier lifestyles (SA3), reduce crime (SA4) and offer the potential for biodiversity enhancement (SA9). Supporting healthier lifestyles is particularly important in Shepway with its general lack of health facilities in the rural areas and a high proportion of individuals with limiting long-term illnesses. Policy A is informed by the Open Spaces: Sports and Recreation Report 2011 and the emerging play strategy, both of which identify the areas of greatest need for open spaces and informal recreation facilities. Relative to option B which focuses on major developments, Policy A is likely to maximise the benefits of new open space and informal recreation facilities.

However, the allocation of new sites for new open space and informal recreation facilities is more likely to result in the allocation of greenfield land, which has the potential to have an adverse effect on efficient use of land relative to regeneration of brownfield sites (SA11).

### Option 21

Providing enhancements to existing open spaces and formal and informal recreation facilities

A: Require developer or Community Infrastructure Levy (CIL)

contributions for new provision/ enhancements to nearby open space and recreation facilities to meet the needs of all new residential development

And/or

B: Require where practicable major new development to improve the quality of existing open spaces and recreation facilities in the local vicinity

Or

C. Require major development to provide on site open space provision based on the Fields in Trust Benchmark Standard

The District has a deficiency in good quality open space, particularly Parks. Furthermore, in recent years, some of the District's open space has been lost to make way for new housing development. Supporting healthier lifestyles is particularly important in Shepway with its general lack of health facilities in the rural areas and a high proportion of individuals with limiting long-term illnesses. All three policy options are likely to result in local investment for the provision of new and upgrading of open spaces and formal and informal recreation facilities (SA3 and SA14). Such improvements are likely to result in indirect benefits for the District, helping promote



healthier lifestyles (SA3) and to reduce crime (SA4). By allowing contributions to be pooled for green infrastructure, option A will enable the Council to address larger scale deficiencies and plan green infrastructure improvements strategically, maximising the above benefits for the District's communities.

However, Site-focused policy options B and C do not facilitate investment in District-wide green infrastructure schemes. This may reduce the Council's ability to tackle deficiencies in larger scale open spaces (SA14) or improve the connectivity of biodiversity networks (SA9).

## Conclusion

To be filled out once we have answers on above

## Playing Pitches

Playing fields are one of the most important resources for sport in England. They provide the valuable space required to maintain and enhance opportunities for people to participate both in formal team sports and in other more informal activities. Along with sporting benefits, good quality, accessible playing fields also contribute to maintaining active and healthy communities and securing wider reaching benefits.

### Box 3

Sports pitches can be provided as acceptable forms of open space on any site, and provision will be expected as per the advice of Sport England on the following sites coming forward in this plan period:

- Shepway Close, Folkestone
- Coolinge Lane Land, Folkestone
- Land at Lympne Airfield, Lympne

These need to be reflected in the site policies

Any playing pitches must meet the minimum sizes and dimensions as outlined in the standards set out by the Fields in Trust publication, *"Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard"*.

## Consideration of Options

### Option 22

The provision of upgraded community and formal recreation facilities

A: Allocate land in the plan for the provision of new facilities based on assessed needs

And/or

B: Allow a flexible approach to delivering new and improved community and formal recreational uses which may include the need to build on part of an area of existing open space in order to provide better quality facilities and bring about environmental improvements and regeneration

And/or

C: Allow more flexible use of vacant retail units for other business uses, community facilities or residential use

### Option 23

Creating a balance between permitting appropriate use of the countryside for recreation and protecting natural resources and the character of the rural areas

A: Develop criteria based policies for equestrian development and other recreational activities that are sustainable and appropriate to a rural location to ensure they respect the character of the countryside, based on the Kent Downs AONB Good Practice guide

Or

B: Rely upon generic design policies to assess such proposals

### Option 24

Rural services and creating a balance between protecting the countryside and supporting the rural economy

A: Develop criteria based policies for the re-use and adaptation of rural buildings and other development associated with small scale business uses in the countryside to ensure they respect the character of the Countryside and in particular the AONB

Or

B: Rely upon generic design policies to assess such proposals

### Option 25

#### Provision of new community facilities in Hythe

That development will be permitted on land at Princes Parade for a hub of new community uses including a leisure centre with swimming pool, a relocated Seabrook elementary school, and a canal side park.

Planning permission will be subject to the following requirements being met:-

- i. Any housing development being limited to that which is demonstrated to be necessary to providing sustainable community uses
- ii. The decontamination of the land
- iii. High quality design of buildings and landscaping that reflects the site's unique seafront location
- iv. Development preserving and where possible enhancing the setting of the Royal Military Canal and other heritage assets
- v. Provision of sustainable transport to and from the site

Or

Development will be permitted on suitable individual sites in and adjoining Hythe for essential new community uses and in particular a leisure centre with swimming pool and a relocated Seabrook elementary school.

Planning permission will be subject to the following requirements being met:

- i. The site is in a sustainable location with good access from a range of travel modes
- ii. The development would not have an adverse impact on the amenity of nearby residential properties
- iii. High quality design of buildings and landscaping are included
- iv. There would be no adverse incursion of the development into the open countryside
- v. There is no adverse impact on acknowledged heritage assets
- vi. The site is sequentially acceptable having regard to flood risk

And/or

Planning permission will only be granted on Land at Princes Parade for minor development that is related to low key leisure uses associated with the enjoyment of the adjoining coastline and canal and which preserves the predominantly open character of the site.

**10.21** Should the above be with the site policy

### **Sustainability Assessment- Issues and Options Stage**

**10.22** Most policy options have generally positive sustainability effects on the topics they address. Negative effects identified for certain policy options being considered included:

- The allocation of new sites for new open space and informal recreation facilities is more likely to result in the allocation of greenfield land than provision as part of regeneration of larger sites, which has the potential to have a minor adverse effect on efficient use of land relative to regeneration of brownfield sites (potential negative effects on SA11).
- Site-focussed policy options for open space provision do not facilitate investment in District-wide green infrastructure schemes. This may reduce the Council's ability to tackle deficiencies in larger scale open spaces or improve the connectivity of biodiversity networks (potential negative effects on SA9, SA14).
- Major development of community facilities on the edge of Hythe has the potential for adverse effects in relation to historic assets, landscape and biodiversity (potential negative effects on SA7, SA8, SA9).

### **Local Green Spaces**

**10.23** The open spaces within our towns and villages are a vital part of vibrant and sustainable settlements, their presence and configuration and the opportunities that they offer in contributing towards making places where we would wish to live, work or visit.

**10.24** The Council recognises the importance of safeguarding existing open space within the towns and villages through the district, such as Garden Squares and Local Wildlife Sites. This principle was re-established in the district on the adoption of the Core Strategy in September 2013 under Policy CSD4 – Green Infrastructure of Natural Networks, Open Spaces and Recreation, which looks at the protection, management and expansion of areas of green infrastructure within the district at a strategic level.

**10.25** The National Planning Policy Framework (paragraphs 76 and 77) makes provision for local communities, through local and neighbourhood plans, to identify special protection areas of particular importance to them. The District Council carried out a 'call for sites' for possible Local Green Spaces as part of the Issues and Options consultation but only received sites for Hythe and Lympe. The sites suggested are listed in Appendix 2.

**10.26** The National Planning Policy Framework states that Local Green Space designations will not be appropriate for most green areas or open space and should only be used:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.

## Policy C5

### Local Green Spaces

Within the designated Local Green Spaces, identified on the Policies Map development will only be permitted where:

1. It is justified by the needs of agriculture or recreation;
2. It can be demonstrated that it cannot be accommodated elsewhere;
3. It does not result in the loss of ecological habitats;
4. Measures are incorporated to reduce, as far as practicable, any harmful effects on the special character of the designated area.

### Options

## Option 26

### Local Green Space

Planning permission will only be granted for development proposals on designated Local Green Space that protect its openness, permanence and special quality.

The Council will support designation of Local Green Space through Neighbourhood Plans where the space has a special character and significance to the local community by virtue of its beauty, historic significance, recreational value or wildlife value

Or

The Council will protect and safeguard the extent of the district's Local Green Spaces as designated on the Policies Map by applying the same level of protection afforded to Metropolitan Green Belt in national planning policy to Local Green Spaces in the District

### **Sustainability Assessment- Issues and Options Stage**

## 11 Transport

### Street design, parking and the new hierarchy

**11.1** The 1960s and 70s concept of the street hierarchy sought to exclude vehicular traffic from residential areas, but in doing so eliminated direct connections between different areas of a settlement, thus limiting connectivity and community-building. This concept is alien to the original layouts of Shepway's settlements, and Folkestone in particular was laid out rationally in a grid that aided connectivity while providing sufficient space for street life. The Council will seek connectivity, conviviality and rationality as major themes in its development over this plan period, making sure new development is integrated with existing, and avoiding spatially-contiguous yet connectively-marooned communities.

**11.2** The approach towards accommodating vehicles in residential developments should be considered as an integral part of the design process and be informed by the Department for Transport's Manual for Streets (2007) and Kent Design. The Design and Access Statement that must be submitted with planning applications should be used to consider how the above issues relate to a specific site and, within the overall proposed design approach for the development establish the most appropriate approach towards parking. This is explored further below.

**11.3** A character and capacity based hierarchy should be taken to street design, ensuring that land is used efficiently and effectively by incorporating on street parking as an integral component of all street types, providing in-built capacity to manage parking demand as a fundamental component of place making.

**11.4** The way people experience the place they live and work in as they move through it has a crucial impact upon how it is perceived and how people behave. Public space and streets for traffic in residential areas are becoming increasingly blurred. The Manual for Streets encourages shared streets and a better balance between pedestrians and vehicles while ensuring accessibility for all. The nature of a street is influenced by its width, the height of adjacent buildings and factors such as surfacing and parking arrangements. In particular the height to width ratio influences the 'feel' of the place. Landscaping and the provision of appropriate street trees is often key in the creation of a successful and desirable place, softening hard infrastructure, and encouraging street life.

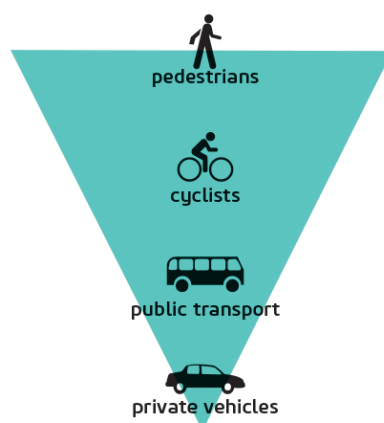
**11.5** Street hierarchy should provide an understandable transition from the external distributor roads where motor vehicular space requirements may be more dominant, to residential streets (covered by this Design Guide) where the needs of pedestrians and other non-car users are of greater importance.

**11.6** The following categories of roads are most suitable for residential frontage, and create different street uses and environments:



- Path: Primarily a pedestrian route but accessible for emergency vehicles and refuse collection. These are potentially enclosed by tall buildings on each side, overlooked, and allow access to residential units.
- Street: A standard street will include provision for parking on one or both sides. It will demonstrate active frontages, provision of pavements and traffic calming measures.
- Avenue: This is a broader street, tree lined and often framing views or leading to major places and public spaces. It is generally framed with taller buildings than a street.
- Mews: Smaller scale shared use surfaces and intended to be a common type within residential areas, often without pavements and with parking in courts.
- Square: A variety of spaces at key junctions and associated with a range of public uses. These are not necessarily pedestrian only areas, but are often shared surfaces but with car free areas adjacent to retail outlets or restaurants and against water.
- SuDS Street: Wherever possible, all streets will be SuDS streets, via which surface water will be moved in surface water channels into an aquifer via any necessary cleansing mechanisms such as reed beds and swales.

**11.7** There should be an understanding that almost all trips begin and end with walking. Reflecting that, the pedestrian will be the beginning and end of Shepway's design and implementation process. The design and operation streets should prioritise modes in this order: pedestrians > bicycle > public transport > private cars. In some circumstances, the hierarchy may be adjusted somewhat, such as along a segregated bicycle lane corridor. This hierarchy will influence street cross-sections, junction design, signal timings, and maintenance scheduling.



**Picture 11.1 Streets should be design to give precedence to those using them as per this hierarchy**

## Policy T1

### Street hierarchy and site layout

Planning permission for new major development will be granted if the Design and Access Statement submitted as part of the application demonstrates attention has been paid to street design. An application should demonstrate the following:

- Street hierarchy considering pedestrians first and private motor vehicles last.
- Permeability through and beyond the site for all users.
- The creation of an environment that is safe for all street users, which encourages walking, cycling and use of public transport.
- A range of street types creating legibility throughout the development, meeting the needs of all users, and not allowing vehicles to dominate.
- Active frontages only, throughout the development, for the purposes of natural surveillance and creating characterful places.
- Excessive street furniture and signage is included only when necessary for reasons of safety and comfort of the population.

Developers should ensure, with the support of Kent County Council as Highways Authority, active travel routes are a priority, both within developments and linking sites to other services, community facilities and transport hubs.

**11.8** The NPPF (paragraph 32) requires the submission of a Transport Assessment or Transport Statement for all developments that generate significant amounts of traffic movement.

**11.9** Transport Assessment - Developments over 80 dwellings (or others within Appendix B of the DfT's "Guidance on Transport Assessment" (GTA) will normally require the preparation of a full Transport Assessment (TA). The scope of the TA should be agreed in advance with the Local Authority and should be in accordance with current national guidelines. It should assess both traffic impact and transport sustainability, including an assessment of how well a scheme addresses the needs of pedestrians of all ages, cyclists and non-motorised users. A balance of the above choices, maintaining permeability and aesthetic quality, will be appropriate for new development.

**11.10** Transport Statement - Developments of between 50 and 80 dwellings (or others in the DfT's guidance) will normally require an abbreviated form of a TA, addressing certain limited issues that are relevant to the particular scheme. These will usually be access to pedestrian, cycle and public transport facilities. The scope of the Transport Statement should be agreed in advance with the Local Authority, and should cover accessibility as well as impact.

**11.11** If there is the possibility that a street will serve further properties in the future, for instance if there is an adjacent allocated site which is likely to be developed (and accessed through the first site) then the streets should be designed to the appropriate standard, or be capable of being altered in the future. No "ransom strip" or other gap should be left between the adopted highway and the site boundary, so that a durable and 'future proof' street layout can be provided.

**11.12** Good street design and effective use of the new hierarchy will bring about the following design outcomes:

- Quality street environments are established where the building frontage is prominent, positively addressing the street and not obscured by the car or garage.
- Convenient and safe routes between the parking space and house are provided.
- Car and cycle parking is safe and secure.
- An efficient use of the land is achieved without excessive land taken by parking and manoeuvring.

## Box 4

### Integrated design

There have been numerous examples of well-designed, integrated and executed development in Shepway in recent years. However, there have also been examples in which these aspects have fallen short of resident and Council expectations, and have not paid sufficient attention to guidance from statutory bodies, design boards or Council planners in the final product.



**Picture 11.2**

The above site, in the south of the district, echoes generic Kentish vernacular in terms of its building design, and provides a range of street types giving precedence to pedestrians and cyclists. However, there are a number of components of this design that could be improved.

Street furniture, including the bollards fronting the pedestrian walkway, appear out of keeping with the setting, and look like an afterthought. In line with these, the telephone exchange box sits prominently on the grass verge as a hurdle. The Kent Design Guide, and the document "Making it Happen" refer to such impositions as "visual clutter", which can impede the movement of pedestrian users, and detract from the streetscene. Choice of materials for the roadway, too, appear undifferentiated and disappointing.

While off-street parking has been integrated somewhat into the development (see left of picture), there are a number of houses along this street without adequate parking provision, with the segregated foot and cycle way with low lighting columns does not accord with "Secured by Design" principles. Penetration of this development is challenging, leads to an expanse of tarmac. A range of surfaces, timber bollards and street trees would significantly enhance the public realm.

**11.13** In the Issues and Options document the following policy directions were proposed:

### Option 27

#### T2 Site Layout

In assessing the layout of new residential development and mixed use schemes that include residential development priority should be given to -

A. Non car based modes of transport in the site layout

Or

B. Maximising the provision of on-site and off-site parking, including visitor parking in those areas with poor access to public transport.

And

C. Maximising permeability and enhancing pedestrian and cycle access;

Or

D. Reducing permeability in site layouts where needed to meet secure by design principles;

And

E. Provision of home zones and other pedestrian priority roads and spaces;

Or

F. Designing for a clear separation between vehicle movements and pedestrian and cycle movements.

## Sustainability Appraisal

**11.14** T2 - The District has a high dependency on the private car. All six policy options are likely to have a positive effect on improving transport links and accessibility in the District (SA10). Policy options A, C, E and F are likely to promote travel by sustainable modes (SA10) with indirect positive effects on climate change mitigation (SA2) and healthier lifestyles (SA3). Policy D is likely to have a positive effect on crime reduction through the promotion of secure by design principles (SA4). Policy B makes provision for private vehicles in areas with poor access to public transport and Policy D reduces permeability for sites that need to meet secure by design principles. Both policy options have the potential to have an adverse effect on the adoption of alternative modes of transport to the private car (SA10), with indirect adverse effects on climate change mitigation (SA2) and the promotion of healthier lifestyles (SA3).

## Conclusion

**11.15** The promotion of the new street hierarchy design principles above can effectively meet the NPPF's core requirement *"to make the fullest possible use of public transport, walking and cycling"*. Properly designed and easily accessible cycle storage facilities properly integrated into development, and indeed at strategic locations across the public realm, can encourage local journeys to be taken using more sustainable means. Initial steps towards this require careful design of streets and the careful integration of private vehicular traffic so as to ensure inappropriate parking, for example, does not prejudice the circulation of other forms of traffic (i.e. pedestrian, cycle or bus).

**11.16** There is real potential to marry many of the above policy options into a coherent policy for placemaking in Shepway, through the frame of the Street Hierarchy. This has the intended outcomes of promoting active travel and increasing wellbeing, creating aspirational residential development, decreasing crime and fear of crime, decreasing car dominance, promoting climate change measures, and increasing "street life".

**11.17** While the options given in parts C and D (above) may suggest an either/or scenario, it is recognised in Secured by Design that permeability of a development site in itself is not a problem. It is only when this permeability is designed as "unnecessary segregated footpaths" with no overlooking and without active frontages for natural surveillance that criminal activity may be more likely.

**11.18** The Council recognises that all sites and development proposals will be different, with different challenges and site conditions. "Home Zones", for example, can be encouraged, but not made mandatory as a blanket policy. Similarly, there are some situations in which segregated roadways will not be as safe as a shared space, and in many cases it will be up to the site designers to offer the best solution for the site within the broad parameters and theoretical logic presented in the policy above.

**11.19** It is considered that the Council's Preferred Option accords with the requirements of the NPPF's Chapter 4, and in particular paragraph 35 which requires the priority to be given to pedestrian and cycle movements, with access to high quality public transport facilities; safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter; incorporating facilities for charging plug-in and other ultra-low emission vehicles; and considering the needs of people with disabilities by all modes of transport.

## Parking

**11.20** A fundamental test for the quality of a street is its approach to parking. While some of Folkestone is fortunate to have benefited from well set-out streets able to accommodate retrofitting, in many other parts of the district parking has become a key concern for residents. Our streets need the flexibility to be able to support a modern reliance on the private vehicle both for economic and social reasons to avoid conflict and nuisance. The provision of on-street parking well-integrated into street design has the following advantages:

- The number of driveway crossovers is minimised, allowing for a continuous and accessible footpath along the street.
- Streetscape berms are retained to create a highly landscaped and attractive neighbourhood street, which encourages walking and cycling to local destinations.
- Streets are safer due to more activity on the street.
- On street parking is very space efficient and maximises quality open space and housing.
- Safe access to the front door on foot and cycle is enabled.
- Parked cars create a buffer between moving traffic and the footpath.
- Parking spaces are used more frequently because everyone can use them; therefore fewer spaces are needed overall compared to allocated spaces.
- Houses gain more open space at the front.
- Residents and passersby can keep a good eye on the cars in the neighbourhood.
- Helps create multi-functional places.

**11.21** The Shepway District Council Transport Strategy (2011) notes that there is a relatively low level of private car ownership in the district when compared with Kent as a whole, with an average of 1.15 cars per household. However, given the multi-polar spatiality of East Kent, and the limited public transport as compared with other areas, there is a persistent reliance on private transport for commuting, leisure and business activity. Car parking should be an integral part of the design of new development.

**11.22** There is evidence that insufficient parking, or parking in the wrong locations, leads to blocked and congested streets and pavement blocking. There is recognition that minimum parking standards are, rather than reducing car ownership, simply creating downstream parking problems. Recent Government guidance is that "Local

planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network".

**11.23** Kent County Council's Interim Guidance Note 3 (IGN3) provides an appropriate foundation for parking design, giving indicative minimum and maximum residential parking guidelines depending on location. This document was produced from Supplementary Policy Guidance SPG4 of the Kent and Medway Structure Plan, and provided an amplified level of interpretation for applying parking standards relevant to Kent. **Proposals for residential development and conversion should accord with this document, and these standards are presented in the table below.** While this is a useful indicative guide, there is scope for adaptation to the variation in specific development context across the district, and context must be another consideration in parking provision.



**Box 5**

**IGN3 Guidance Table for Residential Parking**

Location	City/Town Centre	Edge of Centre	Suburban	Suburban Edge/Village/Rural
<b>On-street Controls</b>	On-street controls preventing all (or all long stay) parking	On-street controls, residents' scheme and/or existing saturation (Note 3)	No, or very limited, on-street controls	No on-street controls, but possibly a tight street layout
<b>Nature of Guidance</b>	Maximum (Note 1)	Maximum	Minimum (Note 6)	Minimum (Note 6)
<b>1 &amp; 2 bed flats</b>	1 space per unit	1 space per unit	1 space per unit	1 space per unit
<b>Form</b>	Controlled (Note 2)	Not allocated	Not allocated	Not allocated
<b>1 &amp; 2 bed houses</b>	1 space per unit	1 space per unit	1 space per unit	1.5 spaces per unit
<b>Form</b>	Controlled (Note 2)	Allocation possible	Allocation possible	Allocation of one space per unit possible
<b>3 bed houses</b>	1 space per unit	1 space per unit	1.5 spaces per unit	2 independently accessible spaces per unit
<b>Form</b>	Controlled (Note 2)	Allocation possible	Allocation of one space per unit possible	Allocation of one or both spaces possible
<b>4+ bed houses</b>	1 space per unit	1.5 spaces per unit	2 independently accessible spaces per unit	2 independently accessible spaces per unit

Location	City/Town Centre	Edge of Centre	Suburban	Suburban Edge/Village/Rural
<b>Form</b>	Controlled (Note 2)	Allocation of one space per unit possible	Allocation of both spaces possible (Note 7)	Allocation of both spaces possible (Note 7)
<b>Are garages acceptable? (Note 4)</b>	Yes, but with areas of communal space for washing, etc.	Yes, but not as a significant proportion of overall provision	Additional to amount given above only	Additional to amount given above only
<b>Additional Visitor Parking (Note 5)</b>	Public car parks	Communal areas, 0.2 per unit maximum	On-street areas, 0.2 per unit	On-street areas, 0.2 per unit

**Table 11.1 : IGN3 Guidance Table for Residential Parking**

Notes

1. Reduced, or even nil provision is encouraged in support of demand management and the most efficient use of land.
2. Parking/garage courts, probably with controlled entry.
3. Reduced, or even nil provision acceptable for rented properties, subject to effective tenancy controls.
4. Open car ports or car barns acceptable at all locations, subject to good design.
5. May be reduced where main provision is not allocated. Not always needed for flats.
6. Lower provision may be considered if vehicular trip rate constraints are to be applied in connection with a binding and enforceable Travel Plan.
7. Best provided side by side, or in another independently accessible form. Tandem parking arrangements are often under-utilised.

**11.24** Residential parking should be designed as part of a place-making approach to design, creating streets that work for residents and are not dominated by the private car. To this end, advice in Building for Life 12 provides best practice guidance for residential parking. Some car parking should be provided on the street, wherever

practicable, in all development. Visitors should park on the street and walk to the dwelling where possible, and this should be designed to be possible. All cars should be surveyed from ground and upper floor windows. Include breaks in rows of on-street parking bays approximately every six spaces. This allows space for street trees to break up the impact of parking, and make it easier for pedestrians to cross the road.



**Picture 11.3 On-street parking is the Council's preference. Here it is appropriately integrated into the development.**

**11.25** While Kent County Council's IGN3 notes that the relative inconvenience of tandem parking can lead to inappropriate parking, and advises independently accessible spaces are provided for on-plot parking, this is not the approach encouraged by the Council. The Council feels that tandem parking can provide a positive solution where multiple spaces are required so that the building line can be maintained and the integrity of the overall streetscene is not undermined. It is acknowledged that the provision of tandem parking can have a small inconvenience factor, and therefore for every tandem relationship on a plot in suburban locations, and in rural locations where new streets are created, 0.5 unallocated flexible parking spaces should be provided on-street.

**11.26** Proposals for development, including the sub-division of larger properties, within areas with a history of on-street parking problems, including town centre areas will need to demonstrate that appropriate parking provision is available or is made.

## Policy T2

### Residential parking

Planning permission will be granted for schemes providing residential parking where the resident and visitor parking is sufficient and well integrated so that it does not dominate the street. Applicants should demonstrate:

1. Priority has been given to on-street parking in well-designed streets.
2. That there is sufficient parking for residents and visitors, with a preference for unallocated parking.
3. Parking is positioned close to people's homes.
4. Parking courtyards are small in size, with no more than five properties using each courtyard, and they are well overlooked.
5. Any roofed parking structures are proportionate so that they do not dominate the streetscene, and are well-integrated into the overall design of the development.
6. A variety of parking treatments on a single site of more than 5 dwellings.
7. A preference for tandem on-plot parking if more than one space is provided.
8. Spaces are of sufficient size to comfortably host a larger car, and on-plot spaces have sufficient space for the movement of wheeled waste bins to a collection point (as required)
9. A charging point for electric vehicles is included in every private car parking space.
10. Covered cycling facilities have been integrated into the residential parking offer.

Rear serviced parking layouts are to be discouraged, and will be permitted only where alternatives are not feasible.

A Transport Assessment (TA) will be expected at both pre-application and application stages to give a clear indication of how the proposed scheme impacts upon any existing adjoining on-street residential parking.

**11.27** In the Issues and Options document the following policy directions were proposed:

## Option 28

### T1 Parking Standards

A: Rely on adopted Kent County Council parking standards (IGN3), supported by national guidance, Kent Design and Shepway Transport Strategy

And/or

B: Produce new Shepway adopted parking standards based on local circumstances which also include criteria for the design and layout of parking spaces (including garages) in new developments

And

C: Adopted parking standards may be varied where:-

i) the location is well served by public transport and there would be no adverse effect on road safety or traffic management;

ii) this would allow development which would preserve or enhance the character or appearance of a conservation area, or assist the re-use of a building of architectural or historic interest which is a recognised heritage asset.

iii) Measures are included in the development or a commuted sum payment (section 106) contribution is made for improvements to or measures to assist encourage the use of public transport, cycling or walking.

And/or

D: In Folkestone Town Centre and Hythe Town Centre, new leisure, retail, office or commercial development should provide essential operational parking only on site.

## Sustainability Appraisal

**11.28** T1 - The District has a high dependency on the private car. Whilst air quality is generally not an issue, this nevertheless has negative effects in relation to traffic congestion and greenhouse gas emissions. Policy option A relies on existing planning policy and would therefore have a negligible effect relative to the SA baseline. Policy options B, C and D are likely to have a positive effect on transport (SA10) in the District by tailoring parking requirements to local needs. Policy options C and D go further than B in that they are more prescriptive, identifying specific areas or circumstances where parking and congestion are important issues and seeking to restrict the use of the private car in favour of more sustainable modes. Therefore,

policy options C and D are likely to have a more positive effect on sustainable transport (SA10), with indirect benefits for the District's ability to mitigate the effects of climate change (SA2).

## Conclusion

**11.29** It is acknowledged that Kent County Council's IGN3 parking standards serve and have served as a useful benchmark from the Local Highway Authority. While the above policy attends to its requirements, it also seeks to balance national government advice, local evidence of need, and climate change commitments. In practice, this is tough to achieve.

**11.30** The government's written ministerial statement of 25th March 2015 states, *"This government is keen to ensure that there is adequate parking provision both in new residential developments and around our town centres and high streets. The imposition of maximum parking standards under the last administration lead to blocked and congested streets and pavement parking."*

**11.31** The preferred policy of the Council, therefore, is to pursue a smarter parking policy that attempts to marry the often competing demands of different sectors. The district's dependence on the private car, as noted, is a county-wide phenomenon, and the district must respond to the very real local parking issues that result from this. In providing sufficient parking spaces, emissions can be reduced by avoiding unnecessary driving around hunting for parking spaces, and in turn avoiding unnecessary and inconsiderate parking. The preferred policy reflects option B.

**11.32** Despite this, there is a real drive for the promotion of use of greener travel options. To this extent, if electric charging points can be built in to all residential parking spaces, this can encourage use of lower emission vehicles.

**11.33** **WHAT ABOUT COMMERCIAL DEVELOPMENT AND TRAVEL PLANS?**

## Garages

**11.34** Given that garages can be variously used either for parking or for storage, or a combination of both, their use for vehicle parking is unreliable. The "Manual for Streets" highlights the propensity for many garages to be used for purposes of non-vehicular storage resulting in problems of displacement and inappropriate parking, which are issues needing to be considered by local planning authorities. While this is mitigated to some extent in urban areas by on-street parking controls, these are not always active in suburban or rural areas, leading to greater on-street parking risk.

## Policy T3

### Residential garages

Application for residential development or conversion will be approved if:

1. Free-standing or integral garages have **not** been included in the number of parking spaces in suburban or rural areas.
2. Integral garages are 'oversized' in town centre or edge of centre locations to allow for use both for car and sundry storage.

**11.35** Permissions and approvals will be subject to planning conditions that remove permitted development rights to prevent car barns/ports being retrofitted with doors post-construction outside of Council control.

**11.36** Design and Access Statements accompanying planning applications should fully explain the logic and approach to parking. Layout plans that clearly identify the status of parking spaces (i.e. allocated, visitor, unallocated), and the unit to which these relate, should be provided.

### Non Residential and Commercial Parking Standards

**11.37** The general guiding principles for the design of residential parking are equally applicable for non-residential and commercial parking, with the exception of the quanta to be provided. The standards provided by Kent County Council in its parking guidance note SPG4 applies to the use classes indicated.

- Land Use Class A1: Shops
- Land Use Class A2: Financial & Professional Services
- Land Use Class A3: Restaurants and Cafés
- Land Use Class A4: Drinking Establishments
- Land Use Class A5: Hot Food Take-aways
- Land Use Class B1: Business
- Land Use Class B2: General Industrial
- Land Use Class B8: Storage & Distribution
- Land Use Class C1: Hotels

- Land Use Class D1: Non Residential Institutions
- Land Use Class D2: Assembly & Leisure
- *Sui Generis*



**Box 6**

Transport Assessments and Travel Plans will be expected from development at the following thresholds:

<b>A1 Shops</b>	<b>1000m<sup>2</sup></b>
A2 Financial and Professional services	2500m <sup>2</sup>
A3 Restaurants and Cafés	1000m <sup>2</sup>
A4 Drinking Establishments	1000m <sup>2</sup>
A5 Hot Food Takeaways	1000m <sup>2</sup>
B1 (a) Office	2500m <sup>2</sup>
B1 (b and c) Research and Development / Light Industrial	3000m <sup>2</sup>
B2 General Industrial	5000m <sup>2</sup>
B8 Storage and Distribution	4000m <sup>2</sup>
C1 Hotels	100 bedrooms
D1 Primary and Secondary Schools, Further (FE) and Higher (HE) Education Establishments	New locations and expansion
D1 All Other Non-Residential Institutions	2500m <sup>2</sup>
D2 Assembly and Leisure	1000m <sup>2</sup>
D2 Stadia	1500 seats
<i>Sui Generis</i>	Individually Assessed

**Table 11.2 : Indicative Thresholds for Developments requiring preparation of transport assessments / travel plans**

**11.38** *Other areas have moved away from this approach, dividing non-residential parking into: Commercial; Industrial; Recreational; Service Industry; Disabled*

## HGV Parking

**11.39** Given the district's location on the strategic transport network between London and Continental Europe, significant flows of HGV traffic are experienced within the district. While provision for suitable stopping places from the M20 motorway is the responsibility of Highways England, there has been a rise in recent years of inappropriate parking and penetration of lorries in transit into local residential areas in search of a stopping place. The Council seeks to ensure through planning policy that HGV stopping places are well catered-for without the need to impact on local resident amenity.

**11.40** For the purposes of understanding this policy, the roads within the District can be classified as follows:

- **Primary routes:** These roads form the primary network for the District as a whole. All long distance vehicle movements between the main settlements in the District and beyond should be targeted towards these routes as they have the highest capacity and have been designed to accommodate proportionately more traffic movements than other routes.
- **Secondary routes:** These roads distribute traffic within residential and commercial areas of the District's settlements and include many rural roads which link some of the smaller settlements to the primary network. Much of the borough is made up of these routes which greatly contribute to its attractive and rural character.
- **Local distributors:** These roads distribute traffic within neighbourhoods. They form the link between secondary distributors and access roads.
- **Access roads:** These roads give direct access to buildings and land within neighbourhood.

## Policy T4

### Lorry parking

Applications for the provision of lorry parking and service facilities will be approved subject to the following criteria:

1. The site should be accessed from a designated strategic road network.
2. Proposals for the mitigation of noise from lorry movements and any associated commercial operations will need to be specifically addressed as part of any application.
3. Substantial landscaping and screening should be provided to mitigate the visual impact of the development and based on a strong landscape framework.
4. Suitable mitigation will be required to deal with artificial lighting to restrict the impact of the development on neighbouring existing residential properties or vulnerable uses.
5. Adequate space for access, sight lines, turning and manoeuvring must be provided in addition to the required parking spaces. These spaces may only be used for any purposes other than parking.
6. The minimum dimensions of a lorry parking space should be 15 metres by 3.5 metres (50 sq. metres).

Every effort should be made to inhibit the circulation of lorries, other than for delivery purposes, on local distributor and access roads within the district, to protect the amenity of local residents.

New residential development will be encouraged to include measures to discourage the parking of lorries.

## Cycle Parking Standards

**11.41** The NPPF provides clear support for Health and Wellbeing aspirations in local populations, through promoting healthy communities, as well as a promoting sustainable transport. Cycling is a clear means of achieving both these national aspirations, and assuring sufficient space associated with new residential development for storage must be a key planning requirement. The policy should also apply to development comprising conversion of a property, unless proven to be unviable or unfeasible.

**11.42** Shepway's parking standards seek to encourage the use of bicycles through making them easily accessible to users; to be protected from theft; and ensuring parking facilities are well integrated into the design of the overall development.

**11.43** Kent County Council cycle parking standards require high standards of security and should avoid the need to take bicycles a long way into a building. Developers are also advised to consult the best practice guidance produced by Cambridge City Council entitled "Cycle Parking Guide for New Residential Developments" as a useful and comprehensive guide to this topic.

**11.44** Any cycle parking provided in garages must allow cycles to be removed easily without first driving out any car parked within it, thus promoting cycling as the modal choice. When provided within the footprint of the dwelling or as a freestanding shed, cycle parking should be accessed by means of a door (secured by mortice lock) and be of a sufficient size to easily accommodate the required cycle provision and allow easy access to avoid the need for lifting of bicycles.

**11.45** For flats and other multi-occupancy dwellings, cycle parking should be sited within 20m of the relevant entrance of the building, and always closer than the nearest non-disabled car parking space. It should be adequately lit (as per the Council's light pollution planning policies), and provided with good surveillance (whether natural or via CCTV).

## Policy T5

### Cycle Parking

Planning permission will be granted for residential development subject to the provision of cycle parking at the following quanta:

<b>Individual residential developments:</b>	<b>1 space per bedroom</b>
<b>Sheltered accommodation:</b>	<b>1 space per 5 units</b>

**Table 11.3**

Parking should be provided either within the curtilage of a residential dwelling, or a secure communal facility where a suitable alternative is not available.

Any external residential cycle parking should be secure, covered, and preferably constructed from the same materials as the main structure.

Any planning application involving cycle parking should demonstrate how the proposal accords with the aspirations and guidance set out in Building for Life 12 with regard to the provision of cycling facilities.

Cycle parking requirements for non-residential uses will be provided in agreement with the Council.

## 12 Natural Environment

**12.1** National guidance is provided in paragraph 73 to 78 of the NPPF which are concerned with ensuring access to high quality open spaces for the community and recognising the contribution to health that such open space makes. Also of relevance is section 11 entitled "Conserving and enhancing the natural environment" which sets out government guidance on how the planning system should contribute to and enhance the natural environment. The Local Planning Authority also has legal duties in relation to Areas of Outstanding Natural Beauty (AONB) under section 85 of the Countryside and Rights of Way Act (2000) where it is required that 'in exercising or performing any functions in relation to, or so as to affect, land' in National Parks and Areas of Outstanding Natural Beauty, relevant authorities 'shall have regard' to their purposes. The Core Strategy Policy CSD4 is concerned with protecting, managing and enhancing Shepway's varied and extensive green and open spaces, including its water features and coast. These include unique landscapes and habitats that are of both national and international importance. Designated sites such as Special Areas of Conservation and Special Protection Areas have been part of conservation protection for so long that their ongoing importance is often underestimated. Despite more recent challenges like climate change and the need for habitat expansion, designated sites are still the most important tool for nature conservation.

### Access to the Natural Environment

**12.2** Access to the countryside and the natural environment is poorer in some parts of the district than others, in particular for some communities which also display relatively poor health indicators and high levels of economic disadvantage. A key issue is how best this position can be improved to ensure that a fair and accessible supply of green open spaces can be delivered through the planning system and one way of doing this is by improving access to the open countryside that surrounds the built up areas within the district. Linking the urban area to the countryside and key open spaces can be improved by making use of existing corridors such as rivers, canals and also the national cycle network. However access will also need to be managed due to the potentially damaging impact of recreational activity on over-wintering birds at the Dungeness SPA/SAC. Measures may include access management at Dungeness, such as increased wardening, and the creation/enhancement of appropriate green infrastructure to improve local access in less sensitive areas. Shepway District Council and Rother District Council have commissioned a study to consider how access to Dungeness may be managed and inform the final drafting of policy. Additional work will be undertaken as part of the Green Infrastructure Strategy review to establish a network of corridors and assets.

## Policy NE1

### **Enhancing and managing access to the natural environment**

To enhance access to the natural environment the Council will

- 1) Target opportunities for improvements on routes and links from urban areas where access is currently poor
- 2) Improve access to key open spaces from all areas
- 3) Manage access to SACs / SPA and require or enhance land to divert recreation activities away from those designations by the provision of enhanced facilities elsewhere, for example urban parks

**12.3** In the Issues and Options document the alternative options consisted of two separate policies

## Option 29

### **NE1 To enhance access to the natural environment**

A: To target opportunities for improvements on routes and links from urban areas where access is currently poor.

Or

B: To focus on a more general approach of improving access to key open spaces from all areas.

### **NE6 Ensuring that increased recreational pressure does not have an adverse impact upon the SAC/SPAs**

A: Develop policies and allocate land to divert recreation activities away from the SAC by the provision of enhanced facilities elsewhere, for example urban parks

And/or

B: Manage access to Dungeness SAC/SPAs complex

## Sustainability Appraisal

**12.4 NE1** - Both policy options are likely to have a positive effect in improving accessibility to the natural environment and their open spaces (SA3 and SA14). Both policy options have the potential to put the biodiversity at risk where habitats and species are sensitive to visitor pressure (SA9). **Recommendation:** Have regard in this policy to the need to avoid negative effects on biodiversity assets that are sensitive to visitor pressure.

**12.5 NE6** - Both policy options are likely to have a positive effect on enhancing biodiversity in the District (SA9). The allocation of additional SANG (Suitable Alternative Natural Greenspace) through the implementation of Policy A would result in the safeguarding of larger areas of land within the District making it harder to develop new residential (SA5), employment (SA6) and infrastructure schemes (SA10) in the District, with potentially adverse effects against their associated SA objectives. **Recommendation:** Provide links in the PPLP to existing evidence in relation to recreational pressure on the District's two European sites and on the most appropriate strategy for mitigating such pressure, if relevant. If such evidence is absent, engage with Natural England to explore this issue and, if relevant, to agree an appropriate mitigation strategy.

## Conclusion

**12.6** As stated in the Sustainability Appraisal both policy options of NE1 have the potential to have a positive effect in improving accessibility to the natural environment provided access was managed to avoid any negative impacts on sensitive biodiversity assets and given that NE6 was concerned with managing access to the SACs/SPAs (albeit primarily Dungeness) it seemed sensible to combine these options into one policy. The Council together with Rother District Council is commissioning a second stage in a study that will provide evidence on recreational pressure and an appropriate strategy to mitigate it. However whilst the approaches in the policies options were largely welcomed it was felt there are other vulnerable areas within the district There are areas in the district as a whole that are particularly subject to recreational pressures due to their location close to the main urban areas. Regard will also need to be given to those other European designated habitats within the district, including the Folkestone to Etchinghill SAC.

## Biodiversity

**12.7** All new developments are encouraged to take account of and incorporate biodiversity into their features at the design stage. The Policy below protects sites of biodiversity importance, which contain wildlife or geological features that are of special interest. Exceptions will only be made where no reasonable alternatives are available and the benefits of development clearly outweigh the negative impacts. Where a development proposal would result in any significant harm to biodiversity and geological interests that cannot be prevented or mitigated, appropriate

compensation will be sought. The Council will be updating its Green Infrastructure Plan which will identify areas such as the Biodiversity Opportunity Areas where enhancements to biodiversity can be targeted. This plan along with advice from partners will inform decision making in relation to identifying and protecting local wildlife corridors, incorporating beneficial features into development and deciding on mitigation measures.

**12.8** Incorporating green space into development makes it more pleasant as an amenity and more resilient to climate change, and is better for the health of people living and working there. Achieving gains for nature through planning is in line with the National Planning Policy Framework ambition to move “from a net loss of biodiversity to achieving net gains for nature”. Pollinator habitat can be created from new wildflower meadows, and bee-friendly landscaping of gardens to green roofs, green walls and bee hotels. The idea of a biodiversity offsetting system in England was announced in the Government’s Natural Environment White Paper - a 50-year vision for the natural environment published in 2011. Biodiversity offsetting is a proposed approach to compensate for habitats and species lost to development in one area, with the creation, enhancement or restoration of habitat in another. Under this system any negative impacts on the natural environment would then be compensated for, or ‘offset’ by developers through developer contributions provision /or CIL.



## Policy NE2

### **Biodiversity**

Planning permission will be granted for development where it can be demonstrated that all the following criteria have been met:

1. The biodiversity value of the site is safeguarded;
2. Demonstrable harm to habitats or species which are protected or which are of importance to biodiversity is avoided or mitigated;
3. The proposal has incorporated features that enhance biodiversity as part of good design and sustainable development, this should include the creation of new pollinator habitat suitable to the scale of development,
4. The proposal protects, manages and enhances the District's network of ecology and biodiversity sites, including the international, national and local designated sites (statutory and non-statutory), priority habitats, wildlife corridors and stepping stones that connect them;
5. Any individual or cumulative adverse impacts on sites are avoided;
6. The benefits of development outweigh any adverse impact on the biodiversity on the site. Exceptions will only be made where no reasonable alternatives are available; and planning conditions and/or planning obligations may be imposed to mitigate or compensate for the harmful effects of the development, this may include securing biodiversity offsetting as compensation for the impacts. Such compensation will be directed to biodiversity opportunity areas (BOAS) within the District or projects identified by the District's Green Infrastructure Plan

**12.9** In the Issues and Options document the alternative options consisted of several policies

### Option 30

#### **NE2 To provide for biodiversity offsetting**

Where major development proposals result in biodiversity loss, identify areas on site or off site for biodiversity offsetting on a case by case basis.

Or

Identify in the local plan boundaries for GI corridors which would be supported by developer contributions or CIL.

#### **NE4 Achieving a balance between accommodating new growth and ensuring the protection of important habitats and species that contribute to the biodiversity of the District**

A Develop additional policies to protect, manage and enhance important habitats and species that are not already subject to Core Strategy policy and national planning guidance.

And/or

B: Promote additional sites of biodiversity value to ensure that they are protected and sensitively managed, and where appropriate provide opportunities for access and education

Or

C: Concentrate on improving existing sites such as Local Nature Reserves

#### **NE5 Promoting the positive enhancement of biodiversity in the District**

A: Require developers to demonstrate how major development will maintain and where possible, positively enhance the biodiversity of the site

And/or

B: Require landscaping in new developments to use native species that reflect the landscape character of the area and safeguard existing key landscape features.

And/or

C: Where possible require developments to incorporate wildlife corridors / links between habitats

And/or

D: Require developers to provide an ecological survey at the time of submitting a planning application unless there is clearly no ecological interest on the site

## Sustainability Appraisal

**12.10** Policy **NE2**: Both policy options are likely to play a positive role in enhancing biodiversity in the District. Investment in green infrastructure can also result in indirect benefits to other strategic issues. The second policy option has a greater potential to conserve and enhance biodiversity by focussing investment in the areas where it is likely to have the greatest positive effect: GI corridors. Furthermore, establishing a link between biodiversity offsetting and CIL communicates more clearly the mechanism through which funds will be raised. As the catalyst for biodiversity offsetting is biodiversity loss, there is an inevitable risk of adverse effects on local biodiversity. **Recommendations**: It will be important to ensure that measures taken to offset loss significantly improve the condition and diversity of the wider habitat resource. **NE4**: Policy options A and B propose the protection and/or designation of additional areas of local conservation value to those already designated in National Planning Policy and the Core Strategy. This would likely result in the safeguarding of larger areas of habitat within the District. Policy C would concentrate investment on existing ecological designations thought to contain the most sensitive and valuable species and habitats in the District. Such an approach would maximise the existing ecological value of the District and potentially improve public access to well-managed environments. Policy options A and B are likely to result in the safeguarding of larger areas of habitat within the District making it harder to develop new residential, employment and infrastructure schemes in the District, with potentially adverse effects against their associated SA objectives. **NE5**: All four policy options are likely to have a positive effect on enhancing biodiversity in the District. Option A focuses the requirements for local ecological mitigation and enhancement on major developments, which is likely to improve the deliverability of small-medium scale developments in the District. Conversely, Policy D requires all developments to carry out ecological surveys helping to safeguard all habitats and species with ecological value. Option B is likely to make a positive contribution to the District's landscapes (SA8) but a more limited contribution to biodiversity. Option C has a more strategic focus, requiring developments to improve ecological networks and wildlife corridors. A strategic approach is likely to result in greater synergies with other strategic issues, such as climate change adaptation and flood resilience. Option A limits the ability for local planning policy to manage the cumulative effects of small-medium scale development on local biodiversity, with the potential for some adverse effects on biodiversity. Conversely, Option D is likely to hinder the deliverability of small-medium scale housing and employment developments in the District as it requires developments of all sizes to carry out an ecological survey. **Recommendations**: Policies NE2, NE4, NE5: Target biodiversity enhancement to the Biodiversity Opportunity Areas

to address targets in the Kent Biodiversity Action Plan and support the establishment or enhancement of landscape scale ecological networks, thereby maximising biodiversity benefits.

### **Conclusion**

**12.11** The preferred policy option takes on the Sustainability Appraisal issues to target biodiversity enhancement to the BOAs and to take a strategic approach to protecting/enhancing the district's ecological networks and wildlife corridors. This policy will be backed up by a revised Green Infrastructure Strategy for the district. Certain respondents felt that biodiversity offsetting should only be used as a last resort and that this would need to be preceded by an evaluation of current and potential sites, their condition, current management and opportunities for enhancement. The majority of respondents wanted a policy that will promote net gains in biodiversity wherever possible, not just for major development, but for all proposals. A few respondents wished to see the Council rely purely on the NPPF. However the NPPF is clear that there should be planning policies to minimise impacts on biodiversity and geodiversity that should:

- plan for biodiversity at a landscape-scale across local authority boundaries;
- identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;
- promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;
- aim to prevent harm to geological conservation interests; and
- where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas.

**12.12** Comments from the majority of respondents indicated that they want policies to protect their environment.

### **Protecting the Landscape and Countryside**

**12.13** The Kent Downs Area of Outstanding Natural Beauty (AONB) covers 878 sq.km from the Surrey border to the White Cliffs of Dover. The AONB roughly follows the southeast's outcrop of chalk and greensand, the two ridges running parallel with each other to the coast. The chalk ridge, with its dip slope and dry valleys, has great wildlife importance in its unimproved chalk grassland, scrub communities and broadleaved woodlands. Farming covers around 64% of the AONB. Expansive arable fields are generally on the lower slopes, valley bottoms and plateaux tops. Historically, the Kent Downs has supported mixed farming practices where arable crop production has co-existed with livestock grazing and horticulture. Broadleaf and mixed woodland

cover 23% of the Kent Downs. Almost 70% (12,129 ha) of the woodland resource is ancient woodland (continuously present since at least 1600). Ash is a particularly prominent tree in the Kent Downs AONB. Both in the woodlands and hedgerows ash forms a prominent and important part of the landscape. Kent Downs woodlands were one of the first areas in Britain to experience widespread infection from Ash Dieback and the landscape implications are thought to be serious with the expected death and weakening of the ash population. Hidden below the chalk is a significant aquifer providing 75% of Kent's drinking water. In the east Kent Downs, the Lympne escarpment of calcareous Sandstone and Ragstone provides a spur of higher ground affording dramatic views across the near-level Romney Marsh and Hythe Bay. The position of the Kent Downs, close to London, mainland Europe, major urban centres and growth areas means that the Kent Downs AONB, has faced severe development pressure.

**12.14** The landscapes within the AONB are highly valued; they need to be protected and enhanced to ensure that their nationally important status can be maintained. It is also important to protect views into and out of the AONB. There are a number of high quality landscape areas outside of the AONB and it will be necessary to consider whether these areas should benefit from a local landscape designation particularly where they are important to the setting of the AONB. Until a new landscape assessment is carried out of the whole district it is proposed to carry forward the designations, Special Landscape Areas and Local Landscape Areas of the previous plan.

### Policy NE3

#### **To protect the District's landscapes and countryside**

The impact of individual proposals and their cumulative effect on Kent Downs AONB and its setting will be carefully assessed. Planning permission will be granted where it can be demonstrated that all the following criteria have been met:

1. The natural beauty and locally distinctive features of the AONB are conserved and enhanced;
2. Proposals reinforce and respond to, rather than detract from, the distinctive character and special qualities of the AONB;
3. Either individually or cumulatively, development does not lead to actual or perceived coalescence of settlements or undermine the integrity or predominantly open and undeveloped, rural character of the AONB and its setting; and
4. Is appropriate to the economic, social and environmental well-being of the area or is desirable for the understanding and enjoyment of the area (where this is consistent with the primary purpose of conserving and enhancing natural beauty); and
5. The policy aims of the Kent Downs AONB Management Plan.
6. Special Landscape Areas are defined as follows and illustrated on the policies map:

North Downs (including the scarp and crest)

Old Romney Shoreline

Dungeness

Proposals should protect or enhance the natural beauty of the Special Landscape Area. The District Planning Authority will not permit development proposals that are inconsistent with this objective unless the need to secure economic and social wellbeing outweighs the need to protect the SLAs countywide landscape significance.

7. Local Landscape Areas are defined as follows and illustrated on the proposals map:

Romney Marsh

Sandgate Escarpment and Seabrook Valley

Eaton Lands

Coolinge Lane and Enbrook Valley

Mill Lease Valley

Proposals should protect or enhance the landscape character and functioning of Local Landscape Areas. The District Planning Authority will not permit development proposals that are inconsistent with this objective unless the need to secure economic and social well-being outweighs the need to protect the area's local landscape importance.

6. Outside of designated landscape areas, proposals should demonstrate that their siting and design are compatible with the pattern of natural and man-made features of the Landscape Character Areas, including cultural and historical associations,

Opportunities for remediation and improvement of damaged landscapes will be taken as they arise.

**12.15** In the Issues and Options document the alternative options consisted of the following:

### Option 31

#### **NE3 Protecting the District's landscapes and countryside**

A: Commission a landscape appraisal that identifies areas of countryside in addition to the AONB that make an important contribution at a local level to the natural beauty of the district and develop policies to ensure that they continue to contribute to the character of the area, protect the natural environment and are not adversely impacted by new development

And/or

B: Develop a criteria based policy, in addition to Core Strategy and national policy, to protect and manage the AONB, including views into and out of it, in line with the AONB Management Plan

And/or

C: Develop policies to protect the high quality areas of landscape that abut the AONB

#### **Sustainability Appraisal**

**12.16** All three policy options are likely to have a positive effect on improving the quality and character of the District's landscapes. The protection of the countryside is likely to have indirect benefits for other strategic issues, such as biodiversity enhancement. Policy option A will result in creation of a robust evidenced-based policy that considers the landscape value of the entire District rather than just the AONB in Policy B and high quality areas that abut the AONB in Policy C and is therefore likely to result in maximising the positive effect on the District's landscapes. Policy options B and C focus on the landscapes and countryside within and immediately adjacent to the AONB. Therefore, these policy options are likely to neglect other areas of the District with high quality landscapes and countryside.

#### **Conclusions**

**12.17** The preferred option seeks to protect the AONB, its setting and high quality areas over the whole of the district. A new landscape assessment has been carried out of the Romney Marsh. Respondents were supportive of developing all three options. They also felt that landscape appraisal work would support the setting issue associated with the AONB and enable the creation of local landscape designations (for setting areas and other locations) if considered appropriate. The Kent Downs AONB Unit has produced an AONB Management Plan on behalf of the constituent Authorities. The AONB Management Plan and its supporting documents identify the distinctive features and characteristics of the landscape and provide the framework



for the management and ongoing spatial planning of the Kent Downs AONB. The Management Plan does not formulate land use planning policies but is a component of the decision making process in planning applications. The status of the Management Plan combined with the thorough process of plan making and review means that the AONB Management Plan and its policies are a material consideration in planning matters and should be afforded weight in decisions. The National Planning Practice Guidance confirms this, and supports the evidence and principles established in the Management Plan being taken into account in local planning authorities' Local Plans and in Neighbourhood Plans.

### **Equestrian Development**

**12.18** Much of the district is rural in character, and development related to the keeping of horses will be expected as one component of rural character.

**12.19** In many cases, this type of development will not require planning permission. Stables for horses kept for the individual enjoyment of a household and not for any commercial gain may be erected within a domestic garden without applying for planning permission, subject to the restrictions which apply to outbuildings within domestic gardens. These restrictions are set out in Schedule 2, Part 1, Class E of the Town and Country Planning (General Permitted Development) Order 2015. However, it should be noted that in some cases these rights have been taken away.

**12.20** The erection of stables, associated tack-room and feed-store buildings and the installation of arenas on agricultural land will require planning permission from the Council for the change of use of the land, as well as for the new building and/or engineering work involved. Planning law currently makes a distinction between horses that are 'grazing on land' and horses that are 'kept on land'. A court judgement in 1981 (known as *Sykes v Secretary of State*) took the view that horses simply turned out on land are 'grazing', which does not require planning permission, whereas 'keeping horses' on land does require planning permission for change of use. The distinction rests upon factors such as the addition of permanent buildings or structures, use of the land to ride, drive, train or other activities which indicate 'keeping' rather than simply 'grazing'.

**12.21** Manèges, or outdoor arenas, require planning permission. These areas change the appearance of land and are usually fenced with timber posts and rails. These often require substantial earthworks since they need to be completely flat.

**12.22** If in doubt, advice should be sought from the local planning authority in advance of any development. The Kent Downs AONB Unit has produced an invaluable document, "*Managing Land for Horses: A guide to good practice in the Kent Downs Area of Outstanding Natural Beauty*", which advises on all matters relating to equestrian activity, including the planning issues around this, relating to that area. The document, however, constitutes good practice for the whole district on this issue.

## Policy NE4

### **Equestrian Development**

Planning applications for equestrian-related development, including the change of use of land, will be permitted where proposals meet the following criteria:-

1. There would be no detrimental impact on the character or appearance of the rural landscape, especially within the Kent Downs Area of Outstanding Natural Beauty and the Special Landscape Areas;
2. Existing buildings are reused where possible but where new buildings are necessary, these are well-related to existing buildings, appropriate to the number of horses to be kept and the amount of land available. The scale and design of the development is appropriate to the character of the locality;
3. Adequate provision can be made to meet access, servicing and parking requirements without detriment to the visual and other amenities of the locality and it will not generate traffic of a volume and type inappropriate to the locality;
4. Applicants can demonstrate that sufficient land is available for grazing and exercise to ensure the safety and comfort of horses and avoid excessive erosion of soil and vegetation;
5. Development does not unacceptably affect local amenity by virtue of smell, noise, lighting or road safety;
6. Any jumps or other related equipment should be well designed and maintained and, removed when not in frequent use.
7. It does not result in the irreversible loss of the best and most versatile agricultural land;
8. The proposal does not lead to the need for additional housing on site; and
9. The proposal is well related to or has improved links to the existing bridleway network, with no impact on the bridleway capacity to accommodate the growth.
10. Suitable provision can be made to deal with foul and surface water drainage and soiled bedding materials.

Planning permission granted for buildings related to horse keeping activities will be subject to a condition that structures are temporary and are removed when the use of the land for such purposes ceases. Particular consideration will be given to the cumulative effects of proposals on the local area and the wider landscape and environment.

**12.23** In the Issues and Options document the alternative options consisted of the following:

### Option 32

#### **C4 Creating a balance between permitting appropriate use of the countryside for recreation and protecting natural resources and the character of the rural areas**

A: Develop criteria based policies for equestrian development and other recreational activities that are sustainable and appropriate to a rural location to ensure they respect the character of the countryside, based on the Kent Downs AONB Good Practice guide

Or

B: Rely upon generic design policies to assess such proposals

### **Sustainability Appraisal**

**12.24** Policy option A's criteria-based approach is likely to promote the development of appropriate recreation uses in the countryside while safeguarding the special character of the countryside. By encouraging the creation of new recreational uses in the countryside, Policy A is likely to have indirect benefits for promoting healthier lifestyles in the District and generating new sources of employment. Policy option B would have a negligible effect relative to the SA baseline as it relies on existing planning policy.

### **Conclusion**

**12.25** As concluded by the Sustainability Appraisal the most effective approach is a criteria based one which will safeguard the countryside whilst encouraging new recreational uses.

## **Light Pollution**

**12.26** Light pollution is the light that is wasted upwards and reflects off the atmosphere, causing the visible blanket cover that hangs over major cities at night. It is a problem for various reasons, including energy wastage, effects on human health and psychology, erosion of tranquillity, and disruption of ecosystems.

**12.27** National Planning Guidance states that, while in new development artificial light may be needed and can provide social benefits especially in terms of sport and recreation, in many cases it is not needed and may cause annoyance and negative ecological outcomes. For maximum benefit, the best use of artificial light is about getting the right light, in the right place and providing light at the right time.

**12.28** The Marsh area currently enjoys some of the darkest skies in the south-east, with parts of the western marsh having been measured by global satellites as 'intrinsically dark' as per NPPF paragraph 25, and therefore worthy of particular protection.

**12.29** Good practice, however, advises appropriate lighting design in all development throughout the district to avoid obtrusive light. Obtrusive light is generally a consequence of poorly designed or insensitive lighting schemes. The three main problems associated with obtrusive light are:

- *Sky glow* - the orange glow we see around urban areas caused by a scattering of artificial light by dust particles and water droplets in the sky;
- *Glare* - the uncomfortable brightness of a light source when viewed against a darker background; and
- *Light trespass* - light spilling beyond the boundary of the property on which a light is located.

**12.30** Sky glow is the result of inefficient and ill-directed lighting and reduces the ability of people to see the natural night sky. This is a problem found not only in urban areas but also in rural areas where dark skies at night are one of the special and intrinsic qualities of the rural landscape. Artificial lighting can also detract from local character by introducing a suburban feel into rural areas.

**12.31** Glare and insensitive lighting can have serious implications for motorists who may become distracted or blinded by glaring lights spilling out on to the highway. Bright or inappropriate lighting in the countryside can also have significant ecological implications.

**12.32** Obtrusive light in rural locations can affect the natural diurnal rhythms amongst a wide range of animals and plants. Light trespass is a common problem and can intrude on the residential amenity in both urban and rural settings causing stress and anxiety for people affected. In addition to these specific problems, obtrusive light represents a waste of energy, resources and money.

**12.33** Local Planning Authorities are advised to distinguish between broad areas that merit different levels of lighting control, as outlined in the Institution of Lighting Professionals (ILP), Guidance Notes for the Reduction of Light Pollution (2011). This can then be used to test the impacts of external artificial lighting will be judged.

**12.34** The Council will require the applicant to assess the need for the lighting scheme proposed, taking into consideration whether the development could proceed without lighting, whether the benefits of lighting outweigh any drawbacks and if there are any alternative measures that may be taken. No lighting is ultimately the best solution in the most sensitive locations and therefore the Council will ensure that only lighting schemes that are strictly necessary are approved in these locations. The Council will also take account of the requirements of the Highway Authority (KCC or Highways Agency) with regard to proposals relating to highway safety to secure the most appropriate solution with least light pollution.

## Policy NE5

### Light pollution and external illumination

Applications for major development, and development including significant external lighting, will be approved if:

- The proposal does not materially alter light levels outside the development site and/or has the potential to adversely affect the use or enjoyment of nearby buildings or open spaces
- An existing neighbouring light source makes the site unsuitable for a particular use (e.g. hospital)
- The proposed lighting scheme accords with the best practice guidance provided by the Institution of Lighting Professionals (2011) relevant to the particular Environmental Zone (see table below).

Applications should include a lighting assessment with details of the following:

- where the light shines;
- when the light shines;
- how much light shines; and
- possible ecological impact.

Zone	What is acceptable?	Where does this apply?
E0	Protected: No decorative lighting acceptable.  Security lighting acceptable only in exceptional circumstances.	Not yet applicable in this district.
E1	Natural: External lighting to be limited to accord with ILP lighting guidance for this zone.  Decorative lighting generally inappropriate.  All lighting must be extinguished after 23:00 except in exceptional circumstances.	North Downs AONB; SSSIs; rural areas outside settlement confines.

Zone	What is acceptable?	Where does this apply?
E2	Rural: For large-scale developments, lighting levels should accord with ILP technical guidance for this zone.	Within identified secondary and primary village confines, Hawkinge, Seabrook, Saltwood, and suburban areas of New Romney, and Hythe.
E3	Suburban: External lighting levels should accord with ILP technical guidance for this zone.	Suburbs of Folkestone, and New Romney and Hythe town centres.
E4	Urban: External lighting levels should accord with ILP technical guidance for this zone. Street lighting proposals should be carefully planned and specified to achieve best practice in light pollution control.	Within Folkestone town centre

**Table 12.1 : Obtrusive Light Limitations for External Lighting Installations**

Allowable limits are presented in Appendix XXX.

**12.35** Developments in the District’s High Speed 1 and Channel Tunnel safeguarded zones shall be so designed to avoid dazzle and glare or light shed which could cause hazard or distraction to operators from any lighting system which forms part of the development or is amended locally to accommodate the development. All proposals for lighting systems, either temporary or permanent, shall be submitted in writing and approved by the Local Planning Authority in consultation with operators. Unless otherwise agreed in writing with the Local Planning Authority in consultation with operators, the approved scheme shall be implemented. This is for reasons of safety as, depending upon the orientation and shrouding of the lighting or component lighting levels and the position of the development, lighting can interfere with sighting of signals.

**Land Stability**

**12.36** With regard to the stability of land, and following the requirements of the NPPF paragraph 120, Planning Practice Guidance has the triple aims of minimising risk and effects of land stability on property, infrastructure and the public; helping ensure that various types of development should not be placed in unstable locations without various precautions; and to bring unstable land, wherever possible, back into productive use.

**12.37** Local geology in Shepway varies, often substantially, over short distances. There is a belt south of the M20, which runs south of Lympe, and through Hythe, Saltwood and Sandgate, where the geology is predominantly Folkestone Beds/Sandgate Beds overlaid by Gault Clay. Groundwater is particularly found at the interface between the Folkestone and Sandgate Beds, and this has been a contributory cause of landslips in this area in the past.

**12.38** The area identified as at risk of landslip has increased over recent years, largely as a result of increased technological sophistication to be able to identify where land is or can be made less stable. While the Council will not necessarily refuse development within these areas, professional expertise must be sought for any activity within these identified zones that may prejudice the endeavour or any property in the vicinity.

## Policy NE6

### Land Stability

Planning permission will be granted for development within the area defined on the Policies Map if investigation and analysis is undertaken by a competent accredited authority which clearly demonstrates that the site can be safely developed. This analysis should also demonstrate that the proposed development will not have an adverse effect on the slip area in part or as a whole.

Where proposals affect land where instability is suspected, any planning application must be accompanied by a land stability or slope stability risk assessment report which:

1. Identifies and assesses the degree of instability;
2. Identifies the measures required to mitigate against any risk identified in 1 (above);
3. Specifies routine monitoring (as appropriate); and
4. Addresses the need for formal environmental assessment arising from any stabilisation works.

The Council will look favourably on schemes that can bring unstable land back into use, subject to other planning considerations.

**12.39** In the Issues and Options document the following policy directions were proposed:



### Option 33

#### **GD3 Ensuring the consideration of environmental issues such as land instability, contamination and pollution**

A: Set out measures to deal with the impacts of noise, light and dust pollution either affecting the proposed development, or arising from it

And/or

B: Encourage development on brownfield sites affected by contamination which can effectively remediate the contamination

And/or

C: Set standards to ensure that land contamination on development sites is adequately mitigated to provide a safe environment for future occupants

And/or

D: Require consideration of refuse storage and recycling storage with suitable access arrangements for collection to be incorporated into all development proposals:-

And/ or

E: Require evidence when an application is submitted or by planning condition as appropriate that sites within land instability areas can be safely developed without adverse impact on the site or adjoining land.

### **Contaminated Land**

**12.40** The UK, as the first country in the world to industrialise, has a legacy of land contamination. The re-use of land has resulted in contamination, which may pose risks to human health and the environment. The NPPF states that responsibility for securing a safe development rests with the developer and/or landowner.

**12.41** While Shepway's levels of contaminated land are not high either nationally or locally, the presence of contamination is a planning consideration and will be taken seriously by the local planning authority. The Council will expect to see consideration of potential for contamination in Screening Report, given that any residential development would be 'vulnerable to the presence of contamination'. For major development, an application will always be accompanied by a contamination assessment including a Phase 1 investigation, consisting of a desk-based study, site walkover and conceptual site model.

## Policy NE7

### Contaminated Land

When development is proposed on or near a site that has been used for the purpose of waste disposal, is known to be contaminated, or there is good reason to believe that contamination may exist, the applicant will be required to carry out a site assessment and submit a report of the findings in order to establish the nature and extent of the contamination.

Development will be permitted subject to the identification of and commitment to implementation of practicable and efficient measures taken to treat, contain and/or control any contamination so as to:

1. protect the occupiers of the development and neighbouring land users, including in the case of housing the users of gardens, from unacceptable risk.
2. ensure the structural integrity of any building built or to be built on or adjoining the site.
3. prevent contamination of any watercourse, water body or aquifer.
4. prevent the contamination of adjoining land or halt existing contamination.

Any permission for development will require that the remedial measures agreed with the Authority must be completed as the first step in the carrying out of the development.

**12.42** In the Issues and Options document the following policy directions were proposed:

### Option 34

#### **GD3 Ensuring the consideration of environmental issues such as land instability, contamination and pollution**

A: Set out measures to deal with the impacts of noise, light and dust pollution either affecting the proposed development, or arising from it

And/or

B: Encourage development on brownfield sites affected by contamination which can effectively remediate the contamination

And/or

C: Set standards to ensure that land contamination on development sites is adequately mitigated to provide a safe environment for future occupants

And/or

D: Require consideration of refuse storage and recycling storage with suitable access arrangements for collection to be incorporated into all development proposals:-

And/ or

E: Require evidence when an application is submitted or by planning condition as appropriate that sites within land instability areas can be safely developed without adverse impact on the site or adjoining land.

### **Sustainability Appraisal**

**12.43 GD3** - All the policy options described should encourage the efficient use of land and ensure that environmental issues such as noise, contamination and land instability are given full consideration in the planning process (SA11). Option D would help to ensure that waste planning is fully integrated into development proposals so that communities have integrated local services (SA3), which will help to reduce congestion in local areas (SA10). In addition, option E goes beyond the requirement of para 120 of the NPPF, by not only ensuring that the developer and/or landowner provides evidence that land stability issues are safely secured, but that the LPA will use measures of oversight, e.g. planning conditions, to ensure that these are effectively implemented.

## Conclusion

**12.44** The NPPF (paragraph 121) requires that planning policies ensure that any site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation. It also requires that after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and that adequate site investigation information, prepared by a competent person, is presented.

**12.45** The policies presented above meet the requirements of the NPPF and NPPG in relation to contamination and land stability, and light pollution.

## The Coast

**12.46** The Marine and Coastal Access Act 2009 (the Act) provided for the introduction of a marine planning system for England's inshore and offshore marine area. As the UK marine area and marine plan area boundaries extend up to the level of mean high water spring tides while terrestrial planning boundaries generally extend to mean low water spring tides (including estuaries), the marine plan area will physically overlap with the boundaries of the Places and Policies Local Plan.

**12.47** The Government's vision for the marine environment is:

### Statement 5

'clean, healthy, safe, productive and biologically diverse oceans and seas'

## Integrated Coastal Zone Management

**12.48** Integrated Coastal Zone Management means adopting a joined-up approach towards the many different interests in coastal areas – both on the land and at sea. In coastal areas, local planning authorities are required by the NPPF paragraph 105 to take account of the UK Marine Policy Statement and marine plans and apply Integrated Coastal Zone Management across local authority and land/sea boundaries, ensuring integration of the terrestrial and marine planning regimes. The designation of Coastal Zone Management Areas will be based on evidence and will require joint working with adjoining Kent authorities with connecting coastlines. The NPPF further states that risks arising from coastal change should be reduced by avoiding inappropriate development in vulnerable areas or adding to impacts of physical changes to the coast.

**12.49** Marine planning, including the preparation of Marine Plans, will be carried out by the Marine Management Organisation (MMO). Marine Plans must be consistent with the Marine Policy Statement and they will make a significant contribution towards coastal integration. They will guide developers about where they are likely to be able to carry out activities or where restrictions may be placed on what they do. Shepway falls within the South Inshore Marine Planning Area, the Marine Management Organisation consulted on a draft Marine Plan options for this area last year. Until the implications of this work are fully understood, it is premature for the Council to pre-empt the outcome of the marine planning process. In the interim, the MMO is being consulted under the Duty to Co-operate.

**12.50** Much of Shepway is low lying with 195km (55%) lying within the Environment Agency's Zone 3a flood risk area. The Council's Strategic Flood Risk Assessment (SFRA) 2009 provides an analysis of the main sources of flood risk to the District, together with a detailed means of appraising development allocations and existing planning policies against the risks posed by coastal flooding over this coming century. The Council are currently working with their consultants on up dating the provisions of the SFRA taking account of more recent climate change data and improved flood defences. This document alongside detailed national planning guidance and policies in the Core Strategy will inform the council when making decisions on land use designations and planning applications in a flood risk area.

## Policy NE8

### **Integrated Coastal Zone Management**

Development in coastal areas should pay regard to the aims and objectives of the Shoreline Management Plan and the emerging Marine Plan. The District Council will promote with partners 'Integrated Coastal Zone Management', including the preparation of a comprehensive management plan for the coast. Proposals and initiatives will be supported that promote the following general objectives:

1. Facilitate the economic, environmental and social well-being of the area;
2. Address proposals for the coastline and coastal communities set out in Coastal Defence Strategies and Shoreline Management Plans;
3. Contribute to greater safeguarding of property from flooding or erosion and/or enable the area and pattern of development to adapt to change, including the relocation of current settlement areas, and vulnerable facilities and infrastructure that might be directly affected by the consequences of climate change;
4. Provide resources to improve the process of harbour and coastal management, incorporating and integrating social, recreational, economic, physical and environmental issues and actions;
5. Improve infrastructure to support sustainable modes of transport, especially cycleways, bridleways and footpaths, including the National Coastal Footpath

**12.51** In the Issues and Options document the alternative options were as follows:

## Option 35

### **CP1 Integrated Coastal Zone Management**

Establish criteria that integrate the aims and objectives of the shoreline plan and marine plans with local plan policies for establishing Coastal Change Management Areas (see CP2 below)

Or

Define Coastal Change Management Plans in the body of the plan.

## Sustainability Appraisal

**12.52** Policy options will help to reduce the risk of flood from coastal change by avoiding inappropriate development in vulnerable areas (SA1). Both options may also have indirect positive effects in relation to safeguarding the special qualities of the Shepway Coastline. The protection and enhancement of these special qualities is likely to make the District's coastline a more popular place to visit, live and work, with positive effects on employment in the District. Both policy options are likely to result in the safeguarding of large areas of the District's coastline which could make it harder to develop new residential (SA5), employment (SA6) and infrastructure schemes (SA10) in the District, with potentially adverse effects against their associated SA objectives.

## Conclusions

**12.53** A Coastal Change Management Area will only be defined where rates of shoreline change are significant over the next 100 years, taking account of climate change. The NPPF states that local authorities should define Coastal Change Management Areas (CCMAs) where they are needed to help reduce the risk of flood from coastal change by avoiding inappropriate development in vulnerable areas. The NPPF states that CCMAs should be designated in any area likely to be affected by physical changes to the coast. CCMAs will not need to be defined where the Shoreline Management Plan (SMP) policy is to 'hold the line' or 'advance the line' for the whole period covered by the SMP. For the South Foreland to Beachy Head SMP, the policy for the majority of locations is hold the line, for Hythe Ranges and Lydd Ranges it is managed realignment. For Copt Point the policy is no active intervention. Currently it is not proposed to define a CCMA but this will continue to be discussed with the Environment Agency. It is considered that the proposed policy will help to reduce the risk of flood from coastal change.

## Development on the coast

**12.54** The cliffs between Folkestone Warren and Dover, included within the AONB, are designated as Heritage Coast in recognition of their national importance. Policy CO6 of the Shepway District Local Plan Review (2006) stated that " the District Planning Authority will give long term protection to the Folkestone and Dover Heritage Coast and to the areas of undeveloped coast shown on the proposals map. Within these areas development will not be permitted unless proposals preserve and enhance natural beauty, landscape, heritage, scientific and nature conservation value (consistent with any agreed management plan). In all cases, it must be demonstrated that a coastal location is required for development and that no suitable site exists along the developed coast. Proposals should where practicable also maintain or improve public access to the coast where this can be achieved without compromising conservation objectives".

**12.55** Besides the Heritage Coast there are also significant areas of other undeveloped coast within the District, which are dynamic and vulnerable to coastal processes and often specifically identified for its nature conservation importance. The main stretch of undeveloped coast spans from Dungeness to Greatstone-on-Sea although smaller expanses exist between the built-up coastal areas from Littlestone to Hythe. Areas range in character from sand dunes to tidal mudflats to extensive shingle deposits. The seaward boundary for both the Heritage and undeveloped coast reflects the mean low water mark. Outside settlement boundaries and villages in the settlement hierarchy, the character of the District's undeveloped coast, should be protected and enhanced. Development in close proximity to the sea suffers physical damage caused by wave and wind borne sand, grit and shingle and chemical degradation of materials from saltwater and spray. Essential to the efficient and effective maintenance and repair of storm damage to coast protection and sea defence works is the easy access for plant and vehicles from the highway to the sea wall/beach. There is provision within the Environment Agency's Land Drainage and Sea Defence Bye-laws for the consent of the Environment Agency to be obtained for any works between low water mark and a line 15 metres from the landward side of the defences it maintains. Reference must be made to the relevant Shoreline Management Plans and Coastal Defence Strategy to ensure that any proposed development is not affected by a coastal management policy or "managed realignment" or "no active intervention". Even in areas where the policy is "hold the line" there is no guarantee of future funding and it is anticipated that all coast protection schemes will require a degree of contribution in order to secure government grant.

**12.56** Seascape is defined by the Marine Policy Statement as 'landscapes with views of the coast or seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other'. The Seascape Character Assess for the Dover Strait was published in July 2015, it provides a spatial classification of Seascape Character Types (SCTs) and Seascape Character Areas (SCAs). It's intended use is to assess the impact of any proposed development or new use, whether onshore or offshore, from a marine and coastal perspective.



## Policy NE9

### Development around the coast

The District Planning Authority will give long term protection to the Folkestone and Dover Heritage Coast and to the areas of undeveloped coast shown on the Policies Map. Within these areas development will not be permitted unless proposals preserve and enhance natural beauty, landscape, heritage, scientific and nature conservation value (consistent with any agreed management plan). Planning permission will be granted for development in the coastal area, outside of Settlement Boundaries, where it can be demonstrated that all the following criteria have been considered:

1. There are no harmful effects on or net loss of nature conservation or areas of geological importance
2. The development provides recreational opportunities that do not adversely affect the character, environment and appearance of the coast
3. Regard has been shown to the high quality and inclusive design of new buildings in coastal locations in accordance with other relevant design and historic environment policies;
4. There are measures for mitigation of any detrimental effects including where appropriate the improvement of existing landscapes relating to the proposal;
5. Where appropriate, opportunities have been taken to upgrade existing footpaths and cyclepaths, enhance and protect the National Coastal Footpath and ensure that public access is retained and provided to connect existing paths along the waterfront;
6. The development would not be detrimental to infrastructure for, and quality of, water-based recreation, or be detrimental to the safety of navigation.
7. Development should be informed by and complement the distinctive characteristics of the Seascape character areas and types identified in the Kent Seascape Character Assessment.

The Council will seek to safeguard a minimum of a 15 metre strip of land immediately behind the landward edge of the existing or proposed sea defence or coast protection works to facilitate access for plant and materials used in connection with their maintenance or repair.

The Council will seek to safeguard a minimum of a 25 metre strip of land, measured from the landward edge of the existing or proposed sea defence or coast protection works in harsh marine environment areas in order to prevent

storm damage to buildings. Planning permission will be granted for a replacement dwelling unless there is past evidence that the existing or demolished property has been damaged as a result of the harsh marine environment. Repeat applications for replacement dwellings will be refused unless the applicant can demonstrate no future harm.

Heritage coast site shown on the Policies Map:

- Folkestone/Dover

Other undeveloped coast sites shown on the Policies Map:

- West Hythe
- Dymchurch.
- St Mary's Bay
- Dungeness

**12.57** In the Issues and Options document the alternative options were as follows:

## Option 36

### CP3 Development around the Coast

Maintaining policies for protecting the undeveloped Folkestone and Dover Heritage Coast.

Or

Having no specific policy for the undeveloped Folkestone and Dover Heritage Coast relying instead on generic planning policies.

And/or

Maintaining the existing policy for Undeveloped Coast Sites at West Hythe, Dymchurch, St Mary's Bay and Dungeness

Or

Having no specific policy for Undeveloped Coast sites at West Hythe, Dymchurch, St Mary's Bay and Dungeness

Or

Identifying additional areas of Heritage Coast and/or Undeveloped Coast sites.

Or

General criteria that control development along the coast to include safeguarding areas of land to allow for coastal defence work and to prevent storm damage to buildings. May in certain circumstances limit development along the coast.

### Sustainability Appraisal

**12.58** Policy options A, C and E protect undeveloped areas of the District's Heritage Coast and are likely to have more positive effects on safeguarding the special qualities of the District's coastline. A Places and Policies DPD that relies on existing generic planning policies in the Local Plan is likely to have a negligible effect (option B). Option E that identifies additional areas of Heritage Coast and/or Undeveloped Coast sites (options, and areas for coastal defence work, could make it harder to develop new residential, employment and infrastructure schemes in the District, with potentially adverse effects against their associated SA objectives.

### **Conclusion**

**12.59** As advised by the Sustainability Appraisal the preferred option is proposed as a generic policy will have little effect. The policy will protect the Heritage Coast and also significant areas of other undeveloped coast within the District which will be shown on the policies map.

## 13 Climate Change

**13.1** National planning policy and legislation requires us to work to mitigate climate change, mainly by reducing our greenhouse gas emissions and promoting sustainability. We need to ensure that the urban and natural environments are capable of being adapted to meet the expected impacts of climate change. One of the aims of Strategic Need B of the core Strategy is "Minimise local carbon emissions, maintain air quality, control pollutants and promote sustainable waste management". The future vision is:

### Statement 6

**Shepway will flourish into a distinct area of *high-quality coastal towns and countryside*.**

This will occur through planning for a smart, self-confident, secure and low-carbon district, and through enhancing the district's many diverse and special environments.

**13.2** There has been significant changes over the last few years to the planning and Building Regulations systems. As a result of the Housing Standards Review, the Code for Sustainable Homes was withdrawn [effective 26 March 2015]. Local Authorities can no longer stipulate compliance with Code levels or require Code assessments in planning policy. In place, a number of changes to existing Building Regulations standards were introduced, along with some new standards. Local Authorities are longer able to require standards outside of those. These included for water (Part G), a new optional standard (110litres/person/day) for water stressed areas has been added to the baseline standard as per existing Part G (125litres/person/day). Shortly after the election, the new Government released its wide ranging Productivity Plan 'Fixing the Foundations'. In this document it announced Government's intention not to proceed with the zero carbon homes policy. This means that the expected change to the energy efficiency standard in Building Regulations (Part L) will not be delivered in 2016 and the 'allowable solutions' mechanism will not be put in place. Local Authorities can still include Merton style policies in their Plans which require a percentage of a development's energy use to be delivered by renewable or low carbon energy on or near to the site. Non domestic building have not been affected. Local Authorities can still require above building regulations standards (commonly defined by the use of BREEAM, LEED or any other tool) for non-domestic buildings.

### **Reducing carbon emissions**

**13.3** One of the aims of the Core Strategy is to minimise carbon emissions and a way to achieve this is to reduce the carbon emissions from buildings. Policy SS3 states that proposals should be designed to contribute to local place-shaping and sustainable development " through appropriate sustainable construction measures, including water efficiency and a proportion of energy from renewable/low carbon sources on new-build development" (para e.ii). Buildings are responsible for around 40 per cent of the UK's energy consumption. Most of our buildings' carbon emissions come from the energy used to provide the heating, cooling, lighting and other building services that keep occupiers comfortable and healthy. This energy has financial and environmental costs and generates carbon emissions. We can avoid this by using energy more efficiently, and by finding other ways to generate energy to heat our homes and offices. A component that covered carbon emissions and sustainable construction was built in to the viability testing of the CIL <sup>(1)</sup>.

#### **Policy CC1**

##### **Reducing carbon emissions**

1. Proposals for all new build dwellings and new non-residential buildings of 1,000 m<sup>2</sup> or more will be required to reduce carbon emissions (over the requirements set by Building Regulations) by a minimum of 10% through the use of on-site renewable energy technologies demonstrated via an appropriate assessment.
2. This could be provided through the installation of an integrated system or site wide solutions involving the installation of a system that is not integrated within the new building. For a site wide solution, evidence must be submitted demonstrating that the installation is technically feasible and is capable of being installed.
3. For growth areas and substantial new development, site wide renewable and low carbon energy solutions that maximise on-site generation from these sources will be sought, such as renewable and low carbon district heating systems or combined heat and power networks.

**13.4** The Issues and Options document policy options are shown below:

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1 In the 'CIL and Whole Plan Economic Viability Assessment'; Dixon Searle Partnership (July 2014), a cost per unit of £2,327 for sustainable design and construction costs, lifetime homes, EPCs and renewables was assumed

## Option 37

### **CC1 Carbon Emissions / carbon reduction**

A: Require the provision of a suite of energy efficiency, water efficiency and sustainable design measures in new housing and commercial developments e.g. use of ground or air source heat pumps, orientation for solar gain, provision of water butts, compost bins and outdoor drying facilities in addition to that required by the Building Regulations

And/or

B: That the local planning authority rely on CIL contributions to fund local carbon reduction projects where it is not technically feasible to incorporate measures on site prior to the introduction of Allowable Solutions.

Or

C: Rely on the provisions of national guidance and the higher level policies expressed in the Core Strategy and the Building Regulations to ensure development contributes towards minimising energy and water usage, and carbon dioxide emissions

### **CC5 Renewable energy/ Off site renewable energy**

A: Develop a renewable energy strategy that identifies suitable sites for renewable energy and promotes the development of Combined Heat and Power (CHP) networks

Or

B: Establish policy that requires CHP solutions to be assessed for all large scale residential, commercial and institutional planning applications.

Or

C: Not have a policy relating to CHP

## **Sustainability Appraisal**

**13.5 CC1:** Policy option C relies on existing national planning policy and Building Regulations would have a negligible effect relative to the baseline. Policy options A and B which go beyond existing national planning policy and building regulations would have a positive effect on improving the District's contribution to climate change mitigation and adaptation and water efficiency. Furthermore, option B is likely to

maximise the community benefits of carbon reduction projects by pooling CIL contributions for investment in larger local carbon reduction schemes, delivering the benefits of economies of scale. Policy options A and B, which go beyond existing national planning policy and Building Regulations, would increase the financial burden on developers, which could make it harder to develop new residential, employment and infrastructure schemes with potentially adverse effects against their associated SA objectives. **CC5:** Options A and B both have a positive effect on promoting renewable and low carbon energy technologies in the District. Option A is more comprehensive, committing to a renewable energy strategy which could identify opportunities and need for renewable and low carbon technologies in the district. Therefore the significance of its positive effect on the District's contribution to climate change mitigation is likely to be greater. Development of a renewable energy strategy could help to avoid the need to assess every large scale development for its CHP potential, reducing the burden on developers. Option C has a negligible effect. Option B requires all large scale residential, commercial and institutional planning applications to assess the potential for CHP solutions. This policy has the potential to make it harder to develop new residential, employment schemes in the District, with potentially adverse effects against their associated SA objectives.

### **Conclusion**

**13.6** In the light of changes to the planning and Building Regulations systems it is proposed that the preferred option is the most appropriate approach.

### **Sustainable Construction**

**13.7** All development should achieve high environmental standards, be appropriately designed for the site and its setting, and adaptable for long-term use. Developers will be encouraged to implement appropriate mitigation and adaptation initiatives to address the potential impact of climate change. Using suitable sustainable construction techniques in new developments will make them more efficient. We also need to consider retrofitting existing buildings as the majority of the buildings we will be using in 2050 have already been built. We should plan for buildings that have a longer useful life. This might include the ability for a building to evolve with changing lifestyles and home occupation patterns. We should also require developments that plan for future weather changes by including adaptations like shading, natural and passive ventilation, and better drainage systems. Water resources are renewable, but not unlimited, and our region is already under severe water stress. Given climate change forecasts and population increases, water shortage will be a very important issue in our district in the plan period. We can seek to combat this and adapt to these conditions by reducing our water consumption, reusing wastewater, water metering and rainwater harvesting.

**13.8** Although Policy SS3 e) ii of the Core Strategy states that proposals should contribute to sustainable development through appropriate sustainable construction measures, including water efficiency and a proportion of energy from renewable/low



carbon sources on new-build development, it does not set specific targets. Specific planning policies on waste are contained in the National Planning Policy for Waste, as stated in the Planning Practice Guidance, all local planning authorities must have regard to that and the National Waste Management Plan for England. Although Shepway does not have any waste planning responsibility it must play its role in delivering the waste hierarchy. This could include measures such as 'including a planning condition promoting sustainable design of any proposed development through the use of recycled products, recovery of on-site material and the provision of facilities for the storage and regular collection of waste' (Planning Practice Guidance, March 2014).

## Policy CC2

### **Sustainable Construction**

For all new dwellings or for new non-domestic buildings, evidence will be required by the developer to demonstrate that all of the following criteria have been considered (proportionate to the scale of development):

1. How the proposal aims to protect and enhance the environment, both built and natural. Where this is not possible, how any harm will be mitigated;
2. The proposal achieves a minimum of 110 litres per person per day including external water use;
3. New development should ensure it is accessible to all, flexible towards future adaptation in response to changing life needs, easily accessible to facilities and services; and takes into account the need for on-site waste reduction and recycling;
4. Where appropriate, the proposals apply sound sustainable design, good environmental practices, sustainable building techniques and technology, including the use of materials that reduce the embodied carbon of construction and the use of re-used or recycled materials;
5. Energy consumption will be minimised and the amount of energy supplied from renewable resources will be maximised to meet the remaining requirement, including the use of energy efficient passive solar design principles where possible;
6. The proposals include measures to adapt to climate change, such as the provision of green infrastructure, sustainable urban drainage systems, suitable shading of pedestrian routes and open spaces and drought resistant planting/landscaping;
7. The historic and built environment, open space, and landscape character will be protected and enhanced;
8. The natural environment and biodiversity will be protected and/or where appropriate provision will be made for improvements to biodiversity areas and green infrastructure and
9. The reduction of the impacts associated with traffic or pollution (including air, water, noise and light pollution) will be achieved, including but not limited to the promotion of car clubs and facilities for charging electric vehicles.

Flexibility

The standards achieved as detailed above may be a matter for negotiation at the time of the planning application, having regard to abnormal costs, economic viability, the feasibility of meeting the standards on a specific site and other requirements associated with the development. This should be based on quantitative financial evidence. Planning applications for extensions to commercial buildings should include sustainable design measures when applicants apply for planning permission, unless the improvements are not viable

**13.9** The Issues and Options document policy options are shown below:

### Option 38

#### **CC6 Encouraging and promoting sustainable transport measures**

A: Require larger schemes to incorporate transport measures such as charging points for electric vehicles and parking space for one or more car club vehicles

And/or

B: Ensure that the requirements of Travel Plans can be implemented on development sites through, for example allowing sufficient space for cycle parking / storage and easy access for pedestrians

#### **CC7 Waste/Recycling**

A: Require all planning applications, other than for small extensions or minor development, to make external provision for on-site waste and recycling storage

Or

B: Allow internal waste and recycling storage.

#### **CC9 Efficient and sustainable water use**

A: Introduce a specific policy that limits water use requiring water saving measures in new homes with a per person consumption target lower than 105 litres per day

Or

B: Introduce a specific policy that limits water use requiring water saving measures in new homes with a per person consumption target lower than 90 litres per day

Or

C: Have no policy on water saving measures in new homes and rely on the Building Regulations, including possible future amendments.

### **Sustainability appraisal**

**13.10 CC6:** Both policy options are likely to have a positive effect on promoting more sustainable and cleaner modes of transport with indirect benefits for the District's ability to mitigate the effects of climate change. Furthermore, investment in public transport measures are likely to result in improved access to local public facilities, services and environmental assets. Both policy options go beyond existing national planning policy and Building Regulations, increasing the financial burden on

developers, which could make it harder to develop new residential, employment and infrastructure schemes in the District, with potentially adverse effects against their associated SA objectives. **CC7:** Both policy options are likely to have a positive effect on promoting more sustainable developments in the District with indirect benefits for the District's ability to mitigate the effects of climate change. Both policy options go beyond existing national planning policy and Building Regulations, increasing the financial burden on developers, which could make it harder to develop new residential, employment and infrastructure schemes in the District, with potentially adverse effects against their associated SA objectives. **CC9:** Policy options A and B are likely to have a positive effect on improving water efficiency in the District and adapting to the effects of climate change. Option B has a lower consumption target and is therefore likely to have a more positive effect. Option C relies on Building Regulations and will therefore have a negligible effect relative to the SA baseline. Both policy options go beyond existing national planning policy and Building Regulations, increasing the financial burden on developers, which could make it harder to develop new residential, employment and infrastructure schemes in the District, with potentially adverse effects against their associated SA objectives. Option B has a lower consumption target and is therefore likely to have a more significant adverse effect.

## Conclusion

**13.11** The NPPF states that planning should support the transition to a low carbon future in a changing climate, and to achieve this should seek ways to radically reduce greenhouse gas emissions, actively support energy efficiency improvements and use nationally described standards when setting any local requirements for a building's sustainability. Previously it had been the Government's intention that all new dwellings would be required to be zero carbon from 2016; however in the publication of Fixing the Foundations – Creating a More Prosperous Nation (published in July 2015), the Government made it clear that it does not intend to proceed with this. The Government has created a new approach for the setting of technical standards for new housing, including relating to water efficiency. The web based planning practice guidance (PPG) states that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of water efficiency where there is a clear local need.

### **SuDS and the mitigation of flood risk on site**

**13.12** Measures that take account of water quantity, water quality and amenity issues are collectively referred to as Sustainable (urban) Drainage Systems (SuDS). SuDS comprise a sequence of management practices, control structures and strategies designed to efficiently and sustainably drain surface water, while minimising pollution and managing the impact on water quality.

**13.13** These systems are more sustainable than conventional drainage methods because they:

- Manage runoff volumes and flow rates, reducing the impact of urbanisation on flooding.
- Protect or enhance water quality.
- Are sympathetic to the environmental setting and the needs of the local community.
- Provide a habitat for wildlife in urban watercourses.
- Encourage natural groundwater recharge (where appropriate).

**13.14** More information about SuDS can be found on the [Susdrain website](#).

**13.15** SuDS are suitable for any site, whether large or small, and do not necessarily require a large land take. Nor do SuDS have to be expensive, with surface SuDS that avoid heavy engineering proving particularly cost-effective solutions.

**13.16** Sustainable drainage includes a variety of components, each having different approaches to managing flows, volumes, water quality and providing amenity and biodiversity benefits. The role of the site in relation to the surface water 'treatment train' should be understood when designing SuDS in to a site, and the advice of an appropriately qualified drainage engineer should be sought to achieve best results. SuDS are not just traditional soakaways, ponds or wetlands, but are a suite of components working in different ways that can be used to drain a variety of sites. SuDS components work in several ways: they can infiltrate (soak) into the ground, convey (flow) into a watercourse (or if necessary a sewer), they can also provide storage on site and attenuate (slow down) the flows of water. Often SuDS schemes use a combination of these processes and components may use a number of mechanisms.

**13.17** The nature of the site should be well understood to get the most out of SuDS. Although many SuDS components using infiltration are highly effective, there are sites where infiltration is not possible, due to impermeable ground conditions, contamination or a high water table. This does not prevent the use of the SuDS approach, but requires careful thought to be given to how water can be treated to improve quality and attenuated to reduce peak flows. Rainwater harvesting, green roofs, permeable surfaces, swales, ponds and wetlands can all operate without infiltration. Permeable surfaces, used for car parks and drives are very effective, even where infiltration is not possible.

**13.18** Under schedule 3 of the Flood and Water management Act, Lead Local Flood Authorities (LLFAs) were to be required to establish SuDS Approval Bodies (SABs) which would have required Kent County Council to approve and adopt SuDS for new developments. In December 2014, the Government announced that schedule 3 would not be enacted and SuDS would be dealt with by strengthening existing planning policy instead. This change, which took effect on April 6<sup>th</sup> 2015, requires local planning authorities to ensure that SuDS are included on new developments.

**13.19** The LLFA is the statutory surface water consultee for all major development, and applicants' attention is drawn to Kent County Council's "Drainage and Planning Policy Statement" which clearly outlines the parameters against which major proposals will be judged. The Environment Agency remains the statutory consultee for river and sea flooding and groundwater issues for Flood Zones 2 and 3 and for Critical Drainage Areas. There are at present no Critical Drainage Areas designated in Shepway.

	<b>Flood Zone 1</b>	<b>Critical Drainage Area</b>	<b>Flood Zone 2</b>	<b>Flood Zone 3</b>
Permitted Development	Guidance notes from LLFA and EA			
Minor Development	Guidance notes from LLFA	EA	Standing Advice from EA	EA
Major Development	LLFA	EA	LLFA (surface water) EA (river and sea)	LLFA (surface water) EA (river and sea)

**Table 13.1 Statutory Consultation Matrix for Flood Areas**

**13.20** Planning Practice guidance advises that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems. Within the district, the vast majority of the southern part (the Marsh) is situated in both Flood Zones 2 and 3, and proposals here should always show how surface water drainage has been taken into account and integrated into the site.

### Policy CC3

#### SuDS

Development will be permitted provided that:

1. surface water is managed close to its source and on the surface where reasonably practicable to do so;
2. priority is given to the use of "ecosystem services" as defined in the NPPF (2);
3. water is seen as a resource and is reused where practicable, offsetting potable water demand, and that a water sensitive approach is taken to the design of the development;
4. the features that manage surface water are commensurate with the design of the development in terms of size, form and materials and make an active contribution to placemaking;
5. surface water management features are multi-functional wherever possible in their land use;
6. there is no discharge from the developed site for rainfall depths up to 5mm of any rainfall event;
7. the run-off from all hard surfaces shall receive an appropriate level of treatment in accordance with Sustainable Drainage Systems guidelines, SuDS Manual (CIRIA C753), to minimise the risk of pollution;
8. major development accords with Kent County Council SuDS policy;
9. development adjacent to a water body actively seeks to enhance the water body in terms of its hydromorphology, biodiversity potential and setting; and
10. all hard surfaces are permeable surfaces where reasonably practicable.

Shepway is one of the driest districts in England, and this is only likely to increase given the ongoing impacts of Climate Change. Mechanisms to ensure the effective collection and reuse of water should be designed in to any surface water drainage system.

**13.21** It would be expected that a drainage strategy would accompany all major planning applications. At a minimum, a drainage strategy must comprise the following:

- A site layout
- A drainage proposal schematic or sketch

- 
- 2 The benefits people obtain from ecosystems such as, food, water, flood and disease control and recreation.



- A description of key drainage features within the drainage scheme (e.g. attenuation volumes, flow control devices etc.)
- Information to support any key assumptions (e.g. impermeable areas, infiltration rates etc.)

**13.22** Development on the site should not increase the overall runoff on the site compared to its greenfield rate. On brownfield sites, discharge rates should be reduced to the equivalent greenfield runoff rate.

### **Adoption and maintenance of SuDS**

**13.23** Unlike in some other areas in England, the statutory water and sewerage undertaker in this area, Southern Water, does not yet adopt SuDS. Wherever these systems are used, there will be a requirement for the developer to provide evidence to the Local Planning Authority that arrangements are in place for SuDS to be adopted either by a management company, private residents, or another responsible body (e.g. Internal Drainage Board). Where provided, SuDS inevitably need to be maintained. It will be the developer's responsibility to ensure that a maintenance manual and schedule related to on-site systems are provided to successors in title. A clause will be inserted into the s106 agreement of any planning permission involving SuDS requiring this, and for the nomination of a named person/body to undertake this.

**13.24** In the Issues and Options document the following policy directions were proposed:

#### **Option 39**

##### **GD4 Address localised flooding and flood risk management**

A: Require all development to manage its own surface water run off so that it has a neutral effect on water courses and the local surface water drainage system

Or

B: Require all development within the flood catchment areas not only to mitigate their own flood risk on site, but to provide extra mitigation to reduce downstream effects arising from the development

### **Sustainability Appraisal**

**13.25** **GD4** - Both policy options should help to reduce the risk of flooding, (SA1) while at the same time encouraging the more efficient use of water resources (SA13). In addition Option B would help to encourage greater cooperation between different

landowners and developers to ensure improved mitigation measures are adopted both on and off the development site, which will reduce the risk of flooding throughout the District.

### **Conclusion**

**13.26** Since consultation on Shepway's Issues and Options Local Plan document, there have been significant changes in the national regime for SuDS approval and consultation. Kent County Council, in its role as statutory consultee on major development, has produced succinct and useful guidance for such applications. The aim of Shepway's preferred policy option is to support the requirements of KCC's function, while ensuring that all developments coming forward take surface water management into consideration from an early design stage. Given the fact that the South East of England will see significant development over the coming decades, the Council realise that even small developments (including those within some classes of the GPDO) will have to play their part in preventing the cumulative impact of increased hardstanding.

**13.27** Therefore, there is a need for the incorporation of option A into planning policy in the Local Plan. Given the above requirement that development does not result in an increase of site runoff compared with its Greenfield rate, which applies also to brownfield land, there may be a requirement for increased mitigation measures so that development actually decreases surface water runoff compared with existing uses. This will provide multiple benefits, and applicants are encouraged to reuse water on site wherever feasible.

### **Renewable energy**

**13.28** National policy promotes increasing energy efficiency, the minimisation of energy consumption and the development of renewable energy sources. This Plan supports development that promotes these objectives. An important element in this is to ensure that the Council embraces effective energy efficiency and the use of renewable energy in all new developments helping to reduce the emission of greenhouse gases and their effect on climate change.

**13.29** There have been a number of changes in government policy since the Issues and Options consultations. The ministerial statement issued in June last year made the following requirement concerning wind turbines: 'when determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if:

- The development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and
- Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing'.

**13.30** Given these changes it is proposed that areas suitable for wind farms will be identified on the policies map based on the Renewable Energy for Kent study; this research by AECOM for Kent County Council produced energy opportunities maps to highlight opportunities for a range of renewable technologies spatially at local authority level. Areas identified as having high potential for large scale wind energy were areas where wind speed and spatial or designation constraints are such that large scale wind turbines might be accommodated. Allocations as required for wind farms as required by the ministerial statement should be made in Neighbourhood Plans in district. Further research has been commissioned to identify more specific areas within the district that will support Neighbourhood Plans in allocating sites. By being in a Neighbourhood Plan this will also clearly demonstrate that any planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing. The Kent Downs AONB unit produced a Renewable Energy Position Statement (Updated June 2011) in which it states that due to the high sensitivity of the Kent Downs AONB, it considers that large scale commercial wind turbine developments will be unacceptable.

#### Policy CC4

##### **Wind Turbine Development**

The creation of wind turbines at a community and commercial scale will be supported where proposals demonstrate that the development site is in an area allocated for wind energy development in an adopted Neighbourhood Plan.

**13.31** The Issues and Options document policy options are shown below:

## Option 40

### CC2 Wind Turbine Development

A. Planning permission will be granted for the development of wind turbines, subject to considerations including noise impacts, safety, ecology, interference with electromagnetic transmissions, heritage, shadow flicker, energy output, cumulative landscape and visual impacts, decommissioning.

Or

B. Commission a study that identifies those areas in the district where wind turbine development might be acceptable and those where for landscape or other reasons are deemed unacceptable.

Extensions and Alterations to Existing Wind Farms:

Extensions to existing wind farms will be supported provided that the proposals are in keeping with the character of the existing development and satisfy the criteria above.

Proposals to re-commission or re-power a wind farm will be supported provided that the development meets the criteria above taking full account of the effects of the extended timescale.

Wind Turbine Development Affecting the Area of Outstanding Natural Beauty (AONB):

There will be a presumption against large scale wind development in the AONB. Developments involving more than one turbine, or turbines with a hub height of over 20m, will not be permitted.

Small scale wind development within the AONB will be permitted provided that its impacts on the environment are acceptable and its installed capacity is commensurate with the needs of the property or business. Development outside of the AONB which has a substantial impact on interior views within the AONB, or important views of the AONB, will not be permitted.

### Sustainability appraisal

**13.32 CC2:** The policy is likely to encourage the development of Wind Turbines/Farms in the District with positive effects on the District's ability to mitigate the effects of climate change. It is also likely to have lesser, indirect positive effects on employment in the District. The policy's presumption against large-scale wind turbines/farms in the AONB is likely to safeguard the special qualities of the AONB,

i.e. its heritage, landscape/seascape, and biodiversity. Development of wind turbines/farms in the District could have an adverse effect on the landscapes/ townscapes/ seascapes as well as the settling of heritage assets. Furthermore, it has the potential to increase the rates of bird strike in the District, with adverse effects on biodiversity.

## Conclusion

**13.33** The preferred option has been developed in response to the change in Government guidance on wind farms to meet the requirements for allocating sites suitable for wind energy and demonstrating community support for such development.

### Policy CC5

#### **Domestic wind turbines and existing residential development**

Wind turbines to provide energy for existing residential dwellings will only be acceptable where proposals meet the following criteria:

A single turbine is proposed for an existing dwelling;

The scale of the turbine is not overwhelming in relation to the height of nearby dwellings;

There is no adverse impact on the setting of a listed building, a conservation area or other heritage asset;

The turbine does not cause any adverse impact on the amenity of a nearby dwelling(s) by way of obstructed outlook, noise or flicker;

The turbine does not have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty or other sensitive local landscapes;

There are no adverse ecology impacts arising from the development;

The turbine is finished in an appropriate colour to minimise its visual impact;

The turbine is removed when no longer operational.

**13.34** The Issues and Options document policy options are shown below:

## Option 41

### CC3 Wind turbines and existing residential development

A: Wind turbines to provide energy for existing residential dwellings will only be acceptable where:

1. A single turbine is proposed for an existing dwelling;
2. The scale of the turbine is not overwhelming in relation to the height of nearby dwellings;
3. There is no adverse impact on the setting of a listed building, a conservation area or other heritage asset;
4. The turbine does not cause any adverse impact on the amenity of a nearby dwelling(s) by way of obstructed outlook, noise or flicker;
5. The turbine does not have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty or other sensitive local landscapes;
6. There are no adverse ecology impacts arising from the development;
7. The turbine is finished in an appropriate colour to minimise its visual impact;
8. The turbine is removed when no longer operational.

Or

B: Wind turbines for existing residential uses will only be acceptable where the above criteria are met and additionally the applicant has demonstrated that they have explored all reasonable alternatives for less intrusive forms of renewable energy such as ground source heating

### Sustainability appraisal

**13.35 CC3:** Both policies are likely to have a positive effect in safeguarding the amenity of local residents as well as the District's heritage assets, landscapes, townscapes and seascapes and biodiversity. Option B goes one step further than option A by requiring applicants to demonstrate that they have explored all reasonable alternatives for less intrusive forms of renewable energy. The second policy approach is more positive than the first as it promotes alternative low carbon and renewable technologies as opposed to just restricting the use of one. Therefore, option B may have a minor positive effect on the district's contribution to climate change mitigation. Both policy options restrict the development of wind turbines in connection with residential uses which could have an adverse effect on promoting climate change mitigation in the District. Recommendation: Option B should expand on what represents a 'reasonable alternative' renewable energy source, e.g. does this mean that an alternative is only reasonable if it can deliver the same amount of energy for the same installation cost?

## Conclusion

**13.36** The preferred option has been developed in response to the change in Government guidance on wind farms to meet the requirements for allocating sites suitable for wind energy and demonstrating community support for such development.

**13.37** The particular planning considerations that should be considered when determining applications for different renewable energy technologies are set out in the Government's Planning Practice Guidance. The guidance gives advice on how cumulative impacts of wind and solar farms can be considered. The Council will expect clear commitments to returning land associated with solar farms or wind farms to their previous use and productive condition. While in use the Council will encourage land diversification alongside its new use – incorporating biodiversity enhancements, or a continued agricultural use. In 2014 BRE National Solar Centre published 'Biodiversity Guidance for Solar Developments'. The Kent Downs AONB Unit's position statement quoted above, considers it extremely unlikely that any location can be found in or within the setting of the AONB where fieldscale photovoltaic arrays, such as solar farms does not have a significant adverse effect on the landscape.

### Policy CC6

#### Solar Farms

The development of new solar farms or the extension of existing solar farms will only be acceptable where-

1. The proposed solar farm does not have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty, other sensitive local landscapes or heritage assets;
2. The proposed solar farm does not result in the direct loss of amenity to nearby residential properties by virtue of glare or other disturbance;
3. Any necessary ancillary building works are minimised so as not to adversely impact on the character of the surrounding area;
4. There are no adverse ecology impacts arising from the development;
5. A suitable landscaping and screening strategy is included with the application
6. The solar panels and supporting frames are finished in an appropriate colour to minimise visual impact;
7. The solar panels are removed when no longer operational.
8. The consideration of the need for and impact of, security measures such as lights and fencing are included in the application;
9. The proposal clearly indicates the installed capacity (MW) of the proposed facility.
10. The solar farm will not result in the loss of the best and most versatile agricultural land.

**13.38** The Issues and Options document policy options are shown below:

### Option 42

#### CC4 Solar Farms

A: The development of new solar farms or the extension of existing solar farms will only be acceptable where-

1. The proposed solar farm does not have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty or other sensitive local landscapes;
2. The proposed solar farm does not result in the direct loss of amenity to nearby residential properties by virtue of glare or other disturbance;
3. Any necessary ancillary building works are minimised so as not to adversely impact on the character of the surrounding area;
4. There are no adverse impacts arising from the development on local ecological and heritage assets ;
5. A suitable landscaping and screening strategy is included with the application
6. The solar panels and supporting frames are finished in an appropriate colour to minimise visual impact;
7. The solar panels are removed when no longer operational.

Or

B: Solar farms will only be acceptable where the above criteria are met and additionally the solar farm will not result in the loss of the best and most versatile agricultural land.

#### Sustainability appraisal

**13.39** Both policy options are likely to have a positive effect in safeguarding the amenity of local residents, as well as the District's heritage assets, landscapes, townscapes and seascapes and biodiversity. However, the second policy goes one step further by preventing solar farms from being constructed on the best and most versatile agricultural land, thereby safeguarding them. Both policy options restrict the development of solar farms in the District which could have an adverse effect on promoting climate change mitigation. However, the second policy goes one step further by preventing solar farms from being constructed on the best and most versatile agricultural land, and therefore has greater potential for negative effects on climate change mitigation. Recommendation: In line with national Planning Practice Guidance, policy criteria should include: consideration of the need to conserve heritage assets, the need for and impact of security measures such as lights and fencing and consideration of the energy generating potential of the proposed site.



## Conclusion

**13.40** The preferred option takes into account the sustainability appraisal recommendation and the Government's Planning Practice Guidance.

## 14 Health & Wellbeing

**14.1** As human beings our default setting is to be in a sociable group, supportive environment and have a purpose. Loneliness and social isolation are harmful to our health: research shows that lacking social connections is as damaging to our health as smoking 15 cigarettes a day (Holt-Lunstad, 2010). The population and housing growth that will take place in Shepway to 2031 will need to be supported by the necessary infrastructure, including that for health. The Core Strategy promotes the development of community facilities that provide the opportunity for healthy lifestyles. This is in line with the priority objective of the 'Fair Society, Healthy Lives' Marmot Review (2010) to create and develop healthy and sustainable places and communities. The NHS reform by the Health and Social Care Bill, transferred the responsibility for public health to Local Authorities. Planning has an important role to play in public health and improvements to the built environment have a significant impact on improving public health. The environment is known to have a major impact on health and well-being.

**14.2** The Government's Planning Practice Guidance published in March 2014, provides guidance on how the NPPF policies on health can be considered in plan making. This includes how opportunities for supporting healthy lifestyles have been appraised such as planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity, and promotes access to healthier food, high quality open spaces and opportunities for play, sport and recreation.

### Promoting healthier food environments

**14.3** The Core Strategy aims to deliver a safe and healthy district. The Health Profile 2015 for Shepway produced by Public Health England shows that in 2012, 25.2% of adults were classified as obese and physical activity was worse than the average for England. Further, in Year 6, 20.6% (206) of children are classified as obese. The local priorities set out in that document include physically active children and adults. According to the Kent 'Healthy Weight' JSNA Chapter Summary Update '2014/15, Swale Shepway and Dartford have the highest levels of adult obesity in Kent, for Shepway that amounts to 56,457 people aged 16 and above carrying excess weight. In November last year meeting the Kent Health and Wellbeing Board (HWBB) decided that local health and wellbeing boards would undertake a review of their action plans for addressing obesity and improving population outcomes for children and adults. The South Kent Coast Clinical Commissioning Group (CCG) and Local HWBB have made tackling unhealthy weight a key priority for joint work over the next few years. South Kent Coast's 'Prevention and Self Care Strategy' and its health

inequality strategic work are prioritising reducing the levels of childhood obesity and are working closely with Public Health to improve outcomes for people with hypertension and long term conditions. Dover and Shepway District Councils are working up robust plans for increasing the level of physical activity and engaging the population in making healthy lifestyle choices. The South Kent Coast, Healthy Weight Strategy is currently in draft form and will be published in 2016.

**14.4** Hot food takeaways provide employment, offer a varied range of food adding to the cultural mix in an area, and can provide food at affordable prices. However many takeaways offer food which is energy dense and nutritionally poor which can contribute to obesity. According to the Public Health England document 'Obesity and the environment: regulating the growth of fast food outlets', "Obesity is a complex problem that requires action from individuals and society across multiple sectors. One important action is to modify the environment so that it does not promote sedentary behaviour or provide easy access to energy-dense food". Elsewhere in the same document it makes the point that obesity tends to track into adulthood, so obese children are more likely to become obese adults. A number of local authorities have drawn up supplementary planning documents (SPDs) to restrict the development of new fast food premises near schools. However, due to consultation and other procedures, these can take a long time to prepare and agree. SPDs must also relate to a policy in the local plan, so the priority is to make sure the issue is addressed within the local plan in the first place. Most authorities have used a distance of 400m to define the boundaries of their fast food exclusion zone, as this is thought to equate to a walking time of approximately five minutes. Ideally this policy will form just one approach to this issue and the Council will also work with businesses to help them make a healthier offer to their customers.

## Policy HW1

### Promoting healthier food environments

The Council will grant planning permission for new hot food take-away shops that do not fall within 400 metres of the boundary of a primary or secondary school (the exclusion zone).

The Council will only consider granting planning permission for new hot food take-away shops outside of the exclusion zone where:

- a. the percentage of hot food take-away shops in Town and District Centres does not exceed 5% and in Local Centres does not exceed 10%
  - b. the location and design is acceptable and the proposed use does not detrimentally affect the vitality of the shopping area
  - c. there is no harm or loss of amenity to the living conditions of nearby residents, including that created by noise and disturbance from other users and their vehicles, smell, litter and unneighbourly opening hours and
  - d. parking and traffic generation is not a danger to other road users, public transport operators or pedestrians.
3. In addition, applicants will be expected to provide acceptable arrangements for:
- a. the efficient and hygienic discharge of fumes and smells, including the siting of ducts, which should be unobtrusive
  - b. the collection, storage and disposal of bulk refuse and customer litter
  - c. sound proofing, especially if living accommodation is above or adjacent and
  - d. other appropriate mitigation measures in relation to the impact on neighbours of the proposed opening hours.

**14.5** In the Issues and Options document the alternative options consisted of the following:

### Box 7

#### **HW1 To consider the effects of hot food takeaways on health and potential planning policy actions**

A: A planning policy to restrict the development of new hot food takeaways within walking distance (e.g. 400 metres) of schools, parks, leisure centres, youth facilities and other similar locations

Or

B: To limit the overall number of takeaways in a settlement or shopping frontage

Or

C: Not to control the location of takeaways unless they have an adverse impact on residential amenity or highway safety.

### **Sustainability appraisal**

**14.6 HW1:** Shepway has a high proportion of people with limiting long term illness. Options A and B are likely to have a positive effect on encouraging healthier lifestyles in the District. Policy C relies largely on existing planning policy would have a negligible effect relative to the SA baseline. By restricting/reducing the number of hot food takeaways in the District, policy options A and B have the potential to have an adverse effect on employment in the District.

### **Conclusion**

**14.7** A combination of options A and B are proposed with specific criteria to aid decision making. Hot food takeaways (Use Class A5) can offer a popular service to local communities and provide employment/business opportunities. However, in the interests of the health of residents, particularly children, as well as ensuring a mix of different uses in shopping frontages, the numbers of A5 uses need to be carefully controlled. Pupils in primary education should not be allowed out of school premises during the school day, and most primary school pupils will be accompanied home by an adult. Secondary school pupils have more freedom during school hours and hot food takeaways located within walking distance of secondary schools are considered a contributing factor to the rising levels of obesity in children. It is for this reason that an exclusionary zone is set at a radius of 400 metres from secondary schools only (10 minute walk). The proximity of the exclusion zones around secondary schools to primary schools, and the restriction of growth of Use Class A5 in shopping frontages, will also assist in limiting the number of hot food takeaways located near primary schools. Of respondents who commented on HW1 only one rejected any form of control on takeaway outlets, they believed that no direct link should be made

between "access to healthier food" and hot food takeaways. However obesity cannot be effectively tackled by one discipline alone and local authorities are ideally placed to develop co-ordinated action across its various services and partner organisations to tackle obesity. The Council's approach to improving healthy weight for health and wellbeing builds on the existing structure and resources available, recognising the capacity of the local authority to influence the development and focus of long term initiatives that will shape future health.

### **Improving health and well-being**

**14.8** Another policy option ensures health is taken into account in new development and proposes that systematic health impact assessments are undertaken for larger proposals. Many aspects of planning can have a significant impact on health. In particular: good quality housing; a well-designed public realm, sustainable transport; employment and training opportunities; and access to leisure, cultural activities and green space. These factors are known as the "wider determinants of health". Health Impacts Assessments (HIAs) provide a systematic approach for assessing the potential impacts of development on the social, psychological and physical health of communities. Ensuring issues are considered at an early stage in developing planning proposals can lead to improvements in both the physical and mental health of the population. HIAs are designed to consider whether a development proposal might reinforce health inequalities and inadvertently damage people's health, or actually have positive health outcomes for the local community.

#### **Policy HW2**

##### **Improving the health and well-being of the local population and reducing health inequalities.**

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

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

A Health Impact Assessment for smaller forms of development may also be required where the proposal is likely to give rise to a significant impact on health.

**14.9** In the Issues and Options document the alternative options consisted of the following:

### Box 8

**HW2 Development should contribute to addressing the causes of ill-health, improving the health and well-being of the local population and reducing health inequalities.**

A: For residential development of 100 or more units and non-residential development in excess of 1,000 sq. m a Health Impact Assessment will be required, which will measure wider impact upon healthy living and the demands that are placed upon health services and facilities arising from the development. Where significant impacts are identified, measures to address the health requirements of the development should be provided and/or secured by planning obligations or planning conditions as appropriate. A Health Impact Assessment for smaller forms of development may also be required where the proposal is likely to give rise to a significant impact on health.

Or

B: The above but identify specific forms of development

Or

C: No requirements for Health Impact Assessments

### Sustainability appraisal

**14.10 HW2:** The requirement of Health Impact Assessments and the implementation of their recommendations in policy options A and B are likely to have a positive effect on promoting healthier lifestyles and improving access to facilities and services including open spaces. Option C relies on existing planning policy which will have a negligible effect relative to the SA baseline. Option A adopts a scale threshold at which Health Impact Assessments are required whereas option B proposes requiring Health Impact Assessments for specific forms of development. Both go beyond existing national planning policy, increasing the financial burden on developers, which could make it harder to develop new residential and employment schemes in the District, with potentially adverse effects against their associated SA objectives.

### Conclusion

**14.11** To ensure that new developments have a positive impact on the health and wellbeing of new and existing residents the Council will require an HIA of development proposals to a level of detail appropriate to its scale and nature. It is recognised that HIAs are most effective for large scale developments and therefore for developments of less than 100 dwellings or 5,000 m<sup>2</sup> the Council will accept less detailed assessments. However as the preferred option states there may be other categories

of smaller development where the council considers that the submission of an HIA is necessary, particularly categories of development contained in Schedule 1 and 2 of the Environmental Impact Assessment Regulations. It should be noted that Population and Human Health will form part of EIA requirements from 2017.

### **Supporting healthy lifestyles**

**14.12** Food security is a long-term challenge; farming needs to be supported in building capacity for sustainable production both in the UK and globally. However, the food chain has major impacts on climate change, biodiversity and the wider environment, which require management. Incorporating productive landscapes into the design and layout of buildings and landscapes provides opportunities for local food growing, supports the creation of healthy and active communities, improves the quality of open spaces and enhances biodiversity. Productive landscapes can take the form of allotments, community garden & growing spaces, green roofs & walls and productive planting.

#### **Policy HW3**

##### **Development that supports healthy, fulfilling and active lifestyles**

To increase, create and safeguard opportunities for healthy, fulfilling and active lifestyles, and the creation of healthy neighbourhoods in Shepway and to reduce the environmental impact of importing food, development proposals should:

- a. Incorporate food growing in the design and layout of buildings and landscaping of all major developments;
- b. Not result in the net loss of existing allotments; and
- c. Not result in the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) unless there is a compelling and overriding planning reason to do so and mitigation is provided through the provision of an allotment where there is the demand

**14.13** In the Issues and Options document the alternative options consisted of the following:

### Box 9

#### **HW3 Development that supports healthy, fulfilling and active lifestyles**

A: To increase, create and safeguard opportunities for healthy, fulfilling and active lifestyles, and the creation of healthy neighbourhoods in Shepway and to reduce the environmental impact of importing food, development proposals should:

- a. Incorporate food growing in the design and layout of buildings and landscaping of all major developments;
- b. Not result in the loss of existing allotments; and
- c. Not result in the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a).

Or

B: A policy that:

- a. Prevents the net loss of existing allotments;
- b. Requires all homes of 3 bedrooms or more to include garden space that can be used for growing food; and
- c. Which protects the loss of grade 3a agricultural land to new development unless there is a compelling and overriding planning reason to do so.

### **Sustainability appraisal**

**14.14 HW3:** Shepway has a high proportion of people with limiting long term illness. Both policy options are likely to have positive effects on encouraging healthier lifestyles in the District and the protection of the Districts best and most versatile land. Policy A restricts development on all Grades 1, 2 and 3a agricultural land and requires the incorporation of food growing facilities on all major developments, which is likely to have a greater positive effect than policy B. Both policy options go beyond existing national planning policy, increasing the financial burden on developers, which could make it harder to develop new residential and employment schemes in the District, with potentially adverse effects against their associated SA objectives. Policy A restricts development on all Grades 1, 2 and 3a agricultural land and requires the incorporation of food growing facilities on all major developments, which is likely to have a greater adverse effect than policy B. Recommendation: Consider adding Grades 1 and 2 agricultural land to policy option 3(c); protection of moderate quality land without protection of excellent and very good quality seems illogical.



## Conclusion

**14.15** The government's white paper "Healthy People, Healthy Lives: our strategy for public health in England" (November 2010) highlights the influence of the environment on people's health and includes the following objectives:

- Create healthy places to grow up and grow old in (para 3.4)
- Active travel (walking and cycling) and physical activity need to become the norm in communities (para 3.32)
- Create an environment that supports people in making healthy choices, and that makes these choices easier (para 3.62)

**14.16** A network of allotments and private gardens, in addition to providing green space in an area, also provide opportunities for outdoor recreation, contributing to physical and mental wellbeing. Allotments provide a place for people to interact, and to produce healthy locally grown food, which can help to improve the diet of residents. The proposed policy takes on board the Sustainability Appraisal's recommendation to protect Grades 1, 2 and 3a agricultural land.

## Promoting Active Travel

**14.17** Physical activity has been shown to increase personal wellbeing while decreasing the chances of diabetes, heart disease and other preventable conditions. Making shorter journeys by foot or by bicycle helps reduce the number of vehicles on the road and improving air quality. In Kent, however, the County Council's research (in its Active Travel Strategy) shows that perception is that there are a lack of suitable routes between homes and community services, workplaces or schools, as well as a lack of facilities such as lockers and secure parking, obstacles in cycle lanes and in footways, and feelings of safety when walking and cycling.

## Policy HW4

### Protecting and enhancing rights of way

Planning permission will be granted for development likely to give rise to increased travel demands, where the site has (or will attain) sufficient integration and accessibility by walking and cycling including:

1. Provision of new cycle and walking routes that connect to existing networks, including the wider Rights of Way network, to strengthen connections between villages, principal towns, market towns, and the wider countryside;
2. Protection and improvement of existing cycle and walking routes, including the Rights of Way network, to ensure the effectiveness and amenity of these routes is maintained, including through maintenance, crossings, signposting and waymarking, and, where appropriate, widening and lighting
3. Provision of safe, direct routes within permeable layouts that facilitate and encourage short distance trips by walking and cycling between home and nearby centres of attraction, and to bus stops or railway stations, to provide real travel choice for some or all of the journey,

The Council will support the delivery of the Kent Active Travel Strategy including routes and proposals for improvements contained in integrated network maps.

**14.18** The policy options considered in the Issues and Options document were:

### Option 43

Protection and enhancement of Public Rights of Way (PROW). Create a network to link up open spaces and provide an improved network of pedestrian and cycle routes

A. Specifically allocate land to create a network of pedestrian routes, cycleways and bridleways between residential areas and main destinations, links between urban areas and the countryside and routes through the countryside in conjunction with the Green Infrastructure Strategy

And/Or

B: Require developers on a case by case basis to link up new residential developments with the footpath / cycleway / bridleway network

**14.19** The Sustainability Assessment notes that both policy options are likely to promote the protection and enhancement of the existing PRow network which is likely to benefit the District's ambitions to promote healthier lifestyles and improve local connectivity (SA3 and SA14), promote sustainable modes of transport (SA10) and reduce greenhouse gas emissions from road traffic (SA2). Option A, in conjunction with the Green Infrastructure Strategy, is likely to create more opportunities to tackle strategic issues and deliver greater enhancement of the PRow network than Policy B, which operates on an application by application basis.

**14.20** However, policy option B's requirement for developers to connect new residential schemes to the existing PRow network has the potential to make it harder to develop new residential schemes in the District with potentially adverse effects on housing provision (SA5).

### **Conclusion**

**14.21** The preferred option will maximise use of the existing network, and address the challenges of increasing walking and cycling in a population with a growing reliance on cars. The RIBA report Healthy Cities 2012 found that streets and parks designed to be safer and more attractive were the most common changes people reported would encourage them to walk more. Provision of safe and pleasant cycle and walkways in conjunction with public health Initiatives such as Beat the Street, a real life walking, cycling and running game for a whole community, can encourage people to be physically active.

## 15 Historic Environment

**15.1** The historic environment comprises of all aspects of the environment resulting from the interaction between people and places through time, whether visible, buried or submerged. It also includes landscaped, planted or managed flora. Elements of the historic environment that hold significance are called heritage assets.

**15.2** The National Planning Policy Guidance (NPPF) states that the historic environment is important to sustainable development and that local planning authorities should set out in their local plans a positive strategy for the conservation and enjoyment of the historic environment. The NPPF also requires local planning authorities to recognise that heritage assets are irreplaceable resource and should be conserved in a manner appropriate to their significance, taking into account of:

- sustaining and enhancing the asset and putting it to a viable use;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.

**15.3** The national Planning Practise Guidance (PPG) proposes that local planning authorities should identify specific opportunities within their area for the the conservation and enhancement of heritage assets.

**15.4** The District Council has commissioned Kent County Council's Heritage Conservation Section to undertake the Shepway Heritage Strategy to meet the requirements of the NPPF and the PPG. The primary purpose of the Heritage Strategy is to identify, group and understand the value of the District's heritage assets and set out a positive strategy. The Heritage Strategy is likely to be completed at the beginning of 2017.

**15.5** The Core Strategy sets out the broad approach to the historic environment, enhancing local identity and includes an express requirement to have regard to local context and the impact of development on heritage assets.

### Preferred Option

#### Heritage Assets Policies

**15.6** Shepway is home to numerous heritage assets, both non-designated and designated, that contribute to a compelling historic narrative about the district. These include an array of medieval churches, castles, windmills and Napoleonic

infrastructure. There are just over 20 conservation areas in the district and over ?? listed buildings. The diagram below illustrates the spacial distribution of some of these assets.

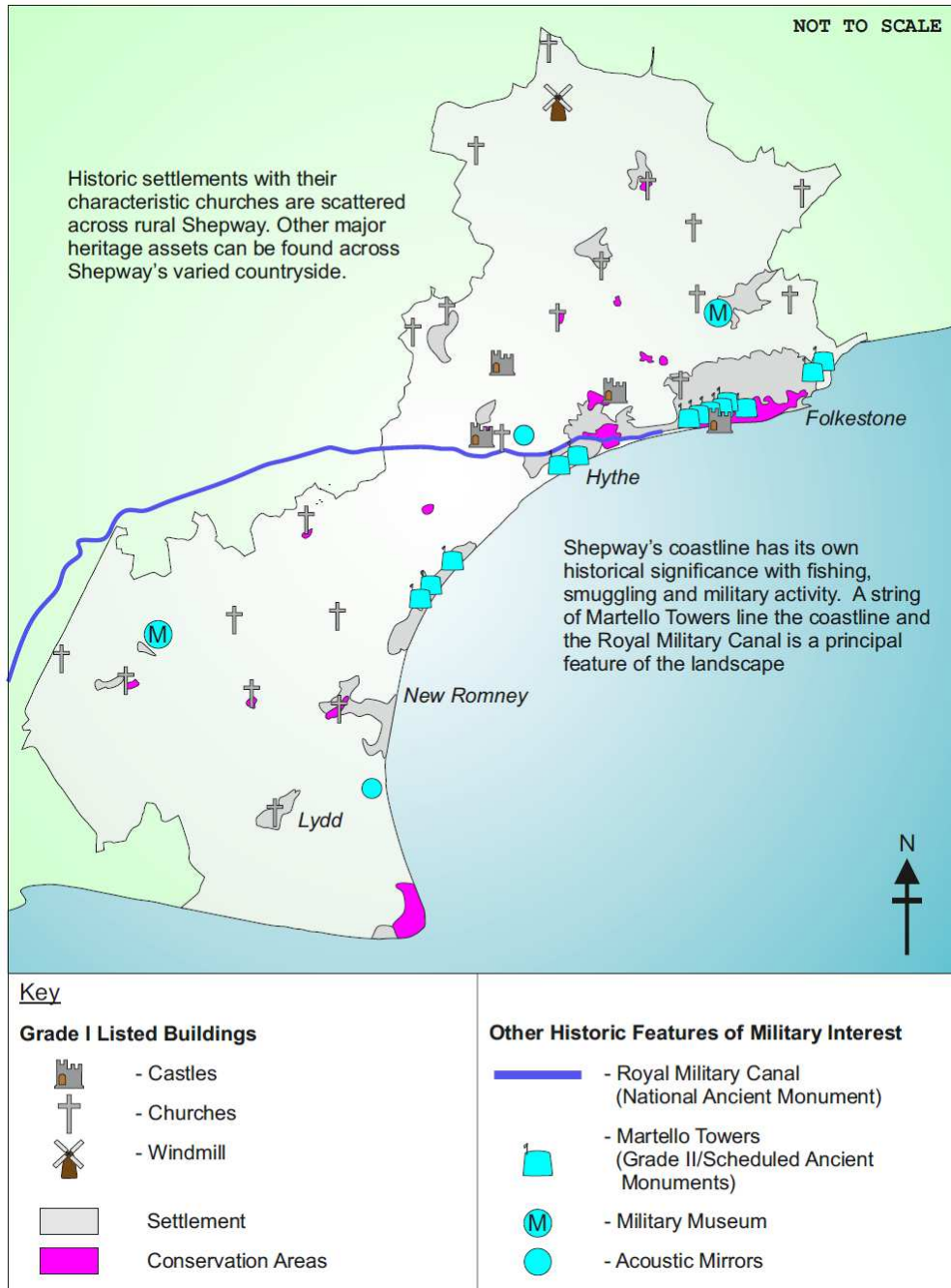


Figure 15.1 Historic features of the rural and coastal built environment

### Box 10

Heritage assets can be designated or non-designated. Designated assets have been identified under relevant legislation and include, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens or Conservation Areas.

Non-designated assets are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated.

**15.7** The District Council considers that these heritage assets, both non-designated and designated can play an important role in the social and economic regeneration of the district, bringing about social cohesion, encouraging economic growth and restoring vibrancy to communities through, for example, the creation of a sense of place, adding value to new developments, and expanding the tourism offer in the district through improved public access.

**15.8** Policy HE1 below supports proposals that provide a viable use to that assist in the social and economic regeneration of the district and ensure the long term protection, conservation and, where appropriate, the enhancement of heritage assets in line with government legislation.

### Policy HE1

The District Council will grant permission for proposals which promote an appropriate and viable use of heritage assets, consistent with their protection and conservation, particularly where these bring redundant or under-used buildings and areas back into use or improve public accessibility to the asset.

### Consideration of Heritage Assets in Planning and Listed Building Applications

**15.9** The District Council will consider listed building and conservation area applications against national legislation starting with S66 and S72 of the Planning (Listed Building and Conservation Areas) Act 1990 and paragraphs 126 and 141 in the NPPF.

## Box 11

### Planning (Listed Building and Conservation Areas) Act 1990

*'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority ... shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' (S66)*

and

*'In the exercise, with respect to any buildings or other land in a conservation area...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area' (S72).*

### National Planning Policy Framework

Para 132 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Para 133 Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.

Para 134 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

## Archaeology

**15.10** In areas of known archaeological potential identified in the Kent Historic Towns Surveys of 2003 - 2004 (undertaken across the county by Historic England and KCC) there will be a reasonable possibility that archaeological remains exist and therefore the potential impact of any proposed development on archaeological remains will need to be considered. Developers may be required to provide detailed information on the nature and quality of any archaeological remains on the site before a planning application is determined. Large scale development proposals affecting sites outside but adjoining areas of known archaeological potential may also be required to submit archaeological surveys.

**15.11** Where archaeological finds occur unexpectedly during development, the Council will seek specialist advice and guidance and this could result in further work to be undertaken, such as recording or further excavations.

## Policy HE2

### Archaeology

Important archaeological sites, together with their settings, will be protected and, where possible, enhanced. Development which would adversely affect them will not be permitted.

In areas where there is known archaeological interest, the District Council will require appropriate desk based assessment of the asset has been provided as part of the planning application. In addition, where important or potentially significant archaeological heritage assets may exist, developers will be required to arrange for field evaluations to be carried out in advance of the determination of planning applications.

Where the case for development affecting a heritage asset of archaeological interest is accepted, the archaeological remains should be preserved in situ as the preferred approach. Where this is not possible or justified, appropriate provision for preservation by record may be an acceptable alternative. Any archaeological recording should be by an approved archaeological body and take place in accordance with a specification and programme of work to be submitted to and approved by the District Council in advance of development commencing.



### **Local Listed of Buildings and Sites of Architectural or Historic Interest**

**15.12** There are many buildings and sites (such as gardens or structures) in the Shepway District that make a positive contribution to the local character and sense of place because of their heritage value but which are not formally designated. Although these heritage assets are not afforded the same protection of those that are designated, the NPPF does state that they should be taken into account in determining planning applications and that they may be offered some level of protection by the local planning authority if they are identified on a formally adopted list of local heritage assets.

**15.13** The District Council is currently undertaking a Heritage Strategy which will identify heritage themes and set out criteria for considering non-designated heritage assets and including them in a 'Local List'. When considering development proposals, the District Council will establish if any potential non-designated heritage asset meets the definition in the National Planning Policy Framework at an early stage in the process and add any properties or sites that meet the criteria to the list. This list will be updated on a regular basis and will be available on line.

#### **Policy HE3**

##### **Local list of Buildings and Sites of Architectural or Historic Interest**

Proposals for development affecting buildings or sites identified on the Local List of Buildings of Architectural or Historic Interest, or would meet the criteria, will be permitted where the particular characteristics that account for the designation are protected and conserved.

**15.14** The criteria for identifying Heritage Assets for a Local List are as follows:

### Statement 7

A Local List of Heritage Assets will include buildings, structures, landscape and archaeological features, which are of local interest, and have no statutory designation. For inclusion within the Local List, the Heritage Asset must comply with at least one of the criteria listed below:

**Historic Interest.** This can include:

- Association with a figure or event of significant local or national importance.
- Buildings relating to traditional or historic 'industrial' processes.
- Age and use of distinctive local characteristics.
- Archaeological importance.

**Architectural and Artistic Interest.** This can include:

- Buildings of high quality design, displaying good use of materials, architectural features and styles and distinctive local characteristics, which retain much of their original character.
- Designed by an architect or engineer of local or national importance.
- Demonstrating good technological innovation.
- Good quality modern architecture.

**Social, Communal and Economic Value.** This can include:

- Reflecting important aspects of the development of a settlement.
- Demonstrating an important cultural role within the community.
- Places which are perceived to be a source of local identity, distinctiveness, social interaction and coherence.
- Demonstrating links to a significant local industry or trade.

**Townscape Character.** This can include:

- Providing a key local or national landmark.
- Of significant townscape or aesthetic value.
- Playing an integral role within a significant local vista or skyline.
- Groupings of assets with a clear visual, design or historic relationship.
- Part of a locally important designed landscape, park or garden.
- Providing a good example of early local town planning.

## Communal Gardens

**15.15** The Leas and the west end of Folkestone are characterised by grandiose 19th and early 20th Century buildings arranged around private and/or communal gardens. These gardens contribute significantly to the character and quality of The Leas and Bayle Conservation Area, but are subject to development pressures. Their retention is important in maintaining the character of this part of Folkestone.

### Policy HE3

#### Communal Gardens

The District Planning Authority will not grant planning permission for proposals for the development of the gardens, identified below and defined on the Policies Map, which form part of the comprehensive layout of the west end of Folkestone.

1. Augusta Gardens
2. Balfour Gardens
3. Clifton Crescent
4. Clifton Gardens
5. Grimston Gardens
6. Trinity Gardens
7. Adj Grand Hotel
8. Westbourne Gardens

## Consideration of Options

### Box 12

#### Option HE1

The policy options considered in the Issues and Options document were:

Promoting and reinforcing the special character of designated conservation areas in the District

Require the design of new development in conservation areas to draw inspiration from local street patterns, building heights, local architectural styles and prevalent materials while remaining distinctive in its own right. Proposed development should take account of approved Conservation Area Appraisals.

Or

B: Promote high quality design of new buildings in conservation areas that while having reference to historical surroundings is innovative, distinctive and contemporary in character.

And/or

C: Require advertisements to reflect historic or locally distinct design wherever possible and to minimise visual obtrusiveness (whilst recognising their function)

### Box 13

#### Option HE2

Balancing the need for change and new development against the need to protect the historic environment and heritage assets.

A: Require all new development to preserve or enhance the architecture, historic interest and setting of our built heritage and heritage assets

And/or

B: Recognise that even in historic environments in some cases modern design can contribute to a sense of place and economic vitality, particularly where the existing character is poorly defined, or of limited visual amenity

And/or

C: Give a greater weight to the need for preservation of listed buildings as “going concerns” when considering the use of buildings, as opposed to requiring strict compliance with the preferred land uses in the development plan

Or

D: Rely upon generic design policies for the assessment of proposals affecting the use of listed buildings

## Box 14

### Option HE3

Ensuring adequate and proportional protection of buildings, gardens, landscapes, structures and archaeological features which are of local historical merit, but which do not meet the national standards for statutory listing

A: Establish a policy that, informed by a Heritage Strategy, identifies buildings, gardens, landscapes, structures and archaeological features that should be afforded an appropriate level of importance and protection as heritage assets.

Or

B: Establish a policy that requires the assessment of development on non designated heritage assets on a case by case basis having regard to generic design policies and the requirements of the NPPF.

And/or

C: In Areas of Archaeological Potential and where appropriate elsewhere require the preservation in situ of archaeological remains that are considered to be of national or local interest unless there is an overriding case based on the needs and requirements of a development

## Sustainability Assessment

**15.16** Positive effects of the first option are that all three policy options are likely to have a positive effect in safeguarding the historic character (SA7) of the District's landscapes and townscapes (SA8). The negative effects are that all policy options go beyond existing national planning policy, increasing the financial burden on developers, which could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District, with potentially adverse effects against their associated SA objectives. Policy B is more flexible than Policy A in that it encourages high quality, innovative, distinctive and contemporary design in conservation areas and is therefore likely to have a lesser adverse effect.

**15.17** With regard to the second option, the SA concluded that Policy options A, B and C all contribute positively to safeguarding the historic character (SA7) of the District's landscapes and townscapes (SA8). However, Policy options A, B and C go beyond existing national planning policy, increasing the financial burden on developers, which could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District with potentially adverse effects against their associated SA objectives. Options B and C are more flexible than A, recognising that modern design can contribute to a sense of place and Option D largely relies

on existing planning policy and is therefore likely to have a negligible effect economic vitality and recognising that listed buildings are “going concerns” when considering the use of buildings, as opposed to requiring strict compliance with the preferred land uses. Therefore, options B and C are likely to have a less adverse effect than Policy A.

**15.18** The three policy options in the third and final option box above are likely to help safeguard local heritage assets not recognised as being of national importance (SA7); however policy options A and C protect specific heritage assets, buildings, gardens, landscapes, structures and archaeological features. Policy B largely has regard to generic design policy options and the requirements of the NPPF, which would suggest that it is likely to have a negligible effect relative to the SA baseline. However, Policy options A and C go beyond existing national planning policy, increasing the financial burden on developers, which could make it harder to develop new residential (SA5) and employment (SA6) schemes in the District, with potentially adverse effects against their associated SA objectives.

## Conclusions

**15.19** The three policy options sought to preserve and enhance the historic environment in new developments. The existing 'Saved Policies' from the 2006 Local Plan are criteria based, listing all features that could be affected by proposals.

**15.20** The Planning (Listed Building and Conservation Areas) Act 1990 sets out the general duty for the local planning authority when considering proposals for Listed Buildings (S66) and buildings or other land within Conservation Areas (S72). These state that the Local Authority should:

*'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority ... shall have **special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses**' (S66)*

and

*'In the exercise, with respect to any buildings or other land in a conservation area...**special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area**' (S72).*

**15.21** The NPPF also sets out the issues that should be considered (considering the significance of the asset and the harm on it) when a local planning authority is determining a applications relating to historic assets. Historic Parks and Gardens are identified as designated heritage assets in the NPPF. In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

**15.22** The NPPF continues to state that the *significance* of the of the heritage asset should be considered and that the more important an asset is, then it should be given greater weight. The Framework then discusses *harm* and *loss* requiring clear and convincing justification. Where there is harm, consent should be refused unless it can be demonstrated substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or can meet criteria set out in the NPPF, which includes a viable use.

**15.23** It is, therefore, considered that a new local plan policy would not add anything further to the protection and consideration of historic assets given in the Act and the NPPF. It is concluded, therefore, that a specific policy on this issue is not required. The SA also concludes that the policy options could also add to the financial burden.

**15.24** Evidence from Historic England <sup>(1)</sup> indicates that the historic environment makes a significant contribution to the UK economy, providing jobs and output across a number of industries, such as tourism. As part of regeneration, the historic environment can assist in the long term success by brining about social cohesion, encouraging economic growth and restoring vibrancy to communities. It is, therefore, important to have a positive policy that encourages the use of historic assets to ensure successful regeneration and the sustaining the assets through viable uses.

**15.25** With regard to the Local List, the NPPF and the PPG encourage local planning authorities to identify non-designated assets through 'Local Lists'. The PPG also suggests that the substantial majority of buildings will have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage interest for their significance to be a material consideration in the planning process. It is, therefore, considered that a policy protecting the special characteristics of a property or site through the local list is justified.

**15.26** The 2006 Local Plan included two policies that protect 'Areas of Special Character' and 'Communal Gardens'. These areas are characterised by their special environmental quality, such as their special the built form or garden sizes, and generally reflecting the historic period they were developed, but which are not protected by Conservation Area status. These policies have been largely successful and it is proposed to continue with these designations. The NPPF does include

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'non-designated heritage assets' within paragraph 135 but this should have regard to the significance of the asset. A policy would provide additional weight to such assets.

## 16 Schedule of Saved Policies

### Schedule of Policies

**16.1** The table below lists the saved Local Plan Policies (2006) that are to be deleted and not replaced.

Policy Issue	Saved Shenway	Explanation for the deletion
Housing land supply	HO1	Covered by NPPF, allocations in Places chapters, HB5,HB7
Land supply requirements 2001-2011	HO2	Covered by allocations in Places chapters
Criteria for local housing needs in rural areas	HO6	No longer required
Loss of residential accommodation	HO7	Replaced by HB1
Criteria for sub-division of properties to flats/maisonettes	HO8	Replaced by HB5
Subdivision and parking	HO9	Replaced by T2
Houses in multiple occupation	HO10	Replaced by HB5
Criteria for special needs annexes	HO13	Replaced by HB4
Criteria for development of Plain Road, Folkestone	HO15	No longer required
Development on established employment sites	E1	Covered by allocations in Places section and E1
Supply of land for industry, warehousing	E2	Covered by allocations in Places section

Policy Issue	Saved Shenway	Explanation for the deletion
and offices. Allocated sites on the Proposals Map.		
Loss of land for industrial, warehousing and office development	E4	Covered by allocations in Employment Section.
Loss of rural employment uses	E6a	No longer required
Folkestone Town Centre - Primary shopping areas as defined on the Proposal Map	S3	Replaced by UA1
Folkestone Town Centre - Secondary shopping area as defined on the Proposal Map	S4	Replaced by UA1
Local Shopping Area - Hythe	S5	Replaced by UA21
Local Shopping Area - New Romney	S6	Replaced by RM1
Local Shopping Area - Cheriton	S7	Replaced by UA2
Local centres - last remaining shop or public house	S8	No longer required
Loss of visitor accommodation	TM2	Replaced by E3
Static caravans and chalet sites	TM4	Replaced by E4
Criteria for provision of new or upgraded	TM5	Replaced by E4

Policy Issue	Saved Shenway	Explanation for the deletion
caravan and camping sites		
Development of the Sands Motel site	TM7	Allocated site: RN8
Requirements for recreation/community facilities at Princes Parade	TM8	No longer required
Battle of Britain Museum, Hawkinge	TM9	No longer required due to lack of progress also partially covered in ND4
Loss of indoor recreational facilities	LR1	Covered in National Planning Policy Framework (NPPF)
Formal sport and recreational facilities in the countryside	LR3	Covered in NPPF
Recreational facilities - Cheriton Road Sports Ground/Folkestone Sports Centre	LR4	No longer required
Recreational facilities - Folkestone Racecourse	LR5	No longer required
Improved sea access at Range Road and other	LR7	No longer required
Provision of new and protection of existing rights of way	LR8	Covered by Countryside and Rights of Way Act (2000)
Open space protection and provision	LR9	Covered by NPPF and Policy C3

Policy Issue	Saved Shenway	Explanation for the deletion
Provision of children's play space in developments	LR10	Covered by C4
Protection of allotments and criteria for allowing their redevelopment	LR11	Covered by NPPF and legislation
Protection of school playing fields and criteria for allowing their redevelopment	LR12	Covered by NPPF and legislation
Standards expected for new development in terms of layout, design, materials etc.	BE1	Covered by HB2 and HB1
Provision of new public art	BE2	Covered by C1
Criteria for considering new conservation areas or reviewing existing conservation areas	BE3	Covered by the Planning (Listed Building and Conservation Areas) Act 1990, the Planning Practice Guidelines 2012 (PPG) and the National Planning Policy Framework 2012 (NPPF)
Criteria for considering development within conservation areas	BE4	Covered by Planning Act, PPG and NPPF.
Control of works to listed buildings	BE5	Covered by Planning Act, PPG and NPPF.
Safeguarding character of groups of historic buildings	BE6	Covered by Planning Act, PPG and NPPF.
Criteria for alterations and extensions to existing buildings	BE8	Covered by Planning Act, PPG and NPPF.

Policy Issue	Saved Shenway	Explanation for the deletion
Design considerations for shopfront alterations	BE9	Covered by HB2
Areas of Special Character	BE12	Covered by HB1, HB2 and HB3
Protection of urban open space and criteria for allowing redevelopment	BE13	Covered by HB1, HB2 and HB3
Protection of communal gardens as defined on the Proposals Map	BE14	Covered by HE3
Requirement for comprehensive landscaping schemes	BE16	Covered by NE3
Tree Preservation Orders and criteria for allowing protected trees to be removed	BE17	Covered by PPG 2012.
Protection of historic parks and gardens as defined on the proposals map	BE18	Covered by NPPF and PPG.
Land instability as defined on the Proposals Map	BE19	Covered by NE6
Criteria to be considered for development proposals relating to sewage and wastewater disposal for four dwellings or less, or equivalent	U1	No longer required

Policy Issue	Saved Shenway	Explanation for the deletion
Five dwellings or more or equivalent to be connected to mains drainage	U2	No longer required
Criteria for use of septic or settlement tanks	U3	No longer required
Protection of ground and surface water resources	U4	Covered in the Core Strategy
Waste recycling and storage within development	U10	Covered by HB2
Requirements for development on contaminated land	U10a	Covered in PPG
Criteria for the assessment of satellite dishes and other domestic telecommunications development	U11	No longer required
Criteria for the assessment of overhead power lines or cables	U13	Covered by legislation
Criteria for assessment of developments which encourage use of renewable sources of energy	U14	Covered by CC1
Criteria to control outdoor lighting pollution	U15	Covered by NE5

Policy Issue	Saved Shenway	Explanation for the deletion
Safeguarding land at Hawkinge, as identified on the Proposal Map, for a secondary school	SC4	No longer required
Criteria for the development of Seapoint Centre relating to a community facility	SC7	No longer required
Provision for buses in major developments	TR2	Covered in Transport Section
Protection of Lydd Station	TR3	No longer required
Safeguarding of land at Folkestone West Station and East Station Goods Yard in connection with high speed railway services	TR4	No longer required for the Folkestone West Station, however East Station Goods Yard is Covered by UA7.
Provision of facilities for cycling in new developments and contributions towards cycle routes	TR5	Covered by T5 and T1
Provision for pedestrians in new developments	TR6	Covered by T1
Provision of environmental improvements along the A259	TR8	No longer required
Criteria for the provision of roadside service facilities	TR9	No longer required



Policy Issue	Saved Shenway	Explanation for the deletion
Restriction on further motorway service areas adjacent to the M20	TR10	No longer required
Accesses onto highway network	TR11	Covered by T1
Vehicle parking standards	TR12	Covered by T2 and T3
Travel Plans	TR13	No longer required
Folkestone Town Centre Parking Strategy	TR14	No longer required
Criteria for expansion of Lydd Airport	TR15	No longer required
Countryside to be protected for its own sake	CO1	Covered by Core Strategy Policy
Special Landscape Areas and their protection	CO4	Covered by NE3
Protection of Local Landscape Areas	CO5	Covered by NE3
Protection of the Heritage Coast and the undeveloped coastline	CO6	Covered by NE9
Protection of protected species and their habitat	CO11	Covered by legislation as well as NE1 and NE2
Protection of the freshwater environment	CO13	Covered by NE2
Long term protection of physiography, flora	CO14	Covered by NE2

Policy Issue	Saved Shenway	Explanation for the deletion
and fauna of Dungeness		
Criteria for farm diversification	CO16	Covered by E5
Criteria for new agricultural buildings	CO18	Covered by HB1 and HB2
Criteria for the re-use and adaptation of rural buildings	CO19	Covered by E7
Criteria for replacement dwellings in the countryside	CO20	Covered by HB7
Criteria for extensions and alterations to dwellings in the countryside	CO21	Covered by HB7
Criteria for horse related activities	CO22	Covered by NE4
Criteria for farm shops	CO23	Covered by E6
Strategic landscaping around key development sites	CO24	Covered by NE2
Protection of village greens and common lands	CO25	Covered by legislation
Criteria for the development of the Ingles Manor/Jointon Road site, as shown on the Proposals Map	FTC3	Covered by UA11
Criteria for the development of land adjoining Hotel	FTC9	Covered by Core Strategy

Policy Issue	Saved Shenway	Explanation for the deletion
Burstin as shown on the Proposals Map		
Criteria for the redevelopment of the Stade (East) site, as shown on the Proposals Map	FTC11	No longer required

**Table 16.1**

## 17 Appendix 1 Alternative Options Considered for Residential

### Urban Area

#### Folkestone

Site	Reason for not allocating
<p><b>Option 44</b></p> <p>688 - Upper Works Site, Castle Hill</p>	<p>There are a number of constraints on the site which include SAC, an Ancient Monument and SSSI. For this reason the site would be unsuitable for residential development</p>
<p><b>Option 45</b></p> <p>608 - West Grove, Wellington Place, Sandgate</p>	<p>The site is unsuitable as it is not large enough to accommodate for the development of 5 or more dwellings. Half of the garden cannot be developed on due to the steep bank and the TPOs in close proximity to the north and eastern edges of the site are a major constraint.</p>
<p><b>Option 46</b></p> <p>674 - Digby Road, CT20 3NB</p>	<p>There are few constraints with this site; the impact residential development here may have on the commercial buildings closeby may need to be assessed. However, the site is suitable.</p>

Site	Reason for not allocating
<p><b>Option 47</b></p> <p>602 - Land between Valebrook Close and Valestone Close, Horn Street</p>	<p>The site consists of open land between two settlements set in a rural location, and on land of archaeological potential. Development of the entire site could lead to the loss of the open space, which would be detrimental to the rural character of this area. It should be noted, though, that this site is the preferred site for Horn Street and offers some unique potential. Only part of the open space has been put forward for housing, with the proposals avoiding the blocks of TPOs.</p>
<p><b>Option 48</b></p> <p>338 - Black Bull Allotments, Dolphins Road, Folkestone</p>	<p>Site could deliver up to 65 new dwellings in the space of 1-2 years. It is within a residential area of high-density semi-detached dwellings, and would therefore fit into the townscape as the size of the site would lead to similar linear development to adjacent roads. However, it is still currently in use as allotments and it is unclear that this use will cease as the allotments have been in use for over 50 years already. Therefore there are more suitable sites that are more likely to come forward in a shorter time span.</p>
<p><b>Option 49</b></p> <p>640 - Land adj. 43 Horn Street</p>	<p>This would not be a preferred site as a result of its distance from services, its physical separation from the settlement of Horn Street, and its extension of the built area further to the West into the Countryside.</p>
<p><b>Option 50</b></p> <p>656 - Silver Spring, Park Farm</p>	<p>Vacant employment site within urban area of Folkestone. Will need to be tested through ELR.</p>

**Table 17.1**

**Hythe**

Site	Reason for not allocating
<p><b>Option 51</b> 603 - Land</p>	<p>The site does not meet the size threshold for the development of at least 5 dwellings. Any intensification of development in this location could be out of keeping with the locality.</p>
<p><b>Option 52</b> 444 - Land NW of Rectory Lane, Saltwood</p>	<p>The site was previously considered unsuitable due to its location within the AONB and being divorced from the settlement. Development would also be detrimental to the setting of the adjacent conservation area through the loss of open land that contributes to its special character. The situation has not changed.</p>
<p><b>Option 53</b> 463 - Hotel Imperial Golf Course Lands, Hythe</p>	<p>This land is adjacent to a site that has been identified for development but it is considered that the two parcels of land have different characteristics. The Hotel Imperial golf course land is considered to be important for the setting of the scheduled monument (Royal Military Canal) as the land is low and flat, reminiscent of the original characteristics when it was constructed. The site also provides accessible open space with its unique open space features (location, setting and scale). Flood risk is also slightly worse than that of the land to the east. The land itself is shown as in Flood Zone 3 (but only a small part is within the 'significant' hazard mapping on the SFRA). It is considered that, as there is no specific reason to set aside this loss for any community benefit. This contrasts with the land to the east, which was a former tip, which has resulted in the majority of the land being raised considerably with only limited public access along the Canal.</p>
<p><b>Option 54</b> 630 - Land adj. 10 Spring Lane, Seabrook, Hythe</p>	<p>This site is allocated Ancient Woodland in its entirety, and benefits from a local wildlife site and landscape character area status. Allocation for development would not be appropriate.</p>

Site	Reason for not allocating
<p><b>Option 55</b></p> <p>624 - Bluewater Caravan Site, Dymchurch Road, Hythe</p>	<p>The site suffers from 'extreme' flood hazard to 2215 as highlighted by the SFRA. The SE remainder of the site suffers from 'significant' flood hazard. Allocation would therefore not be appropriate.</p>
<p><b>Option 56</b></p> <p>626c - Land at Lyell Close, Hythe</p>	<p>The site does not meet the size threshold for allocation.</p>
<p><b>Option 57</b></p> <p>601 - Burmars Road land, 'Sunnyside', Hythe West</p>	<p>The site offers 'extreme' flood hazard to 2115 as per the SFRA. Therefore, allocation would not be appropriate.</p>
<p><b>Option 58</b></p> <p>175 - Land South West of Nickolls Quarry</p>	<p>The site cannot come forward as the majority compromises extreme flood hazard, and the remainder 'significant'. In any case, it is remote from services and would not be able to deliver sustainable development.</p>

Site	Reason for not allocating
<p><b>Option 59</b></p> <p>632 - Elms Farm, Ashford Road, Newingreen</p>	<p>Development here would constitute intensification of development and urbanisation of the countryside. Newingreen is not a recognised settlement in the Core Strategy Settlement Hierarchy, and offers no services. It is situated well outside a recognised settlement boundary. The distances to the closest services mean that development in this location would not constitute sustainable development.</p>
<p><b>Option 60</b></p> <p>326 - Land adj. The Willows, Ashford Road, Newingreen</p>	<p>Development here would constitute intensification of development and urbanisation of the countryside. Newingreen is not a recognised settlement in the Core Strategy Settlement hierarchy and offers no services. It is situated well outside a recognised settlement boundary. The distances to the closest services mean that development in this location would not constitute sustainable development.</p>
<p><b>Option 61</b></p> <p>690 - Red House Farm, Ashford Road, Newingreen</p>	<p>Development on this site would constitute isolated development in the countryside. The closest hamlet, approximately 800m from the site is Newingreen which is not a recognised settlement in the Core Strategy Settlement Hierarchy, and offers no services. The distances to the closest services mean that development in this location would not constitute sustainable development, and any residents would struggle to make trips on foot to and from the site due to the dearth of local infrastructure.</p>
<p><b>Option 62</b></p> <p>Land Opposite Botolph's Bridge</p>	<p>This site adjoins the settlement boundary for Hythe, and contains one of the only areas of 'nil' flood hazard in the locality. While at present it is remote and would not be sustainable location-wise, it adjoins the limits of the Nickolls Quarry/Martello Lakes development which is well under construction. It also comprises contaminated land that development could serve to improve. While the adjacent permitted development is currently under construction, it does not have the best access to services, but this should be remedied in the near future with the</p>



Site	Reason for not allocating
	development of a proximate local centre. Development should ensure, however, that housing is not constructed in the small area of 'significant' flood hazard on the easternmost part of the site.

**Table 17.2**

**Romney Marsh**

Site	Reason for not allocating
<p><b>Option 63</b></p> <p>1009 - Land North of Littlestone Golf Course (Site 1), Littlestone</p>	This site should not go forward given its situation wholly within the SSSI and the fact that it does not meet the minimum size threshold for allocation.
<p><b>Option 64</b></p> <p>1010 - Land at Coast Road (Site 2), Littlestone</p>	This site should not go forward given its situation wholly within the SSSI and the fact that it does not meet the minimum size threshold for allocation.
<p><b>Option 65</b></p> <p>1011 - Land at Coast Road (Site 3), Littlestone</p>	This site should not go forward given its situation wholly within the SSSI.

Site	Reason for not allocating
<p><b>Option 66</b></p> <p>1012 - Land at St Andrews Road (Site 4), Littlestone</p>	<p>This site should not go forward as it does not meet the minimum size threshold.</p>
<p><b>Option 67</b></p> <p>435 - Land North of Avonlea, Dymchurch Road, New Romney</p>	<p>This site is located in Flood Zones 2 and 3, and there is concern that allocation here would establish a precedent of development south of the A259. This would not be suitable for development as it would result in encroachment into the countryside.</p>
<p><b>Option 68</b></p> <p>607 - Land adj. to Church Lane, New Romney</p>	<p>Allocation of this substantial site would result in encroachment into the countryside and would therefore have an adverse landscape impact. In addition to this, capacity reductions would result from the presence of an electricity substation and of electrical and telegraph wiring above ground on the site.</p>
<p><b>Option 69</b></p> <p>347 - Land west of High Knocke, Dymchurch</p>	<p>This site is not sufficiently related to its surrounding settlements. Development on this site would join the settlement of St Mary's Bay with the High Knocke estate, and encourage the conurbation of these settlements with Dymchurch, which is to be resisted.</p>

Site	Reason for not allocating
<p><b>Option 70</b></p> <p>349 - Land r/o Crimond Avenue 'Redoubt and Fleet Hythe' Dymchurch North</p>	<p>Development on this site would be inappropriate given that this estate is significantly separated from the main Dymchurch service centre, and is located on an area of extreme flood risk. It would not be possible to achieve sustainable development on this site.</p>
<p><b>Option 71</b></p> <p>350a - Pear Tree Lane Land, Dymchurch</p>	<p>There are several constraints on this site including TPOS, on-site flood risk and the siting of listed buildings adjacent to the site. Therefore this site is not suitable for allocation.</p>
<p><b>Option 72</b></p> <p>350b - Pear Tree Lane Land, Dymchurch</p>	<p>There is a challenge posed by flood risk, combined with the lack of locally-available services, which means that this Greenfield site would not be suitable for allocation.</p>
<p><b>Option 73</b></p> <p>351a - Land N Hythe Road, Dymchurch</p>	<p>There are areas of extreme flood risk on the site, while the majority of it suffers from significant flood risk, which there are notable patches of water on site. The land is Greenfield, and is almost entirely designated as a local wildlife site - therefore this site is not suitable for allocation.</p>

Site	Reason for not allocating
<p><b>Option 74</b></p> <p>351b - Land N Hythe Road, Dymchurch</p>	<p>There are areas of extreme flood risk on the site, while the majority of it suffers from significant flood risk, while there are notable patches of water on site. The land is Greenfield, and is almost entirely designated as a local wildlife site. Current access is insufficient, and via a builders yard, while any access from the public highway would not be straightforward given the requirement to cross Hoorne's Sewer. Any residents may be disturbed by the presence of the tourist railway along the NW boundary of the site. Development on this site would therefore be contrary to the NPPF principles of sustainable development.</p>
<p><b>Option 75</b></p> <p>352 - Land NE Nesbit Road 'Jesson Farmland', St Mary's Bay</p>	<p>Residential amenity cannot be assured given the shape of the site and its relationship to the railway line. More importantly, access to the site is doubtful, and the adjacent plot's layout means that vehicular access cannot come from the north, meaning that it is not a deliverable site.</p>
<p><b>Option 76</b></p> <p>380 - Land off Jenners Way, St Mary's Bay</p>	<p>Allocation for the whole of this site would be inappropriate given that this would result in intrusion of development into the countryside and create pressure for infill on neighbouring parcels. Flood hazard is the greatest on the part of the site adjacent to Jenner's Way and closest to the settlement.</p>
<p><b>Option 77</b></p> <p>391 - The Old Rectory, Burmarsh</p>	<p>A quarter of this site is subject to TPO, and has a body of water, meaning that the area nearest to the settlement could not be developed, leading to an encroachment into the countryside. The proposed number of dwellings would lead to a patter of development incongruous with the immediate surroundings. This, combined with the dispreferred access arrangements, and other constraints including flood risk and setting of listed buildings means that this is to be a dispreferred option.</p>

Site	Reason for not allocating
<p><b>Option 78</b></p> <p>611 - Former Piggery, Brooker Farm, Newchurch</p>	<p>This site is significantly divorced from the main, minor settlement. Given that this is a Greenfield site in the wider countryside only marginally related to a secondary village without services, the site cannot be allocated for development.</p>
<p><b>Option 79</b></p> <p>600 - Land West of Burmarsh, Burmarsh</p>	<p>Site is considered unsuitable given that development would notably extend the built area of the village into open countryside and would necessitate the upgrading of the main road through the village. This settlement is at the bottom of the settlement hierarchy. therefore significant development would not be sustainable given the significant distances required to access services. Added to this, there is the challenge of significant flood risk.</p>
<p><b>Option 80</b></p> <p>378 - Land at Mulberry Cottage, Lydd</p>	<p>Constraints of this site include its relationship with the adjacent listed buildings and SSSI. In addition, access arrangements could prove challenging given the restricted access to High Street. Furthermore, the site is not available or deliverable fundamentally as a result of its poor access.</p>
<p><b>Option 81</b></p> <p>662 - Land north of Sycamore Close, Lydd</p>	<p>The land is unsuitable for allocation given that it is entirely located within the Dungeness, Romney Marsh and Rye Bay SSSI.</p>

Site	Reason for not allocating
<p><b>Option 82</b></p> <p>319 - Lydd</p>	<p>This site is unsuitable for allocation given its location entirely within the Dungeness, Romney Marsh and Rye Bay SSSI, and its adjacency to the Lade Fort Scheduled Monument.</p>
<p><b>Option 83</b></p> <p>631 - Land at West Place, Brookland</p>	<p>This is a divided site, and neither the constituent parts nor the whole meet the area threshold for allocation.</p>
<p><b>Option 84</b></p> <p>216a &amp; 216b - Station Approach, New Romney</p>	<p>This site is unavailable.</p>
<p><b>Option 85</b></p> <p>681 - Commercial Land, Station Approach, New Romney</p>	<p>This site is unavailable.</p>

Site	Reason for not allocating
<p><b>Option 86</b></p> <p>1016 - Land north of Boarmans Lane, Brookland</p>	<p>This site would not be suitable for development in the first part of the plan period given its lack of adjacency to current residential development. It is located in Flood Zones 2 and 3 and development here would result in countryside encroachment and the conjoining of two distinct parts of the settlement.</p>
<p><b>Option 87</b></p> <p>1021 - Land NE of New Romney</p>	<p>Development of this site would constitute encroachment into the countryside, expansion of the settlement well beyond strategic direction promoted by the Core Strategy, and would constitute excessive urbanisation of the settlement removing the gap between the built area and other development.</p> <p>The site does not benefit from easy access to local services, especially in relation to other submitted sites, is located in flood zones 2 and 3, and has high voltage electricity on site and across the only feasible access to the site.</p> <p>This site should therefore not go forward in the local plan allocation process.</p>
<p><b>Option 88</b></p> <p>1017 - Land South of Boarmans Lane, Brookland</p>	<p>This site has many constraints, including the presence of wiring on site, TPOs, watercourses on site, Flood Zone 2 and 3 situation, controlled water area, and relationship to listed buildings and a conservation area. It does not benefit from access to services within the settlement. Allocation here would constitute unacceptable encroachment into the countryside.</p>

Site	Reason for not allocating
<p><b>Option 89</b></p> <p>604 - Land east of Eastbridge Road, Dymchurch</p>	<p>Development here would set a precedent for the expansion of the Dymchurch development beyond the confines of the railway line, and would consolidate the urbanisation of what at present is an area of rural ribbon development along Eastbridge Road.</p>
<p><b>Option 90</b></p> <p>436 - Land at Church Road, New Romney</p>	<p>Development on this site should consider the setting of the cemetery to the west. However, the site has an existing outline planning permission and, with few constraints and with access to a range of services in New Romney it is considered suitable for residential development and deliverable. The issue of site access should be double checked with KCC, as although the site has had permission for development in the past, it is not clear whether the applicant owns the land through which access will be achieved.</p>
<p><b>Option 91</b></p> <p>1014 - Craythorne Farm, New Romney</p>	<p>While this site has been submitted for 3 dwellings, and it is comparatively further from local services than other allocations, it is still within walking distance of local services in this strategic town. The precedent for New Romney's growth north of Cockreed Lane has been established as a result of planning permission for the redevelopment of the potato company site. The issue of dual site ownership could be resolved through a landowner agreement. This is not necessarily a preferred site, but it should not be rejected at this stage.</p>
<p><b>Option 92</b></p> <p>335 Fisher Field, Dungeness Road, Lydd</p>	<p>Development here could provide a logical extension to the Lydd residential settlement and an improvement in the visual quality of this area to detract from current views of industrial facilities to the south, and the army camp to the west. It could also serve to improve the landscape quality of the locality and serve investment in the immediate site area. It is situated within an appropriate distance of local services. However, allocation would depend on the ability to design beyond the site's constraints - its situation in Flood Zone 3, with 'significant' SFRA hazard could mean the site is unsuitable. In addition to this, it is a minerals safeguarding area.</p>



Site	Reason for not allocating
<p><b>Option 93</b></p> <p>620 - Land at Harden Road, Lydd</p>	<p>Although this site is some distance from local services, it is adjacent to newly developed housing and, unlike a lot of land in this ward, is not in flood zone 3 (it is in zone 2), and poses little flood hazard under the SFRA. The light industrial works to the SW will require some mitigation measures and careful site design, while s38 works may be needed to the unadopted access road. There is also a red flag over this site due to the potential for encroachment into the countryside.</p>
<p><b>Option 94</b></p> <p>329 - Pepperland Nurseries, Boarmans Lane, Brookland</p>	<p>Further investigation may well be needed to determine the lawful use of this site either as agriculture (this is the activity that had been going on) and light industrial (this activity has a permission that may well have been implemented). This is key to the site's status as brownfield or Greenfield and therefore its suitability for (re)development. There is potential for adverse impacts on the conservation area, and the site is remote in terms of access to services. Previous housing schemes on the site have been refused. The site is situated in flood zone 3, and I cannot think there would be sufficient reason to prefer this site over others.</p>
<p><b>Option 95</b></p> <p>609 - Land adjacent Framlea, Rye Road, Pod Corner, Brookland</p>	<p>The Council has recently won an appeal on this site, based on the loss of rural character and development into open countryside and outside of the settlement boundary.</p>
<p><b>Option 96</b></p> <p>373 - Land west of Cockreed Lane, New Romney</p>	<p>This is a relatively large site to the North-West of the New Romney strategic town. However, it is considered unsuitable for development at this stage given both the context (rather than the raw distance) of its separation from the main settlement – it is not in the same administrative ward, and there is a significant amount of undeveloped open space between. While this open space has been submitted for designation, this is proposed to be phased over 10 years and so allocation in the first part of the plan period would not be appropriate. Designation may be appropriate for later in the plan period if sites 415, 430, 639 and</p>

Site	Reason for not allocating
	409 are developed. Therefore, in sum, development would currently constitute encroachment into the countryside and should not be allocated at this time.
<p><b>Option 97</b></p> <p>1015 - Brickyard Poultry Farm, New Romney</p>	This site is considered unsuitable for development early in the plan period given both the context (rather than the raw distance) of its separation from the main settlement – it is not in the same administrative ward, and there is a significant amount of undeveloped open space between. While this open space has been submitted for designation, this is proposed to be phased over 10 years and so allocation in the first part of the plan period would not be appropriate. Designation may be appropriate for later in the plan period if sites 415, 430, 639 and 409 are developed. Therefore, in sum, development would currently constitute encroachment into the countryside and should not be allocated at this time.

**Table 17.3**

**North Downs**

Site	Reason for not allocating
<p><b>Option 98</b></p> <p>1001 - Land at Canterbury Road, Hawkinge</p>	The site is in open countryside not adjoining an existing settlement, the site would in effect be a free standing estate in the AONB, albeit with the facilities in Hawkinge relatively close by and accessible.
<p><b>Option 99</b></p> <p>387 - Hawkinge</p>	Non-Qualifying due to not meeting the size threshold.

Site	Reason for not allocating
<p><b>Option 100</b></p> <p>399 - adj 252 Canterbury Road, Hawkinge</p>	<p>This site is in open countryside not adjoining an existing settlement, the site would in effect be a free standing estate in the AONB, albeit with the facilities in Hawkinge relatively close by and accessible.</p>
<p><b>Option 101</b></p> <p>616 - Land north east of Hawkinge Cemetery, Hawkinge</p>	<p>This site does not immediately adjoin the settlement boundary (CO1) and is in the open countryside of the AONB. It is hard to see how any development could integrate satisfactorily whilst maintaining the settlement's compact form and without unacceptable impacts. The site is bound on all sides by agricultural land, apart from a limited shared boundary with the Cemetery. There are no obviously less sensitive small areas within the site that could be considered/developed individually on a more favourable basis.</p>
<p><b>Option 102</b></p> <p>423 - Land at Peene</p>	<p>Non-Qualifying site due to not meeting the size threshold.</p>
<p><b>Option 103</b></p> <p>634 - Mill House, Oak Hill, Swingfield</p>	<p>This is a rural site well within the AONB. It adjoins extensive agricultural land but is on the edge of a small cluster of residences, which has no relevant facilities. A small residential site has been developed nearby as a 'rural exception' (affordable housing) on a plot tightly bound by roads / properties. It is in close proximity to the A260 and its bus routes, but no facilities are walkable. This is not a sustainable location to take forward through the SHLAA, and the impact of development would be unlikely to be found acceptable.</p>

Site	Reason for not allocating
<p><b>Option 104</b></p> <p>327 - Land off Teddars Leas Road, Etchinghill</p>	<p>This site is the 'wrong side' of the former railway and development here would be encroachment into the countryside / AONB as there is on development to the NE of Etchinghill.</p>
<p><b>Option 105</b></p> <p>423a - Land east of former railway, Teddars Leas Road, Etchinghill</p>	<p>This site is the 'wrong side' of the former railway and development here would be encroachment into the countryside / AONB as there is on development to the NE of Etchinghill.</p>
<p><b>Option 106</b></p> <p>633 - Hilltop Farm, Woodland Road, Lyminge</p>	<p>This is a highly rural site in the centre of the AONB. It is, from all perspectives, countryside. Although the site is claimed to be rundown and brownfield the location is simply not sustainable for five or more private dwellings.</p>

Site	Reason for not allocating
<p><b>Option 107</b></p> <p>691 - Land adj. Lyndon Hall, Lyminge</p>	<p>The site acts as a soft boundary between the urban area and open countryside / AONB, it marks the beginning of the Elham Valley from the north of Elham. In addition the site has a number of additional constraints such as the negative effect on the setting of a listed building and the blanket TPO covering the whole site.</p>
<p><b>Option 108</b></p> <p>428a - Land at Somerfield Court Farm, Barrowhill (Northern) Sellindge</p>	<p>Development here would appear highly improbable given the form of the land - a 'strip' rear of properties (backland development) on the main road - that the site can be associated with a compact form of Sellindge development, which is an aim of the Core Strategy. The site would go against the current urban form in the area and be encroachment into the open countryside. Furthermore this Barrowhill part of the parish has the physical and perceived divide from the main village where the services are related; significant residential development is unlikely to be sustainable.</p>
<p><b>Option 109</b></p> <p>428b - Land at Somerfield Court Farm, Barrowhill (Southern) Sellindge</p>	<p>Development on this site appears to be highly improbable given the form of the land - a 'strip' rear of properties (backland development) on the main road - that it can be associated with a compact form of Sellindge development, which is an aim of the Core Strategy. The site would go against the current urban form in the area and be encroachment into the open countryside. The Barrowhill part of the parish has the physical and perceived divide from the main village where the services are related; and the southern end is not served by any walkable facilities. There does not appear scope for close integration of 5 or more dwellings within the site. Furthermore, the owner does not control an access point to the site.</p>

Site	Reason for not allocating
<p><b>Option 110</b></p> <p>619 - Land west of Trust Cottages, Moorstock Lane, Sellindge</p>	<p>This site is outside the confines of the settlement boundary, development here would be an encroachment in to the open countryside. Although some facilities may not be great distance to travel to, they are not easily walkable as Moorstock is linked to Sellindge by a country lane without a footpath. This location is not sustainable for five or more units as the site does not relate to a compact or walkable defined settlement and would increase the urbanising of a small rural hamlet.</p>
<p><b>Option 111</b></p> <p>628 - Rhodes House, Main Road Sellindge</p>	<p>The site would be heavily constrained because of the need to preserve the setting of the listed building. The land to the front of Rhodes House along the A20 would need to be preserved but it might be possible to get 2 or 3 dwellings on the north of the site. However it is not clear how access would be provided to the highway for these dwellings.</p>
<p><b>Option 112</b></p> <p>1006 - Otterpool Quarry, Sellindge</p>	<p>This site is poorly located in open countryside. In addition the site adjoins a SSSI - therefore developing this site might have an adverse effect.</p>

Site	Reason for not allocating
<p><b>Option 113</b></p> <p>1008 - Land at Great Priory Woods, Sellindge</p>	<p>This site is on the very edge of the village of Sellindge (a rural centre). In terms of the sustainability criteria it does not score well and is far removed from the central area identified as a broad location for development in the Core Strategy (CSD9) where all the facilities and transport links are based. Development here would be encroachment into the countryside and there are more favourable sites within Sellindge for development.</p>
<p><b>Option 114</b></p> <p>613 - Land rear Bamstormers, Stone Street, Stanford</p>	<p>This is backland development located behind houses fronting Stone Street and Kennett Lane, so bounded by gardens on two sides and open countryside. Although centrally located in Stanford it would act as a freestanding estate. The access is not clear and there are other potential constraints on site such as the site is in an area of archaeological potential, possible agricultural grade 2 or 3 and adjoins Stanford Windmill a Grade II listed building.</p>
<p><b>Option 115</b></p> <p>204b - Folkestone Racecourse (parts), Westernhanger</p>	<p>This site would not appear to relate well to Newingreen in size or form and would operate as a freestanding estate. Moreover, there are no facilities at Newingreen and it is no longer a recognised settlement (Core Strategy hierarchy). It is regarded as countryside, although it is not the most remote rural location in the district.</p>

Site	Reason for not allocating
<p><b>Option 116</b></p> <p>614 - Land at Newingreen Estate, Stone Street, Stanford</p>	<p>This bulk of this relatively significant site is Greenfield. The site does not score well for residential development of 5 or more units in overall sustainability terms, due to its location. It does not appear there is a case for an exception, and there is the prospect that any such development would be a housing estate isolated from any recognisable village.</p>
<p><b>Option 117</b></p> <p>316 (Revised) - East Hawkinge Lands</p>	<p>The site has been revised and reduced in size however still remains as a large expansion into the AONB. In addition this site is not well contained and the boundary to the east would be extremely vulnerable to further growth in the future. However, Hawkinge as a service centre has good facilities and transport links and the site is relatively close / walkable to the centre of Hawkinge. For this site to progress further it would need to be reduced in size and consist of a smaller area within the western corner of the site. The density would need to be 20dph to reflect its rural setting in the AONB and the site capacity should be no more than 50 dwellings.</p>
<p><b>Option 118</b></p> <p>261 - Limuru, Cowgate Lane, Hawkinge</p>	<p>Although the site is at the edge of a service centre it is very rural in nature and far removed from services. In addition the site is in the AONB and the impact on this requires specific consideration. However it is hard not to conclude that there appears scope within the land parcel to accommodate five dwellings (or more) plus landscaping although this would require further investigation.</p>



Site	Reason for not allocating
<p><b>Option 119</b></p> <p>423b (South) - Land east of former railway, Teddars Lead Road, Etchinghill</p>	<p>No- This site is 'the wrong side' of the former railway development, in close proximity to a SSSI and Ancient Woodland and within the AONB. There is a danger the site may not relate well to Etchinghill as the houses would be tucked away behind the main frontage and the site would operate as a freestanding, backland estate.</p>
<p><b>Option 120</b></p> <p>606 - The Mount, Barrow Hill, Sellindge</p>	<p>Advice has been sort from KCC Archaeological section regarding the burial mound; they have confirmed that there is an upstanding Bronze Age burial mound recorded on site. Therefore allocation for development would not be appropriate.</p>
<p><b>Option 121</b></p> <p>303A - Land south of Little Densole Farm</p>	<p>The site has been reduced in size, however it still remains a large Greenfield expansion in to the AONB. The sites impact on the AONB requires specific consideration. Significant landscaping would be required, however it is relatively close/walkable to the centre of Densole and good bus links; the village could remain relatively compact. However, there may be other sites in Densole that would be better contained, integrated and more defendable. while not operating as free standing estates as this one could.</p>

Site	Reason for not allocating
<p><b>Option 122</b></p> <p>328 - Sellindge East</p>	<p>This is a large greenfield expansion into the countryside, with a site boundary vulnerable to further growth in the future to the North East of the site. The site is also constrained by the electricity pylons running across the southern section of the site and its proximity to the motorway. However it cannot be argued that the site could not accommodate five (or more) houses with significant landscaping in a smaller development on part of the site.</p>
<p><b>Option 123</b></p> <p>610 - Grove House land, Main Road, Sellindge</p>	<p>The site is very rural and open in character and until the broad location is built out this site does not integrate well with the existing settlement. In addition the site completely wraps around a large characterful detached country house. There are also concerns regarding further sporadic development along the A20.</p>
<p><b>Option 124</b></p>	<p>The sites impact on the AONB requires specific consideration however there appears scope within the land parcel to explore options to accommodate five (or more) dwellings plus significant landscaping.</p>

**Table 17.4**

## 18 Appendix 2 - Options for Local Green Spaces

### Hythe

Location	Reason why the site was not included
<p><b>Option 125</b> Princes Parade</p>	
<p><b>Option 126</b> Land off Range Road</p>	
<p><b>Option 127</b> Hythe Ranges</p>	
<p><b>Option 128</b> Imperial Hotel Golf Course</p>	
<p><b>Option 129</b> Land from East Cliff to West Hythe - Royal Military Avenue</p>	

Location	Reason why the site was not included
<p><b>Option 130</b> Eversley Wood</p>	
<p><b>Option 131</b> Hythe Bowls Club</p>	
<p><b>Option 132</b> Hythe Cricket Club</p>	
<p><b>Option 133</b> Hythe Football Club Reachfields</p>	
<p><b>Option 134</b> Longbridge Allotments</p>	
<p><b>Option 135</b> Palmarsh Recreation Ground</p>	

<b>Location</b>	<b>Reason why the site was not included</b>
<p><b>Option 136</b> Palmarsh School and playing fields</p>	
<p><b>Option 137</b> South Road Recreational Ground</p>	
<p><b>Option 138</b> The Green</p>	
<p><b>Option 139</b> Twiss Road Allotments</p>	
<p><b>Option 140</b> Countryside on Western Edge of Hythe</p>	
<p><b>Option 141</b> Eaton Land Allotments</p>	

<b>Location</b>	<b>Reason why the site was not included</b>
<p><b>Option 142</b> Fishermans Beach</p>	
<p><b>Option 143</b> Gallows Corner</p>	
<p><b>Option 144</b> Green Lane Allotments</p>	
<p><b>Option 145</b> Horn Street Allotments</p>	
<p><b>Option 146</b> Horn Street Recreation Ground</p>	
<p><b>Option 147</b> Hythe Bay School Playing Field</p>	

Location	Reason why the site was not included
<p><b>Option 148</b></p> <p>Land South of London Road A261</p>	
<p><b>Option 149</b></p> <p>Mill Lease near Station Road</p>	
<p><b>Option 150</b></p> <p>MOD Ranges</p>	
<p><b>Option 151</b></p> <p>Oaklands</p>	
<p><b>Option 152</b></p> <p>Old Poultry Site Horn Street</p>	
<p><b>Option 153</b></p> <p>Play Area Princes Parade</p>	

Location	Reason why the site was not included
<p><b>Option 154</b> Royal Military Canal and Banks</p>	
<p><b>Option 155</b> St Martins School Playing Field</p>	
<p><b>Option 156</b> The Grove</p>	
<p><b>Option 157</b> Water Board land, North Road, Hythe</p>	
<p><b>Option 158</b> Foxwood School</p>	



Location	Reason why the site was not included
<p><b>Option 159</b></p> <p>The Hythe Triangle</p>	

**Table 18.1**

**Lympne**

Location	Reason why the site was not included
<p><b>Option 160</b></p> <p>Area around Lympne Village Hall</p>	
<p><b>Option 161</b></p> <p>Buffalo Field</p>	
<p><b>Option 162</b></p> <p>Farmland between Pedlindge and the Roughts</p>	
<p><b>Option 163</b></p> <p>Home Farm Trust</p>	

Location	Reason why the site was not included
<p><b>Option 164</b> Lympne Airfield</p>	
<p><b>Option 165</b> Lympne Airfield North</p>	
<p><b>Option 166</b> Lympne Castle</p>	
<p><b>Option 167</b> Lympne Village Centre</p>	

**Table 18.2**

## 19 Evidence Base Documents

### 1. Foreword

### 2. Introduction

- Shepway Core Strategy, 2013
- Shepway District Local Plan, 2006

### 3. Introduction

- Building Regulations

### 4. Folkestone

- Shepway Town Centre Study, 2015
- Folkestone Creative Foundation Guidance, 2002
- Flood Risk Assessment
- The Core Strategy Local Plan Settlement Hierarchy,
- The Town Centres Study, 2015
- Local Plan Review, 2006
- Issues and Options Draft, 2015
- ELR (Employment Land Review??)
- Romney Marsh Plan, 2012
- Romney Marsh Socioeconomic Action Plan,

### 5. Romney Marsh.

### 6. North Downs

- Kent Downs AONB Landscape Design Handbook and Rural Streets and Lanes Design Handbook.

## 8. Housing and Built Environment

- Building for Life 12 Toolkit
- Manual for Streets'
- Village Design Statements, Conservation Area Appraisals and Neighbourhood Plans
- The Building Research Establishment (BRE) document 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (2011)
- Caba at the Design Council, Design for Homes and the Home Builders Federation
- Kent County Council's Strategic Statement 2015-2020
- Shepway District Council's register can be found by following this link <http://www.shepway.gov.uk/self-build-information>
- Community Support Market Position Statement (February 2016)
- The East Kent GTAA (2014), following the previous PPTS (2012)
- The Department for Communities and Local Government publication, "Planning policy for traveller sites"

## 9. Economy

- The Shepway Employment Land Review
- The Shepway Economic Development Strategy (2015-20120)
- Towards a one nation economy: A 10-point plan for boosting productivity in rural areas
- Tourist Study
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Places and Policies Local Plan Section	Who Responded (listed in no particular order)	Summary of Responses	Officer Responses
Introduction	<p>Ms Liz Duckworth - Development Manager Creative Foundation</p> <p>Mr Alan Joyce</p> <p>Mr James Hammond - Kent Highways</p> <p>Mr John Lister - Natural England</p> <p>Mr James Stevens - Home Builders Federation Ltd</p>	<ul style="list-style-type: none"> <li>Comments on indicators from Core strategy set out in table.</li> <li>Clarification of Plan period 2006-31?</li> <li>Lack of identity for Folkestone, should be more youth focussed</li> </ul>	<ul style="list-style-type: none"> <li>The table referred to sets out the strategic needs and aims of the Core Strategy. The Core Strategy will sit alongside the Places and Policies document so its content and policies do not need to be replicated in this document.</li> <li>The Plan period will be clarified.</li> <li>The Plan will consider each settlement and their individual needs and characteristics.</li> </ul>

Question 1 Housing distribution	<p>Mrs Lesley Whybrow</p> <p>Mr Trevor Minter</p> <p>Mr Jim Martin</p> <p>Ms Laura Sullivan</p> <p>Mr Tom Quaye</p> <p>Mr Martin Whybrow</p> <p>Mr Adrian Fox - Policy and Projects Manager Dover District Council</p> <p>Mrs Ellie Henderson</p> <p>Mr Guy Topham</p> <p>Charlier</p> <p>Mr Brian Lloyd - Senior Planner CPRE Protect Kent</p> <p>Mrs J McCormick - Town Clerk Hythe Town Council</p> <p>Ms Louise Barton</p> <p>Mrs D Bultitude - Stanford Parish Council</p> <p>Mrs Ann Goodwin - Parish Clerk Lympne Parish Council</p> <p>The Crown Estate – Williamson – AMEC</p> <p>Mrs Rosemary and John Griffiths</p> <p>Mr Norman Kwan - Principle Policy Planner Rother District Council</p> <p>AFFINITY WATER LTD - Mr Simon Milliken - Braiser Freeth Chartered Surveyors</p> <p>Shepway Developments Limited - P3529 - Ms Jeanne Taylor - Partner Lee Evans Planning</p>	<ul style="list-style-type: none"> <li>5 year land supply was questioned ( promoting site)</li> <li>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</li> <li>Should say exactly how many houses in each town.</li> <li>Planned development for Hythe contradicted by previous inspector</li> <li>Too much housing and infrastructure unable to cope.</li> <li>Housing should be on brownfield sites.</li> <li>Build housing where it is needed with the services that go with it. Affordable housing especially needed</li> <li>Redevelopment in Folkestone rather than development in smaller surrounding settlements.</li> <li>Ensure 106 agreements for affordable housing are fully met.</li> <li>Make reference to an allowance for minor extensions to the settlement boundaries in these instances as lack of SHLAA and brownfield sites</li> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>5 year housing land supply is reviewed annually. Allocations will contribute to this.</li> <li>The P&amp;P Plan is meeting the needs identified in the Core Strategy. This however could be a consideration for an early review of the Core Strategy.</li> <li>Disagree, the amount of development for each settlement need be considered against the suitability and availability of land and the constraints (for example AONB, Flood Risk).</li> <li>The District Council will have to review all sites against current Government policy.</li> <li>The P&amp;P Plan seeks to allocate enough homes to meet the requirement in the adopted Core Strategy (2013). Infrastructure needs have been identified and tested in the Strategy.</li> <li>Noted.</li> <li>The Plan sets out development for all the district over a twenty year period based on the Settlement Hierarchy.</li> <li>The Plan identifies a range of sites throughout the district to ensure the future needs for all settlements are met. .</li> <li>Noted</li> <li>Sites have been tested through the SHLAA and if they are allocated, the settlement confines will be amended to reflect this.</li> <li>Noted but the Plan will have to consider Government legislation and policy, such as the introduction of Starter Homes.</li> </ul>
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<p>MF &amp; L Limited - P3410 - Ms Jeanne Taylor - Partner Lee Evans Planning</p> <p>WS Furnival - P2854 - Ms Jeanne Taylor - Partner Lee Evans Planning</p> <p>MF &amp; L Limited - P3405 - Ms Jeanne Taylor - Partner Lee Evans Planning</p> <p>clerk Stelling Minnis Parish Council - Ms Jeanne Taylor - Partner Lee Evans Planning</p> <p>Furnival Farming Partnership - P2812 - Ms Jeanne Taylor - Partner Lee Evans Planning</p> <p>Mr Alan Joyce</p> <p>Mr Nicholas Smith - Clerk Stelling Minnis Parish Council</p> <p>Mrs Pamela Keeling - treasurer Friends of St Mary and St Eanswythe</p> <p>Bob Edden - Bob Edden : Architect - PRINCIPAL BOB EDDEN : ARCHITECT</p> <p>Mr Daniel Keeling</p> <p>Mr Nigel Fursdon</p> <p>The Trustees of Viscount Folkestone (1963) Settlement - Miss Karen Banks</p> <p>Mrs D Balcomb - Mrs Pam Przyjemski</p> <p>Valerie Tupling - Hythe Neighbourhood Plan Team</p> <p>EW Kettle (deceased) - Mrs Pam Przyjemski</p> <p>Phides Estates - Phil Joyce</p> <p>Mrs Cathy Newcombe - Town Clerk New Romney Town Council</p> <p>Gill Bell - Office Manager Kent Downs AONB Unit</p> <p>Mr Richard Rix</p> <p>Pentland Homes Limited - Mr Robert Sellwood - Managing Director Sellwood Planning</p> <p>Clive Apps - Leona Quigley - Icen Projects</p> <p>Arena Racing Company Ltd - Mr Simon Chadwick - Managing Director Signet Planning</p> <p>Alan Byrne - Historic Areas &amp; Planning Adviser English Heritage</p> <p>Ms Valerie Tupling</p>	<ul style="list-style-type: none"> <li>• Better match of homes to jobs.</li> <li>• Should attract London commuters</li> <li>• Lack of infrastructure in Hythe for development and concern about flooding.</li> </ul> <ul style="list-style-type: none"> <li>• Relaxation of house building policy in areas of outstanding natural beauty to allow a limited number of small low cost housing</li> <li>• 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</li> <li>• Economic strategy is only 5 years but this is 15 years so could be subject to unforeseen activities/development</li> <li>• Sellindge should get respite given development taken place</li> <li>• 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.</li> <li>• <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.</li> <li>• 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</li> <li>• 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</li> <li>• 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.</li> <li>• It disregards the key principle of identifying housing sites on the most appropriate sites</li> </ul>	<ul style="list-style-type: none"> <li>• Noted, this is set out in the Core Strategy.</li> <li>• Noted.</li> <li>• Noted, infrastructure requirements have been set out in the Core Strategy and the individual requirements of allocations will be identified through consultation with relevant bodies (such the water companies, EA and KCC Highways).</li> </ul> <ul style="list-style-type: none"> <li>• The plan will consider suitable sites within the AONB, reflecting the Settlement Hierarchy.</li> <li>• The Settlement Hierarchy has been based on sustainability issues such as the facilities provided. Further development in unsustainable locations would be contrary to Government policy. Policy to be included for broadband.</li> </ul> <ul style="list-style-type: none"> <li>• The Core Strategy and the P&amp;P Plan provided flexibility in the policies and will be reviewed during that time period.</li> <li>• Noted, Core Strategy Policy CSD9 will be a consideration when allocating land.</li> <li>• Noted</li> </ul> <ul style="list-style-type: none"> <li>• The Core Strategy sets out the requirement for the P&amp;P Local Plan, which is at a minimum 7,000 and maximum 8,000. This will be a matter for a review of the Core Strategy.</li> </ul> <ul style="list-style-type: none"> <li>• Noted, the P&amp;P Local Plan will set out the requirement having regard to allocations and permitted development.</li> </ul> <ul style="list-style-type: none"> <li>• Noted, any allocations will have to consider the particular constraints of the settlement. This may result in allocations that do not reflect the Table.</li> </ul> <ul style="list-style-type: none"> <li>• Noted &amp; agree (please see last comment above).</li> <li>• Noted &amp; agree (please see last comment above).</li> </ul>
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	<p>Mr James Stevens - Home Builders Federation Ltd</p> <p>Mr Tom Cook</p> <p>April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport</p> <p>Mr Ray Duff</p> <p>Tony Barrett - The Caravan Club - Mr Duncan Parr</p> <p>Mr Michael Boor - The Lympne Neighbourhood Plan Group</p> <p>Mr John Ruler and EA Strategic Land LLP - James Waterhouse - Icen Projects Ltd</p>	<p>taking into account issues such as sustainability, environmental constraints, availability of infrastructure, and the character and form of settlements</p> <ul style="list-style-type: none"> <li>• The AONB and Romney marshes should not be a focus for expansion, on environmental grounds.</li> <li>• 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.</li> <li>• 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.</li> <li>• The basis appears sound. Why has the allocation for New Romney apparently gone up to 480 from the 300+ broad brush allocation?</li> <li>• If at all possible, consider the 'garden village' concept as an alternative to some rural area expansion</li> <li>• Based on the information provided within the Issues and Options Consultation, it is unclear exactly how the residual housing target of 3,355 new homes has been derived.</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• Environmental issues will be a consideration when identifying allocated sites. The SFRA 2015 has updated the flood hazard mapping in the Marsh.</li> <li>• Noted, the District Council will be in discussions with KCC &amp; School Academies.</li> <li>• The AONB is a National designation and is afforded protection through the NPPF and the NPPG.</li> <li>• Noted. The amount is an average between the two Strategic Towns. The final figure will reflect the constraints and available land.</li> <li>• Noted but some rural expansion will be necessary to meet the future needs of settlements.</li> <li>• Noted the Preferred Options will set out the allocations to meet the requirement.</li> <li>• Noted.</li> </ul>
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<p>Question 2 Call for sites</p>	<p>AFFINITY WATER LTD - Mr Simon Milliken Mr David Godfrey Mr Guy Topham Mr Brian Lloyd - Senior Planner CPRE Protect Kent Secretary Littlestone Golf Club - Mr Robert Stevenson Mr Robert Stevenson Mrs Ann Goodwin - Parish Clerk Lympne Parish Council Mrs D Bultitude - Stanford Parish Council Mrs J McCormick - Town Clerk Hythe Town Council The Crown Estate – Williamson Mr Roger Joyce Mr Nigel Fursdon Go Folkestone Action Group Richard Wallace - Go Folkestone Action Group Phides Estates - Phil Joyce Clive Apps - Leona Quigley - Icen Projects Pentland Homes Limited - Mr Robert Sellwood - Managing Director Sellwood Planning Christ Church - Christ Church College - Smith Roger - Director Savils Arena Racing Company Ltd - Mr Simon Chadwick - Managing Director Signet Planning Mr Konrad Dancer - Portside Services Ltd Mr Tony Tapley - Consultant RPS - Mr Tony Tapley - Consultant RPS on behalf of GSE Group Fiona Cabache Mr Tom Cook April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport Mr Craig Barnes - Gladman Developments Ltd Tony Barrett - The Caravan Club - Mr Duncan Parr Mr Ralph Thompson Mr Michael Boor - The Lympne Neighbourhood Plan Group Mr Robert Emery - Mr Andrew Street - Consium Town Planning Services Limited Mr E and Mr J Champneys - Jane Scott - Hobbs Parker Property Consultants LLP Mr John Ruler and EA Strategic Land LLP - James Waterhouse - Icen Projects Ltd Julian Goodban - Bellway Homes (South East) - Claire Davies - Savills Planning The Beddy Family - Mr Mike Simmonds - Principal Kent Planning Ltd Quinn Estates - Mr Mike Goddard - Goddard Planning Consultancy Mr Jeremy W H Paine - John Paine Farms - Mrs Pam Przyjanski Mr Trevor Heathcote - COUNTRYSTYLE RECYCLING Mr &amp; Mrs A Orsbourne - BOB EDDEN - PRINCIPAL BOB EDDEN : ARCHITECT Mr &amp; Mrs G Lynch - Mr Mike Simmonds - Principal Kent Planning Ltd</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Westenhanger/Stanford should be looked at as a new community.</li> <li>• Southern edge of West Park Farm, notably around the dated Bookers site and Barnfield Road would be better as residential land than commercial.</li> <li>• Shepway needs a more aggressive policy with regard to empty and derelict buildings</li> <li>• There should be more interspersal of residential uses in the town centre 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</li> <li>• Outside and on the fringes of the town centre Shepway should be realistic about the number of shops required</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> <li>• additional land around Sellindge could be considered.</li> <li>• 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.</li> <li>• Phides Estates seek to promote the future development of land to the south and east of Link Park as a future housing site</li> </ul>	<ul style="list-style-type: none"> <li>• Noted</li> <li>• The Core Strategy sets out the policy for the Settlement Hierarchy. Westenhanger/Stanford could be considered in any review of that document.</li> <li>• The district council will review the employment sites as part of the ELR.</li> <li>• The District Council has worked with KCC on their 'no use empty' campaign that seeks to bring properties back into use. The Government will also be introducing 'Brownfield Land registers' to help bring derelict land and buildings back into use.</li> <li>• Agree that residential uses are important to the vitality of a town centre. The District Council has undertaken a Town Centre Study that will guide the policy for Guildhall Street and its future.</li> <li>• Agree, the secondary frontages will be reviewed to enable alternative uses.</li> <li>• Disagree, whilst Brownfield land will be used for development there is not enough for the number of dwellings identified in the Core Strategy, which is for at least 7,000 dwellings over the plan period with a target of 8,000. The work on the SHLAA has identified the additional sites that are required.</li> <li>• Disagree, demographics indicate that the local population is living longer and in smaller households. There is a need to allocate enough land for future homes to meet the need of the existing population and to ensure people of working age can move into the area.</li> <li>• The adopted Core Strategy Local Plan sets out a figure of 30% affordable for new developments. Government initiatives, such as Starter Homes, will also help local people.</li> <li>• Noted but adopted Core Strategy Local Plan Policy CSD9 identifies land for development.</li> <li>• Noted, but there is not enough brownfield land to meet the requirements. Viability has to be considered when land is been considered.</li> <li>• The site will be considered in the SHLAA.</li> </ul>
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<p>Question 3 Employment uses in Folkestone, around motorway junctions, start up units</p>	<p>Mr Trevor Minter Mrs Sally Chesters Mrs Lesley Whybrow Ms Laura Sullivan Mr Jim Martin Mr Tom Quaye Dr Jean Baker Mr Martin Whybrow Mr David Godfrey Mr Guy Topham Mrs Susan Law Mr Brian Lloyd - Senior Planner CPRE Protect Kent Mr Harald Gardiner - New Folkestone Society Mrs J McCormick - Town Clerk Hythe Town Council Ms Liz Duckworth - Development Manager Creative Foundation Ms Louise Barton Mrs Ann Goodwin - Parish Clerk Lympne Parish Council Mrs D Bultitude - Stanford Parish Council Mrs Rosemary and John Griffiths Dr Jean Baker Mrs Brigitte Orasinski - Artistic Director Strange Cargo Mrs Helen Severs Mr Alan Joyce Bob Edden - Bob Edden : Architect - BOB EDDEN - PRINCIPAL BOB EDDEN : ARCHITECT Mr Daniel Keeling Mr Nigel Fursdon Go Folkestone Action Group Richard Wallace - Go Folkestone Action Group Valerie Tupling - Hythe Neighbourhood Plan Team Mr John Lister - Natural England Mr Paul Wookey - Locate in Kent Mr Kevin Bown - Asset Manager, Area 4 (Kent) Highways Agency Phides Estates - Phil Joyce Mrs Cathy Newcombe - Town Clerk New Romney Town Council Gopak Ltd - Mr Robert Stevenson Gill Bell - Office Manager Kent Downs AONB Unit Pentland Homes Limited - Mr Robert Sellwood - Managing Director Sellwood Planning Arena Racing Company Ltd - Mr Simon Chadwick - Managing Director Signet Planning Ms Amanda Oates - Parish Clerk Sandgate Alan Byrne - Historic Areas &amp; Planning Adviser English Heritage T Haskens - London Ashford Airport - Sean McGrath - Indigo Planning AFFINITY WATER LTD - Mr Simon Milliken - Braiser Freeth Chartered Surveyors Fiona Cabache Mr Tom Cook Mr Michael Boor - The Lympne Neighbourhood Plan Group Quinn Estates - Mr Mike Goddard - Goddard Planning Consultancy</p>	<ul style="list-style-type: none"> <li>• 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</li> <li>• Too much development at junction 11 could damage the countryside</li> <li>• support employment uses around both motorway junctions in cases where heavy duty traffic is involved in the course of business</li> <li>• 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.</li> <li>• 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</li> <li>• 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.</li> <li>• Investment needs to take place in Guildford Streets and other where shops are empty maybe connecting them to the creative quarter</li> <li>• 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</li> <li>• Incubator units should be encouraged in villages - may be as extra income to farmers</li> <li>• 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</li> <li>• With focus and support Cheriton has the potential to become a visitor asset and a cultural destination</li> <li>• Rural areas such as Romney Marsh cannot sustain further employment sites in and around small villages</li> <li>• Infrastructure that is wanting - good health, education and fast broadband services</li> <li>• Area is not short of employment sites as the low take up testifies</li> <li>• Much greater emphasis needs to be put on</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. The District Council has commissioned an Employment Land Review to consider such issues.</li> <li>• Noted. Any allocations would need to consider the impact on the landscape.</li> <li>• Noted. The district Council has commissioned an Employment Land Review to consider such issues.</li> <li>• Noted. The District Council has commissioned an Employment Land Review to consider such issues. The Core Strategy will be subject to a partial review.</li> <li>• Noted.</li> <li>• Noted. The District Council will consider the opportunities for the evening economy in Folkestone.</li> <li>• Noted, this issue will be considered in the policy in the town centre.</li> <li>• Noted.</li> <li>• Noted. The District Council will consider the needs of rural areas in line with Government paper 'Towards a one nation economy: A 10-point plan for boosting productivity in rural areas'.</li> <li>• Noted. The District Council will include policies relating to tourism.</li> <li>• Noted</li> <li>• The District Council considers that there is still a need to cater for businesses in the Romney Marsh area. The Employment Land Review will provide the evidence base for future employment.</li> <li>• Noted. The District Council will be in discussions with KCC in relation to infrastructure needs and will include a policy for broadband.</li> <li>• Noted. The District Council has commissioned an Employment Land Review to consider such issues.</li> <li>• Noted, the Places and Policies Local Plan will include new policies</li> </ul>
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		<p>making employment sites more aesthetically acceptable in country areas.</p> <ul style="list-style-type: none"> <li>• Mention should be made of the contribution made by its outstanding environment (inc. of course the AONB) to both the quality of life and the economic attractiveness of the Borough</li> <li>• 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</li> <li>• 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.</li> <li>• No evidence that supports the view that more modern office space is required in and around Folkestone Town Centre especially around Folkestone Central Station.</li> </ul>	<p>for design.</p> <ul style="list-style-type: none"> <li>• Noted and agreed.</li> <li>• Noted. The District Council has commissioned an Employment Land Review to consider such issues.</li> <li>• Noted, the Plan will include new design policies to achieve this.</li> <li>• The District Council has commissioned an Employment Land Review to consider such issues.</li> </ul>
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<p>Question 4 Reallocation of employment sites</p>	<p>Mr Trevor Minter</p> <p>AFFINITY WATER LTD - Mr Simon Milliken - Braiser Freeth Chartered Surveyors</p> <p>Mr Guy Topham</p> <p>Mr Brian Lloyd - Senior Planner CPRE Protect Kent</p> <p>Mr Harald Gardiner - New Folkestone Society</p> <p>Mrs J McCormick - Town Clerk Hythe Town Council</p> <p>Ms Louise Barton</p> <p>Mrs Ann Goodwin - Parish Clerk Lympne Parish Council</p> <p>Mr Richard Moffatt - Acting Chairman Remembrance Line Association</p> <p>Mrs Rosemary and John Griffiths</p> <p>Mr Roger Joyce</p> <p>MF &amp; L Limited - P3405 - Ms Jeanne Taylor - Partner Lee Evans Planning</p> <p>Mr Alan Joyce</p> <p>mrs pamela Keeling - treasurer Friends of St Mary and St Eanswythe</p> <p>Bob Edden - Bob Edden : Architect - BOB EDDEN - PRINCIPAL BOB EDDEN : ARCHITECT</p> <p>Mr Nigel Fursdon</p>	<ul style="list-style-type: none"> <li>• Support reallocate sites that have no reasonable prospect of coming forward.</li> <li>• Economic Development should not only be centred on Industrial Estate sites, but looked at holistically (Heritage &amp; Arts Tourism is a key driver towards economic wellbeing)</li> <li>• 'no reasonable prospect for employment uses' needs to be further defined</li> <li>• Hythe needs all the business/employment sites it currently has and none should be re-allocated as jobs are needed for the younger generation</li> <li>• 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</li> <li>• Reallocation should not however be seen as a simple change to residential use.</li> <li>• 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</li> <li>• 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.</li> <li>• We do not agree that the Link Park element of the Lympne industrial estate should be excluded from consideration for change of use.</li> <li>• Perhaps shorter-term issues and an unwillingness to explore all options are not allowed to lead to release of potentially</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> <li>• Noted and will be a consideration when drafting new policies</li> <li>• The District Council will carry out an Employment Land Review to consider this.</li> <li>• The District Council will carry out an Employment Land Review to consider this.</li> <li>• Tourism is considered to be important to the district and this will be reflected in the Plan.</li> <li>• Noted, all alternative uses will be considered but ultimately the NPPF is clear in this issue.</li> <li>• Noted.</li> <li>• Noted.</li> <li>• Noted</li> <li>• The District Council will carry out an Employment Land Review which will set out how sites have been assessed.</li> </ul>
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	<p>Go Folkestone Action Group Richard Wallace - Go Folkestone Action Group</p> <p>Valerie Tupling - Hythe Neighbourhood Plan Team</p> <p>Mr Paul Wookey - Locate in Kent</p> <p>Mr John Lister - Natural England</p> <p>Mrs D Bultitude - Stanford Parish Council</p> <p>Phides Estates - Phil Joyce</p> <p>Mrs Cathy Newcombe - Town Clerk New Romney Town Council</p> <p>Gill Bell - Office Manager Kent Downs AONB Unit</p> <p>Pentland Homes Limited - Mr Robert Sellwood - Managing Director Sellwood Planning</p> <p>Arena Racing Company Ltd - Mr Simon Chadwick - Managing Director Signet Planning</p> <p>Ms Amanda Oates - Parish Clerk Sandgate Parish Council</p> <p>T Haskens - London Ashford Airport - Sean McGrath - Indigo Planning</p> <p>Mr Sean McNally - Hythe Neighbourhood Plan Group</p> <p>Mr Tom Cook</p> <p>Mr Michael Boor - The Lympne Neighbourhood Plan Group</p>	<p>sensitive sites relative to the AONB. We would therefore wish to understand how the sites have been assessed</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• In light of the recent adoption of the Core Strategy and measures set out within the draft EDS, we consider that it would be premature to de-allocate or re-allocate any existing strategic employment allocations unless there were strong site specific circumstances.</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• There are other factors that also influence the need for housing, such as the demographics of the population (we are living longer and in smaller households which results in a greater need for housing).</li> <li>• Noted. The Employment Land Review should indicate which sites should come forward.</li> <li>• Noted.</li> </ul>
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<p>Question 5 Town and district centres assessment</p>	<p>Mr James Avery - Secretary Folkestone Town Team</p> <p>Mrs Sally Chesters</p> <p>Mr Trevor Minter</p> <p>Mr Michael Boston</p> <p>Ms Laura Sullivan</p> <p>Mr Jim Martin</p> <p>Mr Martin Whybrow</p> <p>Dr Jean Baker</p> <p>Mr Adrian Fox - Policy and Projects Manager Dover District Council</p> <p>James Hill</p> <p>Mr David Godfrey</p> <p>Mr Guy Topham</p> <p>Mrs J McCormick - Town Clerk Hythe Town Council</p> <p>Mr Harald Gardiner - New Folkestone Society</p> <p>Ms Liz Duckworth - Development Manager Creative Foundation</p> <p>Ms Louise Barton</p> <p>Mrs D Bultitude - Stanford Parish Council</p> <p>Mrs JH Molloy</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Too few entrances for vehicles to allow easy access to potentially key points in the shopping area</li> <li>• Hythe town area currently succeeds due to it having a good range of facilities in the town to encourage people into the high street</li> <li>• Nightlife in Folkestone is a major issue and</li> </ul>	<ul style="list-style-type: none"> <li>• Noted, the Town Centre Study has indicated a need for an evening economy and the District Council will consider ways to improve this.</li> <li>• The Town Centre Study has provided suggestions as to help the town centre though identifying new areas for investment and relaxation of uses.</li> <li>• Noted but the town is served by a reasonable amount of parking and public transport.</li> <li>• Agree and the district Council will seek to protect Hythe Town Centre.</li> <li>• Agree, the Town Centre Study has identified this as a problem.</li> </ul>
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	<p>Viv Kenny - Town Centre Manager Folkestone Town Centre Management Ltd  Mrs Rosemary and John Griffiths  Mrs Helen Severs  Mr Alan Joyce  Mrs Pamela Keeling - treasurer Friends of St Mary and St Eanswythe  Mr Daniel Keeling  Mr Nigel Fursdon  Go Folkestone Action Group Richard Wallace - Go Folkestone Action Group  Valerie Tupling - Hythe Neighbourhood Plan Team  Mrs Cathy Newcombe - Town Clerk New Romney Town Council  Mrs Jennifer Childs - Town Clerk Folkestone Town Council  Mrs Amanda Oates - Parish Clerk Sandgate Parish Council  Mrs Mary Lawes  Fiona Cabache  Chris Raines - Secretary Folkestone Town Team  Ellandi - Ellandi LLP - Mr Matthew Williams - Director Savills  Mr Tom Cook  Mr Ray Duff  Mr Nicholas M Perry  Chris Raines</p>	<p>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.</p> <ul style="list-style-type: none"> <li>• Guildford Street needs investment to prevent the decline there. That the creative quarter needs to be more integrated into the Town as a whole.</li> <li>• The Town Centre is a tolerable destination for local residents but uninviting for visitors</li> <li>• Confusing access (by car or train), and unclear pedestrian routes to the different amenities spoils the visitor experience</li> <li>• The centre has to be seen in context of what the town as a whole has to offer - which is a great deal.</li> <li>• 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</li> <li>• Need to be radical and innovative - in the same way that Ashford took advantage of the opportunities offered by the Tunnel, and HS1</li> <li>• All of Folkestone's top tourist attractions currently mean travelling via the deprived East End which severely diminishes their view of the Town.</li> <li>• 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?</li> <li>• Legibility of Folkestone there are actually three centres in the town, the harbour, the current main retail centre and West Folkestone.</li> <li>• 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.</li> <li>• Sandgate is not recognized on the map and does not figure in the table</li> <li>• Dover District Council wishes to reserve its position on the proposal to increase the comparison retail offer in Folkestone as Dover District Council has unfortunately, not been involved in the preparation of the draft Town Centre Study.</li> </ul>	<p>Policy to be drafted to reflect this issue.</p> <ul style="list-style-type: none"> <li>• Noted and this issues has been identified in the Town Centre Study.</li> <li>• Noted.</li> <li>• Noted, will seek to identify improvements in any town centre policy were it is possible to do so.</li> <li>• Noted</li> <li>• Noted, the district council will consider other uses within the town to improve the viability and vitality of the town centre.</li> <li>• Noted, the district council will consider other uses within the town to improve the viability and vitality of the town centre.</li> <li>• Noted</li> <li>• Noted, the district council will consider other uses within and on the fringes the town to improve the viability and vitality of the town centre.</li> <li>• Noted.</li> <li>• Noted, the district council will consider other uses within and on the fringes the town to improve the viability and vitality of the town centre</li> <li>• Noted, the District Council will consider policies to protect Sandgate shopping centre.</li> <li>• Noted and the SDC will work with neighbouring authorities throughout the process to meet the Duty to Cooperate.</li> </ul>
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<p>Question 6 Folkestone retail offer</p>	<p>Mr Trevor Minter  Dr Jean Baker</p>	<ul style="list-style-type: none"> <li>• Folkestone should exploit new strengths of restaurants, novelty and creative. The environment in Sandgate Road is not conducive - it appears so down at heel</li> </ul>	<ul style="list-style-type: none"> <li>• Noted, the district council will consider other uses within and on the fringes the town to improve the viability and vitality of the town centre.</li> </ul>
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	<p>Mr Adrian Fox - Policy and Projects Manager Dover District Council</p> <p>Mr David Godfrey</p> <p>Mrs J McCormick - Town Clerk Hythe Town Council</p> <p>Mrs D Bultitude - Stanford Parish Council</p> <p>Viv Kenny - Town Centre Manager Folkestone Town Centre Management Ltd</p> <p>Mrs Rosemary and John Griffiths</p> <p>Mr Alan Joyce</p> <p>Mr Daniel Keeling</p> <p>Mr Nigel Fursdon</p> <p>Valerie Tupling - Hythe Neighbourhood Plan Team</p> <p>mrs jennifer childs - Town Clerk Folkestone Town Council</p> <p>Ms Amanda Oates - Parish Clerk Sandgate Parish Council</p> <p>Fiona Cabache</p> <p>Mr James Avery - Secretary Folkestone Town Team</p> <p>Ellandi - Ellandi LLP - Mr Matthew Williams - Director Savills</p> <p>Mr Tom Cook</p>	<ul style="list-style-type: none"> <li>• 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</li> <li>• The retail units currently do not attract high spenders and neither does the towns image</li> <li>• It will be better to make the provision by the amalgamation of smaller shops. This would help maintain the history of the area</li> <li>• Site amalgamation may be key to regeneration of areas such as Guildhall Street, which area could also be encompassed in the café quarter</li> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> <li>• Noted, but the perception of the town is changing with the Old town and Harbour arm.</li> <li>• Noted. The District Council will encourage this in Guildhall Street, as advised by the Town Centre Study.</li> <li>• Noted. The District Council will encourage this in Guildhall Street, as advised by the Town Centre Study.</li> <li>• Noted.</li> <li>• Noted, the District Council will encourage redevelopment opportunities within the town centre. Unfortunately it is not possible to allocate land without certainty of schemes coming forward.</li> </ul>
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<p>Question 7 Cheriton, Hawkinge and Lydd retail</p>	<p>Mr Trevor Minter</p> <p>Mr Martin Whybrow</p> <p>Mr David Godfrey</p> <p>Mr Brian Lloyd - Senior Planner CPRE Protect Kent</p> <p>Mrs J McCormick - Town Clerk Hythe Town Council</p> <p>Viv Kenny - Town Centre Manager Folkestone Town Centre Management Ltd</p> <p>Mr Alan Joyce</p> <p>Mr Nigel Fursdon</p> <p>Mrs D Bultitude - Stanford Parish Council</p>	<ul style="list-style-type: none"> <li>• Hawkinge - no real need for additional.- there are now two divided retail areas in hawking</li> <li>• 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.</li> <li>• Enhanced retail provision at Hawkinge should help town.</li> <li>• Another retail store in Lydd, will help make Lydd a more sustainable town.</li> <li>• 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 .</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> <li>• Noted</li> <li>• Noted</li> <li>• Noted</li> <li>• Noted</li> <li>• Noted</li> </ul>
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Pentland Homes Limited - Mr Robert Sellwood - Managing Director Sellwood Planning		
Ms Amanda Oates - Parish Clerk Sandgate Parish Council		
Mr James Avery - Secretary Folkestone Town Team		
Ellandi - Ellandi LLP - Mr Matthew Williams - Director Savills		
Mr Tom Cook		

Question 8 Leisure Offer	<p>Mr Trevor Minter</p> <p>Mr Martin Whybrow</p> <p>Mr David Godfrey</p> <p>Mr Ross Anthony - Planning Adviser The Theatres Trust</p> <p>Mrs J McCormick - Town Clerk Hythe Town Council</p> <p>Ms Liz Duckworth - Development Manager Creative Foundation</p> <p>Mrs D Bultitude - Stanford Parish Council</p> <p>Viv Kenny - Town Centre Manager Folkestone Town Centre Management Ltd</p> <p>Mr Alan Joyce</p> <p>mrs pamela Keeling - treasurer Friends of St Mary and St Eanswythe</p> <p>Mr Daniel Keeling</p> <p>Mr Nigel Fursdon</p> <p>Valerie Tupling - Hythe Neighbourhood Plan Team</p> <p>Mrs Cathy Newcombe - Town Clerk New Romney Town Council</p> <p>Ms Amanda Oates - Parish Clerk Sandgate Parish Council</p> <p>Alan Byrne - Historic Areas &amp; Planning Adviser English Heritage</p> <p>Fiona Cabache</p> <p>Mr James Avery - Secretary Folkestone Town Team</p> <p>Ellandi - Ellandi LLP - Mr Matthew Williams - Director Savills</p>	<ul style="list-style-type: none"> <li>• How the Council can influence this?</li> <li>• Protecting an historic site such as the Leas Club</li> <li>• revitalisation of cultural facilities such as theatres should be used as a catalyst for wider regeneration within your town centres</li> <li>• Any town centre policy needs to acknowledge that cultural facilities are an important town centre uses</li> <li>• Folkestone does have quality to offer but in some cases the accessibility is poor</li> <li>• Rethinking the road system is long overdue</li> <li>• 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.</li> <li>• Folkestone fairs particularly poorly. Types of leisure missing that would attract an evening economy are a cinema and competition size swimming pool in Hythe</li> <li>• 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.</li> <li>• 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</li> <li>• 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.</li> <li>• Multiplex cinema would be nice, but not a</li> </ul>	<ul style="list-style-type: none"> <li>• Through planning policies that identify areas for evening economy</li> <li>• Not just protection but also finding a viable use for the building</li> <li>• Noted and agreed.</li> <li>• Noted and agreed</li> <li>• Noted</li> <li>• Noted but this would have to be in conjunction with Kent Highways.</li> <li>• Noted, but ice rinks are very expensive to run and would need a wide catchment. Viability would be n issue.</li> <li>• Folkestone has a local cinema and there are plans to replace the swimming pool in Hythe.</li> <li>• Noted.</li> <li>• Noted, the District Council will investigate ways to do this through the Heritage Strategy.</li> <li>• Noted.</li> <li>• Noted.</li> </ul>
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	Mr Tom Cook	<p>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.</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• The current harbour regeneration should be earmarked for the lead in this role.</li> <li>• 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.</li> <li>• No requirement for further theatre provision" and we would add the proviso that we do not lose any provision either.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. Additional parking is to be considered in the area.</li> <li>• Noted.</li> <li>• Noted, although there is a small cinema already in town.</li> <li>• Noted.</li> <li>• Noted, the District Council will consider improvements in the overnight accommodation offer in the district.</li> </ul>
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Question 9 Town centre viability	<p>Mr Trevor Minter</p> <p>Dr Jean Baker</p> <p>Mr David Godfrey</p> <p>Mr Brian Lloyd - Senior Planner CPRE Protect Kent</p> <p>Mrs J McCormick - Town Clerk Hythe Town Council</p> <p>Ms Liz Duckworth - Development Manager Creative Foundation</p> <p>Mr Alan Joyce</p> <p>Mrs Pamela Keeling - treasurer Friends of St Mary and St Eanswythe</p> <p>Mr Daniel Keeling</p> <p>Mr Nigel Fursdon</p> <p>Go Folkestone Action Group Richard Wallace - Go Folkestone Action Group</p> <p>The Trustees of Viscount Folkestone (1963) Settlement - Miss Karen Banks</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• The loss of Tram Road car park will have a significant impact on the other businesses in the area</li> <li>• 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</li> <li>• 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.</li> <li>• 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</li> <li>• The need for better connectivity between</li> </ul>	<ul style="list-style-type: none"> <li>• The District Council will consider other uses within and on the fringes the town to improve the viability and vitality of the town centre.</li> <li>• Noted, the District Council will consider opportunities for further provision of parking in the harbour area.</li> <li>• Disagree, Folkestone has shown improvements with the Old Town and the Harbour Arm initiatives. The District Council will consider other uses within and on the fringes the town to improve the viability and vitality of the town centre.</li> <li>• Noted.</li> <li>• Noted</li> <li>• Agree, improvements to the connectivity and legibility of the town</li> </ul>
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	<p>Mr James Hammond - Kent Highways</p> <p>Valerie Tupling - Hythe Neighbourhood Plan Team</p> <p>Mrs D Bultitude - Stanford Parish Council</p> <p>Mrs Cathy Newcombe - Town Clerk New Romney Town Council</p> <p>Ms Amanda Oates - Parish Clerk Sandgate Parish Council</p> <p>Alan Byrne - Historic Areas &amp; Planning Adviser English Heritage</p> <p>Mr James Avery - Secretary Folkestone Town Team</p> <p>Ellandi - Ellandi LLP - Mr Matthew Williams - Director Savills</p> <p>Mr Tom Cook</p> <p>April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport</p>	<p>the Seafront and the Town Centre is possible and was identified as part of the Core Strategy</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• 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.</li> <li>• 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.</li> <li>• Lydd , the area around the Church ,which is a major tourist attraction , could be enhanced as part of it is lacking in attractiveness.</li> <li>• 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 together), with an appropriate budget and resources</li> <li>• 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.</li> <li>• Any plans to knock down Bouverie Place Shopping Centre (now a bigger eyesore than the Burstin</li> <li>• 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</li> <li>• The map on page 15 of the draft Plan shows distinct zoning of the town centre, the Creative Quarter and the proposed café</li> </ul>	<p>centre will be considered.</p> <ul style="list-style-type: none"> <li>• Agree that it is important to encourage new mixed use developments in town.</li> <li>• Agree &amp; noted</li> <li>• Noted.</li> <li>• Noted</li> <li>• Enterprise Zones need to meet strict criteria. It is unlikely that the town centre would meet these.</li> <li>• Noted</li> <li>• Bouverie Place has been successful and there are no plans to demolish this development.</li> <li>• The District Council will consider other uses within and on the fringes the town to improve the viability and vitality of the town centre.</li> <li>• Noted, the District Council will identify a town centre area to assist in directing town centre uses</li> </ul>
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		quarter. Whilst we understand this as a device for prioritising areas of need, it adds to the perceived separateness of these areas.	
Question 10 Gypsy and traveller accommodation	Mr Adrian Fox - Policy and Projects Manager Dover District Council Mrs Sally Chesters Mr David Godfrey Mr Brian Lloyd - Senior Planner CPRE Protect Kent Mrs J McCormick - Town Clerk Hythe Town Council Ms Louise Barton Mrs Ann Goodwin - Parish Clerk Lympne Parish Council Mrs D Bultitude - Stanford Parish Council Mr Alan Joyce Mr Nigel Fursdon Ms Amanda Oates - Parish Clerk Sandgate Parish Council Mr Tom Cook	<ul style="list-style-type: none"> <li>• 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</li> <li>• best solution would be to enlarge existing facilities rather than set up new sites elsewhere.</li> <li>• No to new or extended sites</li> <li>• 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</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• Noted and the Shepway will continue to inform Dover DC of the emerging Plan under the Duty to Cooperate.</li> <li>• Noted.</li> <li>• Noted but the NPPF stipulates that District Council will have to identify the needs of the Gypsy and Traveller community.</li> <li>• Noted, any new sites will be considered against a criteria based policy.</li> <li>• Noted. The District Council will consider the provision of sites following the suggestion.</li> </ul>
Question 11 Infrastructure	Mr Trevor Minter Dr Jean Baker Mr Adrian Fox - Policy and Projects Manager Dover District Council Mrs Susan Law Mr Guy Topham Mr Brian Lloyd - Senior Planner CPRE Protect Kent Mrs J McCormick - Town Clerk Hythe Town Council Miss Sarah Harrison - Southern Water Ms Louise Barton Mrs Ann Goodwin - Parish Clerk Lympne Parish Council	<ul style="list-style-type: none"> <li>• 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</li> <li>• There is scope in the district to increase rail use, reopen stations and encourage rail travel</li> <li>• 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</li> <li>• Bigger cheaper, wildlife friendly car parks for the commuters.</li> <li>• Port Lympne must attract at least 100,000</li> </ul>	<ul style="list-style-type: none"> <li>• Noted, the District Council will seek to encourage cycling though policies in the plan.</li> <li>• Noted but this would have to be in conjunction with Network Rail and the rail operator.</li> <li>• The District Council will use sustainable criteria for considering sites for allocation.</li> <li>• Noted.</li> <li>• Noted. Lorry parking issues along the highway are, unfortunately,</li> </ul>

<p>Mrs D Bultitude - Stanford Parish Council</p> <p>Tina Wiles - Clerk Hawkinge Parish Council</p> <p>Brian McKay</p> <p>Mrs Rosemary and John Griffiths</p> <p>Mr Norman Kwan - Principle Policy Planner Rother District Council</p> <p>Miss Karen Banks - Associate Lee Evans Planning - Miss Karen Banks</p> <p>Mr Roger Joyce Mr Alan Joyce</p> <p>mrs pamel a Keeling - treasurer Friends of St Mary and St Eanswythe</p> <p>Bob Edden - Bob Edden : Architect - PRINCIPAL BOB EDDEN : ARCHITECT</p> <p>Mr Daniel Keeling</p> <p>Mr Nigel Fursdon</p> <p>The Trustees of Viscount Folkestone (1963) Settlement - Miss Karen Banks</p> <p>Valerie Tupling - Hythe Neighbourhood Plan Team</p> <p>Mr Mark Adams - NHS Property Services Ltd</p> <p>Christopher Conn</p> <p>Mrs Cathy Newcombe - Town Clerk New Romney Town Council</p> <p>Gill Bell - Office Manager Kent Downs AONB Unit</p> <p>Jennifer Wilson - Planning Liaison Technical Specialist Environment</p> <p>Mr Trevor Hall - Developer Contributions Manager Kent Police</p> <p>mrs jennifer child s - Town Clerk Folkestone Town Council</p> <p>Ms Amanda Oates - Parish Clerk Sandgate Parish Council</p> <p>T Haskens - London Ashford Airport - Sean McGrath - Indigo Planning</p> <p>Fiona Cabache</p> <p>Mr Dale Greetham</p>	<p>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.</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• Areas of Folkestone are rendered virtually inaccessible by a roads system designed when we had ferries</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Improvements required to the A259. There needs to be a West Hythe relief road. Horn Street requires a new road.</li> <li>• 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.</li> <li>• 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</li> <li>• High priority should be given to the delivery of fast broadband as this will help to attract businesses particularly software developers to the area.</li> <li>• 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.</li> <li>• There should be provision for a cemetery on the Marsh. Hawkinge is a prohibitive distance to travel for people without their own transport as public transport is poor</li> <li>• More effort is needed to ensure the recent new development of retail and residential is integrated with the older established</li> </ul>	<p>beyond the remit of this Plan. Issue to be raised with KCC Highways.</p> <ul style="list-style-type: none"> <li>• Traffic studies were undertaken as part of the Core Strategy and the proposed amount of development. KCC Highways have been contacted for their views on any emerging sites.</li> <li>• Noted.</li> <li>• Noted, SDC will continue ongoing dialogue with Rother DC and consider alternative to the car.</li> <li>• Noted but bypasses are not always the answer and alternative modes of transport could also be considered and encouraged.</li> <li>• Agree, work will be undertaken as part of the planning permissions for the Seafront development. This is however, included within policy the in Core Strategy Local Plan.</li> <li>• Noted but these are substantial requirements that would need external funding.</li> <li>• Noted.</li> <li>• The overarching policy document, the Core Strategy Local Plan, sets out the infrastructure requirements for the Plan period. Any additional infrastructure required for allocated site will be highlighted in the policy.</li> <li>• Noted and the District Council plan to introduce a policy for new development s on this issue.</li> <li>• Noted. Will consider if there are any improvements that can be made through development.</li> <li>• Noted, but the area is low lying and is subject to flooding and may not be suitable for further cemeteries.</li> <li>• Noted and the District Council will contact the PCT for their comments on how this could be undertaken.</li> </ul>
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	<p>Sport England</p> <p>Mr Tom Cook</p> <p>April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport</p> <p>Mr Michael Boor - The Lympne Neighbourhood Plan Group</p>	<p>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.</p> <ul style="list-style-type: none"> <li>• Agree with the Zones . However disagree with the % differentiation re the Parish &amp; Town Council Neighbourhood Fund ,between those that have a Neighbourhood Plan and those that don't .</li> <li>• Shepway District Council should work with NHS commissioners to plan for healthcare facilities</li> <li>• 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.</li> <li>• Lympne is poorly served for footpaths and this could be improved.</li> <li>• 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.</li> <li>• 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.</li> <li>• Additional primary school infrastructure may have to be identified for Folkestone, Hythe and New Romney to accommodate forecast pupil demands.</li> </ul>	<ul style="list-style-type: none"> <li>• The Zones within the CIL have now been adopted by the District Council. The difference in the fund between those with neighbourhood plans and those without is stipulated in the Governments Legislation.</li> <li>• Noted and the District Council will work with the PCT</li> <li>• Noted, the District Council will work with the water suppliers to ensure that new development has the required infrastructure. Water standards are now set out in the Governments standards.</li> <li>• Noted</li> <li>• The District Council. Working with partners, will undertake a Green Infrastructure Strategy.</li> <li>• Noted and will include reference to indoor and outdoor sports facilities for local infrastructure</li> <li>• Noted, the District Council will work with KCC Education to identify any future needs resulting from residential development.</li> </ul>
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<p>Question12 Local Green Space – national policy, proximity, size</p>	<p>Mrs Lesley Whybrow</p> <p>Ms Laura Sullivan</p> <p>Mr Jim Martin</p> <p>Mrs Sally Chesters</p> <p>Mr Martin Whybrow</p> <p>Dr Jean Baker</p> <p>mrs ellie Henderson</p> <p>Mr Guy Topham</p> <p>Mr David Godfrey</p>	<ul style="list-style-type: none"> <li>• The rules laid down in the NPPF are sufficient and there is no need for Shepway to add additional local rules/definitions.</li> <li>• 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.</li> <li>• 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.</li> <li>• We would wish to see ancient woodland</li> </ul>	<ul style="list-style-type: none"> <li>• Agree, the NPPF criteria will be used as a starting point for assessing Local Green Spaces.</li> <li>• Noted. Local Green Spaces relate to existing spaces that are important to local communities and meet the criteria set out in the NPPF.</li> <li>• Noted.</li> <li>• Noted but ancient woodland is already protected.</li> </ul>
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	<p>Mr Brian Lloyd</p> <p>Mrs J McCormick</p> <p>Ms Liz Duckworth</p> <p>Ms Louise Barton</p> <p>Mrs Ann Goodwin</p> <p>Mrs D Bultitude - Stanford Parish Council</p> <p>Mrs Rosemary and John Griffiths</p> <p>Mrs Helen Severs Mr Alan Joyce</p> <p>Bob Edden - Bob Edden : Architect - PRINCIPAL BOB EDDEN : ARCHITECT</p> <p>Mr Nigel Fursdon</p> <p>Go Folkestone Action Group Richard Wallace - Go Folkestone Action Group</p> <p>Valerie Tupling - Hythe Neighbourhood Plan Team</p> <p>Mr John Lister - Natural England</p> <p>Mrs Cathy Newcombe - Town Clerk New Romney Town Council</p> <p>Gill Bell - Office Manager Kent Downs AONB Unit</p> <p>Jennifer Wilson - Planning Liaison Technical Specialist Environment Agency, Kent Area Office</p> <p>Ms Amanda Oates - Parish Clerk Sandgate Parish Council Mr Tony Tapley - Consultant RPS - Consultant RPS on behalf of GSE Group</p> <p>Mr Dale Greetham - Sport England</p> <p>Mr Tom Cook</p> <p>April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport</p> <p>Mr Michael Boor - The Lympne Neighbourhood Plan Group</p>	<p>protected from development in this plan. Shepway exhibits below average access to woodland in both categories.</p> <ul style="list-style-type: none"> <li>• Most of the Airfield in Lympne should be designated Green Space to create a barrier between the village and the industrial estate.</li> <li>• 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</li> <li>• 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.</li> <li>• 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.</li> <li>• Important to recognise the value of local green spaces as visual elements.</li> <li>• 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.</li> <li>• 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</li> <li>• 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</li> <li>• 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</li> <li>• The consultation will presumably clarify the definition of green space and the designations.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted but the NPPF and the PPG state that a designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name, which this comments seems to imply.</li> <li>• Noted, Princes Parade will be considered against the guidance in the NPPF and the PPG.</li> <li>• Noted, but there may be occasions where Local Green Spaces could be adjacent to but outside the settlement boundary. Government Guidance does not stipulate that this should be a consideration.</li> <li>• Views of the North Downs AONB would already be a consideration as any development would need to consider the setting. Government Guidance does not stipulate that this should be a consideration.</li> <li>• Noted</li> <li>• The assessment would be for Local Green Spaces not the landscape.</li> <li>• Noted, Local Green Spaces will be considered against the criteria set out in the NPPF and the PPG.</li> <li>• Noted. Wildlife is a consideration highlighted in the NPPF.</li> <li>• Noted, all will be considered against the criteria in the NPPF and PPG.</li> <li>• The Plan will provide a definition of Local Green Space.</li> </ul>
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<p>Question 13 Local Green Space assessment methodology</p>	<p>Mr Brian Lloyd - Senior Planner CPRE Protect Kent</p> <p>Mr Harald Gardiner - New Folkestone Society</p> <p>Mrs J McCormick - Town Clerk Hythe Town Council</p> <p>Ms Louise Barton</p> <p>Mrs Ann Goodwin - Parish Clerk Lympne Parish Council Mrs Rosemary and John Griffiths</p> <p>Mrs Helen Severs</p> <p>Mr Alan Joyce</p> <p>Mr Nigel Fursdon</p> <p>Go Folkestone Action Group Richard Wallace - Go Folkestone Action Group</p> <p>ms frances grellier</p> <p>Valerie Tupling - Hythe Neighbourhood Plan Team</p> <p>Mrs D Bultitude - Stanford Parish Council</p> <p>Mr John Lister - Natural England</p> <p>Mrs Cathy Newcombe - Town Clerk New Romney Town Council</p> <p>Gill Bell - Office Manager Kent Downs AONB Unit</p> <p>Ms Amanda Oates - Parish Clerk Sandgate Parish Council Alan Byrne - Historic Areas &amp; Planning Adviser English Heritage</p> <p>Mr Tony Tapley - Consultant RPS - Consultant RPS on behalf of GSE Group</p> <p>Fiona Cabache</p> <p>Mr Tom Cook</p> <p>April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport</p> <p>Mr Michael Boor - The Lympne Neighbourhood Plan Group</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Specific policy requirement that relevant green areas should be local in character and not be extensive.</li> <li>• 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</li> <li>• 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</li> <li>• Agree with the proposed methodology. although the 1-5 scoring needs some clarification</li> <li>• Railway margins are significant green spaces for wildlife</li> <li>• Every site could have totally different values, so should be treated separately . It should take into consideration its economic value</li> <li>• The matrix appears to rely more on existing designations than seeking to really assess local importance to the community as intended</li> <li>• The value of the local green space - in terms of their role in wider networks of landscape and habitat - should be considered.</li> <li>• CPRE Kent does not agree with the approach proposed. The value of local green space is intrinsically a subjective one</li> <li>• Few sites will achieve the required score of 17 to be considered Local Green Space</li> <li>• 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</li> <li>• In order to properly identify historic parks and gardens and other historic green spaces a programme of assessment and appraisal is needed</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• The NPPF and PPG does not consider these as issues for designating Local Green Space.</li> <li>• This comment reflects the NPPF and PPG guidance and will be a consideration when assessing sites.</li> <li>• The criteria in the NPPF will be used and this includes the 'tranquillity' of an area. We will consult on sites that have come forward to judge the local communities views.</li> <li>• Noted.</li> <li>• Noted, will reflect the NPPF criteria and the PPG advice.</li> <li>• Noted, but these would need to be considered against the criteria in the NPPF and could be problematic for the operation of the railway lines if designated.</li> <li>• Noted</li> <li>• Noted. The criteria from the NPPF will be used as a starting point for assessment.</li> <li>• Noted but this may fall outside of the criteria in the NPPF.</li> <li>• The District Council will use the criteria set out in the NPPF. Ultimately, without further guidance from Government, the assessment may well be subjective.</li> <li>• The District Council will use the criteria set out in the NPPF.</li> <li>• Disagree, Paragraph 17 in the PPG suggests that do not have to be accessible to be included.</li> <li>• Noted.</li> <li>• There is no Government stipulation that sites adjacent Local Green Spaces should also be protected. This would have to be a site by site consideration.</li> </ul>
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		<p>Natural England's ANGST criteria could be used.</p> <ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Noted, the District Council will use the criteria set out in the NPPF to consider Local Green Spaces.</li> </ul>
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<p>Question 14 Local Green Space</p>	<p>Mrs Lesley Whybrow Mr Martin Whybrow Mrs Susan Law Mr Brian Lloyd - Senior Planner CPRE Protect Kent Mrs J McCormick - Town Clerk Hythe Town Council Ms Louise Barton Mrs Ann Goodwin - Parish Clerk Lympne Parish Council Mrs Rosemary and John Griffiths Mr Alan Joyce Mr Tony Tapley - Consultant RPS - Consultant RPS on behalf of GSE Group Bob Edden - Bob Edden : Architect - PRINCIPAL BOB EDDEN : ARCHITECT Mr Nigel Fursdon Valerie Tupling - Hythe Neighbourhood Plan Team Mr John Lister - Natural England Mrs D Bultitude - Stanford Parish Council Mrs Cathy Newcombe - Town Clerk New Romney Town Council Gill Bell - Office Manager Kent Downs AONB Unit Ms Amanda Oates - Parish Clerk Sandgate Parish Council Alan Byrne - Historic Areas &amp; Planning Adviser English Heritage Mrs Vanessa Evans Mr Dan Hulme - Shepway Sports Trust - Trustee Shepway Sports Trust Mr Tom Cook</p>	<ul style="list-style-type: none"> <li>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</li> <li>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</li> <li>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</li> <li>The proposed method is not appropriate in terms of Government policy - specifically that relating to the identification process in paragraph 76 of the NPPF</li> <li>We are not sure that the existing sources of information cited, or the policies mentioned (all of which should be carried forward), cover all the criteria for a green area being 'special to the local community' or holding 'a particular local significance'.</li> <li>Concerned that under the current NPPF criteria scoring certain facilities and assets would not fall under the Local Green Space categorisation.</li> <li>It should not be prescriptive and policy should respond positively to and give weight to local opinion.</li> <li>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.</li> <li>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.</li> <li>Preference for such areas to be designated as landscape designations in accordance with para. 113 of the NPPF.</li> <li>Kent Wildlife Trust strongly supports the</li> </ul>	<ul style="list-style-type: none"> <li>Local Green Spaces will be assessed using the NPPF guidance. Areas designated need community support.</li> <li>Noted and will consider other possible designations to protect green areas that fall outside of the Local Green Spaces.</li> <li>Local Green Spaces will be assessed using the NPPF guidance. Areas designated need community support.</li> <li>Noted, the Council will use NPPF guidance.</li> <li>Noted</li> <li>Noted, open spaces will still be protected under the open space policies &amp; NPPF guidance.</li> <li>Local Green Spaces will be assessed using the NPPF guidance. Areas designated need community support.</li> <li>Noted and would be included within the NPPF guidance. Areas designated would need community support.</li> <li>Noted. Local Green Spaces will be assessed using the NPPF guidance. Areas designated would need community support.</li> <li>The NPPF does state that Local Green Spaces should not be an extensive tract of land.</li> <li>Noted</li> </ul>
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	<p>April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport</p> <p>Mr Michael Boor - The Lympne Neighbourhood Plan Group</p>	<p>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".</p> <ul style="list-style-type: none"> <li>• Encompass those non-designated parks and gardens included on the Kent Parks and Gardens survey(Kent Gardens Trust).</li> <li>• 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.</li> <li>• The County Council suggests that ' Village Greens ' and ' Common Land ' should be added.</li> <li>• Yes – provided it protects New Romney's existing green spaces</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> <li>• Noted. Local Green Spaces will be assessed using the NPPF guidance. Areas designated would need community support.</li> <li>• Noted</li> <li>• Open spaces will still be protected by the NPPF (para 74).</li> </ul>
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<p>Question 15 Heritage</p>	<p>Mrs Lesley Whybrow</p> <p>Mr Trevor Minter</p> <p>Mrs Sally Chesters</p> <p>Mr Jim Martin</p> <p>Mr Martin Whybrow</p> <p>Dr Jean Baker</p> <p>Mr Stephen Corner</p> <p>Mrs Susan Law</p> <p>Mr Guy Topham</p> <p>Mr Brian Lloyd - Senior Planner CPRE Protect Kent</p> <p>Mr Harald Gardiner - New Folkestone Society</p> <p>Mrs J McCormick - Town Clerk Hythe Town Council</p> <p>Ms Louise Barton</p> <p>Ms Liz Duckworth - Development Manager Creative Foundation</p> <p>Mrs Ann Goodwin - Parish Clerk Lympne Parish Council</p> <p>Mrs Rosemary and John Griffiths</p> <p>Miss Karen Banks - Associate Lee Evans Planning - Miss Karen Banks</p>	<ul style="list-style-type: none"> <li>• 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</li> <li>• Shepway is rich in heritage assets and this should be supported as high on the Council's priorities</li> <li>• 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-case basis and include public consultation.</li> <li>• 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.</li> <li>• Leas Lift in Folkestone, the Tram Shelter on Princes Parade and the Martello Towers should be included in the Heritage Strategy.</li> <li>• Shornccliffe Garrison is a site under threat of losing its heritage identity, the second largest military camp at one time, with a</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. The District Council is currently undertaking a Heritage Strategy that will identify heritage assets by themes. For buildings or structures that are not protected by a formal designation, the council will start a list for locally important properties. This may be with the assistance of local communities</li> </ul> <p>The setting and vistas of the Canal will be a consideration and the District Council will seek to balance the protection of the Canal and its setting as well as seeking ways to enhance the asset and ensuring an optimum viable use.</p> <ul style="list-style-type: none"> <li>• Noted and the Council will seek to ensure that heritage assets make a valuable contribution to the district.</li> <li>• Noted, the setting of listed buildings and conservation areas are protected through the Planning (Listed Buildings and Conservation Areas) Act 1990.</li> <li>• Noted. The District Council is currently undertaking a Heritage Strategy that will identify heritage assets by themes. For buildings or structures that are not protected by a formal designation, the council will start a list for locally important properties. This may be with the assistance of local communities</li> </ul> <p>The setting and vistas of the Canal will be a consideration and the District Council will seek to balance the protection of the Canal and its setting as well as seeking ways to enhance the asset and ensuring an optimum viable use.</p> <ul style="list-style-type: none"> <li>• Noted. The Heritage Strategy will consider heritage assets as 'themes', which should include the individual assets.</li> <li>• Noted, this site now has planning permission, which included the consideration of heritage issues.</li> </ul>
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<p>Mrs Helen Severs</p> <p>Mr Alan Joyce</p> <p>FPHC</p> <p>mrs pamela Keeling - treasurer Friends of St Mary and St Eanswythe</p> <p>Bob Edden - Bob Edden : Architect - PRINCIPAL BOB EDDEN : ARCHITECT</p> <p>Mr Nigel Fursdon</p> <p>Go Folkestone Action Group Richard Wallace - Go Folkestone Action Group</p> <p>ms frances grellier</p> <p>Valerie Tupling - Hythe Neighbourhood Plan Team Mr Brinley Hughes</p> <p>Mrs D Bultitude - Stanford Parish Council</p> <p>Christopher Conn</p> <p>Mrs Cathy Newcombe - Town Clerk New Romney</p> <p>Gill Bell - Office Manager Kent Downs AONB Unit</p> <p>Ms Amanda Oates - Parish Clerk Sandgate Parish Council</p> <p>Alan Byrne - Historic Areas &amp; Planning Adviser English Heritage</p> <p>Mr Tony Tapley - Consultant RPS - Consultant RPS on behalf of GSE Group</p> <p>Mr Tom Cook</p> <p>April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport</p> <p>Mr Ray Duff</p> <p>Mr Michael Boor - The Lympne Neighbourhood Plan Group</p>	<p>long history stretching back beyond Tudor times,</p> <ul style="list-style-type: none"> <li>• Opportunities to secure the enhancement and maintenance of heritage assets should not be prejudiced by unnecessarily restrictive policies</li> <li>• 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.</li> <li>• 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</li> <li>• 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.</li> <li>• The Heritage Strategy is needed before we proceed further with this plan. The Plan then needs to align with the Strategy.</li> <li>• St Eanswythe is a top attraction to the town but it isn't worthy of a mention in the overall document.</li> <li>• 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</li> <li>• 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.</li> <li>• The Plan should continue to support the Folkestone Townscape Heritage Initiative</li> <li>• Former Crown Post Office in Bouverie could be residential or residential/commercial with the existing uses moved to smaller premises nearby .</li> <li>• 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.</li> <li>• Conservation areas are heritage assets and should be strictly maintained in accord with the objectives that were prescribed at the time of their designation .</li> <li>• The areas historic churches and</li> </ul>	<ul style="list-style-type: none"> <li>• The District Council will have a positive strategy for heritage assets, in line with the NPPF.</li> <li>• Noted. This is an issue that could be considered as part of the Heritage Strategy. Proposed developments are subject to public consultation.</li> <li>• Noted, District Council will follow the advice in the Planning (Listed Buildings and Conservation Area) Act 1990, NPPF and PPG.</li> <li>• Noted.</li> <li>• The Heritage Strategy is an evidence base document, which will inform the final draft plan. It is not necessary at this stage to hold up the plan making process for this issue.</li> <li>• Noted.</li> <li>• Noted. The overall 'package' of the town could be picked up as an action in the Heritage Strategy. The setting and vistas of the Canal will be a consideration and the District Council will seek to balance the protection of the Canal and its setting as well as seeking ways to enhance the asset and ensuring an optimum viable use.</li> <li>• Noted.</li> <li>• Noted &amp; agreed.</li> <li>• Noted.</li> <li>• Noted, the District Council will include a positive policy for the use of heritage assets, with due regard to the Act (1990) , the NPPF and the PPG.</li> <li>• Noted, any planning decisions will be considered against the Planning (Listed Buildings and conservation Areas) Act 1990, the NPPF and the PPG.</li> <li>• Noted and themes will be picked up in the Heritage Strategy.</li> </ul>
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		<p>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</p> <ul style="list-style-type: none"> <li>• Local heritage listing as recommended by English Heritage - Good Practice Guide for Local Heritage Listing</li> <li>• 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</li> <li>• 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.</li> <li>• We would wish to ensure that such a strategy also consider the relevance of the Kent Downs as an historic landscape.</li> <li>• 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</li> <li>• The council should aim to use compulsory purchase powers more often to preserve listed buildings when they are abandoned by owners.</li> <li>• 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,</li> <li>• KCC has carried out studies of several of Kent's districts to identify survivals from the 20<sup>th</sup> century's military and civil 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</li> <li>• Heritage assets are vulnerable to decline through crime and neglect. They can attract</li> </ul>	<ul style="list-style-type: none"> <li>• The district council will include criteria for the creation of the local list in the Plan. This will be updated following the Heritage Strategy.</li> <li>• Agree, the District Council will draft a policy that supports the reuse of Heritage Assets, in line with the NPPF.</li> <li>• Noted, this will be picked up through the Heritage Strategy.</li> <li>• Noted and agreed, landscape will form part of the Heritage Strategy</li> <li>• Noted and agreed.</li> <li>• Noted.</li> <li>• Noted.</li> <li>• Noted &amp; could be considered in the Heritage Strategy.</li> <li>• Noted and this issue will be considered in the Heritage Strategy.</li> </ul>
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		<p>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</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Support the new museum, and what will likely be a need for expansion.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• Expanding the town centre conservation area would not assist with archaeology. Applications that fall within the area identified for archaeology will be sent to KCC for consideration.</li> <li>• Noted. Not aware of any firm proposals to put forward in the Plan.</li> <li>• Noted.</li> <li>• Noted, this should be informed by the Heritage Strategy.</li> <li>• Noted, this issue should be considered in the Heritage Strategy but as it is off shore, it is not within the remit of the Local Plan.</li> <li>• Noted, the district Council, through the Heritage Strategy , will seek to create a local list of non designated buildings and structures important to local communities.</li> </ul>
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<p>Question 16 General development management policy options</p>	<p>Mrs Lesley Whybrow Mr Trevor Minter Ms Laura Sullivan Mr Martin Whybrow Mr Adrian Fox - Policy and Projects Manager Dover District Council Mrs Sally Chesters Mrs Susan Law Mr Guy Topham Mr Brian Lloyd - Senior Planner CPRE Protect Kent Miss Sarah Harrison - Southern Water Ms Louise Barton Mrs Ann Goodwin - Parish Clerk Lympne Parish Council Mrs Rosemary and John Griffiths MF &amp; L Limited - P3410 - Ms Jeanne Taylor - Partner Lee Evans Planning Shepway Developments Limited - P3529 - Ms Jeanne Taylor - Partner Lee Evans Planning - GD4 &amp; GD5 - Question 16</p>	<ul style="list-style-type: none"> <li>• Locally distinct design criteria, particular concerns about recent decisions in Hythe.</li> <li>• 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.</li> <li>• 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.</li> <li>• Design for rubbish disposal needs to be</li> </ul>	<ul style="list-style-type: none"> <li>• The District Council develop design policies that will ensure that the local character is taken into consideration.</li> <li>• Flood mitigation is important and is an issue highlighted in the NPPF and PPG. The District Council will consider SUDS in the plan.</li> <li>• Noted. Sites that are to allocated will need evidence to demonstrate that sites are developable.</li> <li>• Noted and this is an issue that will be considered in the design</li> </ul>
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	<p>WS Furnival - P2854 - Ms Jeanne Taylor - Partner Lee Evans Planning - GD4 &amp; GD5  MF &amp; L Limited - P3405 - Ms Jeanne Taylor - Partner Lee Evans Planning - GD4 &amp; GD5  Mr Alan Joyce  Mrs Helen Severs - GD1A GD4  Bob Edden - Bob Edden : Architect - BOB EDDEN - PRINCIPAL BOB EDDEN : ARCHITECT  Mr Nigel Fursdon  Go Folkestone Action Group Richard Wallace - Go Folkestone Action Group  The Trustees of Viscount Folkestone (1963) Settlement - Miss Karen Banks - GD4  Mrs D Bultitude - Stanford Parish Council  Gill Bell - Office Manager Kent Downs AONB Unit  Jennifer Wilson - Planning Liaison Technical Specialist Environment Agency, Kent Area Office  mrs jennifer childs - Town Clerk Folkestone Town Council  Ms Amanda Oates - Parish Clerk Sandgate Parish Council  Alan Byrne - Historic Areas &amp; Planning Adviser English Heritage – GD1 – GD5  T Haskens - London Ashford Airport - Sean McGrath - Indigo Planning – GD4 – GD5 – GD3 – GD2 – GD1  Mobile Operators Association - Mono Consultants Limited  Valerie Tupling - Hythe Neighbourhood Plan Team  Mr James Stevens - Home Builders Federation Ltd  April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport  Mr Michael Boor - The Lympne Neighbourhood Plan Group  Mr John Ruler and EA Strategic Land LLP - James Waterhouse - Icen Projects Ltd – GD1 – GD5 – GD2 – GD4</p>	<p>given higher priority in new developments. The multiplicity of recycling types , together with declining standards of littering mean that more space and thought on standards and remedies need to be given to this subject.</p> <ul style="list-style-type: none"> <li>• There may be situations where it is appropriate to retain local distinctiveness and times where radical new designs are equally appropriate.</li> <li>• Council will need to prepare an up-to-date local plan viability assessment if it wishes to introduce this as a policy. (GD2 B).</li> <li>• GD5 Incorporating public art in new development is no longer appropriate given the commentary in the PPG on planning obligations (paragraph 4)</li> <li>• 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.</li> <li>• The Plan currently contains a number of policy options that could potentially result in a significant number of individual policies. Should not replicate NPPF or PPG.</li> <li>• I think it is important to design out crime but one can only do that in consultation with local people and the police who will be able to highlight the issues and indeed advise if there are any?</li> </ul>	<p>policies of the plan.</p> <ul style="list-style-type: none"> <li>• Council will in the next stage of the local plan develop more locally specific policies to the different areas of the district including Hythe that will take into account local characteristics and distinctiveness. Mineral exploration is not a District Local Plan issue</li> <li>• Noted, this option has now been superseded by national standards. The Council intend to adopt these. Viability testing has been carried out on these standards by the government body.</li> <li>• Noted, public art, including lighting and landscaping, can help integration of new and existing communities. Local communities are often involved in the design of public art to enhance the local distinctiveness and sense of place.</li> <li>• Noted and agree.</li> <li>• Whilst a local plan should not replicate NPPF guidance the Council should identify particular issues of importance to its area and include relevant policies based on evidence. This was an Issues and Options document which was an opportunity for the Council to test policy ideas.</li> <li>• Criteria that are aimed at designing out crime are based on information provided by the police who are also consulted on the Local Plan</li> </ul>
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Question 17 Housing policy options	<p>Mrs Lesley Whybrow Ms Laura Sullivan Mr Tom Quaye Mr Ross Carter Mr Paul Carney Mrs Sally Chesters Mrs Rosemary and John Griffiths WS Furnival - P2854 - Ms Jeanne Taylor - Partner Lee Evans Planning Mr Nicholas Smith - Clerk Stelling Minnis Parish Council Mr Michael Boor - The Lympne Neighbourhood Plan Group Mrs Helen Severs Go Folkestone Action Group Richard Wallace - Go Folkestone Action Group Dr Karen White The Trustees of Viscount Folkestone (1963) Settlement - Miss Karen Banks Mr Brian Lloyd - Senior Planner CPRE Protect Kent Ms Louise Barton Mrs Ann Goodwin - Parish Clerk Lympne Parish Council Mr Alan Joyce Bob Edden - Bob Edden : Architect - PRINCIPAL BOB EDDEN : ARCHITECT Mr Nigel Fursdon Ms Amanda Oates - Parish Clerk Sandgate Parish Council Mrs Mary Lawes Valerie Tupling - Hythe Neighbourhood Plan Team Mr James Stevens - Home Builders Federation Ltd Mr Michael Boor - The Lympne Neighbourhood Plan Group Mrs Helen Severs Mrs Lesley Whybrow Ms Laura Sullivan Mr Tom Quaye Mr Ralph Brown Lee Evans Partnership - Ms Jeanne Taylor - Partner Lee Evans Planning Mr Michael Boor - The Lympne Neighbourhood Plan Group Mrs Rosemary and John Griffiths Mr Brian Lloyd Ms Louise Barton Mrs Ann Goodwin - Parish Clerk Lympne Parish Council Mr Alan Joyce Mr Nigel Fursdon Alan Byrne - Historic Areas &amp; Planning Adviser English Heritage Valerie Tupling - Hythe Neighbourhood Plan Team Ms Amanda Oates - Parish Clerk Sandgate Parish Council Mr Michael Boor - The Lympne Neighbourhood Plan Group</p>	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>Work with care providers and support services so people can stay in their homes as long as possible.</li> <li>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.</li> <li>Developer concern at certain options being too onerous.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>Objections to development on Princes Parade.</li> </ul>	<ul style="list-style-type: none"> <li>Noted however the requirement that at least half of new homes by 2026 will be 3 bedroom (or larger) dwellings is from the Core Strategy adopted 2013 (Policy CSD2), supported by the Strategic Housing Market Assessment 2009.</li> <li>Noted The District Council has a policy in the adopted 2013 Core Strategy Local Plan that sets out a requirement of 20% lifetime homes. The requirement that at least half of new homes by 2026 will be 3 bedroom (or larger) dwellings is also from the Core Strategy adopted 2013 (Policy CSD2), which was supported by the Strategic Housing Market Assessment 2009.</li> <li>Noted and the District Council will consider design policies to avoid any associated problems caused by conversions.</li> <li>The District Council has been working with KCC on such issues.</li> <li>Noted and agree. However, there will be a need for other land to meet the Core Strategy requirement.</li> <li>Noted</li> <li>Development within Shepway is directed towards existing sustainable settlements, Stelling Minnis is identified as a secondary village therefore it would be expected to see a small amount of growth over the plan period. Could we expand H8 to include something about encouraging a limited amount of small low cost housing in rural areas, further expanding this through our settlement area work? Allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs (NPPF).</li> <li>Noted. Council will in the next stage of the local plan work closely with the community to develop more locally specific policies to the different areas of the district that will take into account local characteristics and distinctiveness. Affordable and social housing is addressed in Core Strategy (2013) Policy CSD1 Balanced Neighbourhoods for Shepway.</li> <li>Noted, the Government is promoting self build and custom building and the District Council is keen to enable such schemes.</li> <li>Noted. Please see response to general comments.</li> </ul>
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	<p>Mr Brian Lloyd  Ms Louise Barton  Mrs Ann Goodwin - Parish Clerk Lympne Parish Council  Mrs D Bultitude - Stanford Parish Council  Miss Sarah Harrison - Southern Water  Shepway Developments Limited - P3529 - Ms Jeanne Taylor - Partner Lee Evans Planning  Dr Karen White  Mrs Lesley Whybrow  Ms Laura Sullivan  Mr James Stevens - Home Builders Federation Ltd  Mrs Rosemary and John Griffiths  L Bauer  Gill Bell - Office Manager Kent Downs AONB Unit  Mr David Stuart  Mr Dale Greetham - Sport England</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted, however the SHMA supported the Core Strategy policies which were adopted in 2013. The Places and Policies Local Plan sites alongside the Core Strategy and further expands upon it with the addition of sites and DM policies.</li> <li>• Noted, a policy already exists for Lifetime Homes in the Core Strategy, which has a viability tested. The Government has since introduced new space standards for new developments, part of which supersedes Lifetime Homes. The District Council can, however, 'passport' the new standards across to the old policy.</li> <li>• Noted, however the SHMA supported the Core Strategy policies which were adopted in 2013. The Places and Policies Local Plan sites alongside the Core Strategy and further expands upon it with the addition of sites and DM policies.</li> <li>• Noted, but it is not possible to place conditions on a property to ensure their long term maintenance.</li> <li>• Recent changes in the Government's definition of Gypsy and Travellers in the guidance has meant that the need for new sites appears to be low and that a criteria based policy would be sufficient.</li> <li>• Gypsies and Travellers are an ethnic minority group in English law. Subsequently Gypsies and travellers have their own specific section of Government planning policy this ensures fairness in the planning system and helps to protect the countryside.</li> </ul>
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<p>Question 18 Economy policy options</p>	<p>Mrs Lesley Whybrow Ms Laura Sullivan Ms Liz Duckworth - Development Manager Creative Foundation Mr Brian Lloyd - Senior Planner CPRE Protect Kent Ms Louise Barton Mrs Ann Goodwin - Parish Clerk Lympne Parish Council Mrs D Bultitude - Stanford Parish Council Mr Guy Topham Mr Norman Kwan - Principle Policy Planner Rother District Council MF &amp; L Limited - P3405 - Ms Jeanne Taylor - Partner Lee Evans Planning Mrs Helen Severs Mr Alan Joyce Go Folkestone Action Group Richard Wallace - Go Folkestone Action Group Gill Bell – Office Manager Kent Downs AONB Jennifer Wilson - Planning Liaison Technical Specialist Environment Agency, Kent Area Office Alan Byrne - Historic Areas &amp; Planning Adviser English Heritage T Haskens - London Ashford Airport - Sean McGrath - Indigo Planning Smiths Medical – Kathryn Williams – JLL Valerie Tupling - Hythe Neighbourhood Plan Team Ellandi - Ellandi LLP - Mr Matthew Williams - Director Savills Mr Michael Boor - The Lympne Neighbourhood Plan Group</p>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Tourism plays an important part in the economy of Hythe. There should be policies which support and protect tourist facilities and assets. A policy to protect the character of the Hythe seafront as a major tourist asset is required.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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 .</li> <li>• 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.</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. The District Council's Economic Division works with KCC and other partners and this issue is being dealt with by the Economic Development Strategy, in which skills and apprenticeships are a priority.</li> <li>• Noted, the District Council will consider the need for policies that support tourism in Hythe and the rest of the district.</li> <li>• Noted, but Government guidance and recent announcements indicate that residential uses are acceptable on employment sites that are not likely to come forward.</li> <li>• Noted and agreed, residential is considered suitable for town centres in the NPPF. The district council will also consider other suitable uses to ensure the viability and vitality of the districts town centres.</li> <li>• Noted.</li> <li>• Noted, The NPPF sets out how local authorities should consider the use of the best and most versatile land.</li> <li>• Noted, the District Council will consider the need for policies that support tourism in the district.</li> <li>• Noted, the District Council will undertake an employment Land Review which will provide the evidence base for this issue.</li> </ul>
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		<p>those areas in its setting.</p> <ul style="list-style-type: none"> <li>• Folkestone and Shepway lack a strong Higher Education presence and a campus life, and this needs to be mentioned in the Plan.</li> <li>• 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.</li> <li>• 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.</li> <li>• The Council should recognise the value of LAA to tourism in Shepway, and the economic value of tourism generally. 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted, the Economic Development Strategy seeks to make improvements to this. If land has been identified for such development it will be allocated in the Plan. Noted. The concept of sustainable communities is integral to this plan that develops the policies set out in the core strategy</li> <li>• Businesses are often exempt from the energy efficiency / renewable energy standards that apply to housing. Important that developers share responsibility for contributing to climate change avoidance especially in Shepway where water scarcity for example is a serious issue. Local plans and their policies are subject to viability testing. The plan must be consistent with the core strategy which recognises the necessity to balance economic, social and environment requirements. This is reflected in the strategic needs and aims that will be carried forward in the Places and Policies Local Plan.</li> <li>• Noted.</li> <li>• Noted and agreed. A policy will be considered to support tourism in the district.</li> <li>• Noted.</li> </ul>
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<p>Question19 Community policy options</p>	<p><b>Responses inc...</b> Mr Ross Anthony – Planning Adviser The Theatres Trust Mr Tony Tapley - Consultant RPS - Mr Tony Tapley - Mr Tony Tapley Mrs Lesley Whybrow</p>	<ul style="list-style-type: none"> <li>• C7: Local Green Space should be afforded the same level of protection as Green Belt.</li> <li>• C1: Supports the inclusion of a policy to protect existing community facilities, as well as to encourage the provision of new ones,</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. This is stated in the NPPF and PPG.</li> <li>• Noted and agreed, ensure any policy reflects the NPPF.</li> </ul>
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	<p>Mr Michael Boor - The Lympne Neighbourhood Plan Group  Mrs Helen Severs -  April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport  Mr Dale Greetham - Sport England  Mr Brian Lloyd - Senior Planner CPRE Protect Kent  Miss Sarah Harrison - Southern Water  Mrs Ann Goodwin - Parish Clerk Lympne Parish Council  Mrs Denise Maskell  Ms avril wigham  Mr Chris Giles  Mrs Mary MacEwen  James Marsh  Helen Colley  Mrs Elaine Martin  Mr Jim Martin  Mr Tim RAYMOND  Mr Marc StClare  Mrs Barbara Thomas  Mrs Christine Owen  Mrs Deborah Gozal  Mr David Thompson  Mr Peter Johannesen  Rona Goodwin  Mr Ross Carter  Penny Graham  mr Michael Tanner  Ms Isabel Newth  Alison Kennett  Mr Roger Parker  Mrs Sarah Odysseas  Mr Michael Boston</p>	<p>however, it is not clear what is meant by 'community facility', nor does the proposed wording fully reflect Item 70 of the NPPF.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• C8 : CPRE Kent agrees that a policy on Public Rights of Way (PROW) should be included in the plan.</li> <li>• 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.</li> <li>• Support the proposals for a new pool and school on Princes Parade. The current pool serves public from Folkestone right down to Lydd, therefore is too small and in a very poor condition.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted</li> <li>• Noted</li> <li>• Planning policy for the site will require the provision of high quality usable open space and improvements to the relationship between the canal and sea. The site is contaminated due to previous uses and has limited public access. As part of any new scheme the access and open space would need to be improved, whilst contamination would have to be appropriately remediated. The inclusion of residential uses delivers mixed use development and enables the high infrastructure costs to be met and also scope to provide high quality design of both landscape and townscape, whilst also contributing to housing needs of the district within a sustainable location within the Urban area. Issues relating to the Scheduled Monument are of high importance and the District Council will continue to consult with Historic England on this issue.</li> <li>• Noted</li> <li>• Noted, the District Council will require any planning application to demonstrate the need for the sports facilities to be provided</li> </ul>
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<p>Question 20 Transport policy options</p>	<p>Mr John Griffiths Gill Bell - Office Manager Kent Downs AONB Unit Valerie Tupling - Hythe Neighbourhood Plan Team Mr Nicholas M Perry Mr Roger Joyce Go Folkestone Action Group Richard Wallace - Go Folkestone Action Group Mr Brian Lloyd - Senior Planner CPRE Protect Kent Mrs Ann Goodwin - Parish Clerk Lympne Parish Council Mr Nigel Fursdon Ellandi - Ellandi LLP - Mr Matthew Williams - Director Savills Mr Michael Boor - The Lympne Neighbourhood Plan Group Mrs Helen Severs Mrs Sally Chesters Dr Jean Baker Mr Martin Whybrow Mr James Hammond - Kent Highways Kent Highways - Parish Clerk Sandgate Parish Council April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport Ms Amanda Oates Bob Edden - Bob Edden : Architect - PRINCIPAL BOB EDDEN : ARCHITECT Mr Kevin Bown - Asset Manager, Area 4 (Kent) Highways Agency T Haskens - London Ashford Airport - Sean McGrath - Indigo Planning</p>	<ul style="list-style-type: none"> <li>• 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).</li> <li>• 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.</li> <li>• Get more freight transported on trains</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> <li>• Reduce parking standards, look into car-free developments where possible, extend pedestrian-friendly areas, with shared surfaces.</li> <li>• Overnight lorry parking is not the same problem as Operation Stack.</li> <li>• Cable car proposal stretching from Folkestone Central Station to the Harbour would be viable and practical as a tourist attraction.</li> <li>• T1 produce new Shepway adopted parking standards based on local circumstances which should include providing parking wherever possible in new developments.</li> <li>• 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.</li> <li>• T6 : favour the continuation of Policy TR15. There is no basis for a new policy because</li> </ul>	<ul style="list-style-type: none"> <li>• Noted but events have now superseded this policy. No policy is required. Policy to restrict further lorry parks will be considered.</li> <li>• Noted, but events have now superseded this question.</li> <li>• Noted but this issue is strategic in nature and beyond the remit of the plan.</li> <li>• Noted, the airport now has planning permission.</li> <li>• Noted, the airport now has planning permission and the issues of nature conservation have now been dealt with. Natural England have been part of this process.</li> <li>• Noted.</li> <li>• Minimum parking standards will be included with the Plan and policies will seek to ensure pedestrian friendly environments.</li> <li>• Noted and agree.</li> <li>• Noted but no schemes have been put forward so cannot be included.</li> <li>• Minimum parking standards will be included with the Plan.</li> <li>• Noted.</li> <li>• Noted, the airport now has planning permission.</li> </ul>
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	<p>Mr Ross Carter</p> <p>Mrs JH Molloy</p> <p>Mr Norman Kwan- Principle Policy Planner Rother District Council – T6</p> <p>Mr Steve Moore - Thanet District Council</p> <p>Ms Laura Sullivan</p> <p>Mrs Mary Lawes</p>	<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted, the airport now has planning permission. Status of Manston Airport is still unclear.</li> <li>• Minimum parking standards will be included with the Plan.</li> <li>• Noted, any policy will reflect this comment.</li> <li>• Noted, the airport now has planning permission. It is not necessary to include a policy as the airport now has planning permission.</li> </ul>
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<p>Question 21 Natural Environment policy options</p>	<p>Mrs Lesley Whybrow Mr Jim Martin Ms Laura Sullivan Mr Adrian Fox - Policy and Projects Manager Dover District Council Mr Brian Lloyd - Senior Planner CPRE Protect Kent Miss Sarah Harrison - Southern Water Ms Louise Barton Mrs Ann Goodwin - Parish Clerk Lympne Parish Council Mrs D Bultitude - Stanford Parish Council Mr Guy Topham Mrs Rosemary and John Griffiths Mr Norman Kwan Mr Martin Whybrow Mrs Denise Maskell Mrs Helen Severs Mr Alan Joyce</p>	<ul style="list-style-type: none"> <li>• Support the commissioning of a landscape appraisal that looks at areas in addition to those already identified as AONBs.</li> <li>• 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.</li> <li>• 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.</li> <li>• NE1 We would support a policy that seeks to ensure greater accessibility for pedestrians and cyclists both within the</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> <li>• Noted.</li> <li>• Noted.</li> <li>• NE1: noted. Intention is to improve access to the countryside where access is poor, particularly for those communities who suffer poor health indicators and/or high levels of economic disadvantage.</li> </ul>
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	<p>Bob Edden - Bob Edden : Architect - PRINCIPAL BOB EDDEN : ARCHITECT  Mr John Lister  Gill Bell - Office Manager Kent Downs AONB Unit  Jennifer Wilson - Planning Liaison Technical Specialist Environment Agency, Kent Area Office  Alan Byrne - Historic Areas &amp; Planning Adviser English Heritage  T Haskens - London Ashford Airport - Sean McGrath - Indigo Planning  Mrs Vanessa Evans  Valerie Tupling - Hythe Neighbourhood Plan Team  April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport  Patricia Rolfe - S.O.M.B.R.E  Mr Michael Boor - The Lympe Neighbourhood Plan Group</p>	<p>urban areas between open spaces and also from the urban areas into the countryside.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• The need to retain tranquillity should be specifically recognised as an issue in the plan.</li> <li>• The importance of 'dark skies' should be acknowledged in the plan and we would urge the Council to work towards developing a dark skies policy along similar lines to that adopted by Ashford Borough Council.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• A policy should include reference to protection for groundwater.</li> <li>• Comments from developers indicate they</li> </ul>	<ul style="list-style-type: none"> <li>• Noted</li> <li>• Noted, the Council will consider the potential for policies concerning tranquillity and dark skies. We have started to look at the possibility of a SPD based on that produced by Ashford.</li> <li>• Noted, the Council will consider the potential for policies concerning tranquillity and dark skies. We have started to look at the possibility of a SPD based on that produced by Ashford.</li> <li>• AONB's and their setting are protected by other legislation such as the NPPF and the PPG. Council will have regard to the AONB management plan in formulating relevant policies.</li> <li>• Noted. However given the uniqueness of some of the sites in this district, we will seek Natural England's advice. Para 118 and mitigation hierarchy maybe relevant. Work on the Dungeness sustainable access strategy will form part of the local plan evidence base. Policy options concerning open space and new development are also in the community chapter.</li> <li>• NE2 - noted, clarification being sought on current position regarding biodiversity offsetting.</li> <li>• Noted, Groundwater is protected through the Core Strategy.</li> <li>• Noted but local planning authorities should not replicate Government</li> </ul>
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		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.	legislation or policies in their Local Plans.
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Question 22 Coast policy options	Mr Jim Martin Ms Laura Sullivan Mrs Sally Chesters Mrs Susan Law Mr Brian Lloyd - Senior Planner CPRE Protect Kent Ms Louise Barton Mrs D Bultitude - Stanford Parish Council Mr Guy Topham Mrs Rosemary and John Griffiths Mr Norman Kwan - Principle Policy Planner Rother District Council Mr Roger Joyce Mr Martin Whybrow MF & L Limited - P3410 - Ms Jeanne Taylor - Partner Lee Evans Planning Mrs Helen Severs Mr Alan Joyce The Trustees of Viscount Folkestone (1963) Settlement - Miss Karen Banks Angela Gemmill Gill Bell - Office Manager Kent Downs AONB Unit Jennifer Wilson - Planning Liaison Technical Specialist Environment Agency, Kent Area Office Valerie Tupling - Hythe Neighbourhood Plan Team April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport Mr Michael Boor - The Lympne Neighbourhood Plan Group MF & L Limited - P3399 - Ms Jeanne Taylor - Partner Lee Evans Planning	<ul style="list-style-type: none"> <li>• Maintaining policies for protecting the undeveloped Folkestone and Dover Heritage Coast</li> <li>• Develop Heritage Coast, work with White Cliffs in designating a World Heritage Site in the Channel</li> <li>• 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</li> <li>• Rother DC would wish to be engaged with SDC and the Environment Agency in relation to any proposals affecting the coastal zone east of Jury's Gap and covering the Lydd Ranges in the context of the Shoreline Management Plan.</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• Agree, Heritage Coast policy will be considered.</li> <li>• Noted. The District Council will continue to work with the White Cliffs.</li> <li>• Noted. The SFRA has now been completed.</li> <li>• Council will continue to work with Rother as part of the duty to co-operate</li> <li>• CP2 includes options should CCMA be defined and how to manage development. Council will refer to AONB Management Plan when formulating Preferred Options</li> </ul>
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Question 23 Climate Change policy options	Airvolution Energy Limited - Mr Andrew Fido - Associate Director Savills Mrs G Smith - Parish Clerk St Mary in the Marsh Parish Council Mr Peter Huxley Mrs Lesley Whybrow Mr Jim Martin Mr Tom Quaye Mrs Sally Chesters Mr Ross Carter Mr Brian Lloyd - Senior Planner CPRE Protect Kent mr Jonathan Jaros Ms Louise Barton Mrs Ann Goodwin - Parish Clerk Lympne Parish Council Mrs D Bultitude - Stanford Parish Council Mr Guy Topham Mrs Rosemary and John Griffiths Mr Norman Kwan - Principle Policy Planner Rother District Council Mr Martin Whybrow	<ul style="list-style-type: none"> <li>• Text currently neglects to provide any commentary regarding the need for standalone renewable energy generating equipment such as wind farms and solar farms.</li> <li>• 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.</li> <li>• Include reference to local neighbourhood plans in policy CC2, CC4</li> <li>• There is a general attitude of negativity in the proposals regarding wind farms and solar panels.</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• Noted, further research will be carried out making reference to latest government guidance regarding renewable energy and developing the preferred options. Wind farms have been subject to Government White Papers.</li> <li>• Noted, further research will be carried out making reference to latest government guidance regarding renewable energy and developing the preferred options.</li> <li>• Noted.</li> <li>• Further research will be carried out making reference to latest government guidance regarding renewable energy and developing the preferred options. Wind farms have been subject to Government White Papers which has limited what local authorities can do in plans.</li> </ul>
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	<p>Mrs Helen Severs Mr Alan Joyce Bob Edden - Bob Edden : Architect - PRINCIPAL BOB EDDEN : ARCHITECT Mr Nigel Fursdon Dr Karen White Mr Peter Huxley Valerie Tupling - Hythe Neighbourhood Plan Team Jennifer Wilson - Planning Liaison Technical Specialist Environment Agency, Kent Area Office mrs jennifer childs - Town Clerk Folkestone Town Council T Haskens - London Ashford Airport - Sean McGrath - Indigo Planning Mr James Stevens - Home Builders Federation Ltd - Indigo Planning April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport Mr Ray Duff Patricia Rolfe - S.O.M.B.R.E Mr Michael Boor - The Lympne Neighbourhood Plan Group</p>	<p>our energy production and consumption that are needed.</p> <ul style="list-style-type: none"> <li>• The erection of further wind turbines in any setting whether rural, urban or residential should not be pursued.</li> <li>• 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</li> <li>• 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 .</li> <li>• 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.</li> <li>• 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 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.</li> <li>• 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</li> <li>• Rely on building regulations for water use</li> <li>• 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</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• Plan does not propose to build wind turbines but to include policies to manage any future proposals. Wind farms have been subject to Government White Papers and the allocation of these need to demonstrate public support.</li> <li>• Further research will be carried out making reference to latest government guidance regarding renewable energy and developing the preferred options.</li> <li>• Noted. Further research will be carried out making reference to latest government guidance regarding renewable energy and developing the preferred options.</li> <li>• Noted, the District Council will consider adopting the new national standards and 'passporting' across the standards for use in relation to adopted Core Strategy policies.</li> <li>• Noted. The District is within a water scarcity area and will 'passport' across the new standards for use inn relation to adopted Core Strategy Policies.</li> <li>• Noted</li> <li>• Noted.</li> <li>• Noted but these are permitted development in most cases. Designated heritage assets would nee planning permission and subject to a design policy.</li> <li>• Noted and the Council is planning do this.</li> </ul>
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		<p>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.</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• Council should include a new policy that requires non residential developments to achieve BREEAM "Excellent" for water consumption.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted.</li> <li>• Noted and agreed.</li> </ul>
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<p>Question 24 Health and Wellbeing policy options</p>	<p>Mrs Lesley Whybrow Ms Laura Sullivan Mr Brian Lloyd - Senior Planner CPRE Protect Kent Ms Louise Barton Mrs Ann Goodwin - Parish Clerk Lympne Parish Council Mrs D Bultitude - Stanford Parish Council Mrs JH Molloy Mr Guy Topham Mrs Rosemary and John Griffiths Mr Martin Whybrow Mrs Helen Severs Mr Alan Joyce Mr Nigel Fursdon Dr Karen White Mr Benjamin Fox - Planware Ltd Valerie Tupling - Hythe Neighbourhood Plan Team Mrs D Bultitude - Stanford Parish Council Gill Bell - Office Manager Kent Downs AONB Unit David Haining April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport Mr Michael Boor - The Lympne Neighbourhood Plan Group</p>	<ul style="list-style-type: none"> <li>• 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</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Ensure that recreational and leisure space is maintained to give people access to</li> </ul>	<ul style="list-style-type: none"> <li>• Allotments are important for the health and wellbeing of the local community.</li> <li>• Council will be considering this issue further, particularly given its responsibilities for the health and wellbeing of its citizens. A number of councils already have SPDs or policies concerning hot food takeaways.</li> <li>• Noted. The Council will work with the CPT to see if this is possible.</li> <li>• Noted. The council consults with the NHS on future health infrastructure provision</li> <li>• Noted. Council is looking at the topic of agriculture in its evidence gathering.</li> <li>• Noted. Recreational and leisure space is the subject of policy options elsewhere in this document.</li> </ul>
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		<p>opportunities to increase their levels of physical activity, whilst also creating spaces where people can meet, and reduce their social isolation.</p> <ul style="list-style-type: none"> <li>We should not be building new houses close to next to motorways or "A" roads</li> </ul>	<ul style="list-style-type: none"> <li>Air quality is considered as part of the planning application process and is also a criteria in one of the development management policies in this document</li> </ul>
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<p>Question 25 Historic Environment policy options</p>	<p>L Bauer Ms Louise Barton Mrs Lesley Whybrow Mrs Susan Law Mr Jim Martin Mr Brian Lloyd - Senior Planner CPRE Protect Kent Mrs Rosemary and John Griffiths Mr Roger Joyce Mrs Helen Severs Mr Alan Joyce FPHC Mr Nigel Fursdon Mrs D Bultitude - Stanford Parish Council Alan Byrne - Historic Areas &amp; Planning Adviser English Heritage Valerie Tupling - Hythe Neighbourhood Plan Team Mr Michael Boor - The Lympne Neighbourhood Plan Group Mrs Denise Maskell Mrs Sally Chesters Mrs Rosemary and John Griffiths Gill Bell - Office Manager Kent Downs AONB Unit Mr Martin Whybrow Mrs Sally Chesters</p>	<ul style="list-style-type: none"> <li>Welcome heritage strategy, investment in historical environment can bring economic benefits. Hope the definition of heritage environment goes beyond narrow concept of 'material culture'</li> <li>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.</li> <li>The design of new development in Conservation Areas should always take account of CA Appraisals, be well designed, draw inspiration from local patterns</li> <li>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.</li> <li>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.</li> <li>Promote good design. Good design responds to locality and context. This might produce 'Contemporary' designs or 'vernacular' designs. Either can be innovative.</li> <li>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.</li> <li>The historic environment is not solely</li> </ul>	<ul style="list-style-type: none"> <li>Noted and agreed</li> <li>Noted and agree. Policies are to be drafted to promote good design.</li> <li>Noted and agreed. Policies are to be drafted to promote good design.</li> <li>Noted. NPPF paragraph 169 indentifies this as an issue to be considered.</li> <li>A general design policy should ensure that issues such as building heights. The Planning (Listed Buildings and Conservation Areas Act) 1990, NPPF and the PPG would ensure suitable development of or near to heritage assets are fully considered. To include similar policies as the existing would repeat National policy.</li> <li>Noted and agreed.</li> <li>Noted and agreed.</li> <li>Noted and agreed. This is covered by the Planning (Listed Building</li> </ul>
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	<p>Mr Jim Martin</p> <p>Mrs Denise Maskell</p> <p>Mr Alan Joyce</p> <p>FPHC</p> <p>Alan Byrne - Historic Areas &amp; Planning Adviser English Heritage</p> <p>Ms Laura Sullivan</p> <p>Mr Jim Martin</p> <p>Mr Brian Lloyd - Senior Planner CPRE Protect Kent</p> <p>April Newing - Kent County Council, Environment, Planning and Enforcement, Growth, Environment and Transport</p> <p>Bob Edden - Bob Edden : Architect - PRINCIPAL BOB EDDEN : ARCHITECT</p> <p>Miss Sarah Harrison - Southern Water</p>	<p>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 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"> <li>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.</li> </ul>	<p>and Conservation Areas) Act 1990, the NPPF and the PPG.</p> <ul style="list-style-type: none"> <li>Noted.</li> </ul>
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<p>Additional Comments</p>	<p>Mr John Moran - Health and Safety Executive Hazardous Installations Directorate</p> <p>Furnival Farming Partnership - Furnival Farming - Ms Jeanne Taylor - Partner Lee Evans Planning</p> <p>Mr Guy Topham</p> <p>MF &amp; L Limited - P3405 - Ms Jeanne Taylor - Partner Lee Evans Planning</p> <p>Shepway Developments Limited - Shepway Developments Limited - P3529 - Ms Jeanne Taylor - Partner Lee Evans Planning</p> <p>J Meek</p> <p>Gill Bell - Office Manager Kent Downs AONB Unit</p> <p>Jennifer Wilson - Planning Liaison Technical Specialist Environment Agency, Kent Area Office</p> <p>Patricia Newport</p> <p>Margaret Ludlow</p> <p>Ms Amanda Oates - Parish Clerk Sandgate Parish Council</p> <p>T Haskens - London Ashford Airport - Sean McGrath - Indigo Planning</p> <p>Mrs Mary Lawes</p> <p>MF &amp; L Limited - P3410 - Ms Jeanne Taylor - Partner Lee Evans Planning</p> <p>Ms Valerie Tupling</p> <p>The Trustees of Viscount Folkestone (1963) Settlement - Miss Karen Banks</p> <p>Mr Dennis Ovenden</p>	<ul style="list-style-type: none"> <li>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.</li> <li>The local highway authority advises that it would welcome involvement in the progression of Neighbourhood Plans.</li> <li>Policy LR9 - in terms of ‘loss of Open Space’ - should not be rolled forward into the New Local Plan.</li> <li>Sandgate is not named on the document maps; it is not recognized as a town or village; its commercial hub bears no mention.</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Noted and agreed. Community Chapter to consider this issue.</li> <li>Noted. As a statutory consultee, the Highway Authority will be consulted on Neighbourhood Planning.</li> <li>Noted. The protection of open spaces is considered within the NPPF, paragraph 74.</li> <li>Noted. Policy for Sandgate retail area to be considered.</li> <li>Noted. The Heritage Strategy will consider the historic landscapes in the district and this will be reflected in the final draft of the plan.</li> </ul>
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This report will be made public on 6 September 2016



Report **C/16/17**

**To:** Cabinet  
**Date:** 14 September 2016  
**Status:** Non-executive Decision  
**Head of Service:** Sarah Robson, Head of Communities  
**Cabinet Member:** Councillor Mrs Jenny Hollingsbee, Cabinet Member for Communities

**Subject:** Shepway District Council - Dementia Friendly Communities Action Plan

**Summary:** Shepway District Council is a member of the Shepway Dementia Action Alliance and as part of the National Dementia Challenge the Council is required to have a local action plan on Dementia Friendly Communities.

**Recommendations:**

1. To note Report C/16/17.
2. To agree the Shepway District Council Dementia Friendly Communities Action Plan.
3. To note the views of the Overview and Scrutiny committee.

## 1. Introduction

- 1.1 In March 2012, the Prime Minister raised the profile of dementia by setting his Dementia Challenge, which was to deliver major improvements in dementia care and research by 2015. This included a commitment to the development of dementia friendly communities across the UK, communities where people with dementia can live as independently as possible, can continue to be part of their community, are met with understanding, and given support when they need it.
- 1.2 Kent Public Health Observatory has produced a Joint Strategic Needs Assessment (JSNA) for Dementia providing an overview of both the current and projected needs at county and individual district level (see Appendix 2). Ageing Well is a key theme for Kent Public Health and the South Kent Coast Health and Wellbeing Board.
- 1.3 Approximately 20,813 people aged over 65 are estimated to have dementia in Kent based on 2013-14 estimates. By 2017 it is predicted that this figure will increase to 21,991.
- 1.4 Diagnosis rates for dementia in Kent are around 44%. One of the key objectives within the Kent and Medway strategic plan is to increase these rates to 60%. However, CCGs are coming under increasing pressure from NHSE to increase rates to 67% by March 2015, in line with the commitment given in the Prime Minister's Dementia Challenge.
- 1.5 Shepway is expecting a significant increase of older people as a proportion of the demographic profile by comparison with other local authorities in Kent. It also recognised, that with an ageing population, the number developing dementia is increasing, which is a major cause of social care need and of carer breakdown. By 2017, Shepway is predicated to have the fourth highest prevalence of dementia across the Kent districts and is a priority for health and social care services overseen by Kent County Council and South Kent Coast Health and Wellbeing Board.
- 1.6 Consideration by Shepway District Council towards dementia is already given in relation to the built environment, including planning, housing and access to local facilities and open spaces. For example, Council officers have worked in partnership with Kent Housing Group and Joint Policy and Planning Board (JPPB) to implement a Dementia Housing Action Plan across Kent.
- 1.7 Amongst a number of other local and county initiatives, Shepway District Council became a member of the Shepway Dementia Action Alliance (DAA) in 2015. However, the DAA's work and development of dementia friendly communities has highlighted a number of themes, which will impact the district; including the need for organisations who deal with the public, such as the Council, to be more corporately dementia friendly aware, ensuring staff are suitably trained and customer contact routes are supportive and accessible.
- 1.8 On joining the Shepway DAA, each partner, including the council must produce a Corporate Action Plan (see Appendix 1), which outlines how, as an organisation, the Council will support its staff and communication channels to promote and support Dementia Friendly Communities . Our proposed priority areas of action are to:

- Provide a spotlight on dementia
- Improve the skills of our workforce
- Raise awareness within partner agencies
- Work with our business community to raise awareness of dementia
- Support the Dementia Friendly Communities project

1.9 The current member lead and ambassador for dementia is Cllr Jenny Hollingsbee, Cabinet Member for Communities. Cllr Hollingsbee represents the Council at the Shepway DAA and the South Kent Coast Health and Wellbeing Board. Jyotsna Leney is the Council's current lead for health and wellbeing and will oversee the delivery and monitoring of the proposed Action Plan.

## **2. Implications**

2.1 The following implications are identified:

- Legal (DK): There are no legal implications arising directly out of this report
- Resources (LH): Financially, there are no costs for joining the Shepway DAA and there are no direct cost implications from the action plan, whilst there are some staffing resource requirements, this can be managed within existing budgets.
- Equalities (ST) Age is a protected characteristic within the Equalities Act 2010 and the Action plan will support our work for those vulnerable clients with dementia.
- Communications (ML) If the recommendation is accepted we can continue to generate positive publicity for our Dementia related activity
- Human Resources (PR) There are no adverse HR implications arising from this report and on a positive side, in addition to supporting individuals within our community, will also provide assistance to our staff who have to carry out the role of carer or could be living with the Disease themselves in future years, by improving their awareness and skills.

## **3. CONTACT OFFICER AND BACKGROUND DOCUMENTS**

Jyotsna Leney  
Community Safety Manager  
Tel: 01303 853460  
Email: jyotsna.leney@shepway.gov.uk

Sarah Robson  
Head of Communities  
Tel: 01303 853426  
Email: sarah.robson@shepway.gov.uk

The following background documents have been relied upon in the preparation of this report: None

### **Appendices:**

- Appendix 1: Shepway District Council Dementia Friendly Communities (DFC)  
Action Plan
- Appendix 2: Kent JSNA on Dementia
- Appendix 3: Council Guide to DFC

## Appendix 1:

### Shepway District Council Dementia Friendly Communities – a local action plan

<b>What will we do?</b>	<b>How will we do it?</b>
<b>Spotlight on Dementia</b>	<p>We will work with the Shepway DAA team to host a ‘Spotlight on Dementia’ event within the district for agencies, carers and people living with dementia to raise overall awareness of the help and support available within their community. This will be delivered by April 2017.</p> <p>We will promote x1 Living Well day at the local leisure centre by April 2017.</p>
<b>Improve the skills of our workforce</b>	<p>We will commit to train all public facing staff on dementia awareness so they have a good understanding of how to interact effectively with people with dementia. This will be rolled out across the Council by the end of the 2016/17 financial year.</p>
<b>Improve support for our workforce</b>	<p>We will commit to providing an informal support forum for staff caring or supporting family members with dementia.</p>
<b>Raising awareness within partner agencies</b>	<p>We will identify opportunities to work with and promote dementia awareness to our partner agencies and use every opportunity to highlight this so they also have an understanding of their own responsibilities to ensure quality of life for people with dementia.</p>
<b>Work with our business community to raise awareness of dementia.</b>	<p>We will work with local businesses and business organisations to raise their awareness of the importance and benefits to them and the wider community of becoming more dementia friendly.</p>
<b>Support the Dementia Friendly Communities project</b>	<p>We will look for opportunities to work with and support the Dementia Friendly Communities project wherever possible within our work across the District, for example linking the Dementia Friendly Communities team to groups and organisations to further promote their role.</p>
<b>Support the Dementia Ambassador for Shepway District Council (SDC)</b>	<p>Cllr Hollingsbee, Cabinet Member for Communities has previously been appointed and continues to be Dementia Ambassador at member level within Shepway District Council , being a spokesperson for the Council in promoting the importance of being dementia friendly as an organisation across the district.</p>

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# KENT PUBLIC HEALTH OBSERVATORY

Kent Joint Strategic Needs Assessment (Kent JSNA)

## Kent 'Dementia' JSNA Chapter Summary Update '2014/15'

Contact: [Abraham.George@kent.gov.uk](mailto:Abraham.George@kent.gov.uk)

Website: [www.kpho.org.uk](http://www.kpho.org.uk)

# Kent Dementia JSNA Chapter Update 2014

## Introduction

Dementia is a triad of problems: memory loss, decline in some other aspect of cognition, and difficulties with activities of daily living. More formally, it is a syndrome (that is, a distinct pattern of symptoms and signs) that can be caused by many brain disorders, most of which progress gradually over several years. The symptoms of dementia occur in three groups:

1. Cognitive dysfunction, resulting in problems with memory, language, attention, thinking, orientation, calculation, and problem-solving.
2. Psychiatric and behavioural problems, such as changes in personality, emotional control, social behaviour, depression, agitation, hallucinations, and delusions.
3. Difficulties with activities of daily living, such as driving, shopping, eating, and dressing.

Dementia mainly affects older people, although there is a growing awareness of cases starting before the age of 65. After 65, the likelihood of developing dementia roughly doubles every five years.

Early-onset (or young-onset) dementia, by convention, is dementia that develops before 65 years of age.

The most common causes of dementia include:

- Alzheimer's disease (about 50%).
- Vascular dementia (about 25%).
- Dementia with Lewy bodies (DLB) (about 15%).
- Frontotemporal dementia (less than 5%).

Source: NICE Clinical Knowledge Summaries

<http://cks.nice.org.uk/dementia#!topicsummary>

## Key Issues and Gaps

- The expected number of elderly people >65 yrs and over with a limiting long term illness is expected to increase from 120,000 in 2012 to 145,000 in 2020. Of these, the expected number of elderly people with dementia is expected to increase from just under 20,000 in 2012 to just under 25,000 people in 2020.
- Based on 2013 estimates, the observed prevalence of dementia (number of dementia patients on QOF registers) is approximately 44% of the expected prevalence across Kent or 9,221 which is an improvement from 37% based on estimates made in 2011.

## Who's at Risk and Why?



**Table 1: The consensus estimates of the population prevalence (%) of late-onset dementia**

Age (years)	Previous estimates (Dementia UK 2007)			Current estimates (Dementia UK 2014)		
	Female	Male	Total	Female	Male	Total
60-64	(0.1)*	(0.2)*	(0.2)*	0.9	0.9	0.9
65-69	1.0	1.5	1.3	1.8	1.5	1.7
70-74	2.4	3.1	2.9	3.0	3.1	3.0
75-79	6.5	5.1	5.9	6.6	5.3	6.0
80-84	13.3	10.2	12.2	11.7	10.3	11.1
85-89	22.2	16.7	20.3	20.2	15.1	18.3
90-94	29.6	27.5	28.6	33.0	22.6	29.9
95+	34.4	30.0	32.5	44.2	28.8	41.1

\* In the Dementia UK 2007 report, the prevalence of dementia among those aged 60-64 was estimated as part of the young-onset dementia consensus

In 2013-14 a Direct Enhanced Service (DES), Facilitating Timely Diagnosis and Support, was introduced for primary care with the aim of encouraging practices to identify patients at clinical risk of dementia, offer an assessment to detect for possible signs of dementia in those at risk, offer a referral for diagnosis where dementia is suspected and support the health and wellbeing of carers of patients diagnosed with dementia.

‘At-risk’ patients were defined as:

- Patients aged 60 or over with cardiovascular disease, stroke, peripheral vascular disease or diabetes
- Patients aged 40 or over with Down’s syndrome
- Other patients aged 50 or over with learning disabilities
- Patients with long-term neurological conditions which have a known neurodegenerative element, for example Parkinson’s disease.

In October 2014, NHS England (NHSE) published a second DES, Dementia Identification Scheme. In addition to identifying and referring those individuals at high risk of dementia, this enhanced service also requires practices to work with nursing and care homes to identify patients in their care who may have symptoms of dementia and offer a dementia assessment. It also encourages GPs to make the diagnosis, where they believe they have the skills and competencies to do so.

This complements the Facilitating Timely Diagnosis and Support DES, but will expire on 31 March 2015.

### **Early onset**

Dementia is much rarer in people under 65 as it is estimated that only 2.2 per cent of people who have dementia have young onset dementia. In Kent there are approximately 400 people currently estimated to have young onset dementia. However, according to the Alzheimer Society’s 2007 report ‘Dementia UK: Full

Report' the prevalence of early onset dementia could be up to three times higher as it is often missed or undiagnosed.

### ***Dementia and learning disability***

People with Down's Syndrome have an increased risk of developing Alzheimer's disease. Three per cent of people with Down's syndrome in their 30s have dementia, rising to 40 percent in their 50s.

By the age of 60 people with Down's Syndrome have a 55 percent chance of developing dementia compared to a five per cent chance within the general population. The actual numbers are small but with more people with Down's Syndrome now reaching older age there will be increasing numbers of people with Down's Syndrome and dementia, who will require specialist assessment and support.

The prevalence of dementia in people with other forms of learning disability is also higher than in the general population. Some studies (Cooper 1997, Lund 1985, Moss and Patel 1993) suggest that the following percentages of people with learning disabilities not due to Down's Syndrome have dementia:

- 50 years and over: 13 per cent
- 65 years and over: 22 per cent.

This is about four times higher than in the general population.

### ***Black and minority ethnic (BME) population***

Currently prevalence rates for dementia in people from black, Asian and minority ethnic communities in the UK have not been identified. Six per cent of people from black, Asian and minority ethnic communities with dementia experience early onset dementia compared with only 2.2 per cent for the population as a whole, reflecting the younger age profile of these communities. Evidence shows that certain communities such as those from South Asia, African and Caribbean backgrounds have higher incidence and prevalence of cardiovascular disease, which will make them more prone to vascular dementia.

There is likely to be significant growth in the number of people with dementia living in black, Asian and minority ethnic communities as the current, relatively young population ages.

### **The Level of Need in the Population**

Approximately 20,813 people aged over 65 are estimated to have dementia in Kent based on 2013-14 estimates. By 2017 it is predicted that this figure will increase to 21,991.

Diagnosis rates for dementia in Kent are around 44%. One of the key objectives within the Kent and Medway strategic plan is to increase these rates to 60%. However, CCGs are coming under increasing pressure from NHSE to increase rates to 67% by March 2015, in line with the commitment given in the Prime Minister's

Dementia Challenge and their progress towards this target is being measured on a monthly basis.

Tables 1 and 2 show the current situation in terms of the prevalence of dementia and how many patients are on the QOF registers. The estimated growth has then been calculated to 2015 showing the increase in numbers of people with dementia depending on diagnosis rates. Figures have been described by Local Authority and CCG respectively.

The tables show that by 2015, assuming a 60% diagnosis rate, 14,455 people will be diagnosed with dementia across Kent and Medway. This means that in two years an additional 6,189 people will need to be assessed as they enter the dementia pathway as people who are newly diagnosed.

**Table 2: Estimates of prevalence of dementia aged 30+, at varying levels of ascertainment, 2013-14 projected to 2017**

Local authorities

Local authority	2013-14			2017 - Showing expected numbers at different levels of ascertainment						
	Estimated prevalence	QOF register	Percentage ascertained	Estimated prevalence	At 2013-14 QOF level	Ascertainment levels				
						50%	60%	70%	80%	90%
Ashford	1,578	686	43.5	1,775	772	888	1,065	1,243	1,420	1,598
Canterbury	2,346	1,162	49.5	2,526	1,251	1,263	1,516	1,768	2,021	2,274
Dartford	1,092	773	70.8	1,167	827	584	700	817	934	1,051
Dover	1,777	723	40.7	1,877	764	938	1,126	1,314	1,501	1,689
Gravesham	1,247	447	35.9	1,306	468	653	784	914	1,045	1,175
Maidstone	2,076	1,146	55.2	2,200	1,214	1,100	1,320	1,540	1,760	1,980
Sevenoaks	1,711	670	39.1	1,810	709	905	1,086	1,267	1,448	1,629
Shepway	1,838	668	36.3	1,904	692	952	1,143	1,333	1,523	1,714
Swale	1,696	772	45.5	1,778	809	889	1,067	1,244	1,422	1,600
Thanet	2,298	868	37.8	2,330	880	1,165	1,398	1,631	1,864	2,097
Tonbridge & Malling	1,551	628	40.5	1,648	667	824	989	1,154	1,319	1,483
Tunbridge Wells	1,604	678	42.3	1,669	706	835	1,001	1,168	1,335	1,502
<b>Total Kent</b>	<b>20,813</b>	<b>9,221</b>	<b>44.3</b>	<b>21,991</b>	<b>9,743</b>	<b>10,996</b>	<b>13,195</b>	<b>15,394</b>	<b>17,593</b>	<b>19,792</b>

Source: POPPI, PANSI, ONS, QOF, KPHO

**Table 3: Estimates of prevalence of dementia aged 30+, at varying levels of ascertainment, 2013-14 projected to 2017**

Clinical commissioning groups

CCG	2013-14			2017 - Showing expected numbers at different levels of ascertainment						
	Estimated prevalence	QOF register	Percentage ascertained	Estimated prevalence	At 2013-14 QOF level	Ascertainment levels				
						50%	60%	70%	80%	90%
NHS Ashford	1,613	710	44.0	1,740	766	870	1,044	1,218	1,392	1,566
NHS Canterbury & Coastal	2,984	1,427	47.8	3,140	1,502	1,570	1,884	2,198	2,512	2,826
NHS DGS	3,103	1,409	45.4	3,220	1,462	1,610	1,932	2,254	2,576	2,898
NHS South Kent Coast	3,256	1,294	39.7	3,456	1,373	1,728	2,074	2,419	2,765	3,111
NHS Swale	1,388	580	41.8	1,494	625	747	897	1,046	1,196	1,345
NHS Thanet	2,213	868	39.2	2,295	900	1,148	1,377	1,607	1,836	2,066
NHS West Kent	6,256	2,933	46.9	6,646	3,116	3,323	3,987	4,652	5,317	5,981
<b>Total Kent</b>	<b>20,813</b>	<b>9,221</b>	<b>44.3</b>	<b>21,991</b>	<b>9,743</b>	<b>10,996</b>	<b>13,195</b>	<b>15,394</b>	<b>17,593</b>	<b>19,792</b>

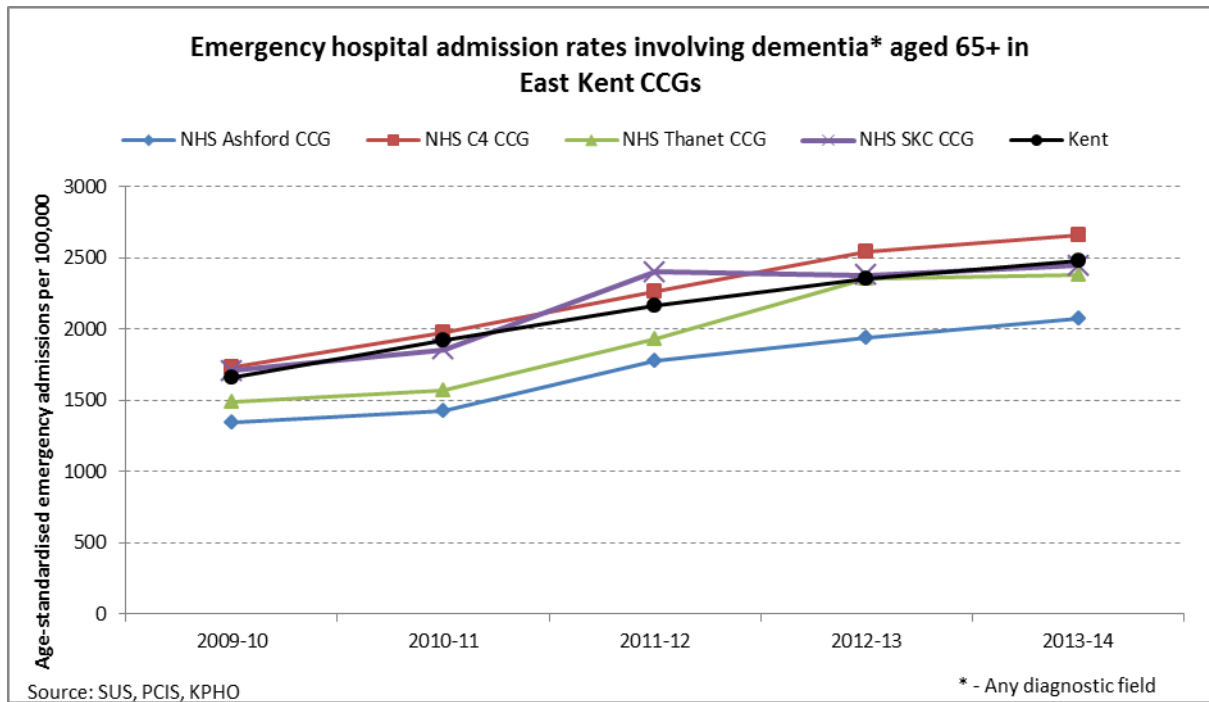
Source: POPPI, PANSI, ONS, QOF, KPHO

Figures 1 to 4 are the latest graphs depicting change in emergency admission rates for dementia across the seven CCGs in Kent. In comparison with earlier analysis, a decrease or stabilisation in rates appear to show in most CCGs except in Canterbury.

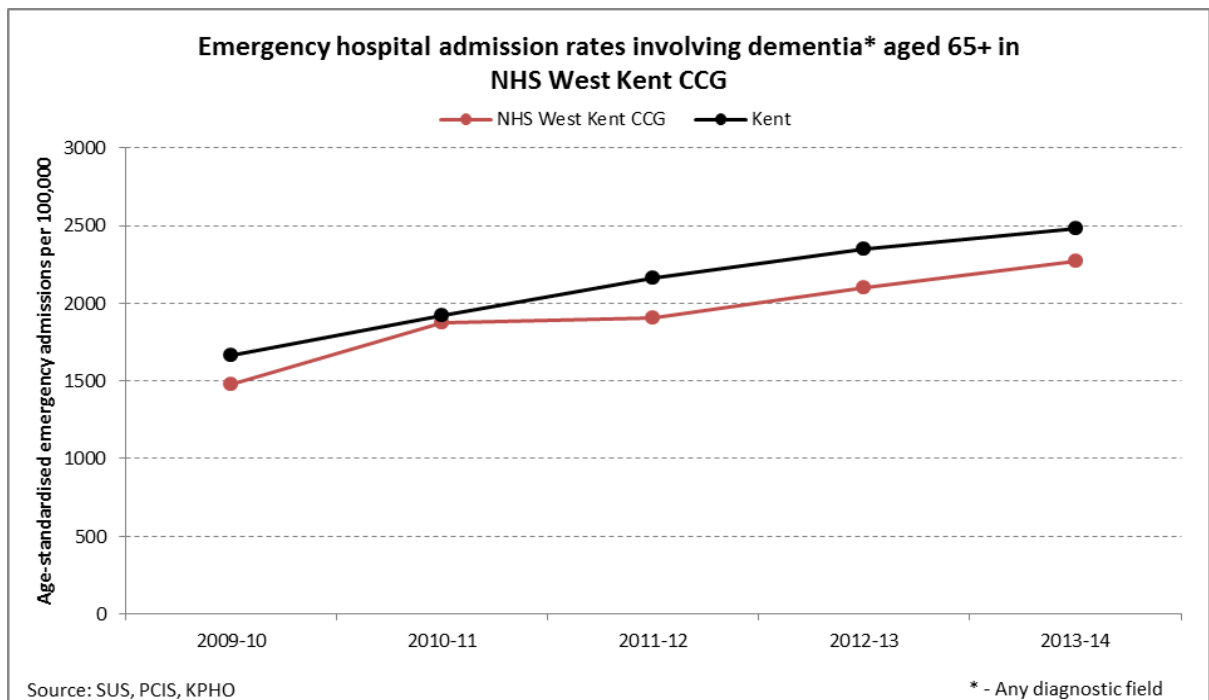
Current intermediate care services face challenges in responding effectively to the needs of people with dementia, resulting in higher risk of hospitalisation as demonstrated in the graphs. Once admitted their length of stay is considerably longer. For example, the 2011 utilization review / bed day audit across the seven acute hospital sites in Kent & Medway showed that, in up to 50% of admissions that were audited, no substantive acute care had taken place at the time audit, and that up to 40% of those admissions were waiting for residential care placement. Most of the admissions audited were emergency and were complex frail elderly.

People with dementia are also more likely to be admitted to long term care after an acute hospital admission and not given the opportunity to return home with support. People with dementia in general hospitals have worse outcomes in terms of length of stay, mortality and institutionalisation

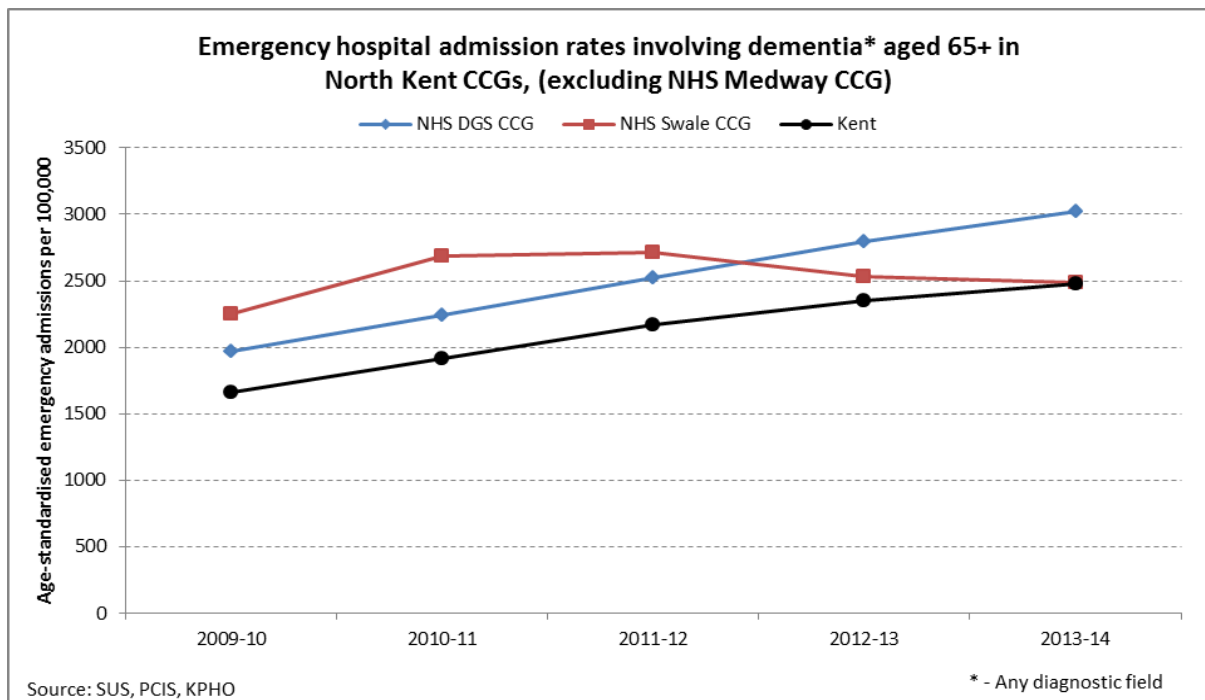
**Figure 1**



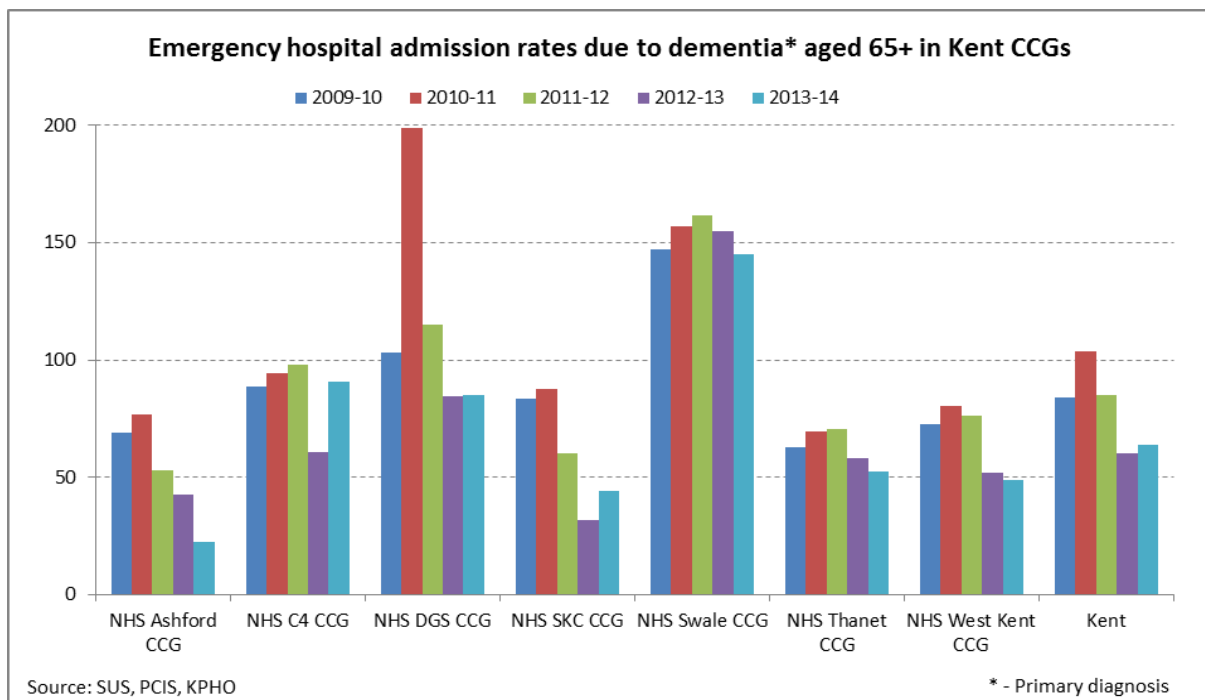
**Figure 2**



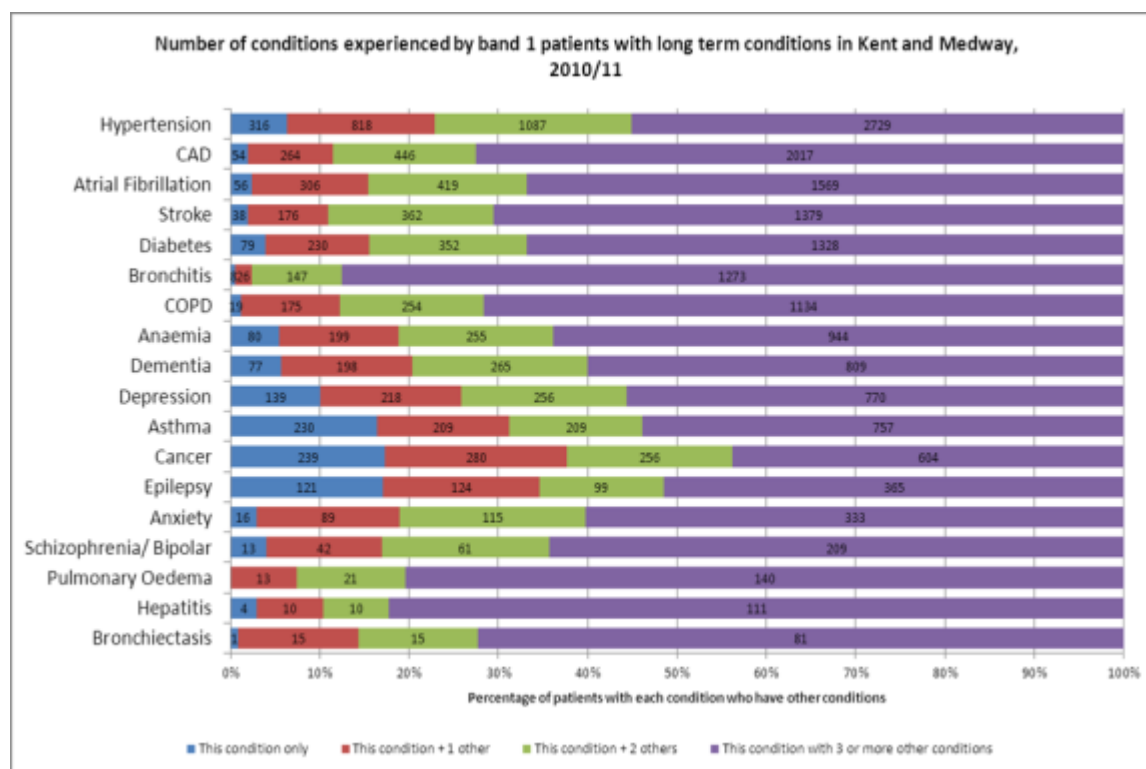
**Figure 3**



**Figure 4:**



**Figure 5:**



Over the last year Public Health carried out an epidemiological study, using a locally developed King’s Fund based risk stratification tool developed by the Kent & Medway Health Informatics Service, giving commissioners a unique whole system baseline profile of population utilization of health and social care services. Results showed a pareto distribution between need and impact, which varied across different services, particularly hospital and adult social care.

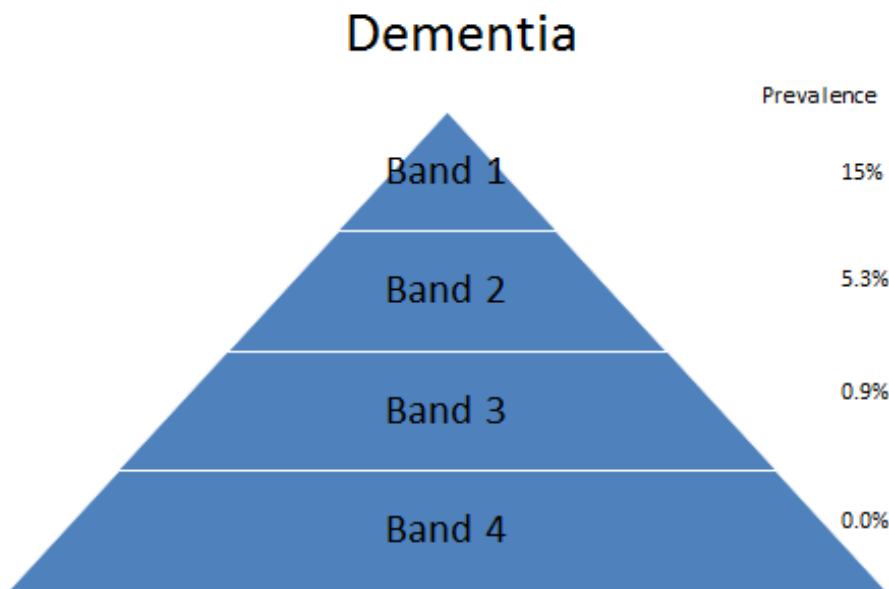
For example the top 0.5% (Band 1) of the Kent & Medway risk stratified population with the highest risk scores for rehospitalisation generated up to 20% of the total unscheduled care spend for the whole population, during the year of ‘crisis’. This proportion rises to more than 40% in the context of total spend dementia related emergency admissions for the whole population as shown in Figure 4. This has substantively contributed to the necessary evidence base and strategic planning of the local health and social care integration programme to improve and optimise patient care, and the cornerstone for Kent CCGs’ transformational plans over the next three to five years. Details of the methodology and analysis are available at <http://www.kpho.org.uk/joint-strategic-needs-assessments/Integration-JSNA-Chapter>.

The same approach has been used to explore the prevalence of dementia in the population and the impact on services, relative to the wider burden of multi morbidity as well as other important programme areas for older people’s health such as falls and fracture prevention and end of life care. Figure 5 shows the proportion of people with multiple morbidities by named long term condition for Band 1. It shows that

people with only dementia is as low as 5%, while the remaining 95% of persons with dementia have at least one other chronic condition.

Broadly speaking, the prevalence of dementia in Band 1 is as high as 15% shown in Figure 6. This trend reduces to less than 1% in Band 4, the remaining 80% of the population having the lowest risk scores. Further work is still required to understand the full distribution of Kent & Medway population of dementia sufferers which number more than 21,000, shown in Tables 1 and 2, across the different risk bands and their differential impact on service utilisation.

**Figure 6:**



**Figure 7:**

Risk Band	Patients – with Dementia	All Patients	Proportion of dementia patients
1	1343	8840	15.2%
2	5111	97244	5.3%
3	2138	247694	0.9%
4	163	1414141	0.0%
Grand Total	8755	1767919	0.5%



**Table 4:**

CCG name	Risk Band	Patients	Spells 09/10	Total Cost 09/10	Spells 10/11	Total Cost 10/11	Spells 11/12	Total Cost 11/12	Total Spells 09/10 to 11/12	Total Cost 09/10 to 11/12
Kent and Medway	1	1341	767	£1,940,118	2995	£8,750,786	1760	£4,889,146	5522	£15,580,050
	2	5103	2827	£7,974,434	3993	£12,279,431	5808	£17,032,495	12628	£37,286,360
	3	2132	142	£239,200	138	£238,801	3955	£12,351,721	4235	£12,829,722
	4	163	5	£2,766	3	£628	325	£974,843	333	£978,237
Kent and Medway Total		8739	3741	£10,156,518	7129	£21,269,646	11848	£35,248,205	22718	£66,674,369

### Understanding costs of dementia on social care

Using the risk stratified population cohort from 04.04.2011, an estimate of the number of people with dementia in each of the risk band has been derived by linking the patient list to inpatient data for 2009/10 to 2011/12. Patients were classified as having dementia if it was recorded in the diagnosis fields of the SUS dataset. Adult social care dataset of the same period was linked to explore associated activity and costs. Table 4 shows that of the out of the 2159 social care clients found in risk band 1 there were 620 patients with dementia representing a prevalence of almost 30% of this group.

**Table 4 Estimated number of patients with dementia by risk stratification**

Risk Band	Social Care Clients	Proportion of total clients in band	Patients with Dementia	Proportion of clients	Proportion of those in risk band
1	2159	9%	620	17%	29%
2	10195	42%	2044	56%	20%
3	7575	31%	889	24%	12%
4	4391	18%	86	2%	2%
Total	24320	100%	3639	100%	15%

Table 6 shows social care costs for these, indicating that clients in Band 4 have the highest per capita cost mainly due to relatively much higher expenditure for permanent residential and nursing. A case note audit carried out by social care on a random sample of Band 4 clients suggests most of them had long term care needs such as sensory impairment, mental health problems and learning disabilities which probably explains the need for more long term residential and nursing care.

**Table 6: Social care costs per patient by risk band**

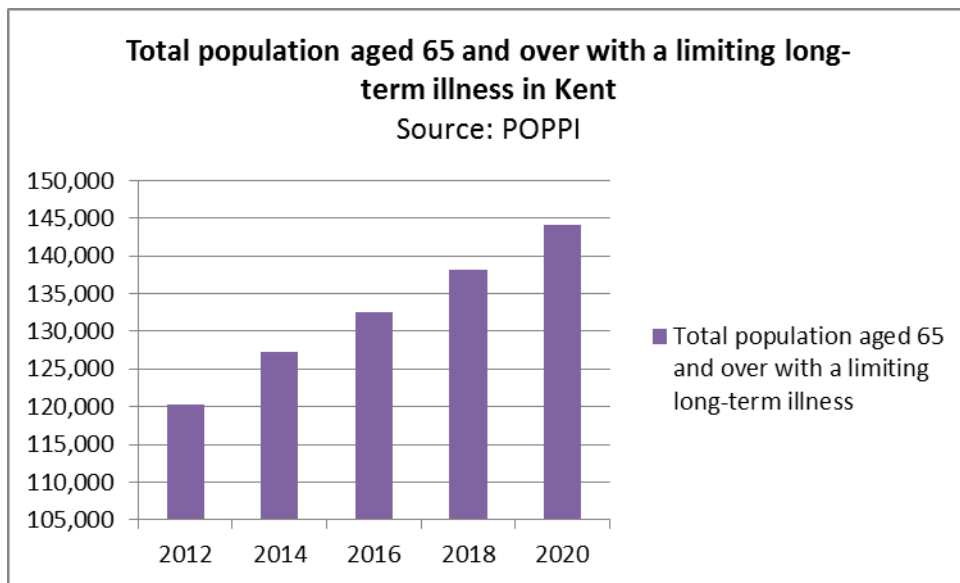
Risk Band	Patients with Dementia in the different risk bands	Social Care costs (2009/10-2011/12)	Costs per patient per year
1	620	£14,540,589	£7,817
2	2044	£54,816,740	£8,939
3	889	£18,906,239	£7,088
4	86	£2,642,020	£10,240

**Current Services in Relation to Need**

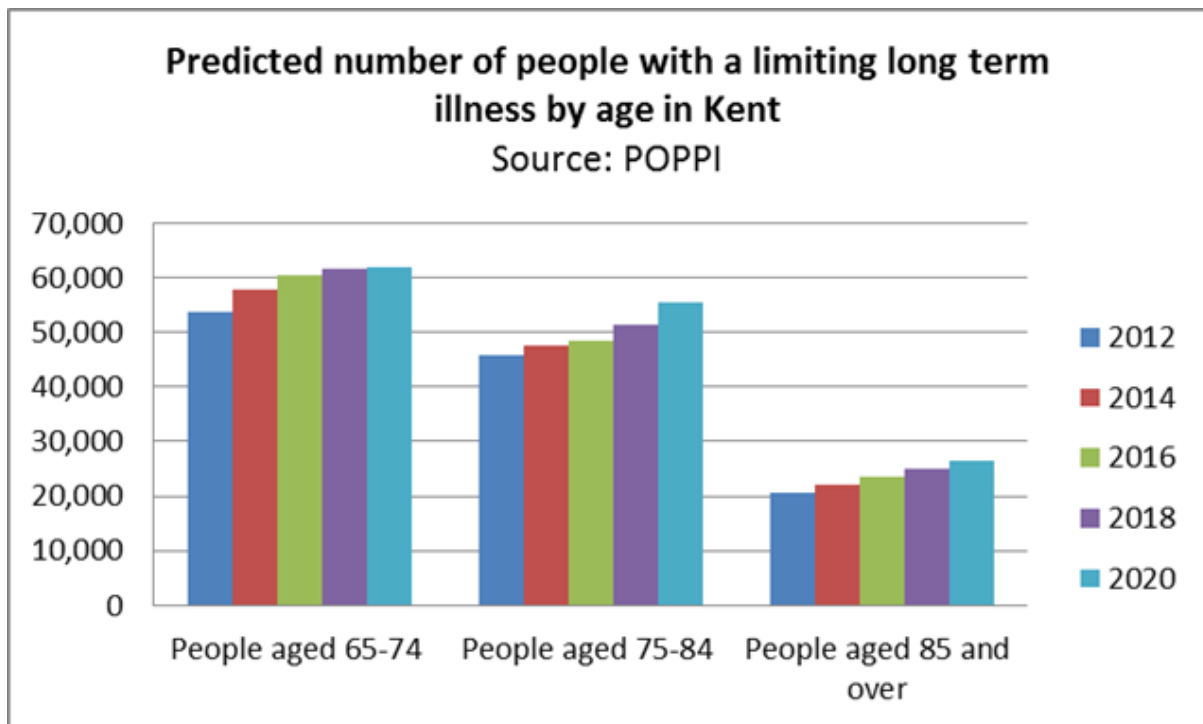
To download a PDF version of the Dementia pathway [please click on this link](#).

**Projected Service Use and Outcomes in Three-Five Years and Five-10 Years**

**Figure 8:**



**Figure 9:**



**Figure 10**

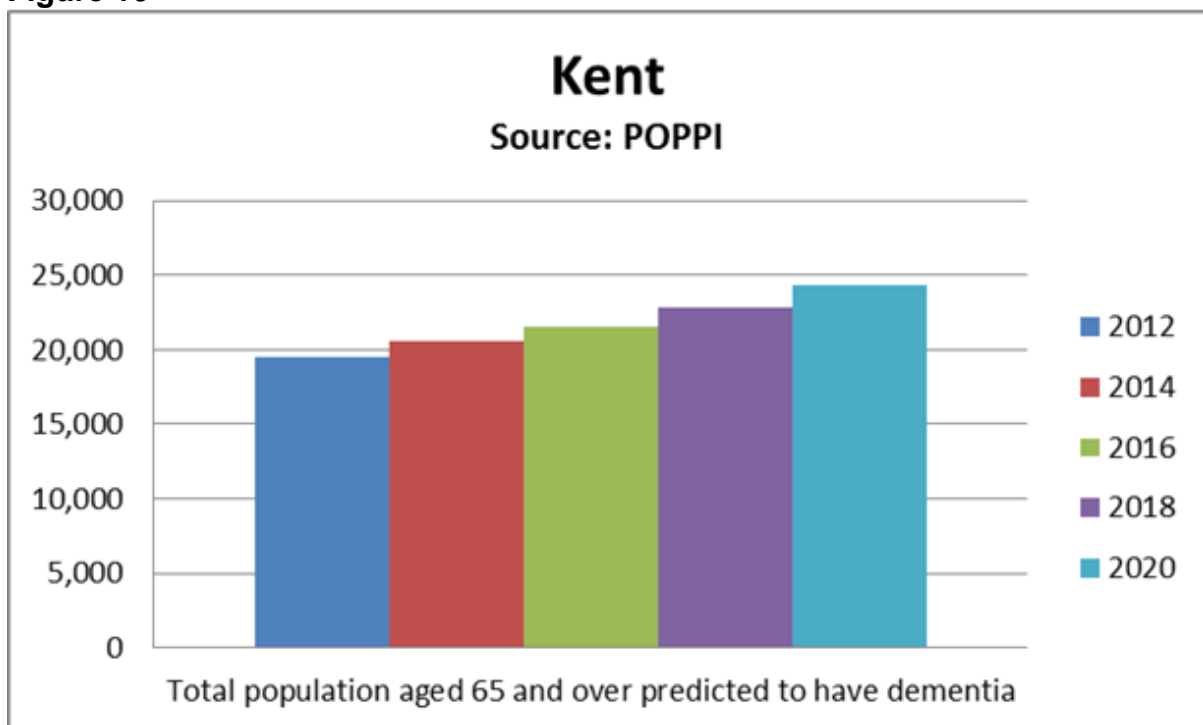
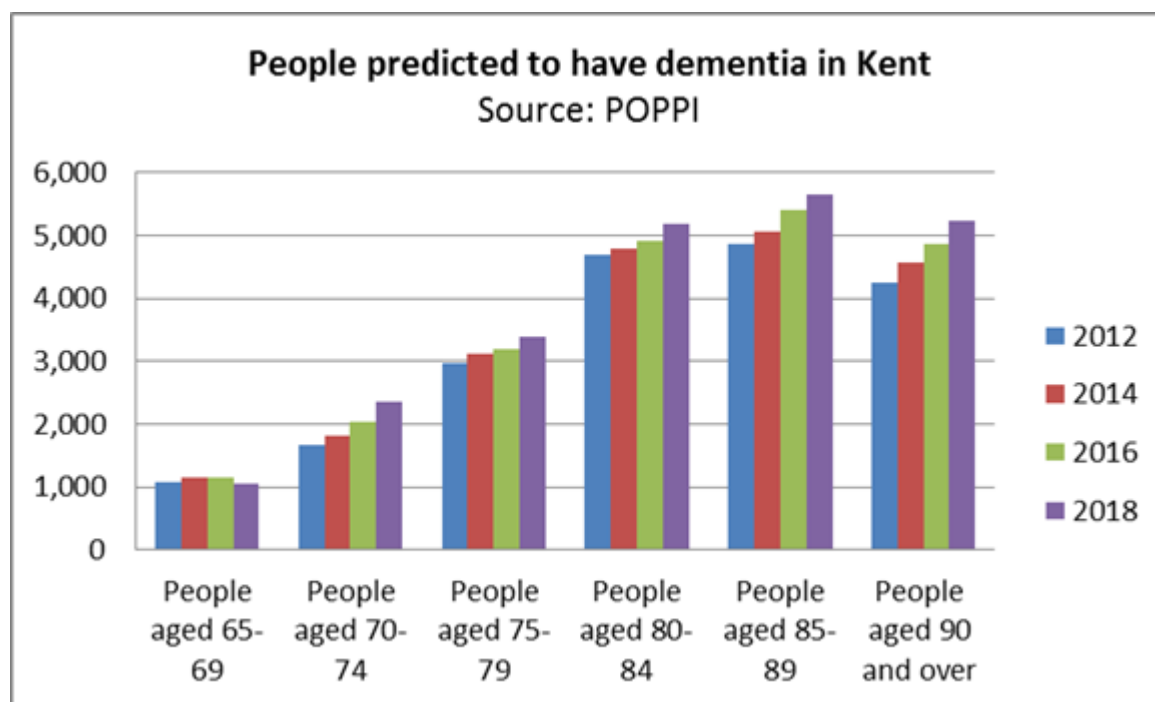


Figure 11:



## Evidence of What Works

### Department of Health

Department of Health (2009) **Living well with dementia: a national dementia strategy**. Available at:

<https://www.gov.uk/government/publications/living-well-with-dementia-a-national-dementia-strategy>

This strategy provides a strategic framework within which local services can:

- a deliver quality improvements to dementia services and address health inequalities relating to dementia;
- b provide advice and guidance and support for health and social care commissioners and providers in the planning, development and monitoring of services
- c provide a guide to the content of high-quality services for dementia

Department of Health (2012) **Dementia Challenge**. Available at:

<http://dementiachallenge.dh.gov.uk/>

The Prime Minister's Dementia Challenge launched in March 2012. It sets out plans to go further and faster in improving dementia care, focusing on raising diagnosis rates and improving the skills and awareness needed to support people with dementia - and their carers. It also has details of plans to improve dementia research.

Department of Health (2012) **The Prime Minister's Challenge on Dementia: delivering major improvements in dementia care and research by 2015: Annual**

**report of progress.** Available at:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/200030/9535-TSO-2900951-PM\\_Challenge\\_Dementia\\_ACCESSIBLE.PDF](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/200030/9535-TSO-2900951-PM_Challenge_Dementia_ACCESSIBLE.PDF)

The progress of the Dementia Challenge is overseen by three groups of 'champions'. This is their latest progress report.

### **NICE Guidance**

NICE/Social Care Institute for Excellence (2006) **CG42 Dementia: supporting people with dementia and their carers in health and social care**

Available at: <http://www.nice.org.uk/nicemedia/live/10998/30318/30318.pdf>

Dementia is associated with complex needs and, especially in the later stages, high levels of dependency and morbidity. These care needs often challenge the skills and capacity of carers and services.

This guideline makes recommendations for the identification, treatment and care of people with dementia and the support of carers. Settings relevant to these processes include primary and secondary healthcare, and social care. Wherever possible and appropriate, agencies should work in an integrated way to maximise the benefit for people with dementia and their carers.

### **Quick reference guide:**

<http://www.scie.org.uk/publications/misc/dementia/dementia-grg.pdf>

NICE (2010) **End of life care for people with dementia: commissioning guide: implementing NICE guidance**

<http://www.nice.org.uk/media/0A2/66/CommissioningGuideEoLDementia.pdf>

This commissioning guide has been developed to help support the local implementation of NICE clinical guidelines to commission integrated end of life care services for people with dementia. The guide makes the case for commissioning end of life care for people with dementia, highlighting key benefits. It specifies service requirements, key components of which are highlighted as: assessment and care planning, coordination of care with ongoing review, and developing personalised high-quality care across a number of settings. It then looks at determining local service levels ensuring co-operation and quality assurance. Links to the clinical guidance are included throughout. The guide is aimed primarily at health and social care professionals responsible for commissioning dementia services and/ or end of life services for people with dementia. It should be read together with related NICE guidance and strategies.

NICE (2011) **Dementia: care pathway.** Available at:

<http://pathways.nice.org.uk/pathways/dementia>

This pathway covers supporting people with dementia and their carers in health and social care. Dementia is a progressive and largely irreversible clinical syndrome that is characterised by a widespread impairment of mental function. Although many people with dementia retain positive personality traits and personal attributes, as their condition progresses they can experience some or all of the following: memory loss, language impairment, disorientation, changes in personality, difficulties with activities of daily living, self-neglect, psychiatric symptoms (for example, apathy, depression or psychosis) and out-of-character behaviour (for example, aggression,

sleep disturbance or disinhibited sexual behaviour, although the latter is not typically the presenting feature of dementia). Dementia is associated with complex needs and, especially in the later stages, high levels of dependency and morbidity. These care needs often challenge the skills and capacity of carers and services.

### **Other Guidance**

Alzheimers Society (2011) **Optimising treatment and care for people with behavioural and psychological symptoms of dementia** Available at: [http://www.alzheimers.org.uk/site/scripts/download\\_info.php?downloadID=609](http://www.alzheimers.org.uk/site/scripts/download_info.php?downloadID=609)

This best practice guide was developed in consultation with an advisory group of leading clinicians specialising in dementia. It is aimed at a wide range of health and social care professionals caring for people with dementia who have behavioural and psychological symptoms to provide evidence-based support, advice and resources. Institute for Research and Innovation in Social Services (2011)

### **Leading for outcomes: dementia**

Available at:

[http://www.iriss.org.uk/sites/default/files/iriss\\_leading\\_for\\_outcomes\\_dementia\\_final-3.pdf](http://www.iriss.org.uk/sites/default/files/iriss_leading_for_outcomes_dementia_final-3.pdf)

This guide is intended for anyone working with people with dementia, and their carers. It provides evidence-based advice, support and training materials to help them focus on outcomes important to people. It is aimed at team leaders, managers and trainers in social services and related areas and is geared to the Scottish perspective and context. It contains exercises and training materials which leaders can access and adapt as appropriate.

### **User views and User Engagement**

The views of service users and their carers are sought in a number of ways and each CCG has its own process for seeking views from patients and the public. However, the community events and insight gathering which has been undertaken as part of the development of dementia friendly communities has highlighted a number of themes, such as:

- Reluctance of some GPs to refer people to the memory assessment service.
- The need for more respite and day services.
- Better out of hours support.
- Better support post diagnosis.
- The need for increased awareness for GPs of dementia and awareness of services, particularly those provided by the voluntary sector.
- Unacceptable waits to receive a diagnosis from the memory service.
- The lack of appropriate information at the right time.
- The need for organisations who deal with the public, such as bus companies, banks and supermarkets, to be more dementia friendly.

## Unmet Needs and Service Gaps

The current model of service delivery for people with dementia is not joined up or designed to be proactive enough to identify people early in order to provide personalised support and prevent people reaching crisis point. The need for good joint working has been underlined repeatedly in a number of reports, but continues to be a barrier for people with dementia. Consequently too many resources are tied up in expensive acute in patient or care home provision.

Timely diagnosis is the key to helping people with dementia, ensuring their families and carers get the support they need to plan for the future and enabling them to make informed choices about how they would like to be cared for. With early intervention, and access to the right services and support, people with dementia can continue to live well for many years. Currently, average diagnosis rates across Kent are 43%. The Prime Minister's Challenge on Dementia (2012) has set an ambition to achieve a diagnosis rate of 67% by 2015.

Forty seven per cent of people with dementia do not feel part of their community. They often experience anxiety and depression and three quarters do not feel society is geared up to deal with dementia (Dementia 2012: A national challenge, Alzheimer's Society, 2012). Sixty two per cent of people with dementia living alone are lonely and it can sometimes be hard to access services, which only adds to this isolation (Dementia 2013. The hidden voice of loneliness, Alzheimer's Society, 2013). The drive to keep people in their own homes and avoid admission to residential care has the potential to increase these feelings of loneliness and isolation.

People with dementia do not have the same access to intermediate care as people without dementia. This is partly due to the fact that it is often thought that people with dementia cannot benefit from rehabilitation services. They also require input for longer period of time. The National Dementia Strategy Impact Assessment calculated that hospital at home rehabilitation schemes could reduce the average length of stay by almost seven days per patient, at an average cost of £3,780 per care episode (Department of Health, 2009, Impact Assessment of the National Dementia Strategy, v 16).

About one third of people with dementia live in residential care, while about two thirds of people who live in care homes are thought to have dementia. Research in 2012/13 by the Care Quality Commission (CQC) found that people with dementia living in a care home are more likely to go into hospital with avoidable conditions (such as urinary infections, dehydration and pressure sores) than similar people without dementia. Once in hospital, people with dementia (not just those admitted from a care home) are more likely to stay there longer, be readmitted and die there. It also found the number of multiple emergency admissions to hospital of people with dementia living in at a care home was 10 per cent higher for those with dementia than similar patients without dementia.

Findings from a national survey of bereaved people, of which one fifth of the responses were related to dementia, found that one in 10 responses relating to dementia rated their end of life care in the last three months of life as 'poor'. Less than half (46 per cent) of bereaved relatives of people with dementia rated the

overall quality of care received by the deceased person across all settings as outstanding or excellent. (First national VOICES survey of bereaved people: key findings report, July 2012).

As indicated above, 2.2% of people will develop dementia before the age of 65. Whilst this is a relatively small number of people, the needs and challenges of this group of people are often different from those individuals who develop dementia in later life. They may still be in employment and may still have dependent children. They tend to be very physically fitter which can present problems if they exhibit challenging behaviours, particularly if they are being cared for alongside older, frailer individuals. There are very few services to meet the needs of this group of individuals (or their families), particularly when someone can no longer be cared for at home. Very often, the only alternative is to place them in a care home with people who tend to be much older and have very different needs.

### **Recommendations for Commissioning**

Kent's vision for dementia friendly communities is an inclusive community where people living with dementia and their carers are active participants within community life. The aim is to develop a whole system approach to dementia friendly communities, working alongside key organisations and people to establish their roles and responsibilities in making this happen Kent plans to co-produce a Kent wide agreement which will create the conditions to allow dementia friendly communities to thrive.

### **Recommendations for Needs Assessment Work**

Public Health is currently exploring how to model the impact of increased diagnostic rates for dementia. Using demographics, service provision data and evidence from risk stratification, a framework will be developed to try to understand the patient journey along the pathway and estimate the demand for services as the disease progresses over time and estimated costs for both health and social care. The work will attempt to provide a starting point to test out some of the assumptions that have been made to consolidate the tool. Additional data from other services such as mental health cluster information (PbR) will be used to ensure the use of real costs to calculate mental health/health expenditure.

Whilst the integration agenda is key to improving the lives of people with dementia and their carers, the needs of people with dementia also need to be considered as part of other strategies, eg urgent care, intermediate care, end of life.

As approximately 90% of people with dementia will have other co-morbidities, dementia needs to be considered as part of the long term conditions agenda and not seen as separate to ensure that individuals receive holistic care. All organisations, within both the statutory and non-statutory sectors need to ensure that their staff receive some level of dementia training, so that they are able to manage most people with dementia. Specialist mental health services should only become involved when people's needs increase and become more challenging.



## Key Contacts

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Linda Caldwell – Senior Associate SECSU [linda.caldwell@nhs.net](mailto:linda.caldwell@nhs.net)

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# Dementia friendly communities

Guidance for councils



# Foreword

Dementia is a condition that is increasingly common; it can have a profound impact on an individual and their family and friends. Traditionally, the focus for dementia care has been NHS treatments and care services delivered by local councils. Recently there has been a shift to a focus on how we can enable people who have been diagnosed with dementia to live as full a life as possible and encourage communities to work together to help people to stay healthier for longer. Councils have a key role in developing inclusive dementia friendly communities.

Many councils are already working in partnership with their local communities to develop innovative ways to enable people with dementia to take part in everyday activities and retain their independence for as long as they are able. Examples include developing dementia friendly streets, where as a result of simple adaptations and awareness raising among staff working in shops, shopping becomes easier for people with dementia

Simple changes to existing services, and awareness raising for those who come into day-to-day contact with people with dementia such as staff working in libraries or in leisure centres, also help people with dementia feel more confident and welcome in using council services.

This guidance outlines the important role of councils in supporting people with dementia by creating local dementia friendly communities and demonstrates how councils are making this happen through case study examples.

**Councillor Izzi Seccombe**  
**Chair LGA Community Wellbeing Board**

# 1. Introduction

A lot has changed since guidance on dementia friendly communities was first published by the Local Government Association (LGA) and Innovations in Dementia in May 2012.

Shortly before publication, the concept of dementia friendly communities was given a huge boost by the launch of the Prime Ministers Challenge on Dementia. Since the launch of the Challenge:

- more than 70 communities have committed to become dementia friendly
- leading businesses across retail, finance, leisure and transport sectors are developing ways to respond to the needs of people with dementia
- More than a million people have signed up to become Dementia Friends – and committed to take action to make their communities a better place for people with dementia.

At the same time there has been a rise of 17 per cent in diagnosis rates, against the backdrop of significant financial pressures on public services, including those for people with dementia.

There has also been a significant increase in the visibility of dementia in the public arena, both in terms of high-profile events such as the G8 Summit on Dementia, but also in the media and through sustained public awareness campaigning at national and local level.

The original guidance, and the tools it contained, have been widely used and adapted both in the UK and overseas, making a significant contribution to the creation of dementia friendly communities. However, a lot has been learned since its publication, and a refresh of the guidelines is now timely. With the introduction of health and wellbeing boards, the return of public health duties and powers, and an increased focus on prevention and information and advice in the Care Act, councils have an even stronger role to play in the creation of communities in which it is truly possible to live well with dementia.

This guidance looks at current best practice and learning in the creation of dementia friendly communities, how it fits within the broader policy landscape, and what actions councils can take, and are already taking.

# 2. About this guide

The purpose of this guide is to help councils play their part in developing communities where people can live well with dementia. It is about enabling people with dementia, their families, friends and carers to feel at home, supported, understood and that they matter.

It is about what local government can do to help make this a reality.

It builds on earlier guidelines produced by the LGA in 2012<sup>1</sup>, and is informed by good practice over the last three years and emerging evidence about what works well in supporting people with dementia and those that support them.

## Who is it for?

This guidance is for all those in local government who have a role in making our communities easier places in which to live well with dementia. It is aimed those who have a role in leading, planning, commissioning and delivering services – from housing, transport, advice and guidance, through to leisure services, cultural activities and supporting community development. It is aimed at leaders and members of health and wellbeing boards (HWB). It is aimed at those working with the newly refreshed public health duties, and those members and officers responsible for health and social care.

It is not intended to be prescriptive, rather, it hopes to inspire and inform those in local government to make a real difference in the lives of their constituents and local citizens, and to help create communities in which it is truly possible to live well with dementia.

## What is dementia?

The word 'dementia' does not describe a medical condition. It refers to a set of symptoms that occur when the brain is damaged by a disease like Alzheimer's, or by small strokes or conditions like Lewy-Body Dementia.

These symptoms may include:

- difficulties with memory
- difficulties with completing or initiating everyday tasks
- problems with communication
- difficulties with perception.

<sup>1</sup> Developing Dementia Friendly Communities – LGA and Innovations in Dementia May 2012.  
[www.local.gov.uk/c/document\\_library/get\\_file?uuid=b6401bb0-31a8-4d57-823b-1fde6a09290e&groupId=10180](http://www.local.gov.uk/c/document_library/get_file?uuid=b6401bb0-31a8-4d57-823b-1fde6a09290e&groupId=10180)

The conditions which cause dementia are usually progressive, with symptoms worsening over time. However it is important to note that:

- every experience of dementia is different – both in the presentation of symptoms, and the rate of progression
- while there is currently no cure for dementia, there is much that can be done to support people with dementia to live well.

# 3 What is a ‘dementia friendly community’?

The Alzheimer’s Society defines a dementia friendly community as:

“A city, town or village where people with dementia are understood, respected and supported, and confident they can contribute to community life. In a dementia friendly community people will be aware of and understand dementia, and people with dementia will feel included and involved, and have choice and control over their day-to-day lives”<sup>2</sup>

People with dementia have described a dementia friendly community as one that enables them to:

- find their way around and be safe
- access the local facilities that they are used to and where they are known (such as banks, shops, cafes, cinemas and post offices)
- maintain their social networks so they feel they continue to belong.

Dementia friendly communities are those in which people with dementia have the best possible opportunities to live well.

The idea that it is possible to ‘live well’ with dementia is one that presents a challenge to the orthodox view of dementia. The idea that a diagnosis of dementia is life-ending is deeply ingrained, but is increasingly being challenged as new visions for living well with dementia emerge.

The notion of ‘living well’ is difficult to pin down, and highly individual. However, research suggests that there are some common themes for people with dementia and common outcomes that we might expect to see from people living well with dementia.

In 2010 the National Dementia Declaration for England (Dementia Action Alliance, 2010)<sup>3</sup> laid out seven quality outcomes, as described by people with dementia and their carers that would indicate they were living well with dementia. These are:

- I have personal choice and control or influence over decisions about me
- I know that services are designed around me and my needs
- I have support that helps me live my life

<sup>2</sup> Building Dementia Friendly Communities – a Priority for Everyone – Alzheimer’s Society 2013  
[www.alzheimers.org.uk/site/scripts/documents\\_info.php?documentID=2283](http://www.alzheimers.org.uk/site/scripts/documents_info.php?documentID=2283)

<sup>3</sup> [www.dementiaaction.org.uk/nationaldementiadeclaration](http://www.dementiaaction.org.uk/nationaldementiadeclaration)



- I have the knowledge and know-how to get what I need
- I live in an enabling and supportive environment where I feel valued and understood
- I have a sense of belonging and of being a valued part of family, community and civic life
- I know there is research going on which delivers a better life for me now and hope for the future.

These quality outcomes are important, not least because:

- the concept of dementia friendly communities represents, in part, a recognition that in order to make these aspirations a reality a community-wide response is required.
- arising as they are from the aspirations of people with dementia and their carers, they are amongst the most significant outcomes by which the success of dementia policy can be measured.

### **The Alzheimer's Society recognition process for dementia friendly communities**

In 2013 the Alzheimer's Society and Dementia Action Alliance (DAA) launched its recognition process for dementia friendly communities<sup>4</sup>, which outlined 10 characteristics of a dementia friendly community.

It suggests that becoming dementia friendly means:

- Shaping communities around the views of people with dementia and their carers
- Challenging stigma and building awareness
- Ensuring that activities include people with dementia
- Empowering people with dementia and recognising their contribution
- Ensuring early diagnosis, personalised and integrated care is the norm
- Befrienders helping people with dementia engage in community life
- Maintaining independence by delivering community- based solutions
- Appropriate transport
- Easy to navigate physical environments
- Businesses and services that respond to customers with dementia

It is clear that supporting the development of communities that model these key characteristics, which take action across these key 'areas of interest', will give people with dementia a better chance of 'living well' within the framework of the quality outcomes listed above.

<sup>4</sup> [www.alzheimers.org.uk/site/scripts/documents\\_info.php?documentID=2136](http://www.alzheimers.org.uk/site/scripts/documents_info.php?documentID=2136)

The purpose of the recognition process is to show that the community in question has committed to becoming dementia friendly. Once a community has registered with the process, they may demonstrate how they meet the foundation criteria for 'working to become dementia friendly' by:

- ensuring the right local structure is in place to maintain a sustainable dementia friendly community
- identifying a person to take responsibility for driving forward the work to support a community to become dementia friendly
- having a plan in place to raise awareness about dementia in key organisations and businesses within the community that support people with dementia
- developing a strong voice for people with dementia living in communities
- raising the profile of the work to increase reach and awareness to different groups in the community
- focusing plans on a number of key areas that have been identified locally
- having in place a plan or system to update the progress of your community.

Once a community has demonstrated how they meet the criteria, they are issued with a symbol that they can give to organisations and businesses in their community that wish to be part of the dementia friendly communities' initiative and have stated what their actions are towards becoming dementia friendly.

The British Standards Institution recently published it's Publicly Available Specification (PAS) 'Code of Practice for the recognition of dementia friendly communities in England' (2015).<sup>5</sup> This document, funded by the Department for Health provides additional guidance and recommendations to support communities taking part in the Alzheimer's Society recognition process.

It also provides guidance and recommendation across specific 'areas of action' to focus on as dementia friendly communities develop, namely:

- arts, culture, leisure and recreation
- businesses and shops
- children, young people and students
- community, voluntary, faith groups and organisations
- emergency Services
- health and social care
- housing
- transport.

These will be of particular interest to officers and lead members with specific interests or duties in these areas.

<sup>5</sup> <http://shop.bsigroup.com/ProductDetail/?pid=000000000030300514>

# 4. Why is dementia a key issue for councils?

There are currently estimated to be 850,000 people living with dementia in the UK. With projected numbers of people with dementia set to increase to 1 million by 2021 and 2 million by 2051, it is clear that a sustainable response to meeting the needs of people living with dementia is required.<sup>6</sup>

You can find details of the numbers of people with dementia in local authority areas, broken down by age and gender as well as projected figures to 2021 at the Alzheimer's Society website [www.alzheimers.org.uk/site/scripts/download\\_info.php?fileID=4](http://www.alzheimers.org.uk/site/scripts/download_info.php?fileID=4)

## Dementia has a massive impact

Dementia has a huge impact on those with a diagnosis, those close to them, and society more generally:

- The Alzheimer's Society estimates that the cost of dementia to the UK economy is £26 Billion a year<sup>7</sup>, more than the cost of heart disease, stroke, or cancer.
- The Alzheimer's Society estimate that 25 percent of hospital beds at any given time are occupied by people with dementia<sup>8</sup> People with dementia also stay in hospital for longer and are more likely to be re-admitted than people with other conditions.
- People fear dementia more than any other disease. 39 percent of over 55s fear getting Alzheimer's the most, compared to 25 percent who worry most about cancer.<sup>9</sup>

## People with dementia want to live everyday lives.

Work with people with dementia reveals a strong desire to live well, to continue with 'the stuff of life' and stay connected to their interests, social networks and communities.

However, research by Innovations in Dementia<sup>10</sup> and Alzheimer's Society<sup>11</sup> suggests that people with dementia increasingly withdraw from everyday life.

6 Dementia UK: Update Second edition 2014 Alzheimers Society

7 Dementia 2014: Opportunity for Change - Alzheimer's Society 2014  
[www.alzheimers.org.uk/site/scripts/download\\_info.php?fileID=2317](http://www.alzheimers.org.uk/site/scripts/download_info.php?fileID=2317)

8 Counting the cost – Alzheimer's Society 2009  
[www.alzheimers.org.uk/site/scripts/download\\_info.php?downloadID=356](http://www.alzheimers.org.uk/site/scripts/download_info.php?downloadID=356)

9 3. Prime Minister's Dementia Challenge – Department of Health 2012  
[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/215101/dh\\_133176.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/215101/dh_133176.pdf)

10 Dementia Capable Communities – The views of people with dementia – Innovations in Dementia CIC 2011  
[www.innovationsindementia.org.uk/DementiaCapableCommunities\\_fullreportFeb2011.pdf](http://www.innovationsindementia.org.uk/DementiaCapableCommunities_fullreportFeb2011.pdf)

11 Building Dementia Friendly Communities – a Priority for Everyone – Alzheimer's Society 2013  
[www.alzheimers.org.uk/site/scripts/documents\\_info.php?documentID=2283](http://www.alzheimers.org.uk/site/scripts/documents_info.php?documentID=2283)

“Many people with dementia are not able to take part in activities that they enjoyed before they developed the condition. Many feel constrained by the condition and are not confident to get out and engage in their area. There is more that the person with dementia would like to do but they need support to do so.”

### **Building Dementia Friendly Communities – a Priority for Everyone – Alzheimer’s Society 2013**

- Thirty-five per cent of people with dementia said that they only go out once a week or less and 10 per cent said once a month or less.
- Nine per cent of people with dementia said they had had to stop doing all of the things they used to do.
- People said that they had to give up activities such as getting out of the house (28 per cent), shopping (23 per cent), exercise (22 per cent) and using transport (16 per cent).
- Sixty-three per cent of people with dementia did not want to try new things and the underlying issues of confidence, worry and fear must be overcome in a dementia friendly community.<sup>12</sup>

(Building Dementia Friendly Communities – a priority for everyone – Alzheimer’s Society 2013).

Yet – enabling people with dementia to take part in ‘everyday activities’ – to meet up with friends, take part in sporting activities, enjoy green space, go shopping – is key not only to enabling them to live healthier and more fulfilling lives, but to reducing and delaying their dependence on expensive health and social care services.

## **So, what is the role of local councils?**

Local councils; as leaders, commissioners, planners, regulators and service providers have a key role in supporting, facilitating and leading the development of sustainable, responsive and community led approaches that enable people living with dementia to overcome these barriers and to live well in their communities for as long as possible.

Councils that look at dementia strategically and positively, working with key partners and communities locally, will help mitigate the pressures on their services, particularly health and social care, from growing demand, while also unlocking enormous potential from people living with dementia, their carers and the wider community.

Health and social care services alone cannot meet the challenge of dementia, nor do people with dementia aspire to spend their lives within it. Dementia requires a community response, and yet it is clear that communities are still not, by and large, set up as well as they could be to support people with dementia to live well.

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<sup>12</sup> Building Dementia Friendly Communities – a priority for everyone Alzheimer’s Society 2013

Many people with dementia feel that the support they need to participate in their community and to do the everyday things they want to do, for example, shopping, socialising or using public transport, is not available. Many do not feel that they are a part of their local communities. The creation of dementia friendly communities is an attempt to meet this need.

As the State of the Nation report on Dementia set out in 2013:

“Establishing dementia friendly communities has the potential to transform the lives of people with dementia in England. Two thirds of people with the condition live in the community, close to a third of whom live on their own. Health and care services, while fundamental, cannot alone ensure people with dementia live good quality lives. Support from wider communities, services and organisations is needed, utilising the untapped potential of communities to help people with dementia and their carers.”<sup>13</sup>

Enabling and supporting the development of dementia friendly communities provides councils and their partners with a vehicle to work in new ways with local communities and to support the development of more responsive services that enable people living with dementia to live well within their local communities for as long as they are able.

The central role of dementia friendly communities in enabling people with dementia to live better lives within their communities has been well documented and established. This has been most recently set out in the Prime Minister’s Challenge on Dementia 2020, in which dementia friendly communities sit at the heart of the vision for the challenge. For example, it sets out an ambition that by 2020:

- half of the population will live in areas recognised as dementia friendly
- all businesses will be encouraged to become dementia friendly
- national and local government will take a leadership role with all government departments and public sector organisations becoming dementia friendly and all tiers of local government becoming part of a dementia friendly alliance.

Councils, working in partnership with others, are well placed to deliver on this ambition. Through their public health responsibilities and their key role within health and wellbeing boards, lead members and officers can engage in and support the development of dementia friendly communities within their areas.

### **Health and wellbeing boards**

The 2012 Health and Social Care Act set out key health duties and responsibilities for councils. This recognises local government’s unique ability to:

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<sup>13</sup> [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/262139/Dementia.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/262139/Dementia.pdf)

- Shape ‘place’ around the needs of people, including those with dementia. The links between wellbeing and the environment in which people live, work, and play are well understood by councils, who wield considerable power in shaping ‘place’.
- Maximise preventative measures by influencing those factors that contribute to shaping people’s health and tackle health inequalities. The links between the conditions in which people are born, grow up, work and raise their families and health are well-documented. Many of these factors fall within the remit of councils and there is increasing evidence about links between health inequalities, lifestyle and dementia.

Health and wellbeing boards have a statutory responsibility to:

- produce a Joint Strategic Needs Assessment (JSNA) that gives a comprehensive analysis of the health and wellbeing needs and assets of the community
- produce a joint health and wellbeing strategy that identifies key priorities in respect of commissioning plans on health and wellbeing
- promote integration – health and wellbeing boards bring together the clinical, commissioning, professional, political and community leadership of an area to drive health improvement and promote better health outcomes.

A number of boards are actively prioritising dementia and dementia friendly communities. In a number of areas, the development of joint health and wellbeing strategies are also following a ‘person-centered’ or ‘life-centered’ approach. This would, for example, include dementia as part of a focus on the ‘later life agenda’.

### **Public health**

The transfer of public health from the NHS to local government in April 2013, was one of the most significant extensions of local government powers and duties in a generation, and offers a unique opportunity to promote the health and wellbeing of communities.

Dementia is a national public health priority, and as such, further serves to highlight the key role for councils in taking forward public health responses on dementia.

This includes promoting a healthy lifestyle to help potentially reduce the risk of developing dementia and work to actively promote access to sport, leisure activities and wider community facilities for those who have been diagnosed with dementia. Public health could incorporate dementia risk reduction work as a key outcome of core health improvement programmes for the whole population, such as work to reduce smoking and harmful drinking and to promote physical activity and programmes.

There is also a clear role for public health in the promotion of positive messages about living well with dementia as well as more general messages about prevention and brain health. This is supported by recent findings outlined in the Blackfriars Consensus on Promoting Brain Health<sup>14</sup>, which states that the evidence on dementia risk reduction is now sufficient to justify action to incorporate it into health policies and to broaden awareness about factors which can reduce the risk of developing dementia.

<sup>14</sup> Blackfriars Consensus on promoting brain health: Reducing risks for dementia in the population; PHE 2014

“It strengthens the case for action to create the physical and economic environments which will support people to lead healthier lives; for example, transport plans and investment that promote more walking and cycling as part of everyday life”  
(Paul Lincoln UK Health Forum CEO quoted in Public Health England press release 20 May 2014).

### **Social care**

The Care Act introduces a raft of new responsibilities for councils, many of which can be clearly linked to and supported by engagement in the creation of dementia friendly communities. One example of this would be the duty to promote people’s wellbeing and to prevent needs for care and support. Another example would be the duty to provide an information and advice service about care and support.

There is the opportunity for councils to extend the information provision and involve community groups to help support people with dementia. For example, in order to live well with dementia people will need information about health and social care, but will also need and benefit hugely from information about support in other areas of their lives as well, from benefits to leisure, transport, housing, employment issues and volunteering opportunities.

New duties around personalisation also provide opportunities to commission support services that allow people to engage the kind of support that suits them.

### **The Equality Act 2010**

The Equality Act 2010 defines disability as a physical or mental impairment that has a ‘substantial’ and ‘long-term’ negative effect on a person’s ability to do normal daily activities. Under this definition many people with dementia fall within its scope and are protected under the Act against all forms of in both employment and the provision of goods and services.

### **A strategic approach to the development of dementia friendly communities**

The development of effective community-based responses to enable people living with dementia to live well within their communities is a cross-cutting issue for councils at ward level, district level, unitary level and county level. Councils can embrace and help deliver dementia friendly communities by working differently and in partnership with community organisations, across the whole of their areas of responsibility. For example:

- Planning officers can involve people with dementia in advising on new developments and make others aware of the issues that people with dementia face in accessing the built environment.
- Housing departments can make sure that housing staff understand how adaptations can enable people with dementia to stay independent in their own homes for longer.
- Transport providers can consider the needs of people living with dementia in the development of their services, so that they have the confidence to travel and can ask for help when required.

Local government has the power to shape these services:

- as leaders and influencers
- as commissioners
- as planners and regulators
- as service providers and employers.



# 5. A dementia friendly community framework.

In the first edition of these guidelines we outlined a model that synthesised the issues arising from our work across the two project sites.

The model was based on five domains, each of which needs to be considered when planning, developing, or assessing the dementia friendliness of any given community, organisation or process.

This model has since been successfully used in assessing more than 60 organisations and services at both national and local level since 2012.

It is easy to understand, and flexible enough to be used in a variety of settings.

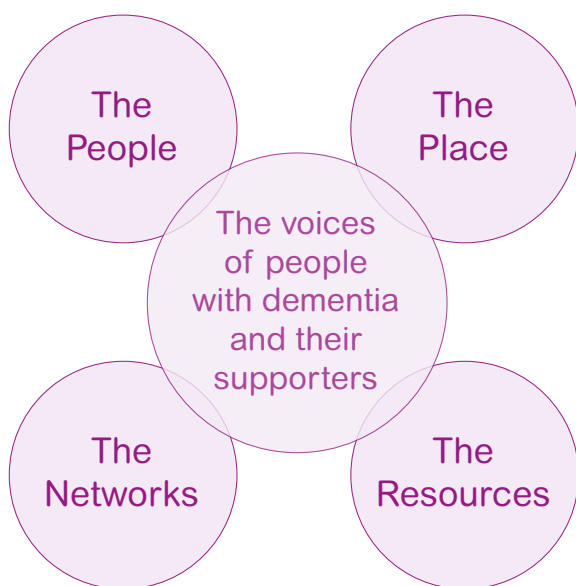
It is not intended to be prescriptive, but is offered as a starting point for others to take up and develop.

## Structure of the Framework Sections

Each of the following sections contains:

- the background to the issue
- key actions that councils can take to make this happen
- examples or case studies of existing practice

## The five domains



# A: The voices of people with dementia and their carers

The voices of people with dementia and their carers are at the start and the heart of the process of creating dementia friendly communities. Dementia friendly communities are responsive to what people want, but perhaps more importantly, people with dementia have the right to have a sense of ownership, investment, responsibility and connectedness to their own communities.

Most people expect the right to have a say in the services they use and the kind of society in which they wish to live. In health and social care settings people with learning disabilities and people with mental health problems, for example, are routinely involved in shaping services and the development of strategies.

For people with dementia, however, this expectation is not yet the norm. For many years, carers were the proxy voice for people with dementia speaking on their behalf. People with dementia tended to be diagnosed at a late stage of their illness, with delivery of care being more of a priority than involvement. However, this is changing and people with dementia are increasingly demanding a say in the decisions that affect their lives.

## Consultation

User consultation should already be embedded in the processes of designing, improving or commissioning services.

### **What can councils do?**

- Take a look at the accessibility of the mainstream consultation and engagement processes you use. DEEP (Dementia Engagement and Empowerment Project) has produced a series of guides that will be of use here (see section on resources below).
- Ask whether there are ways people with dementia can be supported in mainstream engagement processes, for example through the provision of one to one support.
- Ask whether there is a need to set up a separate engagement process for people with dementia.
- When commissioning or licensing services – how do these services go about hearing what its users or customers want or think? User consultation will have a stronger role to play in some services than others, but there will be situations where councils feel justified in making it a determining factor in its decisions.

- Specifications for services for older people or people with dementia should include the need to involve people with dementia and their carers, both in the planning and the delivery of services.
- Make sure that you find out what other strategic partners know about local needs and issues, in particular those who work directly with people with dementia and their carers
- Consider joining forces to consult and engage on issues of common interest.
- Feeding back to people is crucial as it engenders a sense that people have been listened to, even if what they say cannot be acted upon.' Here's what you told us and here's what we did as a result' sends out a very powerful message not just about the validity of the engagement process, but about the values of the organisation and what it thinks of the value of what people say and who says it.

## Beyond consultation

Hearing the voice of people living with dementia is not just about consultation, which is often one-off and as such limits the ways in which people are involved in decisions, planning, and shaping the future.

### **What can councils do?**

- involving people is an ongoing process where people are supported to engage, connect, participate and influence at many points and in many ways
- involving people with dementia can feel hard to implement, especially when resources and time are in short supply. Often, individual staff members feel inspired to support involvement, but feel unconfident or unsupported to take initiatives forward without buy-in and support from above.

## Case study – Gateshead Dementia Action Alliance

A Dementia Friendly Communities Consultation is underway. A questionnaire has been designed and circulated throughout Gateshead's Dementia Action Alliance and sent out to Gateshead residents in receipt of services. It is also available on the council consultation portal. A number of consultation events have been set up and actors from Equal Arts will be delivering these sessions to assist in communicating with people with dementia, in order to get the best out of the sessions. The results of the consultation will be used to ensure that each dementia friendly community that is developed, as part of the Alzheimer's Society accreditation programme, is tailored to the needs of people with dementia in that area.

### Source – Dementia Action Alliance

- Statutory services across the board can be developed and delivered in ways which empower people to retain a sense of independence and self-determination and build resilience – 'doing with' as opposed to 'doing for'. The 'resources' section explores this area in more detail.

## Case study – AGE UK Coventry and Coventry City Council

Coventry City Council commissioned AGE UK Coventry to work with people with dementia on environmental audits of five day centres and residential care settings across the city. A small team of staff and volunteers visited each of the venues to engage with people with dementia using or living in these settings, to gather their views and ideas about their environment.

"For the people with dementia involved, there was a real sense that they saw the process as important and valuable and with each person it was clear that their contributions were considered. In one case, a day centre member telephoned the worker from Age UK Coventry on the day following their visit as he had thought of something else he wished to raise and didn't want it to be missed, a clear indication of the significance of the process for the individuals involved"

### Nichola Lavin – Age UK Coventry

### Age UK Living Life with Dementia 2014<sup>15</sup>

<sup>15</sup> Living Life With Dementia - AGE UK 2014 [www.ageuk.org.uk/Documents/EN-GB/For-professionals/Health-and-wellbeing/Living\\_life\\_with\\_dementia.pdf?dtrk=true](http://www.ageuk.org.uk/Documents/EN-GB/For-professionals/Health-and-wellbeing/Living_life_with_dementia.pdf?dtrk=true)

### Case study – Swindon Forget me Not Group (Avon and Wilshire MHP)

Members of the group were fully involved in the recruitment of a new member of staff. They were supported to draw up the person specification, elected interviewees from a shortlist prepared by the facilitator, and sat on the interview panel. Members who did not want to sit in on the interviews took part in activities with candidates, and then fed back their feelings to the interview panel. Crucially, they also made the final decision about which person got the job.

**Source DEEP Project Dementia Voices Website<sup>15</sup>**

- Supporting peer group development – encouraging and supporting access to and development of local peer support is an effective way of keeping both carers and people with dementia connected to, and engaged with, their local communities. Not only does peer support enable the sharing of knowledge and experience, but it also provides significant opportunities for engagement in the broader community. See the ‘resources’ section for more.

### Case study - The Dementia Engagement & Empowerment Project (DEEP)

DEEP brings together groups of people with dementia from across the UK and supports them to try to change services and policies that affect the lives of people with dementia.

‘I often say I spend a third of my time on dementia activities, a third of my time doing ‘fun things’, and a third of my time recovering from the other two!

Towards the latter days of my career, occasionally I would consider the question, ‘What will I do when I retire?’ Never for one moment could I have anticipated how the last three years have unfurled. Looking back over this time, the biggest rewards have been to see a growing awareness within all sectors of dementia care that the person with a diagnosis can play a significant part in the services which we are to receive. It has been great to see a number of people who previously felt that there was no contribution they could make and nothing they could do to help themselves or others, grow to speaking in front of large and small audiences with passion and conviction, and a real desire to help to make things better for all. Some might say, “Once a teacher, always a teacher.”

**Keith Oliver reflects on his engagement with the DEEP network<sup>16</sup>**

- Another powerful way of engaging with and understanding the issues faced by people with dementia is to ‘walk the patch’. As the title suggests, this means spending time with people with dementia on the streets, in cinemas and shops and anywhere else that people may want to go. Seeing this world through the eyes of someone experiencing some level of cognitive impairment can be a revelatory experience.

<sup>16</sup> DEEP Webpage <http://dementivoices.org.uk>

<sup>17</sup> <http://dementivoices.org.uk/>

## More reading and resources

For more information about **DEEP** - the Dementia Engagement and Empowerment Project. Various guides to engaging with people with dementia can be found here.

<http://dementivoices.org.uk>

Exploring ways for Staff to Consult People with Dementia about Services – Kate Allen JRF 2003 – [www.jrf.org.uk/publications/exploring-ways-staff-consult-people-with-dementia-about-services](http://www.jrf.org.uk/publications/exploring-ways-staff-consult-people-with-dementia-about-services)

RIPFA – Practice Tool – Involving and Engaging People with Dementia

[www.ripfa.org.uk/publications-resources/professional-development/157-practice-tool-involving-and-engaging-people-with-dementia](http://www.ripfa.org.uk/publications-resources/professional-development/157-practice-tool-involving-and-engaging-people-with-dementia)

A guide to community-centred approaches for health and wellbeing – NHS England – Public Health England 2015

<https://www.gov.uk/government/publications/health-and-wellbeing-a-guide-to-community-centred-approaches>

# B: The place

The physical environment, from streetscape down to individual shops and facilities within it, as well as people's own homes, plays a key role in determining the extent to which people with dementia will find their communities dementia friendly.

In the work that informed the original version of these guidelines, people stated that a physical environment in which they can find their way around, in which they know where they are, and which makes them feel safe, is a huge advantage and an ideal gateway to their communities.

## The Built Environment

Neighbourhoods that are designed to make it easy and enjoyable to go outdoors are a significant factor in determining whether people attain recommended levels of physical activity through walking (regardless of sensory or mobility impairment) and is, more generally, a significant predictor of health and life satisfaction.

People who live within a 10 minutes' walk of a local open space are twice as likely to achieve the recommended levels of healthy walking compared with those whose local open space is further away. Access to green space and to nature has been shown to have particular benefits for people with dementia, including better mood, memory and communication and improved concentration. (Greening Dementia - Dementia Adventure<sup>18</sup>)

Orientation, wayfinding, and familiarity all contribute to an accessible environment for people with dementia, as does a reduction in unnecessary clutter and potentially disorienting visual and auditory stimuli.

Unsurprisingly, environments that are viewed by people with dementia as accessible also tend to be easier and more pleasant for everyone else as well. Relatively small changes can make a significant difference to people with dementia, often at no or very little cost.

Many people living with dementia however find it difficult to negotiate public spaces and environments, making it more difficult for them to access social groups or cultural activities, keep fit or visit their local shops.

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<sup>18</sup> Greening Dementia – a literature review of the benefits and barriers facing individuals living with dementia in accessing the natural environment and local greenspace – Natural England 2013 <http://publications.naturalengland.org.uk/publication/6578292471627776>

A number of councils are addressing the issue of place 'head on' – reviewing issues as the height of kerbs, the availability of seating and toilets and the availability and accessibility of green spaces. This has benefits, not only for older people and people living with dementia, but for the wider community.

Many councils are also working in partnership with local businesses, to enable people living with dementia to be able to access local high streets and community amenities without fear of stigma or their needs not being understood. Such work includes the development of 'dementia friendly high streets', shopping areas where local shops and staff working in them are aware of the needs of people living with dementia and extra support that they may need to access their facilities and services.

### **What can councils do?**

Councils can have a significant impact on the accessibility of the built environment to people with dementia through their role in the design and maintenance of local place.

- Councils could conduct an audit of their customer-facing premises to ensure that they are as accessible as possible to people with dementia. A link to a basic audit tool from Innovations in Dementia and other more detailed resources are given below.
- Councils can encourage developers to consider how design can support dementia friendly communities in, for example:
  - the layout of roads and streetscape
  - the design of adequate and legible signage
  - the design of wider and pedestrian-only pavements with clearly-defined edges
  - the provision of more drop-off and pick-up points outside of public venues
  - the impact of good lighting
  - acoustics
  - the design and placement of seating
  - the design and provision of adequate toilets, including those with enough room for people who need support
  - the provision of more handrails at road crossings.
- Engage people with dementia in planning and reviewing the physical environment. New and existing development and planning projects could be considered through the lens of people with dementia to ensure spaces are accessible and inclusive.
- 'Walking the patch' with people with dementia can provide valuable insight for those with responsibility not just for planning but for services across the board. Ask people to explain how they make decisions about where to go and how clearly they understand the environment as you go.
- The design of green and natural spaces could also be considered – having pleasant safe and easily navigable outdoor spaces encourages people with dementia to get out and about and can have a significant impact on health and wellbeing.



- By taking a leading or supportive role in the local Dementia Action Alliance – councils have a great opportunity to share good practice with those partners who can make a real difference to the day to day experience of people with dementia. This includes businesses and organisations who form the ‘high street’. There is much that can be done to improve the physical environment of, for example shops – and of course these are the places where people with dementia are likely to be spending most of their time when they are out, rather than in health and care settings.

### Case study – Hampshire Dementia Friendly High Street

Dementia Friendly High Streets - we are working with local, regional and national shops, organisations and businesses to establish High Streets in which people with dementia will feel understood and accepted. Businesses participating in a Dementia Friendly High Street are entitled to display our Dementia Friendly Hampshire window sticker, which shows people with dementia and their carers that the business is working towards being dementia friendly.

Our first Dementia Friendly High Street was launched in Fareham on 27 November 2013. Since then we have launched 5 more Dementia Friendly High Streets - Lyndhurst; Fleet; Romsey; Alton; Winchester - and have supported local Dementia Action Groups to launch a further 2 - Lymington and Eastleigh. Planned launches for 2015 include Milford-on-Sea, Basingstoke and Andover.

#### **Source – Dementia Action Alliance**

- Councils could also consider the significant role that feeling safe plays in the perception of a dementia friendly community. The creation of safe neighbourhoods needs joint working across council departments, including housing, transportation, and planning, as well as with broader strategic partners.

## Case study – Protection from Doorstep Crime – North Yorkshire County Council Trading Standards

“Doorstep crime gangs increasingly target people with dementia,” warns Ruth Andrews. “It’s big business and well organised.”

Gangs specialise in, say, roofing or gardening but share information, grooming victims carefully. The stakes are high; offenders can take tens, even hundreds, of thousands of pounds from victims.

“Trading Standards wants to help people stay in their own home safely and confidently. That’s not just about the crime, it’s about seeing the whole person,” explains Ruth.

That’s why her 13-strong team has changed their emphasis from prosecution to safeguarding and protection. They’ve put victims in touch with befriending services, arranged family reconciliations, helped get locks changed and had surveyors safety-check homes.

“It’s very labour intensive. But it’s hugely rewarding,” says Ruth.

One challenge has been gathering evidence differently. Ruth’s team thinks constantly about imaginative ways to build a picture. People with dementia can’t always give written statements so the team captures what they can tell the court on video. This also helps the judge and jury understand the personal impact.

**Source – Dementia Friendly Yorkshire JFR 2014<sup>18</sup>**

## Transport

The Equalities Act places a legal duty upon transport providers to make ‘reasonable adjustments’<sup>19</sup> to enable people with disabilities use services, and while the provision of ramps and assistance for people with mobility and sensory problems is widely available, the needs of people with dementia is not often considered. Few service providers take cognitive impairment due to dementia into account when considering their duties under the act.

Many people with dementia are able to drive for some time after their diagnosis, but as dementia progresses many make the decision to stop driving. The loss of a driving licence is a significant blow for many people, not just in terms of convenience, but also in terms of the psychological impact. Passing a driving test for many is a rite of passage and marks transition into adulthood and independence. To lose it may feel like a reverse process, suggesting dependence upon others, loss of status and an activity that many will have found enjoyable and intricately tied up with their own identity. This is particularly hard on people in rural areas who might have very limited access to public transport.

<sup>19</sup> Dementia Friendly Yorkshire - first steps on the journey - JRF 2014 [www.jrf.org.uk/publications/dementia-friendly-yorkshire](http://www.jrf.org.uk/publications/dementia-friendly-yorkshire)

<sup>20</sup> <http://www.equalityhumanrights.com/private-and-public-sector-guidance/organisations-and-businesses/businesses/creating-reasonable-adjustments-disabled-people>

Further guidance around transport is included in the BSI Code of Practice<sup>2021</sup>.

### What can councils do?

- Design transport hubs and stops that are accessible to people with dementia.
- Service specifications could require that consideration be given to accessibility for people with dementia, including:
  - training for customer-facing transport staff (including taxi drivers)
  - clear signage and written information about services.
- Other things that people with dementia say can improve their experience of using public transport include:
  - staff that can be seen at key points in transport hubs
  - clear explanations and support to understand changes and disruptions.

### Case study - York Station – Yorkshire and Humber DAA

York has become the first UK railway station to attempt to become dementia friendly. In addition to training for all British Transport Police office, train operating company staff and even the staff running the coffee shop concessions, they have introduced a 'safe haven' room for people needing a quiet space to collect their thoughts – or to enable carers or family members to be contacted. They have gone one step further, by organising day trips to reassure people with dementia and carers that they can continue to use the railways with the support of knowledgeable and sympathetic staff.

#### Source Dementia Action Alliance

- Councils can encourage the development of one to one support in the form of volunteer drivers or transport 'companions'. Many people with dementia may only need support to gain confidence on a particular route, which they then may be able to use independently.
- Councils could take a lead in coordinating provision of community transport services between themselves and local partner organisations.

### Case study - Reading Dementia Action Alliance

One of the most notable achievements of Reading DAA to date is the collaboration with Reading Buses, who have committed to providing all new employees with Dementia Friends training sessions, with the ultimate aim for all staff to have attended a session. Drivers have been observed as being more considerate to elderly passengers, ensuring they have embarked on the correct bus regardless of a dementia diagnosis.

#### Source Dementia Action Alliance

21 Code of Practice for the recognition of dementia friendly communities in England. British Standards Institution 2015 [www.alzheimers.org.uk/site/scripts/documents\\_info.php?documentID=279](http://www.alzheimers.org.uk/site/scripts/documents_info.php?documentID=279)

## Housing

People with dementia and their carers live in a range of housing including privately owned or rented homes, social housing, as well as supported housing such as extra care housing and care homes. Councils and their partners can help to ensure that housing supports people with dementia to live as independently as possible and engage with their local community.

### Case study – Connect Housing Association

Involvement with the Dementia Action Alliance has enabled Connect Housing to develop an internal Dementia Strategy detailing how it will be supporting current and future generations of tenants with dementia to live independently and well as part of their communities. Connect is a charitable housing and support provider operating in Leeds, Kirklees and parts of Calderdale and Wakefield, providing quality housing to people in over 700 properties specifically for older people. The organisation is already investing in a wide range of physical improvements to property and has supported about 70 staff to undergo dementia awareness sessions and other training.

Further guidance around housing is included in the BSI Code of Practice<sup>21</sup>.

### What can councils do?

- Support staff who are involved in housing to access training that enables them to respond to the needs of people with dementia in the settings in which they work - ie the training needs of people working in community housing are different from those in extra-care. Staff should be able to identify changes that can be made in people's homes to make them easier to live in with dementia.

### Case study – AGE UK Social Care

AGE UK Social Care staff including people from handy person services attended a training course in which they explored ways of making clients' homes easier to live in with dementia. The course included the basic principles of environmental design and audit considerations and practical examples of simple changes, including, for example, see-through doors on kitchen cupboards, placing high contrast covers over light switches to aid visibility, and replacing white toilet seats with black, again, to aid visibility.

<sup>21</sup> [www.alzheimers.org.uk/site/scripts/documents\\_info.php?documentID=2790](http://www.alzheimers.org.uk/site/scripts/documents_info.php?documentID=2790)

- Encourage housing providers, people living with dementia and their carers to consider assistive technology such as aids and adaptations, both low and hi-tech which can help them remain independent for longer. Examples include:
  - flood detectors in bathrooms and kitchens to protect from over-running sinks and baths
  - infra-red detectors to turn on lights if someone leaves their bed – this can help to prevent falls as well as aiding navigation and orientation
  - blackout blinds in the bedroom can aid sleep as well as reducing confusing shadows and light pooling which might lead to disorientation
  - the ASK Sara website run by the Disabled Living Foundation has a wealth of information in this area.
- Encourage housing staff to work with fire and rescue services so that they are aware of fire safety issues, so that where appropriate joint working can take place to address specific needs (see case study ‘protection from doorstep crime’ on page 21).
- When the transition from mainstream to specialist housing is needed, support people with dementia to keep their links to their community by working with housing providers, the family and the person themselves.

## The importance of written and published information

Councils produce a great deal of information both on paper and online and there is much that can be done to make sure it is accessible. The DEEP project has produced some guidelines on writing for people with dementia, referenced below.

The biggest contribution to accessibility comes from the use of plain English – and the Plain English Campaign have a wealth of free information available at their website – see below.

### What can councils do?

- Highlight the importance of the basic principles of plain English and good design for those writing or designing. Ensure that information is written with the end-user in mind. Many professionals write well for other professionals but this doesn’t always translate well into materials for people with dementia.
- Consult with people with dementia about the accessibility of published materials. The DEEP project has produced guidance to consulting with people with dementia, linked below.
- Avoid language that stigmatises people with dementia as a group – words like ‘sufferers’ and ‘victims’ are viewed as exceptionally unhelpful when applied collectively to people with dementia. A guide to language is referenced below.

## **More reading and resources**

**How to do an audit** - basic audit checklists and resources for dementia friendly environments (Innovations in Dementia 2015)

<http://www.innovationsindementia.org.uk/HowToDoAnAudit.pdf>

**Neighbourhoods for life** – designing dementia friendly outdoor environments. Oxford Institute for Sustainable Development

This is aimed primarily at planners, designers and developers and covers all scales from urban design to street furniture, on the criteria to consider in developing dementia friendly urban areas.

It also has much of interest to those thinking about the outside environment at any level.

[www.dementiaaction.org.uk/assets/0000/8252/NfL-FL.pdf](http://www.dementiaaction.org.uk/assets/0000/8252/NfL-FL.pdf)

**Stirling University Dementia Services Development Centre** is arguably the centre of excellence for issues around the design and dementia. It produces a wide range of publications in the theme of design for dementia and also provides training and auditing services:

<http://dementia.stir.ac.uk>

The Virtual Care Home is an online resource from Stirling DSDS that demonstrates key features of dementia friendly design in a care home setting.

<http://dementia.stir.ac.uk/design/virtual-environments/virtual-care-home>

## **Alzheimer's Australia WA**

Alzheimer's Australia WA, in partnership with the NSW Dementia Training Study Centre at the University of Wollongong, have developed a national project focusing on translating research into practice in the area of enabling environments for people with dementia. There are lots of free resources here, including an audit tool for gardens.

[www.enablingenvironments.com.au/About.aspx](http://www.enablingenvironments.com.au/About.aspx)

## **Checklist of essential features of age – friendly cities**

The checklist was produced by the World Health Organisation. Age-friendly environments have much in common with those for people with dementia. This is aimed at those working at a strategic level, and is intended as a tool for measuring dementia friendliness across a wide variety of domains including housing and social inclusion.

[http://www.who.int/ageing/publications/Age\\_friendly\\_cities\\_checklist.pdf](http://www.who.int/ageing/publications/Age_friendly_cities_checklist.pdf)

## **Housing LIN**

Housing LIN have produced a comprehensive resource list around housing and dementia

[www.dementiaaction.org.uk/assets/0000/9077/Housing\\_LIN.pdf](http://www.dementiaaction.org.uk/assets/0000/9077/Housing_LIN.pdf)

### **The King's Fund – Developing supportive design for people with dementia**

To support clinical and care staff, managers and estates colleagues, The King's Fund has produced a range of resources to enable hospitals, care homes, primary care premises and specialist housing providers to become more dementia friendly

[www.kingsfund.org.uk/projects/enhancing-healing-environment/ehe-design-dementia](http://www.kingsfund.org.uk/projects/enhancing-healing-environment/ehe-design-dementia)

### **Social Care Institute for Excellence (SCIE)**

SCIE have detailed online resources looking at dementia friendly design in every room. These resources have been mapped to specific Qualification and Credit Framework (QCF) units.

<http://www.scie.org.uk/publications/dementia/supporting-people-with-dementia/dementia-friendly-environments/index.asp>

**ASK Sara Website** – great for aids and equipment to support people with dementia

<http://asksara.dlf.org.uk/>

**DEEP guidelines** on writing dementia friendly information

<http://dementivoices.org.uk/wp-content/uploads/2013/11/DEEP-Guide-Writing--information.pdf>

**DEEP guidelines** on consulting people with dementia about written information

<http://dementivoices.org.uk/wp-content/uploads/2013/11/DEEP-Guide-Consulting-about-written-documents.pdf>

**DEEP guidelines “Dementia Words Matter”**

<http://dementivoices.org.uk/wp-content/uploads/2015/03/DEEP-Guide-Language.pdf>

### **Plain English Campaign**

link to free guides to writing in Plain English

<http://www.plainenglish.co.uk/free-guides.html>

# C: The people

People make communities friendly – those people whom a person with dementia might interact with in the course of everyday life – shop assistants, bus drivers, train conductors, the postman, the dustbin collector, the library assistant, the gym instructor. These are not people providing care, but people who provide services to all of us.

Most people with dementia live in communities and neighbourhoods and use generic and universal services. Most staff working in services such as housing, customer centres, leisure services, libraries, transport and adult education are going to meet people with dementia as customers. Basic knowledge and understanding about the condition would enable them to do their job more effectively and provide a better experience for the person with dementia.

People are often willing to help, but stigma, fear and misunderstanding around dementia can mean that people are unsure of what to do for the best.

Awareness-raising and training have a crucial role to play in the creation of more dementia friendly communities. This is probably the most important feature of a dementia friendly community and the area where councils have the greatest potential to transform the lives of people with dementia.

Experience suggests that organisations and services with a strong ethos of customer care, and who recruit people with good communication skills, already have most of the attributes they need to provide a great service for people with dementia. All that is needed for many is just a little information.

At a basic level, especially for staff working in non-care services and settings, Dementia Friends is proving to be an effective way of delivering dementia awareness.

## **Dementia Friends**

Dementia Friends was developed by Alzheimer's Society under the Prime Minister's Challenge, and at the time of writing more than a million have attended information sessions and signed up as Dementia Friends. The Dementia Friends programme is the biggest ever initiative to change people's perceptions of dementia which helps people to understand a bit more about dementia and the little ways they can help.

It aims to transform the way the nation thinks, talks and acts about the condition.

Ways of becoming a Dementia Friend include attending an information session, learning a little bit more about what it is like to live with dementia and then turning that understanding into practical action that could help someone with dementia living in their community.



Local councils can actively support the roll out of Dementia Friends by promoting the training amongst council staff and members; by making space available for Dementia Friends training and by encouraging all staff to visit the Dementia Friends website and watch the short video on becoming a Dementia Friend. Further information on becoming a Dementia Friend is available at [www.dementiafriends.org.uk](http://www.dementiafriends.org.uk)

### **Dementia Friends Champions**

Dementia Friends Champions are volunteers trained by Alzheimer's Society to deliver Dementia Friends sessions in their workplaces and communities. In many councils, local members are choosing to become dementia champions and to take an active role training others to become Dementia Friends and in supporting their local areas to become dementia friendly.

Further information on becoming a dementia champion is available at [www.dementiafriends.org.uk](http://www.dementiafriends.org.uk)

### **Training all council staff about dementia**

Local councils commission and deliver core services that are necessary for all of us to live our daily lives well. These include libraries and leisure services, waste disposal services, council tax and other revenue services, advice and guidance services and welfare rights services, etc.

Ensuring that staff working within these services are aware of the potential needs of people living with dementia and their carers, can make a significant difference to their lives. It can also be cost effective for councils, as it can result in people with dementia living in their local communities for longer without requiring intensive health and social care support.

For some staff, accessing a Dementia Friends information session may be sufficient. However, for others and particularly those in customer facing roles, staff might benefit from additional training or support. We have set out below a few examples of areas where local councils may want to consider providing additional information or training for staff. For example for staff working in:

- **Welfare rights.** Training might be helpful to enable them to understand the variety of services and supports that can be accessed by people living with dementia and their carers. This will include occupational therapists, physiotherapists, social workers, GPs, Dementia Support workers. It is important that staff working in more generic advice roles are aware of these services so that they can make sure that the advice and guidance they offer takes these into account.
- **Waste disposal.** Training might be helpful on how to recognise the signs of dementia so that they can be responsive to the needs of people living with the condition.
- **Libraries.** Training or information might include the impact of dementia on reading, resources that are available on dementia and how they can make the library more accessible to people living with dementia.
- **Transport.** Drivers are trained to understand the impact of dementia, how this might affect someone while travelling and how to do their job in a way which makes the service more accessible to everyone:

## Case study Drivers for Change: Dementia friendly bus transport in Northumberland

Northumberland is developing a dementia awareness training package for local bus drivers for inclusion in the Certificate of Professional Competency.

The training development has identified that a more sustainable and effective process is to work in partnership with the existing providers of driver training to develop an enhanced package that focuses on awareness and practical measures to support passengers.

- **Tourist and visitor information.** Visitors with dementia who are unfamiliar with the environment may need additional support.

## Case study – Sam Farooq – Information Advisor – Visit York

“When my manager suggested dementia friendly training, I’m embarrassed to say I had to Google what dementia meant,” says Sam Farooq. The training gave Sam a real insight into what living with dementia involves. But she also realised she was already helping people with dementia day in, day out. “One lady came in every day with the same question,” she explains. “I wondered why she didn’t remember what I’d told her the day before. Now I think she was probably living with dementia.”

Around seven million people visit York each year. Whether they live locally or on the other side of the world, many pass through the visitor centre. “We’ll go the extra mile for anybody. It’s what we do,” says Sam. “That made switching to dementia friendly working easy.” The big difference is simply having more awareness, taking a little more time. “If someone comes in five times a day asking the same thing, it doesn’t matter,” says Sam. “I’d rather they felt safe and secure.” Sam tells how one lady came into the centre in distress, having completely forgotten why she was in York. Staff were able to reassure her, find her address in her handbag and arrange a taxi home. Sam is proud of the centre’s dementia friendly sticker. It impressed four Canadian visitors so much they came in just to say congratulations. “They gave me a huge hug,” she laughs. “I’d like to see the sticker across the whole city. On buses, in taxis, at the post office and the library, in schools.” To anyone thinking of making their workplace dementia friendly, Sam says: “Go for it. Don’t be embarrassed if you feel you know nothing. Go on a course, talk to other people, listen to their stories. There’s a lot of support out there.”

### **Dementia Friendly Yorkshire – first steps on the journey – JRF 2014**

The Social Care Institute of Excellence (SCIE) has produced an E-learning course called Open Dementia – it is a useful and flexible resource as a starting-point for further training and awareness- raising. It has seven modules, and each can be completed in about half an hour. It is free of charge, of very high quality, and focused chiefly on people with dementia living in the community.

The SCIE course has been used by more than 60 local Age UKs, who have been working to make their mainstream services accessible to people with dementia since 2012 – and feedback has been very positive.

To ensure that the SCIE course was relevant to specific roles, many AGE UKs produced a matrix to map volunteer and staff roles to specific elements of the course.

In this approach, staff who manage a particular team, service, or function within the organisation complete the whole course themselves. While they are becoming familiar with the material, they are also constructing their own 'matrix' linking specific parts of the course with specific roles within their team.

There will of course be staff who might benefit from some additional training, but the SCIE course provides a firm foundation of knowledge that should be suitable for most staff and volunteers working within mainstream services AGE UK 2014<sup>23</sup>

### **Addressing the needs of people with dementia from Black, Asian, Minority and Ethnic (BAME) communities through training and support.**

In the delivery of a dementia friendly community, it is important to remember the person behind the dementia, and that they will have their own unique set of circumstances like, for instance, being from a Black, Asian and Minority Ethnic community.

“Research into the barriers to social participation for all people from seldom-heard communities shows that many face additional pressures or difficulties. People from black, Asian and minority ethnic groups, for instance, may face problems around both accessing health services and engaging in activities, especially where people feel that practitioners do not have cultural competence, hold particular stereotypes, or make assumptions about the care that people want”<sup>24</sup>

### **Lesbian, Gay, bisexual and transgender (LGBT) people with dementia**

LGBT people with dementia and their carers often face particular challenges. For example they may feel out of place in traditional support groups or they may be worried about accessing services due to fears of homophobia. Many feel that they would be uncomfortable with care home staff or paid carers knowing their sexual orientation. The Alzheimer's Society makes a number of recommendations for working positively with LGBT people with dementia<sup>25</sup>.

23 Making your services dementia friendly – a how to guide for local AGE UKs – Age UK 2014

24 Black and minority ethnic people with dementia and their access to support and services; Moriaty et al: SCIE 2014

25 [www.alzheimers.org.uk/site/scripts/documents\\_info.php?documentID=1100](http://www.alzheimers.org.uk/site/scripts/documents_info.php?documentID=1100)

## Younger people with dementia

There are more than 40,000 younger people with dementia in the UK. Younger people with dementia may have different needs, and require some different support to older adults. The Alzheimer's Society have published a factsheet 'younger people with dementia' that looks at the types of dementia that younger people may have, some of the difficulties that they might experience and where support can be found.<sup>26</sup>

## Councils as employers

As employers, councils have a responsibility towards staff whose lives may be affected by dementia. There will not be any council who does not have staff or elected members who have close family members with dementia. It is almost certain that many, if not most councils will also have employees and elected members who have or are developing dementia.

Dementia increasingly affects younger people and older people are retiring later, this means that many people are still in work when they get the first symptoms of dementia or a diagnosis. Dementia affects each person differently so it is not possible to predict how long someone can keep working. Also an individual's ability to continue working is dependent on the nature of their work. Earlier diagnosis and medication are helping more people with dementia stay in work for longer. It is important to recognise that a person with dementia may not need to stop working: indeed it may be better for their well-being to carry on as long as they are able to do so.<sup>27</sup>

Under the Equality Act (2010) employers must avoid discrimination and make reasonable adjustments to make sure that people with dementia and their carers are not disadvantaged at work. Developing employment policies and practices that support people affected by dementia not only fulfils councils' duty as employers under the Equality Act 2010, but also communicates a powerful message about their commitment to creating a dementia friendly community.

Local councils can be one of the largest employers within an area. As such, they play an important role in supporting the needs of people living with dementia or who have caring responsibilities within their employment.

This might include:

- making sure that information about dementia and support is available to staff
- providing occupational health services for staff
- developing action plans to enable staff who have been diagnosed to continue in their role for as long as possible, as their dementia develops
- providing flexible working arrangements where appropriate to accommodate the caring responsibilities of employees with close family members with dementia
- developing clear exit strategies which might include volunteering opportunities to enable those leaving to maintain their connections with the organisation and their communities, continue to use their skills and knowledge and to maintain their self-esteem.

<sup>26</sup> [www.alzheimers.org.uk/site/scripts/download\\_info.php?downloadID=1104](http://www.alzheimers.org.uk/site/scripts/download_info.php?downloadID=1104)

<sup>27</sup> [www.alzheimers.org.uk/site/scripts/documents\\_info.php?documentID=355](http://www.alzheimers.org.uk/site/scripts/documents_info.php?documentID=355)

## Case study – Joseph Rowntree Foundation (JRF)

The Joseph Rowntree Foundation and Housing Trust employ around 750 people in Yorkshire. As part of their initiative to become a dementia friendly organisation, JRF has reviewed its HR policies and is promoting the role of its Admiral Nurse in supporting employees as well as residents. Information boxes have been placed in all 17 work settings, and a resource of books built up in the central library. A local solicitor has been providing pro bono information sessions open to all staff about the importance of Lasting Power of Attorney and wills. One third of all staff, including most Trustees and Directors, have become Dementia Friends, raising awareness of the condition in all parts of the organisation.

### What can councils do?

- Encourage and support all staff and elected members to engage with the Dementia Friends programme and to become Dementia Friends.
- Support key staff and elected members to become dementia champions – so they can train and support other members and officers to become dementia friends and to act as ambassadors and supporters of work to promote dementia friendly communities locally.
- Consider including Dementia Friends as part of basic induction for all customer facing staff.
- Support the rollout of Dementia Friends to partner organisations and the broader community by making premises available for session, or by running sessions in public spaces or as a part of larger events.
- Provide additional training or information on dementia for staff in customer facing roles who need more than basic awareness, including and going beyond those in health and social care.
- Take advantage of the existing good quality and free training resources – there is a great deal of existing high quality training online, including the SCIE open dementia course.
- Raise awareness about the specific issues facing people with dementia within Black and Minority Ethnic Communities.
- Take a lead in developing employment policies that include the needs of people with dementia and their carers.
- Include information about dementia and dementia support in newsletters, websites and on council noticeboards.

## **More reading and resources**

Dementia Friends at <https://www.dementiafriends.org.uk/>

SCIE Open Dementia E-learning course

<http://www.scie.org.uk/publications/elearning/index.asp>

How to help people with dementia - a guide for customer-facing staff - Alzheimer's Society <http://alzheimers.org.uk/customerfacing>

For more information on BAME populations, see Dementia Does Not Discriminate the experience of people with dementia from black, Asian and minority ethnic communities  
All Party Dementia Group

DEEP guidelines - Dementia Friendly Tips for Employers.

<http://dementiavoices.org.uk/resources/deep-guides/>

Employers Toolkit (Draft) Alzheimer's Society (2015)

Living with Dementia booklet; Employment. Alzheimer's Society. (2010)

[http://www.alzheimers.org.uk/site/scripts/download\\_info.php?fileID=1016](http://www.alzheimers.org.uk/site/scripts/download_info.php?fileID=1016)

# D: The resources

This section looks at how resources can be deployed in services that have the greatest potential to support people with dementia and their carers engage with their communities.

Traditionally, support to people with dementia has focused on the later stages, through day centres, care homes and home care. Over the last 20 years the focus has shifted towards earlier support and this has accelerated, along with the demographic changes, improvements to diagnosis and the changing aspirations of people with dementia.

More recently still, an emphasis on prevention of dementia has become prominent in public health messages along with emerging evidence about the possibility of reducing specific risk factors for dementia.<sup>27</sup>

It is not just people in the later stages that benefit from support. This starts from before diagnosis and at the point of diagnosis. The provision of timely support enables people to maintain independence and avoid crisis admissions to healthcare. It also contributes towards the sustainability of dementia friendly communities.

The following three sections discuss important initiatives and services that have the potential to support the capacity and resilience of people with dementia and their carers:

- access to timely diagnosis
- appropriate post-diagnostic support
- services which support people to stay connected, such as accessible activities, peer groups and one to one support.

## Supporting people to access a timely diagnosis

Improving the rate of diagnosis has been a major focus of dementia policy from the Dementia Strategy onwards. Research suggested that attempts to improve diagnosis rates have achieved mixed results. In 2010/11, in England, less than half (42 per cent) of those estimated to have dementia were being diagnosed. The recent Prime Minister's Challenge on Dementia reports that this has risen by 17 percentage points to 59 per cent.

<sup>27</sup> Blackfriars Consensus on promoting brain health: Reducing risks for dementia in the population; PHE 2014 [http://nhfshare.heartforum.org.uk/RMAssets/Reports/Blackfriars%20consensus%20%20\\_V18.pdf](http://nhfshare.heartforum.org.uk/RMAssets/Reports/Blackfriars%20consensus%20%20_V18.pdf)

Receiving a diagnosis of dementia can be devastating for individuals and their families. However, with the right support to enable people to understand the implications of a diagnosis and how to continue to live well, being diagnosed can bring huge benefits.

- it gives them a better chance of learning to live well and cope better with dementia
- it opens up appropriate treatments and support
- it enables people to plan ahead and make decisions about their future needs
- it can identify common treatable conditions that can mimic the effects of dementia, such as depression, constipation or infection.

It is also essential for the health and social care system because it makes it easier to plan for future care needs, avoid crisis admissions to hospital and use local resources better.

However, the best diagnosis services are of little use if people are unwilling to seek diagnosis, or don't know how to access it.

Stigma is a major barrier to diagnosis<sup>29</sup>. People are less likely to seek a diagnosis if they are unaware of the advantages of doing so, and there is strong evidence of a connection between awareness of dementia and take-up of diagnosis -so activities to raise awareness, in relation to both people with a potential to develop dementia and the wider public are likely to have a continued impact, particularly within black, Asian and minority ethnic communities for whom lack of awareness has been identified as a significant influence on poor rates of diagnosis<sup>30</sup>.

There is strong evidence to show the benefit of early diagnosis to individuals and families and also to the taxpayer. As long ago as 2009, an economic metric was published by the Department of Health, which demonstrated the financial benefits of early diagnosis in delaying admission to hospital and to care homes (Department of Health, 2009a)<sup>31</sup>.

## Appropriate post – diagnostic support.

Delivering immediate and appropriate post-diagnostic support in a way that emphasises the potential to live well with dementia has a significant role to play in raising the expectations of both people with dementia and their carers and supporting their ongoing engagement in their communities.

29 [www.mrc.ac.uk/news-events/news/social-stigma-around-dementia-hinders-diagnosis-care-and-research/](http://www.mrc.ac.uk/news-events/news/social-stigma-around-dementia-hinders-diagnosis-care-and-research/)

30 Dementia Does not Discriminate -The experiences of black, Asian and minority ethnic communities - House of Commons All Party Parliamentary Group on Dementia 2013

31 Unlocking Diagnosis – the key to improving the lives of people with dementia APGD 2012 – referencing Department of Health (2009a). The clinical and health economic case for early diagnosis and intervention services in dementia. Department of Health, London.



## Case study – The Think Again programme – Avon and Wiltshire MHP

The Think Again programme provides a post-diagnosis therapeutic group course for up to seven people with dementia and their carers which lasts for eight weeks. Each session lasts for two hours and covers a variety of issues including practical coping strategies, looking at the impact on the relationship, forward planning, and sessions with a psychiatrist. An exit strategy is agreed with ongoing support from local partners, including the Alzheimer's Society.

However, this level of support following diagnosis is far from the norm, with many people with dementia and carers reporting significant delays between diagnosis and the receipt of meaningful support, if at all<sup>32</sup>.

'You are fine at the moment – but come back when there is a problem' is a phrase which is often reported by people with dementia and carers<sup>33</sup>.

Ongoing support post-diagnosis has been identified as a significant challenge, if improvements in the diagnosis rate are to have meaning for those receiving the diagnosis.

“Improving diagnosis rates involves more than just improving numbers – it involves designing a diagnostic pathway that takes people from their first appointment with their GP through to the support they receive in the years following a diagnosis. This requires investment, joint working across health and social care, and leadership. Political commitments and top-down policy directives are starting to yield improvements, but must also be met with local services designed around the needs and voices of people with dementia”<sup>34</sup>.

However, there is currently a lack of clarity and strong evidence about what interventions work in post-diagnostic support, with the Alzheimer's Society also highlighting further inconsistencies:

“...at present there is no guidance on a minimum provision of support and it is unclear in England and Wales whether the responsibility for commissioning services lies with health or social care. As a result access to support after diagnosis is inconsistent.”

**(Alzheimer's Society 2014)**

The impact of a range of different post-diagnostic interventions is, in the words of

32 [http://www.alzheimers.org.uk/site/scripts/documents\\_info.php?documentID=404](http://www.alzheimers.org.uk/site/scripts/documents_info.php?documentID=404)

33 <http://dementiapartnerships.com/wp-content/uploads/sites/2/dementia-review-final-report.pdf>

34 Dementia 2014: Opportunity for Change – Alzheimer's Society 2014  
[www.alzheimers.org.uk/site/scripts/download\\_info.php?fileID=2317](http://www.alzheimers.org.uk/site/scripts/download_info.php?fileID=2317)

the 2020 Challenge currently being ‘robustly tested’, and there is an acceptance that there needs to be significant improvement in the sharing of good practice in this area. However, the Prime Minister’s Challenge 2020 also challenges local commissioners to develop a better understanding of local needs, available services, and gaps in provision in order to develop appropriate commissioning strategies.

“People’s experience of living with dementia or caring is significantly determined by characteristics such as their ethnicity, age, pre-existing disabilities or whether they have a carer living with them. Local commissioners and providers need to continue to improve their understanding of the best ways to tailor post-diagnosis support services to diverse needs.”<sup>35</sup>

While giving little in terms of recommendation for specific forms of post-diagnostic support, the Challenge cites one to one support and peer group support as good examples of practical ways to support and maintain engagement.

It also highlights the role of Dementia Advisors or Navigators to support people to find and coordinate appropriate support, as well as the broader role of information and advice services to people with dementia and carers. Also cited is the need for access to psychological interventions for people with dementia and their carers. Access to counselling support for carers and people with dementia in particular have been very poor, which may seem surprising given the impact that dementia has in so many areas that counselling may seem ideally suited to address.

It is likely that these forms of post-diagnostic support will continue to be highly significant factors in supporting people with dementia to maintain resilience.

### **What can councils do?**

- Councils could review how they are enabling people living with dementia and their families and carers to access holistic, integrated and effective post-diagnostic support. It is important that people living with dementia, their families and carers are aware of what local services are available and how to access them, and that such services are based on evidence of what works.
- Psychosocial interventions have a key role to play, both immediately post-diagnosis and on an ongoing basis. Health and wellbeing boards could consider how services can be stimulated and supported to meet this need.
- Existing counselling and mainstream information services could be encouraged to consider their accessibility to people with dementia, and their awareness of issues affecting carers.
- Support from Dementia Advisors is crucially important for people with dementia and these initiatives could be encouraged and maintained.

<sup>35</sup> Dementia 2014: Opportunity for Change – Alzheimer’s Society 2014 / [www.alzheimers.org.uk/site/scripts/download\\_info.php?fileID=2317](http://www.alzheimers.org.uk/site/scripts/download_info.php?fileID=2317)

- Councils have a key role to play in ensuring their staff have access to appropriate information and knowledge about dementia and, where relevant, understand what good quality post-diagnostic integrated care and support looks like.
- Good quality post-diagnostic support is not confined to health and social care, but includes a whole range of services that enable people to take a part in the lives of their communities and to live as fulfilling a life as possible.
- Public health could maintain focus on public health campaigns using resources such as Dementia Friends, as well as promoting key messages and actions to promote prevention and healthy living.

## Supporting people to stay connected

The most dementia friendly community in the world will be of little use if people with dementia are so discouraged and downhearted that they won't even leave the house. This is where the support and services people receive post-diagnosis are so important for building and maintaining resilience and social capital.

“The review on promoting cognitive health and vitality (by Yevchak et al) clearly demonstrated the importance of older people maintaining social engagement, contacts and stimulation. Conversely, these authors found that older people with higher levels of perceived isolation and feelings of disconnection were twice as likely to experience more rapid cognitive decline in multiple-functional domains compared with ‘those individuals who perceived themselves to be supported by and connected to others.’<sup>36</sup>

Systematic reviews have found evidence that participating in stimulating and social activities can reduce the risk of developing dementia. These activities can also help reduce depression and feelings of loneliness in people with dementia, increasing quality of life and self-confidence.<sup>37</sup>

People with dementia commonly express a desire to continue to live their lives and maintain their interests, activities, hobbies, and community connections. It is widely recognised that many people become isolated following a diagnosis of dementia, and there is a strong tendency for people to withdraw into the relative safety and comfort of their own homes. There is also strong evidence that people with dementia who become isolated from their communities experience faster rates of cognitive decline.

As research from the Alzheimer’s Society (Building Dementia Friendly Communities 2013) highlights, many people with dementia withdraw from everyday life, and face significant barriers in maintaining their engagement.

36 Prime Minister’s Challenge on Dementia 2020: Department of Health, Cabinet Office, Prime Minister’s Office.  
[www.gov.uk/government/publications/prime-ministers-challenge-on-dementia-2020](http://www.gov.uk/government/publications/prime-ministers-challenge-on-dementia-2020)

37 Dementia and Cognitive Decline – a review of the evidence - Sujita Ray and Dr Susan Davidson – pub AGE UK 2014  
[www.ageuk.org.uk/Documents/EN-GB/For-professionals/Research/Cognitive\\_decline\\_and\\_dementia\\_evidence\\_review\\_Age\\_UK.pdf?dtrk=true](http://www.ageuk.org.uk/Documents/EN-GB/For-professionals/Research/Cognitive_decline_and_dementia_evidence_review_Age_UK.pdf?dtrk=true)

“Many people with dementia are not able to take part in activities that they enjoyed before they developed the condition. Many feel constrained by the condition and are not confident to get out and engage in their area. There is more that the person with dementia would like to do but they need support to do so”.

### **Staying connected through dementia specific initiatives**

In many areas, local councils are working with voluntary organisations such as the Alzheimer’s Society and AGE UK to offer a variety of activities for people with dementia at a local level. These include activities such as ‘dementia cafe’s’ and ‘singing for the brain’.

Dementia cafe’s come in various shapes and sizes. Some cafes provide additional support and information from professionals, others do not. Some provide structured activity, others do not. What they all share in common is an opportunity for people with dementia and their carers to meet in mainstream community settings and enjoy company and the support of others

#### **Case study - Singing for the Brain – Hartney Whitney**

Singing for the Brain uses singing to bring together people with dementia and their carers with volunteers. There is a strong emphasis on fun, but the sessions are also structured to include activity which stimulates memory and cognition.

“It’s really good fun, obviously, but more importantly it gets us out of the house, and we get to be with others who share the same issues and problems.” (carer)

“I love it – it makes me feel we’re not alone – and as I have always sung it’s like I am helping the others with my loud voice – even if I do go out of tune.” (person with dementia)

These services are well-used and very popular with people with dementia and their carers. For many they provide an important ‘way in’ to meeting other people in a similar situation and experience suggested that they can also provide a ‘safe haven’ from which to venture further into the community.

#### **Case study – Dementia cafe**

In one cafe visited by the author, people with dementia had started to venture to the pub next door, with initial support from a volunteer. This has become a regular part of the cafe session, with carers remaining in the cafe. A number of men with dementia have since started to meet in the pub informally, once they realised that they would be welcomed and felt comfortable.

**Source – Innovations in Dementia**

It is clear that for many people with dementia and their supporters, these services provide a very important anchor to their communities. However, although they are highly cost-effective, they are often insecurely funded.

Dementia cafe's and Singing for the Brain are widely adopted and well recognised ways of providing opportunities for peer support and activity for people with dementia and their carers. However, there is a huge range of imaginative approaches to providing activities targeted at people with dementia.

Many councils have been proactive in supporting the development of a range of approaches, often working together with local partners.

### Case study – Wolverhampton City Council and the Dementia Action Alliance

Thirty people with dementia took part in a project involving the city's Arts and Heritage Service in collaboration with the Grand Theatre, English Touring Opera, the Royal College of Music and Turtle Key Arts. The project was supported by a grant from Wolverhampton City Council and the use of facilities at the City Archives and Art Gallery. People with dementia worked with musicians and a writer, using objects from the museum collections to stimulate ideas for new songs. Participants were fully involved in writing the songs and performed them to a specially-invited audience of family and friends at the Grand Theatre. The project aimed at promoting the message that people can live well with dementia, enjoying new activities and new learning. Funding from the city council enabled the production of a booklet and CD so participants and their families could have a permanent reminder of their achievement.

#### Source – Dementia Action Alliance

It is easy to fall into making assumptions about what people want to do, but the range of activities being developed is a useful reminder that people with dementia are as varied in their interests and aspirations as everyone else.

“When I was younger, I was into punk music..... I don't do tea dances.” person with dementia in Scarborough (source DAA)

#### One to one support

This is where the potential for personalised one to one support is particularly relevant, and is one of the forms of post diagnostic support specifically mentioned in the 2020 Dementia Challenge.

One to one support has been consistently identified by people with dementia as key to engaging in their communities, dating from early work by Innovations in Dementia<sup>38</sup> Alzheimer's Society notes:

<sup>38</sup> Dementia Capable Communities – The views of people with dementia – Innovations in Dementia CIC 2011  
[www.innovationsindementia.org.uk/DementiaCapableCommunities\\_fullreportFeb2011.pdf](http://www.innovationsindementia.org.uk/DementiaCapableCommunities_fullreportFeb2011.pdf)

One third of people (35 per cent) would like more care, support and services to do things in the community, including more opportunities to participate and help to attend activities through a befriender.

Alzheimer's Society 2013 <sup>39</sup>

Light touch support in the form of befriending or buddying schemes, or even less formal ways of engaging support, could have a particular relevance for people in the earlier stages, but once established could serve to maintain the person's engagement in their community as their dementia progresses. This also offers the opportunity to engage volunteers from different backgrounds to support people with dementia in a wider range of activities than might have previously been on offer.

### Case study – My Day, My Way

My Day, My Way is a specialised 1 – 1 support service for those with a dementia living in the community. As part of the service we support individuals to remain independent in the community accessing local groups and activities. We use the life history of those that access the service to engage in meaningful activities, for example horse riding, swimming, craft clubs and exercise classes. All of our staff are trained with regards to dementia support and promote the ideals of a dementia friendly society at all the groups we attend, often signposting group organisers and attendees to Dementia Friends sessions.

**(Source - Dementia Action Alliance)**

### Peer group support and volunteering

Peer group support has also been identified by many people as playing a crucial role in building and maintaining community connectedness. Similar to one to one support, it is one of the few forms of post-diagnostic support specifically cited in the 2020 dementia challenge.

People with dementia engaging in the DEEP project report enormous benefits from being in the company of other people with dementia. Not least of these is the inspiration derived from seeing others living well, and renewed confidence to be part of the wider community.

Many people with dementia have spoken about the sense of loss of role that they experience upon diagnosis. Many feel that their life is over, that they have nothing to offer.

This is why opportunities to contribute and to maintain reciprocity are so important for people with dementia. Feeling that what they say matters is a very significant characteristic of a dementia friendly community.

<sup>39</sup> Building Dementia Friendly Communities – a Priority for Everyone – Alzheimers Society 2013  
[www.alzheimers.org.uk/site/scripts/documents\\_info.php?documentID=2283](http://www.alzheimers.org.uk/site/scripts/documents_info.php?documentID=2283)

Many people with dementia also mention their need to give back to their communities, and many choose to volunteer to support other people with dementia, and have been actively involved in setting up support groups.

“Helping vulnerable groups of people to get out and get active in their communities is shown as the best way to have a huge positive impact on their overall wellbeing, according to a SCIE report into ageing (May 2012). Although existing campaigns encouraging better understanding of dementia and developing befriending groups will help to achieve this, the Council for Voluntary Service’s experience with various other groups of individuals with additional support needs shows that continued active involvement in community life and being able to make a contribution through volunteering is the most effective way of fostering a sense of belonging and value”

**(Council for Voluntary Service – Dementia Active Project Proposal).**

The DEEP project provides numerous examples of user-led initiatives. One such is Dementia Mentors – a support service which provides people with dementia to mentor those with a recent diagnosis:

**Case study – Maidstone Mentors – Kent and Medway Primary Trust, Alzheimer’s Society Maidstone Peer Support Group (Members of the DEEP network)**

Maidstone mentors provides volunteers with dementia to support and provide a listening ear to people recently diagnosed with dementia.:

“The idea for Maidstone Mentors came from Tom who attends Maidstone Peer Support group. Tom had previously reached out to his GP offering his phone number to be passed onto people who had been recently diagnosed so that he could listen to their worries and let them know that support is out there. He wanted to prevent anyone else feeling as alone as he had when he was diagnosed.”

**Staying connected through mainstream services and activities**

However, while activities specifically targeted at people with dementia are important, more significant and sustainable gains are likely to be made in ensuring that mainstream provision is as accessible as possible. Many people with dementia have argued for the importance of ‘normal’, of the ‘stuff of life’, and of wanting to maintain their everyday activities, rather than being channelled into ‘specialist’ provision.

This is at the core of the notion of dementia friendly communities. The more accessible mainstream services become, the less likely it will be that people with dementia will need or want specialist provision.

## Case study – AGE UK

Sixty local Age UK services across England are working to make their mainstream services accessible. Innovations in Dementia was commissioned to support them to audit their accessibility of their mainstream services to people with dementia.

Services have been opened up to people with dementia, by ensuring that staff and volunteers are aware of how to support people with dementia, and by making often small but highly impactful changes to the environments in which services are delivered. Recent research by AGE UK recognises that the unique potential of AGE UK in supporting people with dementia may lie in the fact that it is NOT a dementia specific organisation.

## Case study – Age UK Solihull

Since taking part in the first 'Including People With Dementia' project in late 2012/ early 2013, Age UK Solihull has taken a different approach to how it provides services for all older people their families and carers.

“At Age UK Solihull, over the past two years, we have shifted our ethos to recognise and understand dementia but not let it define the person. The view we take is simple – focus on the person and their needs, not a diagnosis or a label. All services provided by Age UK Solihull are now regularly assessed to ensure they are all accessible to all, irrespective of whether or not the individual has a mental or physical condition. Dementia specific services are not provided, indeed, recently the Carers Support Scheme, which was restricted to carers of those living with dementia, has been opened out to all carers of older people living with a long term condition. The aim is to ensure all services reflect the needs of the older population of Solihull and the illnesses they live with. We do not label, we are inclusive of all”

### **Age UK – Living Life with Dementia 2014**

Across the AGE UK network, and in other voluntary sector organisations, more and more people with dementia are being supported through mainstream services and activities. Services such as information and advice, leisure activities, basic help at home, and opportunities for social interaction are essential to people with dementia and their carers throughout the progression of dementia.



## **What can councils do?**

### **Dementia-specific activities**

- Consider how they can support the development and sustainability of popular and well used services such as Singing for the Brain and Dementia cafes. This could be through direct funding support, or by helping with access to premises, staff or equipment.

### **One to one support**

- Support the development of one to one support schemes for people with dementia that include opportunities for both practical support and engagement in the community.
- Encourage organisations to think differently about recruiting a broader range of volunteers with specific interests to support a broader range of people with dementia.

### **Peer group support and volunteering**

- Encourage and support the development of peer support groups for people with dementia – the DEEP project can offer further guidance.
- Encourage and support opportunities for mentoring and volunteering for people with dementia.
- Work with volunteer agencies to ensure that their services are accessible to and aware of the needs and potential of people with dementia as volunteers.

### **Stimulating Support through mainstream services and activities**

- Provide information about activities and facilities in accessible formats (see section on written and published material on page 25).
- Involve people with dementia in exploring the accessibility of existing services.
- Think about how the capacity of council services can be stimulated to provide a range of support for people with dementia, for example:
  - activities at the local leisure centre in which people with dementia can take part in– classes with carers, adapted games, supporting access to mainstream provision
  - leisure centres and facilities could be supported and encouraged to recruit existing members or users to buddy a person with dementia who wishes to continue an activity, or learn a new one
  - libraries can provide dementia specific resources and facilities specifically aimed at people living with dementia
  - highlight the importance of ongoing adult education for people with dementia to local adult education colleges – as accessing further education and learning can help maintain health, skills and learning capacity.
- Provide leadership and challenge to civil society organisations to look after their own members (for example, regular walking groups, whose membership is usually predominantly drawn from older people could be encouraged to organise a buddy scheme to help support members who develop dementia to stay involved in their activities)

- Help people providing leisure activities to consider how their people, set-ups and signage can become more helpful to members who are becoming confused, or who may be unfamiliar with layouts
- Through appropriate training and awareness-raising ensure that frontline staff do not inappropriately refer people with dementia seeking support from mainstream services and facilities to specialist provision
- When commissioning services, recognise the role that mainstream activities and services play in the lives of people with dementia – ultimately, it is in mainstream provision that people with dementia will spend most of their time and derive most of their benefit
- Encourage organisations to think differently about recruiting a broader range of volunteers with specific interests to support a broader range of people with dementia.

**Further reading:**

Unlocking Diagnosis – the key to improving the lives of people with dementia  
APGD 2012

**The British Psychological Society, with partners including DEEP, has produced a guide to psychosocial interventions in the early stages of dementia.**

**It is available here:**

[www.bps.org.uk/system/files/user-files/DCP%20Faculty%20for%20the%20Psychology%20of%20Older%20People%20\(FPoP\)/public/a\\_guide\\_to\\_psychosocial\\_interventions\\_in\\_dementia.pdf](http://www.bps.org.uk/system/files/user-files/DCP%20Faculty%20for%20the%20Psychology%20of%20Older%20People%20(FPoP)/public/a_guide_to_psychosocial_interventions_in_dementia.pdf)

# E: The networks

It takes a lot of organisations and individuals to make a community, and it is therefore important that a range of organisations are involved in creating dementia friendly communities.

Lots of other people and organisations are thinking about the need to become more dementia friendly, including many of your strategic partners. Working with and supporting them could be a valuable contribution to making the wider community more dementia friendly as well as getting support and learning to apply to your own services.

As strategic leaders, councils have a key role to play in influencing and encouraging their partners to consider the needs of people with dementia and their carers in the services that they provide, as well as a corporate responsibility within their own organisation and amongst their own staff for the services. There are various ways councils can support others to become dementia friendly. Councils are well placed to galvanise other organisations to work together, most likely through:

- health and wellbeing boards
- by becoming an active member of or leading the development of a local Dementia Action Alliance
- via their regulatory and licensing functions, examples of which can be seen in the domains 'the voice of people', 'the place' and 'the people'.

## Case study – Norfolk Health and Wellbeing Board

Norfolk have as one of their three priorities - Making Norfolk a better place for people with dementia and their carers - with clear actions focused upon:

- building an integrated approach – including a comprehensive dementia needs assessment to inform the JSNA to include the needs of BAME groups – and a review of transport
- promoting awareness of dementia – including supporting dementia friendly communities and ensuring that strategic partners staff and volunteers are required to have appropriate levels of awareness and training in dementia
- improving dementia care pathway- with a focus on co-production with people with dementia and their carers – timely diagnosis – effective post-diagnostic support – support for Dementia cafes – Admiral Nurses – and increased awareness and use of aids and adaptations in housing
- supporting Independent living - including support for information and advocacy services – support for carers – and focus on housing
- improving services for those unable to live independently.

Statutory members of health and wellbeing boards with remits of particular relevance to dementia friendly communities include:

- Director of public health – public health has an important role to play both in prevention, but also as a source of information about local demographics.
  - Director of adult social care – the lead officer for adult social care will be the source of much knowledge and expertise in supporting people with dementia and their carers.
  - Director of children’s social care – children’s social care could play an important role in communicating the impact of dementia on children, including children acting as carers for younger people with dementia, as well as providing education and support for children affected by dementia.
  - Healthwatch representative – has clear potential to ensure that the voice of people with dementia and their carers is heard clearly (whether or not people with dementia have been directly co-opted).
- They have a key ‘listening’ function, not just in the production of the JSNA, but also in the capacity to co-opt representatives of user and patient groups – including potentially people with dementia and their carers.
  - They have a statutory duty to promote integration such that all the relevant partner organisations work together to maximise the wellbeing of the local population.
  - They are the most important forum for local authorities to influence how healthcare is developed, commissioned and delivered.
  - They are responsible for producing the Joint Health and Wellbeing Strategies.

Local health and wellbeing boards will prioritise the areas their JSNAs have highlighted as being of particular concern locally. This may mean that dementia is not specifically highlighted within the strategy, nor that dementia is named as a priority. In many areas councils and their partners are providing strategic oversight and shared ownership of the commissioning and delivery of the range of services that people living with dementia and their carers need. This might include evidence-based and high quality clinical services through to community based services that promote wellbeing and enable people to stay connected. In many areas, such partnerships and strategic groups include:

- **Education** – as work with schools is key to help children understand more about dementia and to promote important intergenerational work.

### Case study – Dementia Diaries

The Social Innovation Lab Kent (SILK) is based within Kent County Council. SILK has co-produced the Dementia Diaries - a book aimed at young people – with a group of 20 young carers of people with dementia between the ages of seven and seventeen.

Read more here: <http://socialinnovation.typepad.com/files/journal-of-dementia-care-1.pdf>

- **Planning** – as we have seen in the section on ‘place’, planning officers can involve people with dementia to advise on new developments and ensure that others are aware of the issues that people with dementia face in accessing the built environment.
- **Housing** – Making sure that housing works well for people with dementia and that housing staff understand how adaptations can enable people to stay independent in their own homes for longer.
- **Transport** – working with partner organisations to take on board the needs of people with dementia.
- **Highways** – providing signage is clear and easily understood.
- **Environmental services** – providing instructions for recycling that are clear and easy to understand.
- **Leisure and culture services** – providing leisure and cultural services that are accessible, and frontline staff who are aware of how they can support people with dementia to use their facilities.

### Other statutory agencies

Other statutory agencies also have many insights to offer and contributions to make. The police and transport services, for instance, have everyday experience of responding to the needs of people with dementia who get into difficulties but receive little training on how to do so. Councils can use strategic drivers such as the community safety plan, policing plan, the health and wellbeing strategy and transport plan, as well as strategies for older people and people with dementia as levers to reinforce their needs.

Many police and fire and rescue services are already members of their local Dementia Action Alliance and are taking steps to ensure that people with dementia are properly supported.

Here, for example are the action points listed by Essex Police on their membership page of the Dementia Action Alliance:

- make frontline officers aware – Dementia Friends meetings
- have a look at the setup of our stations. Are they Dementia Friendly?
- have a point of contact at each station. Preferably a Dementia Friend
- have a person trained to train others within the police. Dementia Champion
- PCSO to attend a coffee meeting within their ward
- GPS trackers / Missing people – extend funding

interact with local stores within their ward.

### Case study – Kent Fire and Rescue Service and Kent County Council

Kent Fire and Rescue Service and Kent County Council have worked together to improve safety for people with dementia.

Eight of the fire service's team are now able to do the councils home safety assessment and give the go-ahead for a range of safety equipment to be installed. This includes monitored lifeline units, pendants, keysafes and smoke and heat detectors.

This helps people stay in their own homes for longer and gives peace of mind to their families.

Previously there could be significant delays in getting the equipment installed as fire officers identifying problems had to request a further assessment by the council. The cost savings to the council are significant – as the equipment costs a few hundred pounds versus thousands if someone has to go into residential care due to problems caused by a delay in getting the equipment fitted.

### Working with wider partnerships – Dementia Action Alliances

Local Dementia Action Alliances present a powerful way for local councils to work together with local partners in the creation of dementia friendly communities.

**“These local alliances or similar action groups bring together diverse stakeholders including bus companies, taxi firms, police, fire and rescue services, high streets, local authorities, charities, care providers and health trusts, faith groups and schools”**

**(Building Dementia Friendly Communities – Alzheimer's Society 2013).**

One of the main areas of activity for local Dementia Action Alliances has been around the process of building dementia friendly communities.

At the time of writing there were 138 Dementia Action Alliances working on action plans to create dementia friendly communities, and The Prime Minister's Dementia Challenge 2020 sets out a vision that all tiers of local government should become part of a local Dementia Action Alliance by 2020.

Many councils have already been very active in their local DAA's with some taking the lead role. Examples of this can be seen in the case studies throughout this document.

The role of councils in respect of their local DAA will vary according to local conditions. There is considerable scope for:

- Councils to take the lead in creating a local DAA if there is not one in existence. This does not mean that their leadership has to continue once the DAA has been set out but could involve the initial impetus and a small amount of initial input to get things up and running.

In some areas, councils have stepped in to provide leadership and direction if the local DAA appears to be faltering, through either lack of resources or lack of direction or support.

In other areas, councils have joined existing DAAs which already have strong leadership and have played their part accordingly.

Experience suggests there is a strong argument for leadership to come from, or be passed to other partners, not least because of the need to emphasise the role of partners from outside of health and social care in creating dementia friendly communities.

### **What can councils do?**

- set up a local DAA if there is not one in existence or join one if there is
- provide support to the local DAA if it needs it – but be conscious of the value of not taking over. DAAs have an important role in creating a shared and jointly owned vision across all partners
- sign up for the Alzheimer's Society Dementia Friendly Communities recognition process
- use strategic drivers such as the community safety plan, policing plan, health and wellbeing strategy and transport plan as well as strategies for older people and people with dementia as levers to reinforce the needs of people living with dementia
- support and encourage local businesses, community based and voluntary organisations to ensure that they are enabling people living with dementia to access their services and activities. This will include working with local faith groups, social clubs, sporting and leisure associations – to persuade them of the importance of making their services accessible to people living with dementia and actively promoting activities for them. This might involve minimum seed funding, to enable organisations to address the needs of members who have dementia or people with care for someone with dementia.

## More reading and resources

The website of the National Dementia Action Alliance <http://www.dementiaaction.org.uk>

The Alzheimer's Society Dementia Friendly Communities recognition process.  
<http://alzheimers.org.uk/recognitionprocess>

## About the Author

**Steve Milton** has worked in social care since 1987 as a researcher, writer, trainer, and service manager. He has worked in the dementia field since 1995. In 1996 he set up the Alzheimer's Society helpline, which he led until 2002. During that time the helpline provided support and information to over 150,000 people.

Steve leads Innovations in Dementia's work on dementia-friendly communities and disability rights.

Steve was awarded fellowship of the Royal Society for Arts in 2014 in recognition of his work on behalf of people with dementia.

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We consider requests on an individual basis.



## Overview and Scrutiny Committee

- Held at: Boulogne Room - Civic Centre, Folkestone
- Date: Tuesday, 5 July 2016
- Present: Councillors Mrs Ann Berry, Peter Gane, Clive Goddard, Mrs Claire Jeffrey, Michael Lyons, Frank McKenna, Ian Meyers, David Owen and Mrs Rodica Wheeler
- Apologies for Absence:
- Officers Present: Bev Jackson (Housing Options Manager), Jyotsna Leney (Community Safety Manager) and Sue Lewis (Committee Services Officer)
- Others Present:

### 11. **Declarations of Interest**

There were no declarations of interest.

### 12. **Street Homelessness: A Review of the Funding Provided to Porchlight and the Rainbow Centre**

Report OS/16/01 In 2015, the Council agreed to fund Porchlight and the Rainbow Centre, to provide an Outreach Worker and Homeless Link worker posts to prevent and tackle the barriers associated with street homelessness.

This report reviews the progress of the Outreach Worker and the Homeless Link Worker, and proposes that the council should continue to provide funding for these posts, the Folkestone Churches Winter Shelter (FCWS) and the Porchlight Private Rented Scheme (PRS).

Bev Jackson, Housing Options Manager was in attendance to answer any questions on this item.

Members paid particular attention to the following:

- The winter shelter has been providing a service for the past 7 years and numbers have been consistent in the last 2 years. Since December 2015 the numbers have dropped and this could be due to the complexity of the type of people.
- There is a mental health nurse who works at the Rainbow Centre to provide support to those clients who ask for help.
- Social Lettings Agency – partnership work with Ashford is ongoing and members were informed that a focus group had been set up to look at issues surrounding suitable, affordable housing, options for landlords and working together with others with networking to engage new landlords.
- The Rainbow Centre is doing some work on homelessness across the district and the council will look at the results of this and try and build on the winter shelter provision.
- Universal Credit will have an impact but as this is still new no figures are available at this time but officers will monitor the process.

Members congratulated the work that officers are doing and the continuing partnerships that have been developed and are being developed to provide the best service for the district. The Council is getting best value and this should be welcomed.

Proposed by Councillor Peter Gane  
Seconded by Councillor Mrs Claire Jeffrey and

**Resolved:**

1. **To receive and note Report OS/16/01.**
2. **To note that the Council is getting best value and to congratulate all organisations involved in this project.**

(Voting: For 9; Against 0; Abstentions 0)

13. **Dementia Friendly Communities Action Plan**

Report C/16/17 Shepway District Council is a member of the Shepway Dementia Action Alliance and as part of the National Dementia Challenge the Council is required to have a local action plan on Dementia Friendly Communities.

Jyotsna Leney, Community Safety Manager presented members with the local action plan which focuses on improving skills, understanding the challenges and having a better awareness of the disease.

It is clear that awareness and education are key and because of this the council is working hard to provide the necessary support and information in the district.

It is not always easy to access information and the council wants to be able to give as much detail as possible to those in need of support, such as, Hawkinge House which provides an excellent facility and Folkestone Sport Centre which provides classes and exercise for those patients with dementia.

Members were particularly interested in how they could get involved in promoting this across the district and as a starting point suggested that the action plan is sent to all town and parish councils.

The Community Safety Manager agreed that we all need to work together and therefore suggested that the council brings in specialists to talk to members and invite parish and town councils to hear these discussions.

Councillor Meyers informed the committee that all emergency services; police, fire and rescue and border control officers are now required to complete an e-learning course on dementia and know how to recognise patients who may be suffering with this. It is something that could be rolled out across the council.

Councillor Mrs Jenny Hollingsbee is the representative for the District Council.

Proposed by Councillor Michael Lyons  
Seconded by Councillor Clive Goddard and

**Resolved:**

1. **To note Report C/16/17.**
2. **To agree the Shepway District Council Dementia Friendly Communities Action Plan.**
3. **To note the views of the Overview and Scrutiny committee.**

(Voting: For 9; Against 0; Abstentions 0)

14. **Annual Scrutiny work Programme 2016-17**

Report A/16/13 presents recommendations for the work programme for the overview and scrutiny committee for 2016/17.

Proposed by Councillor Clive Goddard  
Seconded by Councillor David Owen and

**Resolved:**

1. **To receive and note report A/16/13.**
2. **To approve the annual scrutiny work programme for 2016-17 attached to this report.**

(Voting: For 9; Against 0; Abstentions 0)



This report will be made public on 31 August 2016

**Folkestone**

Hythe & Romney Marsh  
Shepway District Council



Report Number **C/16/41**

**To: Cabinet**  
**Date: 14 September 2016**  
**Status: Non-Key Decision**  
**Head of Service: Pat Main, Head of Finance**  
**Portfolio Holder: Councillor Miss Susan Carey, Cabinet Member for Finance**

**SUBJECT: RISK BASED VERIFICATION POLICY FOR HOUSING BENEFIT AND COUNCIL TAX REDUCTION**

#### **SUMMARY:**

This report sets out a new policy within the administration of Housing Benefit and Council Tax Reduction to implement and carry out Risk Based Verification of applications and reported changes.

This forms an element of the eform application process to be introduced in October 2016.

#### **REASONS FOR RECOMMENDATIONS:**

Cabinet is asked to approve the following recommendations to allow the implementation of Risk Based Verification on Housing Benefit and Council Tax Reduction new claims and change of circumstances. This will allow the targeting of resources from low risk cases to those which are at higher risk of potential fraud and error. By identifying these cases at the point of entry the process should help to reduce fraud and error from entering the system.

#### **RECOMMENDATIONS:**

Cabinet is asked to:

- 1. To receive and note report C/16/41.**
- 2. To agree to the Risk Based Verification policy (Appendix 1) to take effect from 1 October 2016.**

## **1. BACKGROUND**

- 1.1 Following the publication of DWP Circular HB/CTB S11/2011 (Appendix 2), local authorities have been able to implement a 'risk-based' approach to verifying claims.
- 1.2 Risk Based Verification (RBV) is technology that changes the evidence requirements as it risk assesses new claims and changes in circumstance at the point of claiming/notifying of a change. Claims will be categorised as low, medium or high risk. Levels of verification against each risk category are detailed in the draft Risk Based Verification Policy (Appendix 1). Classification of claims allows resources from low risk cases to be channelled towards high risk cases and reduce fraud and error from entering the system at the first point of entry.
- 1.3 Housing Benefit (HB) and Council Tax Reduction (CTR) has traditionally been claimed through paper application forms. These are then scanned and indexed into software accessed by assessment officers.
- 1.4 The implementation of electronic claims from October 2016 will allow new claims to be made online and enable the electronic notification of changes of circumstance. The data entered onto these forms can be analysed using RBV software to provide the following benefits:
  - i) For cases identified as low risk, the applications will be processed faster than the current format, delivering service improvement for the customers and improved performance for the Council.
  - ii) For cases that are identified as high risk the Council will be able to more accurately detect fraud and error at the start of a claim/change and reduce the risk of large overpayments and fraud.
- 1.5 It should be noted that the implementation of RBV technology is essential to enable delivery of the service's 2016/17 budget saving as part of the revenues and benefits Digital Transformation project.

## **2. HOW RISK BASED VERIFICATION WORKS**

- 2.1 RBV assigns a risk-rating to each claim. This determines the level of verification required. Greater activity is therefore targeted toward checking those claims deemed to be at highest risk of involving fraud or error:
  - Low risk cases: only essential checks will be made (for example, ID as required by legislation). This is a saving on assessment administration for these cases which are currently checked fully. This will be for approximately 55% of cases
  - Medium risk cases: these will be processed to a similar way as claims are currently, with evidence required as originals or photocopies being accepted. This will be for approximately 25% of cases.
  - High Risk cases: Enhanced stringency will be applied to the verification. Original copies will be required and possible additions such as the requirement of extra documentation, visits and further interventions. This will be for approximately 20% of cases.



2.2 The estimated distribution means that there are significant processing efficiencies for over half of the cases and resources can be allocated to targeting verification and scrutiny on a lower number of high-risk claims which will lead to more effective targeting of minimising fraud and error at the first stage of application.

### 3. LEGAL REQUIREMENTS

3.1 If an authority chooses to adopt RBV it must have in place a RBV Policy setting out the risk profiles and verification standards that will apply and the minimum number of claims to be checked.

3.2 The RBV policy must be approved and signed off by members and have the agreement of the Council's Section 151 Officer. The DWP also consider it good practice for the policy to have been examined by the Council's Audit & Risk Committee or similar appropriate body. These requirements are laid out in Appendix 2 (Point 14).

3.3 Due to the nature of the content of the policy, it is not made publicly available. It is also expected that there is monthly monitoring of RBV to ensure the effectiveness of the baseline and performance.

### 4. RISK MANAGEMENT

4.1 A summary of the perceived risks follows:

<b>Perceived risk</b>	<b>Seriousness</b>	<b>Likelihood</b>	<b>Preventative action</b>
RBV policy is not agreed	High	Low	The Policy will be reviewed and agreed by all relevant parties prior to being used in a live environment.
The Council fails to apply verification standards as stipulated in the RBV policy, resulting in loss on HB subsidy	High	Low	Internal Audit and RBV suppliers will analyse and agree the standards as set out in the policy
Applicants will enter false data into the system to maximise their awards fraudulently.	Medium	Low	The RBV risk analysis will highlight cases of clear discrepancy prior to payments being made. A percentage of low risk cases will receive follow up reviews a time after their claim is made to make a cursory check on the circumstances.
RBV results are not identifying the expected results of cases in each risk	Medium	Medium	The performance will be monitored monthly to ensure effectiveness.

## 5. LEGAL, FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

### 5.1 Legal Officer's comments

There are no legal implications arising directly out of this report on the basis the Council has the right to use the software which implements the RBV policy. However, CMT must be aware of potential consequences to staff arising out of implementation of the RBV policy.

### 5.2 Finance Officers comments

This report relates to the adoption of a Risk Based Verification (RVB) policy for Housing Benefit and Council Tax Reduction claims. Linked to the implementation of electronic claims from October 2016, it will enable the Council to determine the risk level of such claims. This will enable the Council to target those claims deemed to be at the highest risk of involving fraud or error.

Paragraph 1.4 indicates that for high risk cases the Council will be able to more accurately detect fraud and error at the start of a claim/change and reduce the risk of large overpayments and fraud. This should provide saving because we only receive 40% subsidy on these cases where an overpayment occurs.

In addition, paragraph 2.1 shows that it is estimated that 55% of cases will be low risk. Because these require lower administration costs, this should produce a saving to the Council. These and any associated one-off restructuring costs need to be quantified and included in future Budget Strategies.

Guidance in Appendix 2 indicates that failure by the Council to apply the verification standards contained in its RBV Policy to its HB/CTB claims will cause the expenditure concerned to be treated as a Local Authority error. The Council would receive no subsidy on these payments. Careful monitoring of this will, therefore, be required.

### 5.3 Equalities and Diversities Implications

The policy has been produced in line with Department of Work and Pensions guidance on the use of Risk Based Verification circular S11/11 and is the basis for seeking to reduce the amount of fraud and errors within the process. It is therefore not deemed to have an impact on the protected characteristics and will in fact, seek to ensure a fairer and more robust process in the system.

### 5.4 Communication Implications

If adopted this can be publicised as an example of council working more efficiently.

## 6 CONTACT OFFICERS AND BACKGROUND DOCUMENTS

- 6.1 Councillors with any questions arising out of this report should contact the following officer prior to the meeting

*Report author: Andrew Hatcher*

*Telephone: 01303 853348*

*Email: [andrew.hatcher@shepway.gov.uk](mailto:andrew.hatcher@shepway.gov.uk)*

### 7.2 Appendices:

Appendix 1 – Proposed Shepway District Council Housing Benefit and Local Council Tax Reduction Risk Based Verification Policy



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By virtue of paragraph(s) 1 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

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## Housing Benefit and Council Tax Benefit Circular

Department for Work and Pensions

1<sup>st</sup> Floor, Caxton House, Tothill Street, London SW1H 9NA

# HB/CTB S11/2011

### SUBSIDY CIRCULAR

<b>WHO SHOULD READ</b>	All Housing Benefit (HB) and Council Tax Benefit (CTB) staff
<b>ACTION</b>	For information
<b>SUBJECT</b>	Risk-Based Verification of HB/CTB Claims Guidance

### Guidance Manual

The information in this circular does not affect the content of the HB/CTB Guidance Manual.

### Queries

If you

- want **extra copies of this circular/copies of previous circulars**, they can be found on the website at <http://www.dwp.gov.uk/local-authority-staff/housing-benefit/user-communications/hbctb-circulars/>
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## Risk-Based Verification of HB/CTB Claims Guidance

### Introduction

1. This guidance outlines the Department's policy on Risk-Based Verification (RBV) of Housing Benefit and Council Tax Benefit (HB/CTB) claims.

### Background

2. RBV allows more intense verification activity to be focussed on claims more prone to fraud and error. It is practiced on aspects of claims in Jobcentre Plus (JCP) and the Pension Disability and Carers Service (PDCS). Local authorities (LAs) have long argued that they should operate a similar system. It is the intention that RBV will be applied to all Universal Credit claims.
3. Given that RBV is practised in JCP and PDCS, the majority (up to 80%) of HB/CTB claims received in an LA may have been subject to some form of RBV. Already 16 LAs operate RBV. Results from these LAs have been impressive. In each case the % of fraud and error identified has increased against local baselines taken from cells 222 and 231 of the Single Housing Benefit Extract (SHBE). In addition, in common with the experience of JCP and PDCS there have been efficiencies in areas such as postage and storage and processing times have improved.
4. We therefore wish to extend RBV on a **voluntary basis** to all LAs from April 2012.

This guidance explains the following;

- What is RBV?
- How does RBV work?
- The requirements for LAs that adopt RBV
- How RBV claims will be certified
- What are the subsidy implications?

### What is RBV?

5. RBV is a method of applying different levels of checks to benefit claims according to the risk associated with those claims. LAs will still be required to comply with relevant legislation (Social Security Administration Act 1992, section 1 relating to production of National Insurance numbers to provide evidence of identity) while making maximum use of intelligence to target more extensive verification activity on those claims shown to be at greater risk of fraud or error.
6. LAs have to take into account HB Regulation 86 and Council Tax Benefit Regulation 72 when verifying claims. The former states:

*“a person who makes a claim, or a person to whom housing benefit has been awarded, shall furnish such certificates, documents, information and evidence in connection with the claim or the award, or any question arising out of the claim or the award, as may reasonably be required by the relevant authority in order to determine that person’s entitlement to, or continuing entitlement to housing benefit and shall do so within one month of being required to do so or such longer period as the relevant authority may consider reasonable.”*

Council Tax Benefit Regulation 72 is similar.

7. These Regulations do not impose a requirement on authorities in relation to what **specific** information and evidence they should obtain from a claimant. However, it does require an authority to have information which allows an **accurate assessment** of a claimant’s entitlement, both when a claim is first made and when the claim is reviewed. A test of reasonableness should be applied.

### How does RBV work?

8. RBV assigns a risk rating to each HB/CTB claim. This determines the level of verification required. Greater activity is therefore targeted toward checking those cases deemed to be at highest risk of involving fraud and/or error.
9. The classification of risk groups will be a matter for LAs to decide. For example, claims might be divided into 3 categories:
  - **Low Risk Claims:** Only essential checks are made, such as proof of identity. Consequently these claims are processed much faster than before and with significantly reduced effort from Benefit Officers without increasing the risk of fraud or error.
  - **Medium Risk Claims:** These are verified in the same way as all claims currently, with evidence of original documents required. As now, current arrangements may differ from LA to LA and it is up to LAs to ensure that they are minimising the risk to fraud and error through the approach taken.
  - **High Risk Claims:** Enhanced stringency is applied to verification. Individual LAs apply a variety of checking methods depending on local circumstances. This could include Credit Reference Agency checks, visits, increased documentation requirements etc. Resource that has been freed up from the streamlined approach to low risk claims can be focused on these high risk claims.
10. We would expect no more than around 55% of claims to be assessed as low risk, with around 25% medium risk and 20% high risk. These figures could vary from LA to LA according to the LA’s risk profiling. An additional expectation is that there should be more fraud and error detected in high risk claims when compared with medium risk claims and a greater % in medium risk than low risk. Where this proves not to be the case the risk profile should be revisited.
11. LAs may adopt different approaches to risk profile their claimants. Typically this will include the use of IT tools in support of their policy, however, the use of clerical systems is acceptable.

12. Some IT tools use a propensity model<sup>1</sup> which assesses against a number of components based on millions of claim assessments to classify the claim into one of the three categories above. Any IT system<sup>2</sup> must also ensure that the risk profiles include 'blind cases' where a sample of low or medium risk cases are allocated to a higher risk group, thus requiring heightened verification. This is done in order to test and refine the software assumptions.
13. Once the category is identified, individual claims cannot be downgraded by the benefit processor to a lower risk group. They can however, exceptionally, be upgraded if the processor has reasons to think this is appropriate.

### **The requirements for LAs that adopt RBV**

14. RBV will be voluntary. However, all LAs opting to apply RBV will be required to have in place a **RBV Policy** detailing the risk profiles, verification standards which will apply and the minimum number of claims to be checked. We consider it to be good practice for the Policy to be examined by the authority's Audit and Risk Committee or similar appropriate body if they exist. The Policy must be submitted for Members' approval and sign-off along with a covering report confirming the Section 151 Officer's (section 85 for Scotland) agreement/recommendation. The information held in the Policy, which would include the risk categories, should not be made public due to the sensitivity of its contents.
15. The Policy must allow Members, officers and external auditors to be clear about the levels of verification necessary. It must be reviewed annually but not changed in-year as this would complicate the audit process.
16. Every participating LA will need a robust baseline against which to record the impact of RBV. The source of this baseline is for the LA to determine. Some LAs carry out intensive activity (along the lines of the HB Review) to measure the stock of fraud and error in their locality. We suggest that the figures derived from cells 222 and 231 of SHBE would constitute a baseline of fraud and error currently identified by LAs.
17. Performance using RBV would need to be monitored monthly to ensure its effectiveness. Reporting, which must be part of the overall Policy, must, as a minimum, include the % of cases in each risk category and the levels of fraud and error detected in each.

### **How RBV claims will be certified?**

18. Auditors will check during the annual certification that the subsidy claim adheres to the LA's RBV Policy which will state the necessary level of verification needed to support the correct processing of each type of HB/CTB claim. The risk category will need to be recorded against each claim. Normally the LA's benefit IT/clerical system will allow this annotation.

<sup>1</sup> Whilst DWP is of the opinion that the use of IT will support the success of RBV, it does not in anyway endorse any product or company

<sup>2</sup> The same safeguard must be applied to clerical systems

## Other considerations

19. The sample selection for HB/CTB cases will not change i.e. 20 cases will be selected for each headline cell on the claim form. The HB COUNT guidance used by the external auditors for certification will include instructions for how to deal with both non-RBV and RBV cases if selected in the sample. For non-RBV cases, the verification requirements will remain the same i.e. LAs will be expected to provide all the documentary evidence to support the claim.

## What are the subsidy implications?

20. Failure by a LA to apply verification standards to HB/CTB claims as stipulated in its RBV Policy will cause the expenditure to be treated as LA error. The auditor will identify this error and if deemed necessary extrapolate the extent and, where appropriate, issue a qualifying letter. In determining the subsidy implications, the extrapolation of this error will be based on the RBV cases where the error occurred. For this reason, it is important that RBV case information is routinely collected by ensuring that LA HB systems incorporate a flag to identify these RBV cases. If sub-populations on RBV cases can not be identified, extrapolations will have to be performed across the whole population in the particular cell in question.
21. We will now work with the respective audit bodies to incorporate this into the COUNT guidance. If you have any queries please contact Manny Ibiayo by e-mail [HBCTB.SUBSIDYQUERIES@DWP.GSI.GOV.UK](mailto:HBCTB.SUBSIDYQUERIES@DWP.GSI.GOV.UK)



This Report will be made public on 6 September 2016

Report Number **C/16/48**

**To: Cabinet**  
**Date: 14 September 2016**  
**Status: Key Decision**  
**Corporate Director: Tim Madden, Organisational Change**  
**Cabinet Member: Councillor David Monk, Leader of the Council**

**SUBJECT: MEDIUM TERM FINANCIAL STRATEGY 2017/18 TO 2020/21**

**SUMMARY:** The Medium Term Financial Strategy (MTFS) is the Council's key financial planning document. It puts the financial perspective on the council's Corporate Plan priorities, expressing the aims and objectives of various plans and strategies in financial terms over the four year period ending 31<sup>st</sup> March 2021. It covers both revenue and capital for the General Fund and the Housing Revenue Account. Also included are the Council's reserves policies. The MTFS is a key element of sound corporate governance and financial management.

#### **REASONS FOR RECOMMENDATION:**

Cabinet is asked to agree the recommendations set out below because:-

- (a) The MTFS is the council's key financial planning document.
- (b) The strategy defines the financial resources needed to deliver the council's corporate objectives and priorities and covers the financial implications of other key strategies.
- (c) The council needs to be able to carry out an early assessment of the financial implications of its approved policies and strategies and also external financial pressures facing the authority to ensure that it has robust budgeting and remains financially viable.

#### **RECOMMENDATIONS:**

**Cabinet is asked to recommend to Council:**

1. To receive and note Report C/16/48.
2. To recommend that the Medium Term Financial Strategy, as appended to this report, is adopted.
3. To agree to the MTFS and Efficiency Plan for submission to DCLG as set out within the documents.
4. To agree the flexible use of capital receipts as set out in the report to fund the digital delivery programme.

## **1. THE MEDIUM TERM FINANCIAL STRATEGY (MTFS)**

- 1.1 The MTFS is the council's key financial planning tool and underpins the strategic approach to financial planning. It is a live document which needs to be periodically reviewed to reflect changing priorities and objectives. As the MTFS outlines the financial resources necessary to deliver strategic priorities, it should not be viewed in isolation but as part of the wider corporate process.
- 1.2 The council last reviewed the MTFS at its meeting of 18 November 2015. The attached MTFS has updated the document agreed at that point based on the work completed to date in preparation of the 2017/18 budget. The detailed budget strategy, which sets out the detailed preparation for the 2017/18 budget, will be presented to Cabinet at its meeting of 18<sup>th</sup> November 2016. The MTFS provides the medium term view of the financial position of the Council.
- 1.3 The attached document reflects a summarized version of the key financial elements facing the Council. It contains all the pertinent points and in particular updates the financial projections which are of importance at this stage of the process and links to the new corporate plan. The intention is, once the 2017/18 budget is completed, to refresh this document and to present the full version to Cabinet and Council which will take into account the final budget of the council which will be agreed in February 2017.
- 1.4 As in recent years, local authority financial management is set against a background of uncertainty and the MTFS is subject to influence outside the authority's control. Nationally, the uncertainty following the "Brexit" vote, the change of Political leadership and any potential impact on the economy and public finances means that all local authorities need to try and plan for future uncertainties. In addition, there are a number of pieces of local government legislation currently under consideration which will mean that the environment for local authorities is changing and they will need to adapt to new circumstances. Key changes include the future funding arrangements for Business Rates, the end of the Revenue Support Grant and any structural or devolution proposals which will affect councils in different areas according to local circumstances. These will have a significant impact upon the financial profiling of the Council. The impact of decisions arising from council policy could also affect the MTFS and therefore further iterations of the MTFS will reflect the financial implications of those decisions taken.
- 1.5 The current strategy has been developed in the context of this period of uncertainty. As such, assumptions have had to be made with regard to future income streams and assessments of future government grant. Although these are very much best estimates, they are taken in the context of the current economic climate and the expected continuation of the desire to eliminate the current deficit. As such, a difficult but realistic forecast of income trends has been incorporated into this MTFS model.
- 1.6 The current MTFS forecasts a cumulative funding gap of £2.960 million over the lifetime of this MTFS. This is based on a 2% annual council tax

increase for the period of the MTFS. These will be subject to Political decisions at the appropriate time. The table below also shows the cumulative deficit over the period of the MTFS.

	2017/18 £000	2018/19 £000	2019/20 £000	2020/21 £000
Deficit	0	473	1,444	2,960

- 1.7 The budget strategy previously referred to will set out the proposals and investments for 2017/18 in greater detail. Further work will be commencing to address the deficit in future years including looking at future income streams and developments.
- 1.8 As part of the 2016 Finance Settlement, the government indicated it wished to offer local authorities the option of producing an “Efficiency Plan” in exchange for “locking into” the four year settlement for Revenue Support Grant as set out commencing in 2016/17. The format of that plan is undefined however it is clear that the government does not wish to create a significant bureaucracy and will expect it to contribute to financial management of the authority.
- 1.9 The MTFS to a large extent covers the requirements of the efficiency plan, however there has been additional text added to make the links to wider corporate documents which will shape, influence and direct the future role of the Council including its financial stability. The statement needs to be presented to the DCLG by the 14<sup>th</sup> October 2016 and the MTFS represents the plan for submission to the DCLG.
- 1.10 A further development the government has introduced is to allow greater flexibility in the use of capital receipts. This allows capital receipts to be used to fund revenue investments provided they meet certain criteria which are set out within the MTFS. This allows the investments needed to be drawn from capital rather than needing to be taken from revenue thus increasing the flexibility for the Council. The MTFS sets out the expected current savings arising from the digital delivery programme and sets out the use of £980,000 capital receipt from 3 – 5 Shorncliffe Road to fund these. As set out, it is prudently expected that this will make a return within 2 years. The aim is to invest to generate future revenue savings for the Council. The recommendation in this report seeks approval to this approach to generate future savings for the council.
- 1.11 The MTFS is included at Annex A to this report and sets out the financial forecast for the Council.

## **2. RISK MANAGEMENT ISSUES**

- 2.1 A summary of the perceived risks follows:

Perceived risk	Seriousness	Likelihood	Preventative action
The Council does not	High	Low	Financial Services

remain up to date up to date with changes in legislation and other developments.			are keeping abreast of finance changes.  Heads of Service to keep up to date with / communicate changes to their areas of work.
Assumptions may be inaccurate	High	Medium	Budget monitoring process is up to date and a close eye is being kept on financial developments nationally. Assumptions are constantly reviewed and amended in light of information received.
Local Government Finance Settlement is worse than anticipated.	High	Medium	Realistic assumptions have already been included and any new information is being assessed as to its likely impact. Reduction in grant funding reduces external impact.
MTFS becomes out of date	High	Low	This is reviewed annually through the budget process.

### **3. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS**

#### **3.1 Legal Officer's Comments (DK )**

There are no legal implications arising out of this report.

#### **3.2 Finance Officer's Comments (TM)**

There are no direct financial consequences arising from this report. However the strategy will influence the management of the council's resources ensuring that the focus is on the objectives and targets outlined in the corporate plan.



### 3.3 **Diversity and Equalities Implications (TM)**

There are no diversity and equality implications arising from this document. When the budget for 2017/18 is prepared, an Equalities Impact Assessment will be completed.

## 4. **CONTACT OFFICERS AND BACKGROUND DOCUMENTS**

Councillors with any questions arising out of this report should contact the following officer prior to the meeting

*Tim Madden, Corporate Director, Organisational Change*  
*Tel: 01303 853371 E-mail: tim.madden@shepway.gov.uk*

The following background documents have been relied upon in the preparation of this report:

No background documents have been used.

### **Appendices:**

Medium Term Financial Strategy 2017/18 – 2020/21

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# MEDIUM TERM FINANCIAL STRATEGY

## 2017/18 TO 2020/21

(Version produced in August 2016)



**Folkestone**  
Hythe & Romney Marsh  
Shepway District Council



## MEDIUM TERM FINANCIAL STRATEGY

### Introduction

This document sets out the key challenges and approach of the Council in relation to Shepway District Council's Medium Term Financial Strategy ('MTFS') for the next four years. The MTFS provides an integrated view of the whole of the council's finances and it also maps out the objectives to be secured, policies to be applied and risks to be managed over the period.

Local government has taken a disproportionately large share of the reductions in public expenditure as part of efforts to balance the nation's finances. In response to this financial challenge, local government has innovated, streamlined services and increased productivity. The Government is likely to continue with plans to devolve more responsibilities to local government and expect these to be funded locally principally through business rates. The devolution of business rates is intended to be fiscally neutral but the details of how this will work have yet to be determined. This will bring both risk and opportunity for the council.

The 'BREXIT' vote to leave the EU will have profound consequences on the UK and the political landscape but the Chancellor's assurance to continue long term grant funding won before the UK leaves will protect the council's position on any potential EU funded projects.

The MTFS is a critical document in setting out the council's approach to establishing a strong financial base to enable the council's policies and priorities to be delivered. Within the document are some key issues which will need to be tackled. The annual budget setting process will set out the detailed actions required to meet these but will in all cases be consistent with the direction and objectives of the MTFS.

### Shepway Council - the Current Position

Shepway Council covers an area of 140 square miles and has a population of just over 100,000 people with approximately 48,200 dwellings in the district. The council has responsibility for a wide range of services including waste collection, planning, environmental enforcement, housing and homelessness, parking and grounds maintenance. In 2016/17 it planned to spend approximately £16.1 million per annum net revenue expenditure on services.

### The Council's Aspirations

The vision and strategic objectives of the council are laid out in the Corporate Plan 2013 to 2018 and are shown below:

#### **The vision for Shepway:**

**Prosperous and Ambitious** – Working for more jobs and homes in an attractive district.

As a council, to help achieve the vision for the district, our five strategic

objectives are:

- Boost the local economy and increase job opportunities
- More homes
- Listening to local people
- Support an attractive and vibrant place to live
- Deliver value for money

The council will have a particular emphasis on supporting the growth and sustainability of the economy to increase prosperity, to increase the number of houses in a sustainable manner over the longer term and on improving our effectiveness and efficiency through service design and digital delivery. By focusing on these key priorities, the council will be able to direct resources to achieving its key strategic objectives and to ensure sustainability in its activities.

### **Strategic Financial Objectives**

The MTFS covers all areas of the council spending and is underpinned by the strategic financial objectives as set out below:

- To maintain a balanced Budget such that expenditure matches income from Council Tax, fees and charges, and government and other grants and to maintain that position.
- To maximise the council's income by setting fees and charges, where it has the discretion and need to do so, at a level to ensure at least full cost recovery, promptly raising all monies due and minimising the levels of arrears and debt write offs.
- To ensure a long term sustainable view is taken of any investments and the appropriate risk analysis is provided in considering those.
- To set a rate for Council Tax which maximises income necessary for the council to deliver its strategic objectives but ensures that government referendum limits are not exceeded. The % increase will be reviewed annually.
- To ensure resources are aligned with the council's strategic vision and corporate priorities.
- To actively engage local residents and other interested stakeholders in the financial choices facing the council.
- To maintain an adequate and prudent level of reserves.

The council faces a number of difficult decisions if it is to achieve its corporate priorities. Effective prioritisation and management of resources therefore continues to remain significant for the coming years.

### **The Efficiency Plan**

The government has offered local authorities a minimum grant envelope for the 4 year period of this strategy. In order to secure this, the council must produce an efficiency strategy. Although the strategic financial approach is set out within this document, it is more than just an MTFS. It represents the council's ambition to not just to survive financially, but to thrive and develop a sustainable future for the district. The key strands of this are:

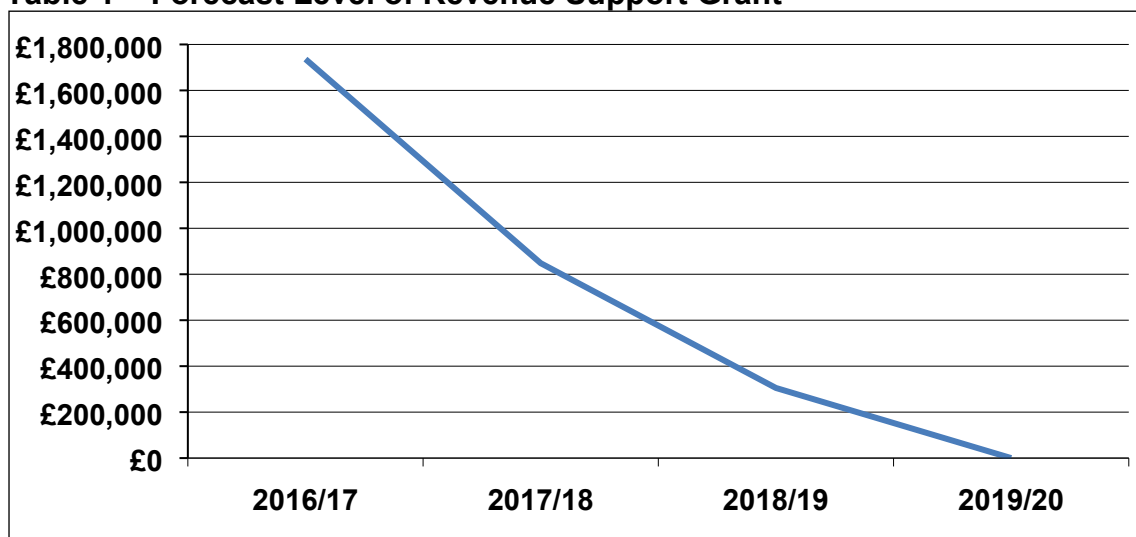
- The Corporate Plan 2013 – 2018 the key objectives of which are set out above
- The Shepway Economic Development Strategy 2015 - 2020
- The councils digital delivery programme
- The flexible use of capital receipts (see later in this document)
- The Medium Term Financial Strategy
- The HRA Business Plan
- The investment in longer term strategic developments to secure the financial future of the council
- The Expression of Interest to build a garden town at Otterpool Park with a long term financial benefit for the council and establishing sustainable communities for the future
- A sustainable and prudent reserves policy to underpin the financial resilience of the council
- Considering opportunities for effective working with other authorities

The range of documents provides the overall strategy of the council in delivering its future agenda and as a combination they are owned by the council as a whole. This MTFS brings together the financial strands of that approach in the context of the current financial climate.

### **Financial Pressures and Projections**

The council is part of the local government sector which has been one of the areas hardest hit by central government's deficit reduction plan. The spending review 2015 confirmed a transition away from direct central government grant. The current financial forecast anticipates that 2018/19 will be the final year of Revenue Support Grant from the government. **Table 1** below shows the current level of grant and the forecast reducing levels of grant over the period of this strategy.

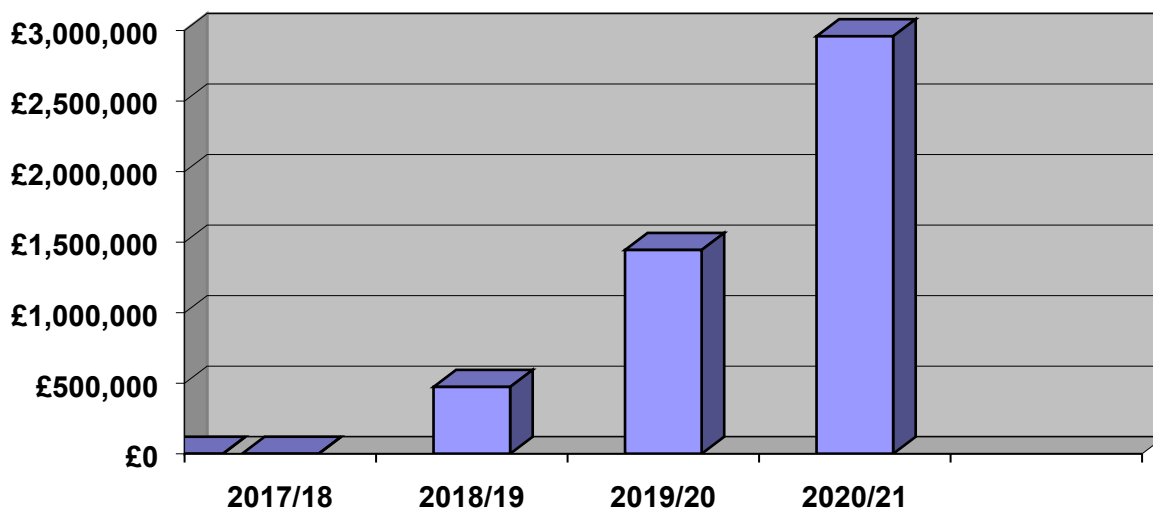
**Table 1 – Forecast Level of Revenue Support Grant**



The chart shows that the forecast level of grant for 2019/20 is nil and this is expected to be the “new norm”. In some respects the reduction in funding and the elimination in grant are consistent with the government’s desire to see more money raised locally to provide local services. Proposals to localise business rates by 2020/21 will place significant responsibility in local areas with significant risk but also with opportunity. It also requires the Council to take control of its financial future in the knowledge that the uncertainty around the level of central government grant is no longer a factor in planning the authority’s finances.

This reduction in grant, when taken together with a range of elements including inflation, legislation and the general economic climate have meant that the financial projections for the council continue to show an ongoing deficit which the financial planning processes of the council will need to address. The level of the deficit projection for the period to 2020/21 is detailed in **Appendix 1** and is shown in **Table 2** below:

**Table 2 – Cumulative Deficit over the MTFS period**



The above represents the cumulative deficit position based on the current actions and an annual 2% increase in council tax. This is based on the actions for 2017/18 being fully implemented. Whilst the position is challenging, it does represent an achievable financial position at least over the short to medium term. It is worth noting that these challenges are being faced across the country by the local authority sector and are not in themselves unique to Shepway.

The Council has developed a number of approaches in recent years to balance its books. This has included:

- Reviewing the level of council tax. A 1% increase or decrease will have an effect of approximately £85,000 income in a year for Shepway District Council.
- Alternative income streams. Looking to generate future income sources through investments in the district which can generate a return over the longer term for the council including the development of Oportunitas Ltd to increase those income streams. The recent purchase of land at Otterpool Farm and the submission of an Expression of Interest for a garden town also represent a desire to establish much longer term income streams and capital resources and using sites such as Princes Parade to fund further investment in the district.
- Continuing to transform the way we work to maximise operational efficiencies. Following on from the “ways of working” project, further investment is to be made on utilising digital delivery to gain significant efficiencies but also to improve the customer experience.
- Take advantage of commercial opportunities wherever possible to cover costs and to review our fees and charges.
- Review of previous years’ out turn and our base budget to ensure maximum value is obtained from those resources already allocated – effectively to ensure financial discipline and good housekeeping are maintained
- Taking advantage of any grants where they align with the council’s priorities but also to ensure there are arrangements in place for when those grants cease



- Considering the use of reserves in a sustainable and prudent manner to support the council's strategy.

To maintain the council's financial standing it is important that it continues its proactive approach to financial planning and ensures that the savings plans are deliverable and that any investments are focussed on the financial health of the authority.

## **Council Tax**

The Council Tax is one of the key funding streams for the council and accounts for approximately 50% of the council's income. Although this is a significant funding source, it is subject to restrictions by central government. The Localism Act included a requirement to hold a local referendum if any Council Tax increase is deemed 'excessive' and this level is currently set at 2% by central government.

If a council wishes to increase its Council Tax levy beyond pre-determined levels it will have to produce a 'shadow budget' at the maximum level allowed and implement this if the referendum is lost and also to bear the costs of any referendum. It should be noted that the government has the ability to either increase or decrease the level at which a referendum would be triggered.

The government has provided funding in recent years for a council tax freeze however there was no freeze in 2016/17 and it has been assumed that there will not be a freeze over the period of this strategy. Appendix 1 has assumed a council tax increase of 2% per annum for the period of this strategy.

## **Use of Reserves**

The council has a level of reserves which provides it with some protection against the difficult economic times. The level of reserves currently held by Shepway gives it a secure financial base however the changing environment means the approach to reserves will change for the following key reasons:

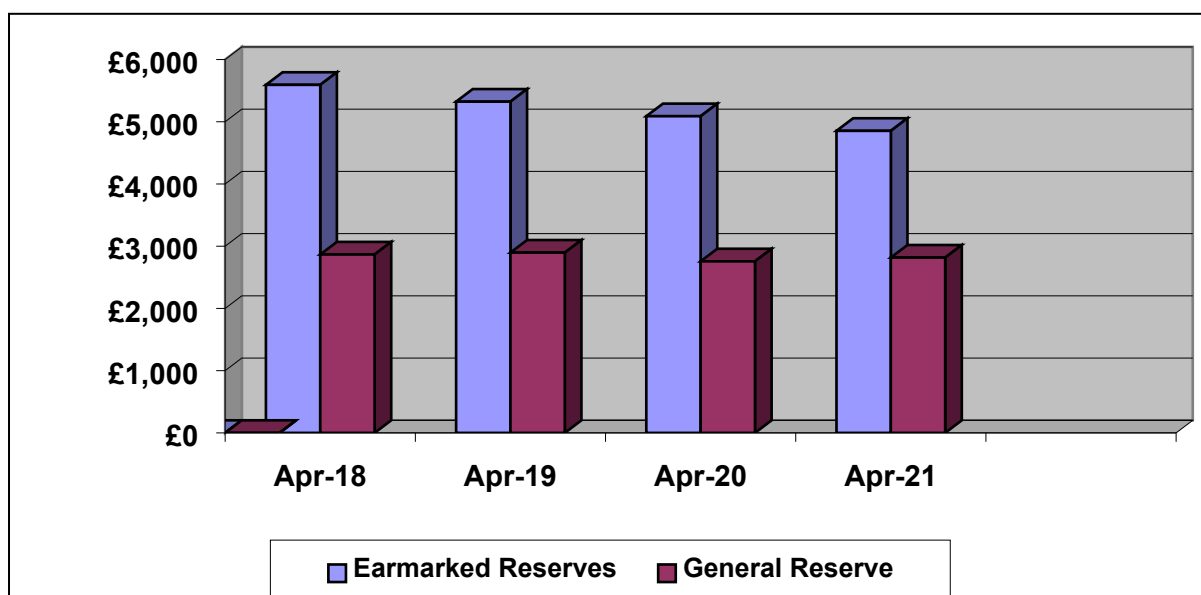
Firstly, the reducing level of government grant as identified above means that it is vital to consider how to achieve income streams in the future. Whilst it is feasible to borrow additional funds and in many ways this is appropriate given the current low interest environment, this does come at a cost so at times it can be more prudent to apply the reserves especially given the lack of return on any cash holdings.

Secondly, central government has indicated that local authorities should look to use their reserves as part of their financial planning and not to hold high levels of reserves without a clear purpose.

**Appendix 2** to this report sets out the council's overall reserves policy and the context in which decisions are made as to the appropriate level of reserves.

The council's prudent approach to reserves means there is flexibility as to how these can be applied in future. The projected level of reserves for the next 4 years is shown as a bar chart in **Table 3** below. The actual figures are shown in Appendix 2.

**Table 3 – Level of Reserves for MTF period 2017/18 to 2018/19**



The prudent use of reserves to support investments alongside borrowing whilst holding a level of reserves which provides a strong financial base will be a balancing act over the medium term.

### **New Homes Bonus (NHB)**

The New Homes Bonus was introduced in 2011/12 and has become an important funding source for councils. It is designed by Central Government to incentivise new house building. Local authorities are rewarded with a financial bonus, equal to the national average Council Tax on each additional property built and paid for the following six years after the occupation as a non ring fenced grant. This bonus is split in two tier areas 80% to the District Council and 20% to the County Council and includes where properties which have been empty for more than six months are brought back into use. There is also an enhancement for affordable homes. This provides a bonus system that gives a fiscal incentive to encourage local authorities to facilitate housing growth. The first bonus was paid in the financial year 2011/12 and builds successively in the following financial years to 2016/17 after which the bonus will be paid on a rolling basis. However, after the initial funding that the Government has set aside for the scheme has been exhausted, the cost of paying the New Homes Bonus will be met by top slicing formula grant.

The future of the New Homes Bonus is currently being consulted upon with one of the options being a reduction in the time it is paid to four years rather than six. This has been built into the projections for the reserves strategy but will need to be reviewed once the outcome of the consultation is known. Shepway currently utilises half of its existing New Homes Bonus to support services with the remaining amounts being set aside within a reserve to fund the additional cost of services.

Whilst this strategy has allowed the council to build up its reserves which will give it some future stability, careful attention will need to be given to any changes within this income stream particularly towards the end of this strategy and beyond and whether it will continue in the longer term as the financial landscape changes.

### **Business Rates (Non Domestic Rates)**

From 2013, the government introduced a scheme through which local authorities would be able to retain a proportion of any business rates growth above a set baseline. The purpose was to give local authorities a financial incentive to encourage and foster economic growth within their area and to work collaboratively with other authorities and business organisations to achieve that growth. Whilst this scheme has been broadly welcomed by local authorities, there are concerns over the potential volatility of this income stream with the level of appeals and that even a small variation in the overall revenue generated can carry a significant financial impact. The government is currently undertaking a review of how business rates operate and has undertaken a major consultation exercise with a view to achieving 100% localisation of business rates by the end of the current parliament.

With regard to the MTFs, Shepway has welcomed the emphasis on economic growth but has been cautious about building this into the base budget. Part of this is due to the impact of appeals and the volatility of the income which makes it more complex to forecast. As such, any surpluses have been placed within a reserve until there is a degree of certainty before they can be used which may well not be until the following financial year. This is prudent management to manage the natural fluctuations of the business cycle. The council also, in 2015/16, joined the Kent business rates pool on the basis of financial modelling which demonstrates a financial gain to the authority due to a reduction in the amount being paid to central government. This has been extended into 2016/17 and is under consideration for future years.

The Chancellor of the Exchequer has announced further changes to the Business Rates regime with proposals being presented which will devolve 100% of business rates to local government rather than the current 50%. These proposals are currently under discussion and will be implemented by the end of the current Parliament. It is anticipated that the proposals will be fiscally neutral at a national level and that there will be additional responsibilities given to councils as part of these arrangements. These are subject to the current consultation with legislation being introduced in April 2017.

### **Housing Revenue Account**

The council has a separate account, the Housing Revenue Account (HRA) which supports local authority housing throughout the district. The HRA is now required to produce a 30 year business plan which demonstrates the affordability and sustainability of the management and investment in the council's housing stock. This full plan was reviewed and agreed by the council's Cabinet at its meeting of 23 March 2016 and can be found at the following link.

<http://www.shepway.gov.uk/moderngov/documents/s18931/rcabt20160323%20appendix%20to%20HRA%20Business%20Plan.pdf>

The main strategic objectives of the HRA business plan are:

- To provide high quality affordable homes that meet fully the Shepway housing standard.
- To provide an efficient and effective housing management service, and invest in service improvements.
- To maximise the recovery of rental income.
- To build new council homes.

The refreshed HRA business plan agreed the following principles:

- The repayment of the council's HRA debt by year 25 of the business plan (by around 2040-41)
- The implementation of a fully funded Shepway Housing Standard Programme throughout the 30 year life of the Business Plan.
- The provision of resources for a new build and housing acquisition programme. Due to the recent policy changes announced by the Government, it has been necessary to reduce our delivery target of up to 300 homes over the next 10 years, to up to 200 homes over the next 10 years.
- A minimum balance of £2million to be retained within the HRA at all times.
- Minimum borrowing headroom of £2million to be retained at all times.
- The plan should provide sufficient resources to fund environmental improvements to the communal parts on the council's estate areas.
- A detailed review of the Business Plan should be completed every year (previously stated as every 5 years)

### **Medium Term Capital Programme**

The Medium Term Capital Programme sets out how capital resources are used to achieve the council's vision and corporate priorities. Funding for capital projects is limited and where possible external funding is used to supplement the programme. The council has an affordable Capital Programme and this is assessed against business cases taking into account future resources to support projects. A strategy has been adopted which will look to utilise capital receipts to support investments for the council. Demand for financing potential new projects continues to outweigh the funding available and developments such as Princes Parade and Otterpool Park will need to be prioritised as part of the programme.

The main strategic objectives of the Capital Programme, which provide the underlying principles for financial planning, can be summarised as follows:

- To maintain a five year rolling Capital Programme which remains within the approved affordable, sustainable and prudential limits.

- To ensure capital resources are aligned with the council's strategic vision and corporate priorities by ensuring all schemes are prioritised according to the council's prioritisation methodology.
- Prudential Borrowing to be undertaken to support the councils priorities where there is a business case for it to do so and there are sufficient monies to meet in full the implications of capital expenditure, both borrowing and running costs.
- To maximise available resources by actively seeking external funding to support council priorities and disposing of surplus assets.
- To use internal resources alongside external resources where appropriate to support the capital programme and minimise any borrowing costs.

The council forecasts its capital programme over a 5 year period and the latest position is set out in the report to council on the 18<sup>th</sup> February 2016. This can be found at:

<http://www.shepway.gov.uk/moderngov/ieListDocuments.aspx?CId=122&MId=2967&Ver=4>

### **Flexible Use of Capital Receipts**

In March 2016 the government produced Statutory Guidance on the Flexible Use of Capital Receipts. Proper accounting practices mean that capital receipts can only be used to support capital expenditure. However, the purpose of the guidance is to give flexibility as to the use of capital. In summary, the guidance allows councils to use capital receipts from the disposal of property, plant and equipment assets received in the period 1 April 2016 to 31 March 2019 to fund revenue spending which is forecast to generate ongoing savings to an authorities or several authorities, and / or to another public sector bodies net service expenditure.

The guidance itself gives examples of the type of expenditure that can be funded from this source although it is not exhaustive. This includes sharing back office services, funding the cost of service reconfiguration where this leads to revenue savings and driving a digital approach to the delivery of more efficient services. A fuller list is provided in the guidance.

This provides an opportunity for the council to invest in some significant projects during this period to embed efficiencies for future years. A key project at the present time is delivering a digitally enabled service delivery which will reduce costs and also improve customer service delivery. The use of capital receipts to invest in this programme will result in significant ongoing savings for the council.

The initial work has identified a number of key projects which are being worked upon and are at different levels of progression. These are set out below:

Project	Comments	Estimated annual savings (£)
Revenues and Benefits	Transformation of service as identified for 2016/17 budget	350,000
Finance	Review of service and increase in resilience	75,000
Self service virtual parking permits and vouchers	Automating renewals to improve service reduce customer contact and to prevent additional costs as number of schemes develop.	33,600
Events	Improve customer experience and management efficiencies within Communities restructure	10,000
Website project	Establishing platform for future delivery	30,500
Licensing	Increase customer satisfaction through automation of processes. Future savings to be identified	tbd

The savings identified to date are approximately £499,100 per annum although this is based on a cautious approach at present. Initially the capital receipt from the sale of 3 – 5 Shornccliffe Road of £980,000 has been earmarked to support investments in the IT infrastructure to deliver the savings which represents a return in just over 2 years.

As further initiatives are developed, this element of the strategy will be presented to the council alongside the respective efficiency project.

### **Risks and Sensitivities**

In considering the future projections, it is recognised that there are unknowns which could impact upon the existing forecasts. The MTFs should be seen not as a static document but rather one that is constantly evolving as the environment around it changes. Some of the key risks and sensitivities which need to be monitored are mentioned below.

- Economic conditions. The impact of the economic cycle will need to be considered particularly in relation to business growth, inflationary pressures and interest rate movements. The impact of changes and any impact on public finances will need to be fully evaluated on the financial model.

- Impact of “Brexit”. Whilst the government has underwritten EU funding agreed prior to the 2016 Autumn Statement, the impact of any departure from the EU is one that is unclear and may impact both politically and economically.
- Government Finance Legislation. There are key pieces of government legislation which will impact upon the future financial position of the council. In particular the impact of the localisation of business rates and any additional responsibilities will need to be fully evaluated.
- Other Government Legislation. There are a significant number of political initiatives particularly in relation to localisation and the role of local government. These will need to be assessed for their relevance to Shepway and the impact on future finances.
- Buoyancy of income streams. These will be sensitive to changes in consumer confidence and the economy so will need to be closely monitored.

## **Conclusion**

The MTFS represents the collation of the key financial documents which looks to forecast the likely financial position the council will be facing over the next 4 years. It is the critical financial planning tool for the council and will provide the overall steer for the ongoing discussions throughout the annual budget cycles in dealing with the current economic climate.

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## Appendix 1

	<b>Orig Base</b>				
	<b>2016/17</b>	<b>2017/18</b>	<b>2018/19</b>	<b>2019/20</b>	<b>2020/21</b>
	<b>£</b>	<b>£</b>	<b>£</b>	<b>£</b>	<b>£</b>
<b>Heads of Service</b>					
CMT and Leadership Support	812,540	812,540	812,540	812,540	812,540
Head of HR	918,080	918,080	918,080	918,080	918,080
Communications	256,490	256,490	256,490	256,490	256,490
Democratic Services and Law	4,872,720	4,871,720	4,901,720	5,011,720	4,871,720
Head of Finance	4,365,660	4,327,830	4,327,830	4,327,830	4,327,830
Head of Communities	2,533,540	2,519,820	2,369,820	2,369,820	2,369,820
Head of Planning	764,890	852,890	852,890	852,890	852,890
Head of Commercial and Technical	2,481,060	2,474,060	2,474,060	2,474,060	2,474,060
Head of Strategic Development	329,240	288,620	288,620	288,620	288,620
Head of Economic Development	555,880	992,880	517,880	455,880	455,880
Changes not attributed to services	0	110,605	112,817	115,638	117,950
Recharges to non GF accounts	-1,868,500	-1,947,951	-1,918,001	-1,955,240	-1,993,883
Unallocated net employee costs	64,000	292,000	597,000	904,000	1,413,000
<b>Head of Service net expenditure</b>	<b>16,085,600</b>	<b>16,769,584</b>	<b>16,511,746</b>	<b>16,832,328</b>	<b>17,164,998</b>
Internal drainage board levies	435,830	444,489	453,379	462,447	471,696
Interest payable and similar charges	576,230	525,230	460,230	438,230	432,230
Interest and investment income	-604,510	-441,000	-509,000	-461,000	-474,000
New Homes Bonus grant	-1,949,620	-912,842	-659,262	-347,064	0
Other non-service related grants	-762,650	-742,353	-693,975	-710,075	-723,276
	<b>13,780,880</b>	<b>15,643,108</b>	<b>15,563,118</b>	<b>16,214,866</b>	<b>16,871,648</b>
Net transfers to/from reserves	-1,707,900	-995,559	-269,747	-233,891	-234,880
Minimum revenue provision adjust.	405,130	405,130	405,130	405,130	405,130
Financing of fixed assets	5,373,600	2,154,000	138,000	138,000	138,000
	<b>17,851,710</b>	<b>17,206,679</b>	<b>15,836,501</b>	<b>16,524,105</b>	<b>17,179,898</b>
Transfer to/from Collection Fund	-588,670	51,600	-100,000	-100,000	-100,000
Net business rates income	-3,799,080	-3,905,896	-3,984,613	-4,084,978	-4,167,277
Revenue support grant	-1,736,220	-848,143	-305,135	0	0
	<b>11,727,740</b>	<b>12,504,241</b>	<b>11,446,753</b>	<b>12,339,127</b>	<b>12,912,621</b>
Council Tax Requirement	-9,011,680	-9,236,156	-9,465,853	-9,690,518	-9,920,812
Surplus/deficit to General Reserve	2,716,060	3,268,085	1,980,900	2,648,609	2,991,809
Target surplus/deficit to Gen Reserve	2,716,060	1,764,000	-30,000	140,000	-60,000
<b>Shortfall</b>	<b>0</b>	<b>1,504,085</b>	<b>2,010,900</b>	<b>2,508,609</b>	<b>3,051,809</b>
Less CMT savings identified following budget workshops		-1,157,021	-1,190,000	-1,190,000	-1,190,000
Use of New Homes Bonus (2016/17 allocation)		-347,064	-347,064	-347,064	-347,064
<b>Revised Shortfall - in year</b>		<b>0</b>	<b>473,836</b>	<b>971,545</b>	<b>1,514,745</b>

Revised Shortfall (cumulative)

0    473,835    1,445,380    2,960,125

## **Appendix 2 – Reserves Policy**

### **INTRODUCTION**

The establishment, monitoring and review of the levels of reserves and balances are an important element of the council's financial management systems and financial standing.

The Chief Finance Officer (S151 Officer) is required by law to formally report to the council her/his opinion on the adequacy of the council's reserves. Irrespective of this, a well managed authority is clear about the reserves it needs now and in the future to support its service aspirations, whilst at the same time delivering value for money within a climate of significant resource pressure and economic/ social risk.

This policy does not cover non-distributable reserves required to support financial accounting transactions e.g. the Revaluation Reserve, Capital Adjustment Account and Pension Reserve. (Non-distributable reserves are those that cannot be used for revenue or capital purposes.)

Reserves can be held for four reasons:

- A working balance to help cushion the impact of uneven cash flows and avoid unnecessary temporary borrowing.
- A contingency to cushion the impact of unexpected events or emergencies.
- A means of building up funds to meet known or predicted liabilities.
- A means of setting aside sums for future identified uses and / or investments

Such reserves are generally referred to as earmarked reserves.

### **WHAT ARE RESERVES?**

There is no clear definition of reserves even though reference is made to reserves in legislation. The Chartered Institute of Public Finance and Accountancy (CIPFA) states "amounts set aside for purposes falling outside the definition of provisions should be considered as reserves." Provisions are required for any liabilities of uncertain timing or amount that have been incurred.

Generally there are two types of reserves, those that are available to meet revenue or in some cases capital expenditure (Usable) and those that are not available to finance revenue or capital expenditure (Unusable). Useable reserves result from events that have allowed monies to be set aside, surpluses or decisions causing anticipated expenditure to have been postponed or cancelled. They can be spent or earmarked at the discretion of the council.

The council must manage its reserves in accordance with its strategic longer term planning process.

## LEVEL OF RESERVES

As mentioned above the council's reserves can be regarded as general and earmarked reserves. In addition, the council maintains a Usable Capital Receipt reserve.

### Projected Levels

The projected level of reserves over the next five years is summarised at the table below.

#### Projected level of reserves over next 5 years

	1 April 2016 £'000	1 April 2017 £'000	1 April 2018 £'000	1 April 2019 £'000	1 April 2020 £'000
<b>General Reserve</b>	<b>5,707</b>	<b>4,631</b>	<b>2,867</b>	<b>2,897</b>	<b>2,757</b>
Earmarked Reserves:					
Vehicles, Equipment and Technology	942	619	640	668	694
Leisure	246	296	196	196	196
Carry Forwards	1,650	256	256	256	256
Non Domestic Rates	2,460	1,519	1,054	1,054	1,054
Invest to Save	381	381	366	366	366
Corporate Initiatives	1,226	606	345	283	283
New Homes Bonus	1,757	2,356	2,385	2,160	1,907
IFRS Reserve	84	67	49	38	30
Economic Development	2,251	487	300	300	300
Other	32	12	12	12	12
<b>Earmarked Reserves - Total</b>	<b>11,029</b>	<b>6,599</b>	<b>5,603</b>	<b>5,333</b>	<b>5,098</b>
Housing Revenue Account reserve	5,865	2,946	1,989	2,009	2,016
Usable Capital Receipts Reserve	6,391	2,966	2,966	2,966	2,966

As part of its MTFs, the council also adopts some fundamental principles as to how reserves are used:

- The reserves must only be used to fund one off expenditure.

- Any recurring item may only be funded from reserves if plans are in place to replenish the reserve within 12 months.
- Any unplanned revenue income receipt should be put in reserves pending any future decisions as to its use.
- Reserves should be maintained at a sustainable level to ensure an adequate working balance is maintained.
- Reserves may be used as part of a planned process to balance the budget in order to avoid short term responses which may not be in the best interests of the council.

The council has prudently built up its reserves in recent years to be able to provide for its priorities when required. In particular, the need to consider alternative income streams through investments to compensate for the reduction in grants from central government. The use of the reserves to support this objective will need to be fully considered on a business case basis and will be used to approve any relevant funding.

The use of reserves is a critical part of the council's budget strategy and the level of reserves is kept under ongoing review. Any future calls on the reserves are considered by looking at the whole position and ensuring minimum reserve levels are adhered to. It is vital that the future needs of the authority such as through the VET reserve are continually refreshed and updated and that earmarked reserves are applied appropriately.

## **ASSESSING THE ADEQUACY OF RESERVES**

The Chartered Institute of Public Finance and Accountancy (CIPFA) state that the Institute 'does not accept a case for introducing a statutory minimum level of reserves, even in exceptional circumstances'. It does however confirm that authorities should make their own judgment on such matters, taking into account all relevant local circumstances on the advice of their Chief Finance Officer.

The Local Government Act 2003 requires the Chief Finance Officer to formally report on the adequacy of the proposed financial reserves.

To arrive at assessing the adequacy of reserves a number of issues need to be addressed:

- What are the strategic, operational and financial risks facing the authority?
- Does the authority comply with the requirements to ensure that there is an adequate system of internal control?
- Are the key financial assumptions in formulating the council's budget robust and reasonable?
- Does the council have adequate financial management and cash flow arrangements?

In addition there are a number of questions an authority can ask to demonstrate that it is managing its affairs satisfactorily, such as:

- What is the track record of the council in its budgetary and financial management?
- What is the council's record regarding Council Tax collection?
- What is the council's capacity to manage in-year budgetary pressures?
- What is the strength of the council's financial reporting?
- What are the procedures to deal with under and over spends during and at the year end?
- In the case of earmarked reserves, will there be expected calls on the reserves that prompted the setting up of the reserves in the first place?

Finally, there is a need to look at the assumptions made in setting the budget, not just for the coming year but also under the MTFS.

The budgetary assumptions cover:

- Inflation and interest rate projections.
- Estimate and timings of capital receipts.
- Treatment of planned efficiency savings.
- Financial risks involved in major funding arrangements.

The assessment of the adequacy of the reserves and the robustness of the estimates are contained within the Chief Finance Officers report to council as part of the budget setting process based upon Section 25 of the Local Government Act of 2003.

### **Allocation of Reserves**

There are to be no withdrawals from reserves, unless of a one-off nature, or if they are part of a planned usage which will lead to the elimination of any deficit and the setting of a balanced budget. It is not normal practice to withdraw from the General Fund Reserve to balance the annual budget, unless plans are in place to provide for an ongoing balanced budget.

### **Budget Assumptions**

These are set out in detail within the Budget Strategy and a sensitivity analysis has been undertaken regarding the financial forecasts for the next five years. The council is responsible for a number of demand led budgets which are difficult to control.

The council has identified its strategic financial risks and has carried out an assessment of that risk. Based on this analysis, the following levels are considered appropriate:

### **Required Levels of Reserves**

	<b>Minimum Level £m</b>
General Fund	2.8

Housing Revenue Account	2.0
Capital Receipts	0.5

**The minimum level of the General Reserve balance has been arrived at after assessing the strategic financial risks faced by the council.**

The table above shows that a minimum General Reserve balance of £2.8 million should be maintained. This includes an income accrual of £1.224m which is particularly significant given the proposed changes to universal credit and the potential impact on the ability to recover Housing Benefit overpayment. The HRA minimum balance has been set at £2.0 million as part of the preparation of the HRA business plan.

### **OPPORTUNITY COST OF HOLDING RESERVES**

Having set minimum levels, the opportunity cost of holding reserves needs to be considered. All balances are used to either reduce temporary borrowing or are invested subject to other cash flows. Therefore in measuring any opportunity cost of holding these reserves, account needs to be taken of the interest saving. The opportunity cost of holding the reserves is therefore a judgment whether the 'worth' of expenditure foregone is more than the income generated. Given the current economic climate and prevailing uncertainty over future grant funding the risks the authority is exposed to exceed the opportunity cost of holding reserves.

### **REPORTING FRAMEWORK**

The levels of reserves is continually monitored and a full review is undertaken each year.

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This Report will be made public on 6 September 2016

**Folkestone**

Hythe & Romney Marsh  
Shepway District Council



Report Number **C/16/46**

**To:** Cabinet  
**Date:** 14 September 2016  
**Head of Service:** Pat Main, Finance  
**Status:** Non Key Decision  
**Cabinet Member:** Councillor Miss Susan Carey, Finance

**SUBJECT:** BUSINESS RATES RETENTION CONSULTATION

**SUMMARY:** In July 2016 the Government commenced consultation on proposals for local authorities and their preceptors to retain 100% of the business rates collected, in return for the cessation of central grant support to local government. This report seeks Cabinet's views on the Council's proposed response to these proposals and the 36 questions asked by Government so that a final response to the consultation can be agreed and submitted.

**REASONS FOR RECOMMENDATIONS:**

Cabinet is asked to provide feedback and confirm the Council's response to the consultation so that it can be submitted by the deadline of 26 September 2016.

**RECOMMENDATIONS:**

1. To receive and note Report C/16/46.
2. To approve the Council's response to the Government's consultation on 100% business rates retention.

## 1. BACKGROUND

- 1.1 By the end of this Parliament, local government will retain 100% of taxes raised locally. This will give local councils in England control of around an additional £12.5 billion of revenue from business rates to spend on local services. In order to ensure that the reforms are fiscally neutral, councils will gain new responsibilities, and some Whitehall grants will be phased out.
- 1.2 At the beginning of July, Government published a consultation document seeking views on a number of issues to be considered in designing a new system of local government finance. This includes how the reformed system recognises the diversity of local areas and the changing pattern of local governance arrangements. There could be more ambitious devolution of responsibilities in areas which have already taken steps to reshape their governance and Greater Manchester and the Liverpool City Region are already piloting 100% business rates retention as part of their devolution deals. The offer to pilot the approach to business rates retention is open to any area that has ratified its devolution deal.
- 1.3 It also considers how the design of the new system can provide the right level of incentive and reward to those councils – particularly those working closely with local businesses and together as Combined Authorities – that pursue policies that drive additional growth in their areas. For example, the Government has already announced that the levy on growth within the current 50% rates retention scheme will be abolished in the new system. In addition, seven councils have already agreed new powers to shape the operation of the business rates tax in their area.
- 1.4 Finally, this consultation seeks views on how business rates income might be shared across different tiers of local government. There is a balance to be struck between providing a strong incentive for growth in local areas and considering the distribution of funding between local authorities. There will still need to be some system of redistribution between councils so that areas do not lose out just because they currently collect less in local business rates. The consultation seeks views on how this should work, including the extent to which the design of the system should seek to enable places to retain the rates they collect.

### Timetable for Reform

- 1.5 The Government's timetable is outlined below:

Summer 2016	Consultation on the approach to 100% business rates retention. The Government is inviting responses to the consultation by 26 September 2016. Those responses will help shape specific proposals across all aspects of the reforms.
Autumn 2016	We expect to see a more technical consultation on specific workings of the reformed system.
Early 2017	As announced in the Queen's Speech, the Government

	will introduce legislation in this Parliamentary session to provide the framework for these reforms. We expect the legislation to be introduced later in the Parliamentary session.
April 2017	Piloting of the approach to 100% business rates retention to begin.
By end of Parliament	Implementation of 100% business rates retention across local government.

### Current System

- 1.6 The move to 100% business rates retention builds on the current system, in which local government as a whole retains 50% of locally collected business rates. That system was introduced in April 2013. Before then, all business rate income collected by councils formed a single, national pot, which was then distributed by Government to councils in the form of formula grant. Through the Local Government Finance Act 2012, and regulations that followed, the Government gave local authorities the power to keep half of business rate income in their area by splitting business rate revenue into the 'local share' and the 'central share'.
- 1.7 The central share is redistributed to councils in the form of revenue support grant and in other grants. The local share is kept by local government, but is partly redistributed between local authorities through a system of tariffs and top-ups. This redistribution ensures that areas do not lose out just because their local business rates are low compared to their assessed needs.
- 1.8 Within the current system, councils keep up to 50% of growth in their business rate receipts arising from new or expanding businesses. Local authorities that pay tariffs are also liable to pay a levy of up to half of this type of growth. The money raised from this levy is then used to fund a safety net system. This system protects those councils which see their annual business rate income fall by more than 7.5% below their 'baseline funding level'.

### Government Proposals for 100% Business Rates Retention

- 1.9 The Government argues that 100% business rates retention will have some strong similarities with the existing system. For example, there will continue to be a level of redistribution between authorities similar to the current system of tariffs and top-ups. In addition, there will continue to be protection in the system to insulate authorities from shocks or significant reductions in their income.
- 1.10 There will also be some important differences. The Government has already announced that the levy on growth will be scrapped under 100% business rates retention, and that authorities will have additional flexibilities around the operation of the multiplier. In addition, we expect that the design of the new system will take account of the changing shape of local government, including the role of Combined Authorities.

- 1.11 In advance of this consultation, the Government has been working closely with the LGA and other representatives of local government to develop the principles that the reform package will be based upon. This has included a joint LGA/DCLG chaired Steering Group and set of Technical Working Groups to look at every aspect of how the new system should work, alongside which responsibilities should be devolved. This work has considered the following themes:
- The devolution of responsibilities
  - The operation of the system, including how growth is rewarded and risk is shared
  - Local tax flexibilities
  - Assessment of councils' needs and redistribution of resources
  - Accountability and accounting in a reformed system.
- 1.12 As part of the 2016/17 Local Government Finance Settlement, the Government announced a Fair Funding Review of councils' relative needs and resources. The last needs assessment carried out in 2013/14 largely focussed on updating the data used in the assessment. The formulae themselves have not been thoroughly reviewed for over a decade and there is good reason to believe that the demographic pressures affecting particular areas, such as the growth in the elderly population, have affected different areas in different ways, as has the cost of providing services. The Fair Funding Review will address the following questions:
- What do we mean by relative 'need' and how should we measure it?
  - What are the key factors that drive relative need?
  - What should the approach be for doing needs assessments for different services?
  - At what geographical level should we do a needs assessment?
  - How should 'resets' of the needs assessment be done?
  - How, and what, local government behaviours should be incentivised through the assessment of councils' relative needs?
- 1.13 The outcomes of the Fair Funding Review will establish the funding baselines for the introduction of 100% business rates retention, in the context of current local government services. The distribution of funding for new responsibilities will be considered on a case by case basis.
- 1.14 In order to strike a balance between incentivising business growth in local areas and maintaining a fair distribution of funding between local authorities, Government proposes to 'reset' the system on a fixed basis. The spectrum of possible models is wide; however this consultation focuses on three options:
- Full reset of the system, frequently (every five years)
  - Full reset of the system, infrequently (every 20 years)
  - Partial reset of the system, frequently (every five years).
- 1.15 The Office of Budget Responsibility estimates that the value of additional business rates revenue available to local government from locally collected rates in 2019/20 will be around £12.5 billion. While most business rates are collected locally, rates for properties on the 'central rating list' are collected

directly by government. The central ratings list contains the rating assessments of networked properties including major transport, utility and telecommunications undertakings and cross-country pipelines. This income is paid into the Consolidated Fund, with the statutory obligation under the Local Government Finance Act 2012 that an equivalent amount be redistributed to local government through grants. The estimated value of central list income in 2019/20 is circa £1.5 billion.

- 1.16 In the Chancellor's Budget 2016, following the conclusion of the business rates review, the Government announced a range of measures to reduce the burden of business rates on ratepayers, and to modernise the system. These included:
- Permanently doubling Small Business Rate Relief (SBRR) from 50% to 100% and increasing the thresholds to benefit a greater number of businesses;
  - Increasing the threshold for the standard business rates multiplier to a rateable value of £51,000, taking 250,000 smaller properties out of the higher rate;
  - Announcing that as of April 2020, taxes for all businesses paying rates will be cut through a switch in the annual indexation of business rates from RPI, to be consistent with the main measure of inflation, currently CPI.
- 1.17 In addition, the Government announced that it will modernise the administration of business rates, aiming to revalue properties more frequently and make it easier for businesses to pay their rates.
- 1.18 It is also clear that the process for appeals is in urgent need of reform. Too many rating appeals are made with little supporting evidence and are held up for too long, creating costs and uncertainties for businesses and local authorities. In October 2015 the Government published a consultation paper which set out proposals for a three-stage approach to resolving appeals: 'Check, Challenge, Appeal'. It is hoped that these reforms will introduce a more structured, rigorous and transparent system which will be easier for ratepayers to navigate.
- 1.19 It is still uncertain how the move to the new business rates systems will potentially impact on initiatives that have an economic development focus, including:
- Linked to Consultation Q22 - Small business rates reliefs and reductions; including local schemes that are detailed via the following link: <http://www.shepway.gov.uk/business/business-rates/relief-and-reductions>
  - Linked to Consultation Q31 - Business Improvement Districts (BIDs).

#### Devolution of Responsibility

- 1.20 The Government has announced that the move to 100% business rates retention will be fiscally neutral. To ensure this, the main local government grants will be phased out and additional responsibilities will be devolved to local authorities in order to match the additional funding from business

rates. Views are being sought as to what should be devolved as part of these reforms. The LGA and DCLG have compiled a list of options for consultation, based on four guiding principles:

- Devolution of responsibility should build on the strengths of local government, providing opportunities for greater integration and removing barriers to innovation.
- Devolution of responsibility should support the drive for economic growth, through a clear link to employment, skills or infrastructure.
- Devolution of responsibility should support improved outcomes for local people.
- Devolution of responsibility should be made with consideration for the medium-term financial impact on local government, allowing time for planning followed by a period of stability and predictability.

1.21 The range of options for devolution of responsibilities are summarised in Appendix 2.

1.22 The Government have already agreed a number of devolution deals with different parts of the country, including devolution of a range of functions and associated budgets, pooled at Combined Authority level within single investment funds. Views are sought on the range of associated funds that could be pooled in this way. Current deals include the following

- All mayoral devolution deal areas have an agreed Investment Fund, which is a grant-based fund specific to each deal, which is paid in annual instalments for 30 years. However, only the first five years' funding is confirmed with the remainder subject to five-year reviews.
- At present, nine devolution deal areas have agreed the devolution of the Adult Education Budget from 2018/19. The devolution of this budget is subject to the satisfaction of a number of 'readiness' conditions set out in the deals.
- All devolution deal areas receive consolidated funding for Transport which is made up of a number of grant streams, for example highways maintenance funding and, in some areas where bus franchising is implemented, the associated commercial bus service operators grant.
- All devolution deal areas have the flexibility to incorporate the Local Growth Fund awarded to Local Enterprise Partnerships in their area into their Combined Authority single investment funds.

1.23 The consultation also presents options for a number of local tax flexibilities, some of which are only likely to continue to be available to Combined Authorities. These include the ability to increase or reduce the business rates multiplier and the power to impose an infrastructure levy.

#### Accountability and Accounting

1.24 Finally, the consultation will examine the impact of the reforms on the balance of local and central accountability, as well as seeking views on the current method of accounting for business rates through the Collection Fund.

## **2. PROPOSED RESPONSE TO THE CONSULTATION**

- 2.1 The Finance team has analysed the proposals contained within the consultation document and considered how this Council should respond, both in the interests of local government nationally and more importantly in terms of local best interests. The 36 consultation questions and the Council's proposed response to each are laid out at Appendix 1 for Members' consideration and comment. Appendix 2 does not form part of the proposed consultation response, but has been included as useful context when considering this report.

### 3. OPTIONS

- 3.1 Cabinet have the following options when considering the proposed response to the consultation:
- a) To approve the proposed response
  - b) To request changes for inclusion in the final version that is submitted.

### 4. RISK MANAGEMENT ISSUES

- 4.1. Whilst the Government maintains that the move to 100% business rates retention and the corresponding cessation of central grant support in 2020 will have a neutral effect on local government finances, there is clearly significant risk facing individual local authorities, which may or may not be adequately addressed through top-ups and tariffs.

<b>Risk</b>	<b>Seriousness</b>	<b>Likelihood</b>	<b>Preventative action</b>
That the Council receives insufficient funding to deliver core services  The proposed move to 100% business rates retention, and accompanying loss of grant, could leave the local authority financially worse off.	High	Medium	Remain informed and contribute to the national debate. Prepare robust financial plans that can be flexed in response to changing financial projections.

### 5. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

#### 5.1 Legal Officer's Comments (DK)

The legal issues are fully covered in the body of this report. Legal Services confirms that following the various consultation processes referred to in the report, the Government anticipates introducing legislation to implement this initiative in early 2017.

## 5.2 Finance Officer's Comments (PM)

At this stage of the consultation process the Government's proposals are not clearly enough defined to undertake a meaningful evaluation of the impact on an individual local authority's finances. There are a number of variables in addition to the rateable value, including the impact of resetting the baseline, a full revaluation of the ratings list, the impact of the fair funding review and crucially the impact of the decisions made regarding which central grants and responsibilities will in future be funded through 100% rates retention. Appendix 2 provides some background information about these specific funding streams.

## 5.3 Diversities and Equalities Implications (PM)

There are no diversity and equality implications arising from this document. An Equalities Impact Assessment may be required when the Government's business rate retention proposals are confirmed and implementation is being planned.

## 6. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

Councillors with any questions arising out of this report should contact the following officer prior to the meeting

Pat Main, Head of Finance  
Telephone: 01303 853387.  
Email: pat.main@shepway.gov.uk

The following background documents have been relied upon in the preparation of this report:

The consultation and the accompanying Fair Funding Review can be found at <https://www.gov.uk/government/consultations/self-sufficient-local-government-100-business-rates-retention>

### Appendices:

Appendix 1: Proposed response to the consultation

Appendix 2: Possible devolution of responsibilities to local government to be funded from retained business rate



## SELF-SUFFICIENT LOCAL GOVERNMENT: 100% BUSINESS RATES RETENTION CONSULTATION

### CONSULTATION RESPONSE

***Question 1: Which of these identified grants / responsibilities do you think are the best candidates to be funded from retained business rates?***

As a general principle, we believe that the grants and responsibilities funded from retained business rates should be those where there is a good fit with existing local authority areas of experience and competence.

However, in keeping with the principle of fiscal neutrality, we would not expect the transfer of grants and responsibilities to local authorities under these proposals to fundamentally alter the balance of funding between national taxation and locally collected tax revenues. Whilst the Council might have a view about the appropriateness of certain responsibilities falling within the business rates retention scheme, more important are the principles around how they are rolled in and the need for absolute transparency regarding the amounts involved and the assumptions for future years.

For example:

- Attendance Allowance expenditure is demand led. There is a risk that increases in retained business rates income would not be sufficient to meet increases in demand for services that are influenced by demographics rather than performance of the local economy.
- Council Tax and Housing Benefit Administration Subsidies relate to functions carried out by local authorities and legitimately could be funded from retained business rates.
- There is no reason to not include RSG, public health, better care fund, ILF, early years and benefit administration subsidy within retained business rates income. However, the question of how the funding is distributed will be critical, along with the arrangements for transfer of responsibility for managing them.

***Question 2: Are there other grants / responsibilities that you consider should be devolved instead of or alongside those identified above?***

Funding from national agencies, such as the Environment Agency and the Homes and Communities Agency, should be channelled through local authorities, which are best placed to ensure that it is invested effectively to meet local needs.

The level of funding in these areas should not, however, be cut and/or replaced with funding from business rates.

***Question 3: Do you have any views on the range of associated budgets that could be pooled at the Combined Authority level?***

This is not currently relevant to Shepway District Council, however we believe that there should be a bespoke approach to Combined Authority pooled budgets according to local needs and circumstances. With the devolution agenda focused on investment in employment, skills and infrastructure, it would make sense for

Combined Authorities to pool resources targeted at stimulating economic growth. Skills funding, LGF and transport grant would be wholly appropriate for pooling.

**Question 4: Do you have views on whether some or all of the commitments in existing and future deals could be funded through retained business rates?**

Business rates must not be used to fund future devolved responsibilities which have not previously been funded this way. It will be important to ensure that there is adequate funding in the system for devolved responsibilities. This may mean supplementing business rates with funding from Government if new responsibilities are devolved.

**Question 5: Do you agree that we should continue with the new burdens doctrine post- 2020?**

Yes, the new burdens doctrine should continue post-2020, as local government will be making financial plans for the medium term and in an already increasingly uncertain funding landscape, responding to new burdens within planned resources would be difficult.

**Question 6: Do you agree that we should fix reset periods for the system?**

While acknowledging that this may lead to complexity, our preference is for partial resets which allow for some growth benefit while ensuring protection within the system.

Reset periods should be fixed and we are supportive of a five year cycle, as anything that brings a degree of predictability to a system that is inherently uncertain is to be welcomed.

**Question 7: What is the right balance in the system between rewarding growth and redistributing to meet changing need?**

We favour prioritising meeting changing need rather than focussing solely on rewarding growth.

However, where a local authority invests in skills and infrastructure and the housing to support that growth, then it should be entitled to some benefit from the increased taxation that this generates in order to provide improved services and opportunities for local people. Nevertheless, the system needs to recognise that not all geographical or administrative areas have the same natural advantages as others.

**Question 8: Having regard to the balance between rewarding growth and protecting authorities with declining resources, how would you like to see a partial reset work?**

Partial resets will ensure that an element of protection is retained in the system. The potential long term financial impacts for local authorities as a consequence of too infrequent resets would justify the costs of administration.

The stated aim of allowing local government to retain business rate income is to encourage proactivity in generating business growth, thus benefitting the UK economy. However, sometimes an individual local authority can be affected by

circumstances outside of its control, such as the decommissioning of power stations. A partial reset would provide a measure of protection for local authorities affected in this way. Also by resetting the system every five years, it should mean that the impact of resets would not be as dramatic as they would be if carried out every ten or twenty years.

**Question 9: Is the current system of tariffs and top-ups the right one for redistribution between local authorities?**

In resetting the base for 100% business rates retention, the current methodology of top-ups and tariffs is operating fairly effectively, but it is important that the accompanying Fair Funding Review establishes a robust baseline.

There are benefits in having a system with an element of certainty but having a high tariff means local authorities don't see much from the business rates, which defeats the point of business rates retention. Any new system will need retain some form of top-up for those authorities with lower business rates income. This may be achieved on a regional basis. For example, the current Kent-wide pooling arrangement works well.

**Question 10: Should we continue to adjust retained incomes for individual local authorities to cancel out the effect of future revaluations?**

Yes – to avoid regional inequality. The most sensible approach would be to align the timing and frequency of general revaluations with the timetable for resetting the business rates retention system. On that basis five years is our preference.

**Question 11: Should Mayoral Combined Authority areas have the opportunity to be given additional powers and incentives, as set out above?**

This is not currently relevant to Shepway District Council.

**Question 12: What has your experience been of the tier splits under the current 50% rates retention scheme? What changes would you want to see under 100% rates retention system?**

The original tier splits included elements of inequality of allocation between tiers; we would therefore be looking for a determination that is relevant, appropriate and fairly reflects requirements.

For example, Shepway District Council notionally receives 40% of business rates (after allowance for losses and reliefs) versus Kent County Council's 9% share.

In extending the scope of business rates retention:

- it is important that tier splits should be more transparent (for example, 40% should mean 40%)
- the 80:20 weighting in favour of lower tier authorities should be maintained.

**Question 13: Do you consider that fire funding should be removed from the business rates retention scheme and what might be the advantages and disadvantages of this approach?**

Fire funding should be removed. Linking fire authority funding to other local authority funding adds unnecessary complexity to the system.

Care would need to be taken to ensure that business rates income for local authorities was not unfairly top-sliced to maintain fire authorities' income.

**Question 14: What are your views on how we could further incentivise growth under a - 100% retention scheme? Are there additional incentives for growth that we should consider?**

We would support greater flexibility over tax raising powers for investment in employment, skills and infrastructure.

**Question 15: Would it be helpful to move some of the 'riskier' hereditaments off local lists? If so, what type of hereditaments should be moved?**

We believe that this would be helpful to mitigate the risks associated with the relocation/closure of significant entities with the proviso that the top-up calculation should guarantee 100% reimbursement of lost income.

In Shepway's case, an example would be the power station at Dungeness.

**Question 16: Would you support the idea of introducing area-level lists in Combined Authority areas? If so, what type of properties could sit on these lists, and how should income be used? Could this approach work for other authorities?**

This is something which does not affect Shepway District Council but we recognise that, in a Combined Authority context, all business rates could be managed as a single list, which would help to de-risk an individual council's business rates tax base.

**Question 17: At what level should risk associated with successful business rates appeals be managed? Do you have a preference for local, area level (including Combined Authority), or across all local authorities as set out in the options above?**

Risk is something which could be managed at regional (ie. county level), as adjacent authorities, already familiar with working under two-tier and rates pooling arrangements, will have some power to influence outcomes. In our view it would not be practical to manage appeals risks across a wider area.

Of greatest concern is the length of time that appeals take to be determined – there must be prompter resolution. The Valuation Office should be resourced to address current backlogs.

**Question 18: What would help your local authority better manage risks associated with successful business rates appeals?**

We would look to the outcome of the recent separate Government consultation on the appeals process to result in positive action to address these risks. This risk would be significantly lower if the Valuation Office were resourced to address the current backlog in appeals.

**Question 19: Would pooling risk, including a pool-area safety net, be attractive to local authorities?**

Kent councils already operate a pooling system that provides a safety net for member authorities that lose business rates income. To the extent that the pool area forms a logical political and geographical unit, we would support pooling of risk.

**Question 20: What level of income protection should a system aim to provide? Should this be nationally set, or defined at area levels?**

Our preference is for a protection scheme that delivers growth benefits while ensuring protection within the system.

Any safety net arrangement which is introduced should be set at the regional (county) or individual local authority level (see responses to questions 18 and 19 above).

**Question 21: What are your views on which authority should be able to reduce the multiplier and how the costs should be met?**

This should be the responsibility of upper tier authorities, in consultation with the Borough/District council billing authorities who are well-placed to assess impacts on local businesses.

Giving billing authorities alone the ability to reduce local multipliers, could lead to inequalities within the same region.

**Question 22: What are your views on how decisions are taken to reduce the multiplier and the local discount powers?**

We agree with the Consultation paper: authorities should continue to use their existing local discount powers for targeted relief.

**Question 23: What are your views on increasing the multiplier after a reduction?**

Any increases should be capped and take into account affordability for local ratepayers. Decisions to make a reduction should always be balanced with an assessment of the impact of future increases.

**Question 24: Do you have views on the above issues or on any other aspects of the power to reduce the multiplier?**

We have no further points to raise in response to this question.

**Question 25: What are your views on the flexibility levying authorities should have to set a rateable value threshold for the levy?**

Shepway District Council is not currently a levying authority. Levying authorities should be given the flexibility to protect small businesses.

**Question 26: What are your views on how the infrastructure levy should interact with existing BRS powers?**

We believe that it is important to keep the system simple, protect business ratepayers and not impose unnecessary burdens on businesses.

**Question 27: What are your views on the process for obtaining approval for a levy from the LEP?**

While not directly relevant to Shepway District Council, it is preferable for this power to remain with democratically accountable authorities, not with LEPs.

**Question 28: What are your views on arrangements for the duration and review of levies?**

While not directly relevant to Shepway District Council, this is something which should not be rigid. It is important that maximum flexibility is built into the arrangements. The duration of a levy should be clearly set out in a prospectus, which also details how the revenues raised by the levy are to be used.

**Question 29: What are your views on how infrastructure should be defined for the purposes of the levy?**

The definition applied to the Community Infrastructure Levy should be sufficiently comprehensive while allowing for some local flexibility.

**Question 30: What are your views on charging multiple levies, or using a single levy to fund multiple infrastructure projects?**

While not directly relevant to Shepway District Council, the defining principle should be to keep this as simple as possible; preferably a single levy. A single levy to fund multiple infrastructure projects would be simpler to administer, as well as providing greater flexibility to transfer funds between schemes if necessary.

**Question 31: Do you have views on the above issues or on any other aspects of the power to introduce an infrastructure levy?**

While not directly relevant to Shepway District Council, it is important to protect the interests of local business ratepayers and to have a system that all parties perceive as a transparent, accountable and democratic process.

**Question 32: Do you have any views on how to increase certainty and strengthen local accountability for councils in setting their budgets?**

Compared to previous arrangements, there is already increased certainty and strengthened local accountability in place under current arrangements, therefore we would argue for any changes following this consultation to result in a process that is transparent and simple to administer.

We would also wish to see the funding arrangements fixed over the period of our Medium Term Financial Strategy, ie. four years.

**Question 33: Do you have views on where the balance between national and local accountability should fall, and how best to minimise any overlaps in accountability?**

We are in favour of local government having greater responsibility and accountability for local services, as long as this is supported by flexibility and control over locally raised taxes and other revenues.

**Question 34: Do you have views on whether the requirement to prepare a Collection Fund Account should remain in the new system?**

The Collection Fund Account will remain necessary while local authorities remain responsible for collecting local taxes on behalf of precepting bodies.

**Question 35: Do you have views on how the calculation of a balanced budget may be altered to be better aligned with the way local authorities run their business?**

We would expect to see transparent reporting of income raised from local taxation and the specific services that are being funded with it.

***Question 36: Do you have views on how the business rates data collection activities could be altered to collect and record information in a more timely, efficient and transparent manner?***

It is important that the data collection documents (NNDR1 and NNDR3) are retained but consistency is important and they need to be issued in a timely manner.

## Possible Devolution of Responsibilities to Local Government to be Funded from Retained Business Rates

Funding Stream	Current Position	Could it be funded from retained business rates?
Revenue Support Grant	Revenue Support Grant is a central government grant given to local authorities which can be used to finance revenue expenditure on any service and is established through the local government finance settlement.	RSG is currently the principal component of the local government settlement and should logically be funded through 100% business rates retention.
Rural Services Delivery Grant	This grant is distributed through the local government finance settlement to the top-quartile of authorities ranked by super-sparsity, based on the Rural Services Delivery Grant methodology for 2015-16.	The grant currently forms part of the core spending power
Greater London Authority Transport Grant	This grant is used for capital improvements to relieve congestion, improve reliability on key routes and provide a good fit with UK transport policies. The Chancellor announced in the Spending Review that the Greater London Authority Transport Grant would be devolved into retained business rates.	This grant does not directly apply to Shepway Council.
Public Health Grant	Public Health Grant provides funding for the discharge of public health functions defined in section 73(B)(2) of the National Health Service Act 2006. The ring-fence on the public health grant will be maintained in 2016-17 and 2017-18. Further consideration will be needed on how best to promote stability and improvements in public health from the proposed new funding arrangements.	This grant does not directly apply to Shepway Council.
Improved Better Care Fund	The funding for the Improved Better Care Fund goes directly to local government to ensure that health and social care services work together to support older and vulnerable people. It is our intention that any change to current funding arrangements ensures that the Improved Better Care Fund is used by local government to fund adult social care services.	This grant does not directly apply to Shepway Council.
Independent Living Fund	The grant for former recipients of the Independent Living Fund (ILF) compensates for the cost pressures caused by the closure of the ILF. This followed the introduction of the	The ILF is currently funded by the Department of Works and Pensions. This grant does not directly apply to Shepway Council.



Funding Stream	Current Position	Could it be funded from retained business rates?
	Care Act 2014 which ensures that the key features of ILF support, namely personalisation, choice and control, are now part of mainstream adult social care system.	
Early Years	The grant is provided to English local authorities to fulfil their duties under sections 6, 7, 7A, 9A, 12 and 13 of the Childcare Act 2006 and under regulations that will be made pursuant to section 2(1) of the Childcare Act 2016. It is currently part of the Dedicated Schools Grant. Consideration of this grant for devolution would take place after successful delivery and establishment of the Manifesto commitment to 30 hours free childcare from September 2017.	This grant does not directly apply to Shepway Council.
Youth Justice	The funding provided by the Ministry of Justice to the Youth Justice Board is distributed as a grant to local authorities for the operation of the youth justice system and the provision of non-custodial youth justice services. The Ministry of Justice funding does not include funding from police, probation and health authorities who contribute at a local level to the costs incurred by local authorities in the provision of youth justice services.	This grant does not directly apply to Shepway Council.
Local Council Tax Support Administration Subsidy and	Local Council Tax Support Administration Subsidy provides funding towards the administration of local council tax support claims where there is not also a housing benefit application. Housing Benefit	Shepway currently receives around £634,000 per annum in administration subsidy, although this has historically been reducing by around £50,000 per annum.
Housing Benefit Pensioner Administration Subsidy	Administration Subsidy contributes towards the cost of administering housing benefit on behalf of the DWP. A portion of this subsidy contributes to the administration costs of joint housing benefit and local council tax support claims. Housing Benefit will cease to be paid to working age customers, as Universal Credit, which includes housing costs is rolled out. Housing Benefit for pensioners will remain with Local Authorities for now, and the Government will consult ahead of any proposed changes to that position. Nonetheless, at that point increased support for the higher level of non-joint local council tax support claims will continue to be required and so Local Council Tax Support grant, including the element of Housing Benefit administrative grant	The scheduled rollout of Universal Credit will clearly have implications over the next couple of years.

Funding Stream	Current Position	Could it be funded from retained business rates?
	for what are currently joint claims, could be considered for devolution.	
Attendance Allowance	As announced in December, the Government will also consider giving more responsibility to councils in England to support older people with care needs – including people who, under the current system, would be supported through Attendance Allowance. This will protect existing claimants, so there will be no cash losers, and new responsibilities will be matched by the transfer of equivalent spending power.	At around £5bn nationally this would represent a significant new burden on local authorities. 13.0% of people aged 65 and over in Kent claim it. This is higher than the average in the South East (12.4%) and below the national average of 14.3%.

This report will be made public on 6 September 2016

**Folkestone**

Hythe & Romney Marsh  
Shepway District Council



Report Number **C/16/42**

**To:** Cabinet  
**Date:** 14 September 2016  
**Status:** Non-Key Decision  
**Head of Service:** Dr Sarah Robson, Communities  
**Cabinet Member:** Councillor David Monk, Leader

**SUBJECT: Film Classification Policy**

**SUMMARY:** In order for films to be shown at licensed premises they must be classified by the British Board of Film Classification or the Council in accordance with the Licensing Act 2003 (LA03). If the Council classify or re-classify films, they must have a relevant Policy in place. Currently Shepway District Council does not have a Film Classification Policy.

**RECOMMENDATIONS:**

**Cabinet is asked to:**

1. To receive and note the report.
2. To approve the Film Classification Policy (see Appendix 1).

## **1. BACKGROUND**

- 1.1 Usually films, including short public information films, are classified by the British Board of Film Classification (BBFC) for a fee. Local Authorities have the ability to override BBFC classification decisions, and can classify films that have not been considered by the BBFC.
- 1.2 The Licensing Authority has the right to classify films that are shown in premises licensed under the LA03 such as cinemas, hotels, clubs and public houses.
- 1.3 All films, even charity and public information films, have to be classified in order to be shown in a licensed premises. Since 1<sup>st</sup> April 2016 adverts can be classified/passed by the Cinema Advertising Association (CAA) for a fee, however, charity/public information films still have to be approved by the BBFC.
- 1.4 Silver Screen Cinemas in Folkestone recently hosted a charity film event to raise funds for the Kent Surrey & Sussex Air Ambulance. The event organiser asked Shepway District Council to classify a short film about the Air Ambulance which they wanted to show at the fund raising event. They have stated that they are likely to require us to classify additional trailers in the future for charity events.
- 1.5 If local councils overrule the BBFC or make their own decisions, they must have a published policy in place.

## **2. BRITISH BOARD OF FILM CLASSIFICATION (BBFC)**

- 1.1. The BBFC is an independent body which was originally established by the film industry in 1912. Local Authorities were made responsible for what was shown in cinemas and from early on accepted the decisions of the BBFC. There are obvious benefits to both Local Authorities and the film industry in having a central but independent body bring consistency to the age rating process and accept responsibility for decisions.
- 1.2. Local Authorities remain legally responsible for what is shown in cinemas under the Licensing Act 2003 and can still overrule the decisions of the BBFC. This does not happen very often. Local Authorities add an important element of local democracy into the classification process.
- 1.3. In 1985 the BBFC became the statutory authority for age rating videos under the Video Recordings Act 1984.

## **3. POLICY**

The proposed Film Classification Policy can be read at Appendix 1. The Policy outlines the reasons for requiring a policy, what the Council hopes to achieve by introducing the Policy, the principles that will be followed when classifying films and the procedures that will be followed when making the classification.

- 2.1 As a requirement is placed on the Licensing Authority to carry out this function it is not proposed to carry out any form of consultation as this is a procedural matter. If approval is given the policy will be implemented with immediate effect.

2.2 It is not proposed to charge for classification at this stage, however this will be reviewed at the next Annual Review of Fees and Charges.

#### 4. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

##### 1.1 Legal Officer’s Comments (DK)

Shepway District Council is a ‘licensing authority’ under section 3 of the Licensing Act 2003 (“the LA 2003”) and when acting in such a role it must:

1. promote the various licensing objectives contained in section 4 of the LA 2003;
2. have regard to guidance issued by the Secretary of State under section 182 of the LA 2003 (the current contents of which were published in 2013); and
3. determine its licensing policy every 3 years in accordance with section 5 of the LA 2003.

This report identifies (in summary) the various requirements which the Council must comply with contained in each of the LA 2003, associated legislation and guidelines published by the British Board of Film Classification, each of which must be complied with.

##### 1.1 Finance Officer’s Comments (DB)

This report relates to the classification of films shown in premises in the Shepway area. It recommends the establishment of a policy to do this. There are no direct financial implications from this.

##### 1.2 Diversities and Equalities Implications (ST)

There are no diversity or equalities implications arising from this report.

#### 5. RISK MANAGEMENT

The perceived risks are shown below

Perceived risk	Seriousness	Likelihood	Preventive action
Not having a policy in respect of unclassified films might result in the moral and psychological harm being caused to members of the public, in particular children, by film exhibitions containing strong language, horror/violence or sexual images.	High	Low	Once the Licensing Committee approve the Policy and agree to delegate the classification decision to Offers then it is not thought that films would be shown without classification. Licensing Officers will ensure that premises are fully informed of the Policy and regular inspections will take place
A film could be classified incorrectly and break one of the Licensing Objectives on section 4 of the Licensing Act 2003 ‘The prevention of children from harm’	High	Very Low	Officers will closely adhere to the BBFC Classification Guidance: <a href="http://www.bbfc.co.uk/what-classification/guidelines">http://www.bbfc.co.uk/what-classification/guidelines</a>

## 6. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

Councillors with any questions arising out of this report should contact the following officers:

**Briony Williamson - Licensing Officer**

**Tel: 01303 853475**    **Email: [briony.williamson@shepway.gov.uk](mailto:briony.williamson@shepway.gov.uk)**

The following background documents have been relied upon in the preparation of this report:

Licensing Act 2003

Licensing Act 2003 – Revised Guidance 2015

### **Appendices:**

Appendix 1: Film Classification Policy

# Shepway District Council

## Film Classification Policy

Draft

September 2016



**Folkestone**

Hythe & Romney Marsh  
Shepway District Council



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## Foreword

The Council, as the Licensing Authority, is responsible for authorising the public exhibition of films. Section 20 of the Licensing Act 2003 (the Act) states that where a Premises Licence or Club Premises Certificate authorises the exhibition of a film(s), the licence must include a condition requiring the admission of children to films to be restricted in accordance with recommendations given either by the British Board of Film Classification (the BBFC) or by the Licensing Authority itself.

The purpose of this Policy is to set out the formal procedure for the Licensing Authority to determine the classification of previously unclassified films, appeals by distributors against the British Board of Film Classification's decisions or requests to reclassify films.

Through the introduction of this policy, we hope to encourage the already diverse and thriving creative community in Shepway, to show locally created films at licensed premises.

This policy was put before Cabinet for approval in September 2016.

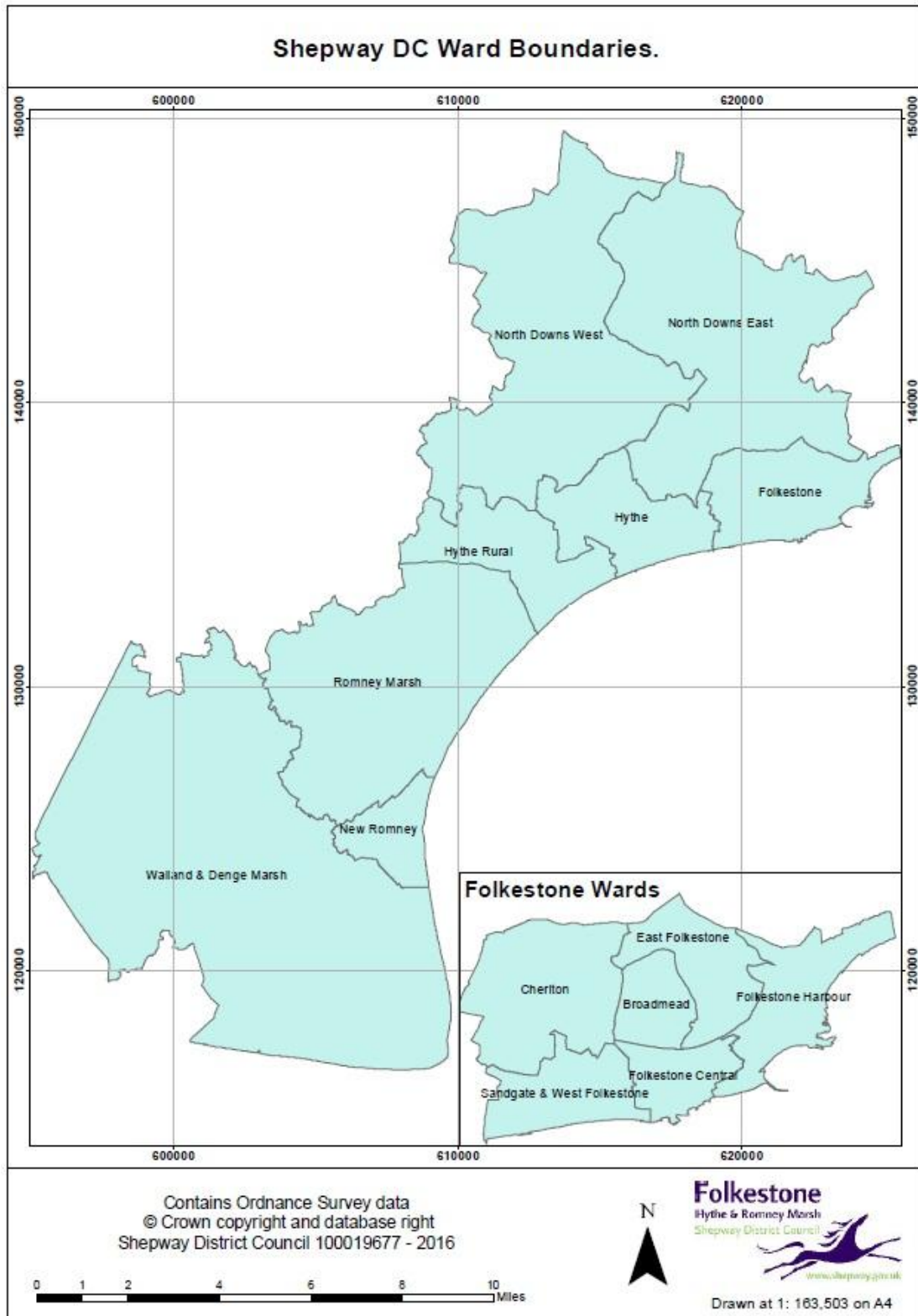
Dr Sarah Robson  
Head of Communities  
Shepway District Council

## About Shepway District

Shepway District covers an area of 35,670 hectares (140 sq. miles) on the east Kent coast about 75 miles from London. It has a population of around 109,500 (2014) most of whom live in the Folkestone and Hythe Urban area, but there are also settlements at Lydd and New Romney and along the coastal strip.

The District occupies a key strategic position between the United Kingdom and mainland Europe at the end of the M20 motorway and with the Channel Tunnel, the port of Folkestone and Lydd Airport providing gateways to continental Europe. The location of the District is set out in the map below.

Shepway District Council is situated in the County of Kent, which contains 12 District Councils and 1 Unitary Authority in total. Each is represented on the Kent & Medway Regulatory Licensing Steering Group (K&MRLStGp) whose role includes the identification of issues on which a consistent countywide approach is considered essential and the formulation of recommended policy that establishes a minimum standard on these identified issues.



There is 1 cinema in Folkestone and a thriving Creative Quarter, Schools, Colleges and a University likely to be requiring classification of locally created films.

## Introduction

Shepway District Council, the licensing authority for the District of Shepway, is introducing this Film Classification Policy in accordance with Section 5(1) Licensing Act 2003.

The Act requires that the licensing authority carry out its various licensing functions so as to promote the following four licensing objectives:-

- The prevention of crime and disorder;
- Public safety;
- The prevention of public nuisance; and
- The protection of children from harm.

Each objective is of equal importance and there are no other licensing objectives. These four objectives are of paramount consideration at all times. These four licensing objectives are considered in more detail in Shepway's Licensing Policy Statement 2016-2021.

The Film Classification Policy is concerned primarily with the following two licensing objectives, the former being the most relevant:

- The protection of children from harm.
- The prevention of crime and disorder;

Where a premise seeks or intends to exhibit film(s) that venue must be covered by a Premise Licence, Club Premises Certificate or Temporary Event Notice under the Licensing Act 2003. Under the Licensing Act 2003, the definition of the exhibition of a film is the exhibition of moving pictures.

In summary, the public exhibition of all films on licensed premises must either be classified by the BBFC or authorised by the Licensing Authority under the powers of the Licensing Act 2003.

The Licensing Authority, when authorising film(s), shall at all times take into account the Guidance issued under section 182 of the Licensing Act 2003 (the National Guidance).

The Licensing Authority may be requested to authorise a film that has already been classified by the British Board of Film Classification (BBFC) in two different circumstances:

- (a) a distributor of a film may appeal against the decision of the BBFC and request that the Licensing Authority re-classifies/authorises the film for local screening (with recommendations on age restrictions); and
- (b) An independent party may request that the Licensing Authority reclassifies/authorises the film for local screening (with recommendations on age restrictions).

In addition, the Licensing Authority may be requested to authorise the showing of an unclassified film(s). This normally occurs in the following cases:

- A film festival covering a specific period of time
- A one off screening of a film
- A trailer for a film

## General policy

In accordance with paragraph 10.31 of the National Guidance, the Licensing Authority shall concern itself primarily with the protection of children from harm. It will not use its powers to censor films save where there is clear cause to believe that this is required to promote the licensing objectives.

In terms of film exhibitions and festivals, the most relevant licensing objective is the Protection of Children from Harm.

### Protection of Children from Harm

Paragraph 2.41 of the National Guidance states:

*The protection of children from harm includes the protection of children from moral, psychological and physical harm and this would include the protection of children from too early an exposure to strong language and sexual expletives, for example, in the context of film exhibitions or where adult entertainment is provided.*

## Principles in determining film classifications

The BBFC classifies films in accordance with its published Guidelines, which are based on extensive research into public opinion and professional advice. The National Guidance under Section 182 of the LA03 recommends that:

*Licensing Authorities should not duplicate the BBFC's work by choosing to classify films themselves. The classifications recommended by the BBFC should be those normally applied unless there are very good local reasons for a Licensing Authority to adopt this role. Licensing Authorities should note that the provisions of the 2003 Act enable them to specify the Board in the licence or certificate and, in relation to individual films, to notify the holder or club that it will make a recommendation for that particular film*

The Licensing Authority considers the classification system used by the BBFC to be nationally understood and accepted. It will therefore use this system, and any amendments thereto, as a reference point for determining its recommendation(s) on the restriction of access of children to the film(s). It should be noted however that the Licensing Authority is not obliged to follow these guidelines.

Where a licensed premise seeks to exhibit a film that has not been classified by the BBFC then it will be the responsibility of the Licensing Authority to authorise that film. The procedures outlined later in this document will be followed.

The Licensing Authority recognises the principle within the Human Rights Act 1998 that adults should be free to choose their own entertainment. Material should not be in breach of the criminal law, including material judged to be obscene under the current interpretation of the Obscene Publications Act 1959 or has been created through the commission of a criminal offence.

Applicants must ensure that all material that is the subject of the application complies with the current interpretation of the Obscene Publications Act 1959, the Copyright Design and Patents Act 1988 or any other relevant legislation and has not been created through the commission of a criminal offence.

Any authorisations for the exhibition of film(s) issued by the Licensing Authority shall only apply when the film(s) is exhibited within Shepway District and does not affect the authorisation or recommendations in any other borough.

Once authorised by the Licensing Authority a film will be authorised for a particular showing or festival only subject to the recommendations imposed by the Licensing Authority (unless further application for re-classification is made). Details of the authorisation including any recommendations shall be available from the Council's Licensing Services.

The issue of any authorisation by Shepway District Council is strictly limited to the authorisation within Shepway District and it is assumed that all relevant third party consents and licences in respect of any and all copyright, confidential information and all other intellectual property rights have been obtained.

The Licensing Authority will consider each authorisation on its own merit and may impose additional and more specific recommendations where it deems necessary in order to comply with the Protection of Children from Harm Licensing Objective.

Where the Licensing Authority authorises unclassified material to be shown the Licensing Authority will require an undertaking from the applicant that he has satisfied himself after proper enquiry that no material to be exhibited contravenes the current interpretation of the Obscene Publications Act 1959, the Copyright Design and Patents Act 1988 or any other relevant legislation and has not been created through the commission of a criminal offence.

The Licensing Authority shall also not be liable for any material that has been created through the commission of a criminal offence. It is the responsibility of the applicant to ensure that no film or trailer contravenes the law.

Where the Licensing Authority has determined to refuse authorisation of a film(s) clear and concise reasons shall be given.

## Procedures for authorisation requests for approval of films already classified by the BBFC

Applications for authorisation of films already classified by the BBFC shall be referred to and determined by the Licensing Sub Committee on behalf of the Licensing Authority. This Sub Committee shall consist of three Members of the Licensing Committee. Applications should be submitted in writing to the Licensing Service.

In accordance with the National Guidance all requests shall be accompanied by the film(s) where possible in DVD format to avoid delays, the cost to be borne by the applicant. If DVD format is not possible then arrangements will be made for a suitable venue to view the film. This will allow the Licensing Sub Committee time to view and authorise the film(s) so that the licence holder is able to adhere to any recommendations on age restrictions the Licensing Authority may impose. In any event, all requests should be submitted in writing to the Licensing Authority a minimum of **28 days** before the proposed screening.

Where an individual or organisation not connected with the film(s) requests reclassification of a BBFC classified film, they are not expected to provide a copy of the film(s). The Licensing Authority will then make suitable arrangements to view the film. It is also accepted that in these circumstances, it may not be possible to give **28 days'** notice before the proposed screening.

All requests must be accompanied by detailed reasons for the request. Requests will be dealt with as expeditiously as possible as it is appreciated that films are generally only shown in cinemas for a relatively short period.

The Sub Committee will then view the entire film and assess it against the BBFC guidelines and National Guidance. The Sub Committee shall issue a Notice of Determination of the authorisation within 5 working days from the date of viewing. The Licensing Authority will then formally advise the applicant and the licence holder of any recommendation(s) restricting the admission of children to the film(s).

Requests must be relevant to the Protection of Children from Harm licensing objective and not frivolous, vexatious or repetitive. Requests may also be relevant to the Prevention of Crime and Disorder licensing objective but only in relation to the contravention of the current interpretation of the Obscene Publications Act 1959 or any other relevant legislation.

In line with the National Guidance, where a film(s) is recommended by the Licensing Authority as falling into an age restrictive category, no person under the age specified shall be admitted. Where a film(s) is recommended by the Licensing Authority as falling into a category requiring any persons under a specified age to be accompanied by an adult, no person under the age specified shall be admitted unless accompanied by an adult.

In these circumstances, the licence holder will be required to display in a conspicuous position a notice clearly stating the relevant age restrictions and

requirements. With regard to the wording of such Notices, the Licensing Authority shall have regard to National Guidance, e.g.:

- *Persons Under the Age Of [insert appropriate age] Cannot Be Admitted To Any Part of The Programme*
- *Persons Under the Age Of [insert appropriate age] Can Only Be Admitted To The Programme If Accompanied By An Adult.*

## **Procedure for authorisation of films which have not been classified by the BBFC or Shepway District Council**

Applications for authorisation will in the first instance be considered by officers under delegated powers. Any request to authorise an unclassified film may however, be referred by the Principal Environmental Health Officer at his/her discretion to the Licensing Sub Committee for determination.

Applications should be submitted in writing to the Licensing Authority a minimum of **28 days** before the proposed screening.

An application for authorisation should include the following information:

- (a) the film maker;
- (b) such recommendation as may have been made by the film maker upon age limit for the intended audience for exhibition of the film;
- (c) any existing classification issued by an existing classification body, whether within or outside the UK;
- (d) a synopsis identifying the material within the film considered by the exhibitor to be likely to have a bearing on the age limit for the audience for exhibition of the film. Where an applicant seeks an authorisation allowing exhibition of the film to persons 18 years and over only, a detailed synopsis will not be required;
- (e) if known, a legitimate and legal internet site where the film, or a portion of the film is available to view without charge;
- (f) any proposals on age restrictions for viewing the film that the applicant intends to impose; and
- (g) details of how age restrictions will be enforced.

In accordance with National Guidance all requests shall be accompanied by the film(s) where possible in DVD format to avoid delays, the cost to be borne by the applicant. If DVD format is not possible then arrangements will be made for a suitable venue to view the film. This will allow the Principal Environmental Health Officer time to view and authorise the film(s) so that the licence holder is able to adhere to any recommendations on age restrictions the Licensing Authority may impose. In any event, all requests should be submitted on the Licensing Authority's application form a minimum of **28 days** before the proposed screening.

The Principal Environmental Health Officer, whilst viewing the film(s) will have regard to BBFC Guidelines and National Guidance and shall issue a Notice of Determination of the application within five working days from the date of the viewing.



When considering all such requests the Principal Environmental Health Officer will pay particular attention to the Protection of Children from Harm Licensing Objective.

In line with of the National Guidance, where a film(s) is recommended by the Licensing Authority as falling into an age restrictive category, no person under the age specified shall be admitted. Where a film(s) is recommended by the Licensing Authority as falling into a category requiring any persons under a specified age to be accompanied by an adult, no person under the age specified shall be admitted unless accompanied by an adult.

In these circumstances, the licence holder will be required to display, in a conspicuous position, a notice clearly stating the relevant age restrictions and requirements. With regard to the wording of such Notices, the Licensing Authority shall adopt the example as laid out in the National Guidance:

- *Persons Under the Age Of [insert appropriate age] Cannot Be Admitted To Any Part of The Programme*
- *Persons Under the Age Of [insert appropriate age] Can Only Be Admitted To The Programme If Accompanied By An Adult.*

In order to ensure the promotion of the Protection of Children from Harm and Prevention of Crime and Disorder licensing objectives, the Licensing Authority will formally advise the licence holder and applicant of any recommendation(s) on the restriction on the age of access for children to the film(s). This may also include any relevant notices required to be displayed by the licence holder inside and outside the premises. The licensed premises hosting the exhibition of film will be expected to comply with these recommendations.

The Licensing Authority recognises the principle that adults should be free to choose their own entertainment and will not normally override this principle - as such requests shall not normally be refused. However, in all cases the Licensing Authority will expect the applicant to follow the BBFC's Guidelines for 18 and R18 restricted films.

## **Section 20 Licensing Act 2003: Exhibition of Films**

All premises permitted to exhibit films are subject to the following mandatory conditions:

- 1. Where a Premises Licence or Club Premise Certificate authorises the exhibition of films, the licence or certificate must include a condition requiring the admission of children to the exhibition at any film to be restricted in accordance with these paragraphs.*
- 2. Where a film classification body is specified in the licence or certificate, unless paragraph 3 (b) below applies, admission of children must be restricted in accordance with any recommendation by that body.*

3. *Where:*

- (a) the film classification body is not specified in the Licence or Certificate; or*
- (b) the Licensing Authority has notified the holder of the Licence or the Club which holds the Certificate that this paragraph applies to the film in question, admission of children must be restricted in accordance with any recommendation made by the Licensing Authority.*

4. *In these paragraphs "children" means persons aged under 18 and "film classification body" means the person or persons designated as the authority under section 4 of the Video Recordings Act 1984 (authority to determine suitability of video works for classification).*

## **Exemptions for the Showing of Films**

The provision of the exhibition of a film(s) is exempt from regulation by the Licensing Act 2003 if **either**:

It consists of, or forms part of, an exhibit put on show for any purposes of a museum or art gallery (the LA03 does not define a museum or art gallery so the ordinary meaning of the term is taken)

**or:**

Its sole or main purpose is to:

- (a) demonstrate any product,
- (b) advertise any goods or services (excluding the advertising of films),
- or
- (c) provide information, education or instruction

It should be noted however, that advertisements for goods or services require clearance from The Cinema Advertising Association (CAA). From 1st April 2016 the CAA is the sole clearance body for commercial advertising in cinemas.

## **Appendix A: Useful contact details**

### **Licensing Team**

Shepway District Council  
Civic Centre  
Castle Hill Avenue  
Folkestone  
Kent CT20 2QY  
T: 01303-853526  
E: [licensing@shepway.gov.uk](mailto:licensing@shepway.gov.uk)

### **British Board Film Classification**

BBFC  
3 Soho Square  
London  
W1D 3HD  
T: 020 7440 0299  
E: [helpline@bbfc.co.uk](mailto:helpline@bbfc.co.uk)

### **Cinema Advertising Association**

Corinthian House  
279 Tottenham Court Road  
London  
W1T 7RJ  
T: 020 7199 2433  
E: [submissions@cinemaadvertisingassociation.com](mailto:submissions@cinemaadvertisingassociation.com)

