

**Appendix 2: Summary of 2016 Consultation – Numbers of Respondents  
and Methods of Consultation Response (Report prepared  
by the Communications Team)**

## Planning Policy Consultation – Communications Report

<b>Measure</b>	<b>2015<sup>(1)</sup></b>	<b>2016<sup>(2)</sup></b>	<b>% change</b>
Number of respondents	234	616	+163%
Number of online respondents	98 <sup>***</sup>	436 <sup>*</sup>	+345%
Number of email respondents	123 <sup>***</sup>	106 <sup>*</sup>	-14%
Number of respondents by letter	22 <sup>****</sup>	86 <sup>*</sup>	+290%
Number of individual private respondents	147	510	+247%
Number of individual respondents representing an organisation	49	39	-20%
Number of respondents on behalf of others (agents)	38	67	+76%
Number of private individuals online	78 <sup>****</sup>	405 <sup>**</sup>	+419%
Number of private individuals by email	56 <sup>****</sup>	53 <sup>**</sup>	-5%
Number of private individuals by letter	18 <sup>****</sup>	58 <sup>**</sup>	+222%

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

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

Note: A number of respondents used more than one method of response (such as by email and duplicate copy by letter):

\* 11 respondents used two or more response methods.

\*\* 6 respondents used two or more response methods.

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

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

**Appendix 3: Summary of 2016 Preferred Options Places and Policies Local  
Plan Consultation Comments – Main Issues Raised and Amendments  
Proposed**

## INTRODUCTION

### 1. Introduction (Chapter 3)

#### Summary of consultation comments

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

## PART ONE - PLACES

### 2. Introduction (Chapter 4)

#### Summary of consultation comments

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

### **3. Urban Character Area (Chapter 5)**

#### **Summary of consultation comments**

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

### **Folkestone**

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

### Policy UA1: Folkestone Town Centre

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

- Ellandi LLP states that the shopping frontages have not been defined in line with national planning policy;
- KCC states that the area is rich in heritage assets; and
- Other amendments to the supporting text are suggested.

3.5 Two comments to the policy state that:

- Environmental improvements and a more mainstream retail offer are needed to revitalise the town centre; and
- The policy should allow for the fast-changing nature of the retail sector, particularly the impact of online shopping.

3.6 Ellandi LLP generally supports the policy, but proposes a number of changes and clarifications.

3.7 Folkestone Town Council questions whether the designation of the entire town centre under the policy, in addition to Folkestone Harbour and sites at Park Farm, is viable, and that the town's heritage should be emphasised. Shepway HEART Forum refers to proposals for redevelopment of the bus station. Go Folkestone Action Group wishes to see space above shops refurbished for residential use and states that the policy should give more recognition to the historic character of Folkestone; the Group also highlights problems of vacancies in Guildhall Street.

3.8 Stagecoach in East Kent highlights that a suitable alternative site is needed if the bus station is to be redeveloped.

3.9 KCC supports the policy but considers that it should include mention of the historic character of the town centre. Historic England states that an up-to-date character appraisal and management plan for the Conservation Area should be used to guide development proposals. Shepway District Council Strategic Projects states that the policy should be revised to reflect the positive contribution that residential uses can make to the town centre.

#### Policy UA2: Cheriton Local Centre

3.10 Policy UA2 seeks to manage development to protect the vitality of Cheriton Local Centre. Two comments have been made to this policy.

3.11 Comments state that the proliferation of betting shops should be restricted and that there are no longer any banks in Cheriton.

#### Policy UA3: Sandgate Local Centre

3.12 Policy UA3 seeks to manage development to protect the vitality of Sandgate Local Centre. Two comments have been made to this policy.

3.13 Sandgate Parish Council supports the policy. The Sandgate Society stresses the importance of retaining a commercial hub in the centre of the village.

#### Policy UA4: Silver Spring Site, Park Farm

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

#### Policy UA5: Former Harbour Railway Line

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

- Further work should be undertaken to explore connectivity to other areas of the town;
- The Remembrance Line's Tramway system could run alongside the pedestrian and cycle route; and
- The route should be used for vehicular traffic.

3.22 Four comments support the policy.

3.23 Shepway HEART Forum states that options should be explored to provide a low carbon transportation system on existing rail infrastructure.

3.24 KCC supports the policy and states that the Tram Road Link Walkway and Cycleway is an identified scheme in the Local Transport Plan.

#### Policy UA6: East Station Goods Yard, Folkestone

3.25 Policy UA6 allocates the site for 40 dwellings and 1,000sqm commercial floorspace (B1/B8). Criteria cover: the provision of commercial floorspace; the comprehensive development of the site; access; contamination; archaeological potential; noise and vibration from the railway; and contributions towards play facilities on Folly Road. (Planning permission 14/0928/SH was granted on this site for a mixed use development of 41 dwellings and 1,000sqm of commercial space.) 15 comments have been made to this policy.

3.26 12 comments state that:

- East Folkestone Railway Station should be reinstated;
- The site should be used for a park-and-ride tramway; reference is made to the Remembrance Line Association's proposals;
- Pedestrian and highway safety is a key concern and improvements are needed; and
- The accompanying plan is difficult to read.

3.27 Shepway Green Party states that instead of allocating the site for development, the Council should lobby for the reopening of Folkestone East station.

3.28 KCC suggests amendments to wording relating to archaeological potential. Southern Water states that masterplanning should take account of the nearby Folkestone Junction Wastewater Pumping Station and that access to underground sewerage infrastructure is required for maintenance purposes.

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

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

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

3.30 10 comments state that:

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

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

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

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

#### Policy UA8: The Royal Victoria Hospital, Radnor Park Avenue

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

3.35 Six comments state that:

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

- 3.36 Shepway HEART Forum states that options should be explored for a private health company to operate services from the site. Go Folkestone Action Group considers that the loss of the entire site for housing is shortsighted and that some allowance should be made for the provision of medical facilities and social care.
- 3.37 KCC seeks amendments to wording relating to archaeological potential. Southern Water requires access to underground sewerage infrastructure for maintenance.

Policy UA9: 3-5 Shorncliffe Road, Folkestone

- 3.38 Policy UA9 allocates the site for 20 apartments. Criteria cover design, impacts on the Conservation Area and archaeological potential. Two comments have been submitted to this policy.
- 3.39 Folkestone Town Council highlights the need for drainage and infrastructure improvements. KCC suggests amendments to wording related to archaeology.

Policy UA10: Ingles Manor, Castle Hill Avenue

- 3.40 Policy UA10 allocates the site for 46 dwellings and commercial floorspace (B1). Criteria cover: impacts on the Conservation Area and heritage assets; the provision of 1,400sqm commercial space; retention of the existing barns; and archaeological potential. 12 comments have been made to this policy.
- 3.41 Two comments object to the loss of open space and protected trees.
- 3.42 Folkestone Town Council states that the loss of the garden centre and café is unfortunate, but that the garden cottage and barns should be preserved, as should the protected trees. The Town Council also highlights the need for infrastructure and drainage improvements. Shepway HEART Forum wishes to see a replacement garden centre and commercial space. Go Folkestone Action Group considers that the site is exceptional and development should be at low density; the Group also highlights infrastructure and drainage problems.
- 3.43 The Trustees of Viscount Folkestone do not object to the policy but seek the deletion of requirements for office accommodation and retention of the barns. Murston Construction supports the policy but seeks the division of the site between commercial and residential elements to allow them to come forward independently.
- 3.44 KCC suggests amendments to wording related to archaeology. Southern Water requires a connection to the local sewerage system.

Policy UA11: Shepway Close, Folkestone

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

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

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

#### Policy UA12: Former Gas Works, Ship Street

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

#### Policy UA13: Highview School, Moat Farm Road

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

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

Policy UA14: Brockman Family Centre, Cheriton

- 3.57 Policy UA14 allocates the site for 26 houses or 50 apartments. Criteria cover: ecology; trees and hedgerows; and archaeological potential. Two comments have been submitted to the policy.
- 3.58 One comment suggests improvements to the road network. KCC suggests amendments to wording related to archaeology.

Policy UA15: The Cherry Pickers Public House, Cheriton

- 3.59 Policy UA15 allocates the site for 10 houses or 20 apartments. Criteria highlight highway mitigation and archaeological potential. Four comments have been submitted to this policy.
- 3.60 A comment states that adequate parking needs to be provided; another comment suggested amendments to local bus routes.
- 3.61 KCC suggests amendments relating to archaeology. Southern Water states that access to underground sewerage infrastructure will be required.

Policy UA16: Affinity Water, Shearway Road, Cheriton

- 3.62 Policy UA16 allocates the site for 70 dwellings and open space. A masterplan is required; criteria cover pedestrian links, protected trees, public open space, the provision of self- and custom-build plots and archaeological potential. 13 comments have been submitted to this policy.
- 3.63 Affinity Water Ltd supports the policy but states that 70 dwellings would fail to make full use of the site's potential; an amendment is sought to provide 120 dwellings.
- 3.64 Two comments raise concerns regarding inadequate sewerage infrastructure and flood risk. Some amendments to bus routes in the area are suggested. A comment raises points about the site description, stating that protected trees have been lost to development.
- 3.65 Folkestone Town Council highlights flooding problems with the Pent Stream and seeks protection for the mature trees on the site; these concerns are shared by Go Folkestone Action Group.
- 3.66 KCC suggests amendments to wording related to archaeology and states that public rights of way need to be retained and enhanced. Southern Water requires a connection to the local sewerage system and access to underground sewerage infrastructure for maintenance. The Environment Agency highlights that the site lies within a protection zone for groundwater; contamination should therefore be controlled.

### Policy UA17: The Shepway Resource Centre, Military Road

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

### Policy UA18: Land East of Coolinge Lane, Folkestone

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

### Policy UA19: Encombe House, Sandgate

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

### **Hythe**

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

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

#### Policy UA20: Hythe Town Centre

- 3.81 Policy UA20 seeks to manage changes of use in Hythe Town Centre to protect the town's vitality. 15 comments have been submitted to this policy.
- 3.82 Two comments have been made to the map defining the town centre boundary, stating that the northern boundary should be drawn along Malthouse Hill, Bartholomew Street and Dental Street.
- 3.83 Seven comments make points including:
- Hythe now has a preponderance of non-retail uses in the centre: these should be monitored and the policy should set a minimum percentage of retail uses;
  - There needs to be a greater focus on employment as employment sites, such as Smiths Medical, are being lost;
  - Any development should protect the character of the town; and
  - Temporary 'pop up' shops and a Hythe market could help revitalise the town.
- 3.84 Hythe Civic Society seeks the provision of sufficient parking within development proposals in town centres. Hythe Neighbourhood Plan Group supports the policy but requests further criteria related to the historic character of the High Street. Shepway Green Party considers that the policy should specify a percentage of retail (A1) uses in the frontage.
- 3.85 KCC asks for reference to be made to special historic character of the town centre and the Hythe, High Street and Vicinity Conservation Area. Historic England seeks reference to archaeological potential within the town centre.

#### Policy UA21: Smiths Medical Campus, Hythe

- 3.86 Policy UA21 allocates the site for 80 dwellings and employment use (B1/B8). Criteria cover: design and layout; the provision of self- and custom-build plots; retention of employment; archaeological potential; contamination; and ecology. (Pre-application discussions have taken place regarding this site.) 25 comments have been made to this policy.
- 3.87 10 objecting comments state that: the site should be developed for a leisure centre in preference to Princes Parade; education and health facilities are inadequate; and the area is already congested with traffic.

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

Policy UA22: Land at Station Road, Hythe

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

Policy UA23: Land at Saltwood Care Centre, Hythe

- 3.96 Policy UA23 allocates the site for extra-care housing. Criteria cover: accessibility; care provision; landscape character; access; and archaeological potential. (The site is subject to planning permission

15/0720/SH for 84 extra-care homes.) 20 comments have been submitted to this policy.

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

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

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

the Group states that this should be increased to allow the Princes Parade allocation to be deleted. Shepway HEART Forum states that St Saviour's Hospital should be retained as a locally listed building.

- 3.105 Sport England objects to the policy stating that the Council's Playing Pitch Strategy is out-of-date and there is no evidence justifying loss of playing pitches on the site. Natural England states that Foxwood School may contain priority deciduous woodland habitat.
- 3.106 KCC highlights a number of highways and pedestrian improvements that will be required; amendments are also suggested to wording related to archaeology. Southern Water requires connection to the local sewerage system.

#### Policy UA25: Princes Parade, Hythe

- 3.107 Policy UA25 allocates the site for 150 dwellings. The policy requires the delivery of a masterplan setting out the provision of a replacement for Hythe Swimming Pool, public open space and a mix of homes including accommodation for the elderly, affordable housing and self- and custom-build. Other criteria cover: the setting of the Royal Military Canal, potential contamination and the protection of the Royal Military Canal Local Wildlife Site. 512 comments have been submitted to this policy and the supporting text. (Comments relating to Princes Parade have also been made against other chapters of the PPLP and these are highlighted in the relevant sections of this Appendix.)
- 3.108 494 comments of objection have been made raising a number of issues. Objections state that the development would: amount to overdevelopment; lead to the erosion of the separation between Hythe and Sandgate; set a precedent for other sites; provide second homes rather than homes for local people; impact negatively on the Royal Military Canal Scheduled Ancient Monument; impact negatively on the Local Wildlife Site and ecology; and impact negatively on views, landscape and local character. In addition comments state that the development would be at high risk of flooding and increase contamination and light pollution. It is stated that infrastructure would be unable to cope, particularly the road network, public transport, health, education, sewerage, water and electricity. It is stated that the proposed leisure centre would be in the wrong place to satisfy demand and the development would have a negative impact on tourism and local businesses. Among those objecting are: the Hythe Neighbourhood Plan Group; Shepway Green Party; Shepway HEART Forum; Sandgate Parish Council; Monks Horton Parish; and Monks Horton Parish and Sellindge and District Residents' Association.
- 3.109 Hythe Town Council supports the requirement for an appropriate mix of well-designed homes, but states that any self-build homes must conform to a masterplan to ensure a good visual appearance.
- 3.110 Historic England objects to the allocation, stating that the site should not be allocated for significant development based on the likely impact on the Royal

Military Canal. KCC states that it has substantial concerns about the allocation and cannot see a way in which the development could proceed while ensuring that the Canal's setting is also preserved and enhanced.

- 3.111 15 comments support the allocation, stating that it represents a good opportunity to provide an enhanced facility and that it would deal with an unkempt area. Among those supporting the policy are the Hythe Aqua Swimming Club and Shepway District Council Strategic Projects.

Policy UA26: Hythe Swimming Pool, Hythe

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

#### **4. Romney Marsh Character Area (Chapter 6)**

##### **Summary of consultation comments**

- 4.1 This chapter sets out a number of policies for the Romney Marsh Area, including for New Romney Town Centre and sites for housing and other developments.
- 4.2 A number of comments have been submitted to the supporting text:
- A comment welcomes the settlement hierarchy and the fact that housing was not allocated in every village;
  - London Ashford Airport states that insufficient recognition is given to the airport as a major employer and economic driver;
  - CPRE Shepway states that the housing allocated to the Romney Marsh area exceeds the target set out in the Core Strategy;

- Objections highlight: overprovision against Core Strategy targets; high flood risk; a lack of infrastructure, particularly health and education; struggling shops in New Romney town centre; poor design of recent housing; loss of the rural character of the towns and villages; loss of bungalows to create high density housing; loss of green spaces and impacts on the tourist economy; lack of employment opportunities; and traffic congestion;
- A comment objects to the proposed new link road at New Romney; and
- A comment states that Dungeness needs protecting and that older buildings are being replaced with modern creations.

#### Policy RM1: New Romney Town Centre

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

#### Policy RM2: Land off Victoria Road West, Littlestone

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

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

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

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

Policy RM4: Land west of Ashford Road, New Romney

- 4.17 Policy RM4 allocates the site for 60 dwellings. A number of requirements cover: vehicle and pedestrian access; the provision of self- and custom-build plots; surface water drainage; landscaping; archaeological potential; impacts on heritage assets; provision of open and play space; ecological impacts; contributions to medical facilities; and access to the Ashford Road New Romney Pumping Station. 14 comments have been submitted to this policy.
- 4.18 11 objections raise issues of: overprovision of housing against Core Strategy targets; lack of infrastructure; poor access, parking provision and highways capacity; overstretched education and health facilities; lack of employment opportunities; loss of grazing land and green spaces; flood risk; and loss of an important gateway to the town.
- 4.19 Kent Planning Ltd supports the policy and states that the land is not liable to flooding.
- 4.20 KCC suggests amendments relating to archaeology and public rights of way. Southern Water states that the masterplan should require consideration of odour and vibration given proximity to the pumping station.

Policy RM5: Land to the south of New Romney

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

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

- 4.27 Policy RM6 allocates the site for 29 dwellings. Criteria cover: the provision of medical facilities; surface water drainage; landscaping; the provision of community facilities; and archaeological potential. 12 comments have been submitted to this policy.
- 4.28 The Marsh Academy objects to the allocation, stating that the land is needed for educational purposes; the Academy also states that it has rights of access over the site that it would not be willing to give up. A Governor of the Academy adds that the development would increase dangers to children; the Youth Centre on the site would need to be relocated, as would the electricity and water sub-stations. New Romney Town Council maintains that the allocation should be reduced in size to take account of restrictive covenants.

4.29 Six objections state that: the land is needed for expansion of education facilities and green space; the road network is inadequate; car parking is at capacity; health and education facilities are overstretched; and the land should be protected as a community asset.

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

#### Policy RM7: Development at North Lydd

4.31 Policy RM7 allocates four sites in North Lydd for a total of 65 dwellings: Kitewell Lane, rear of Ambulance Station (eight dwellings); Land south of Kitewell Lane (nine dwellings); Station Yard, Station Road (30 dwellings); and Peak Welders (18 dwellings). A masterplan is required for the four sites and the policy sets out a number of criteria that development should meet. Ten comments have been submitted to this policy.

4.32 In relation to the Kitewell Lane site, KCC states that Kitewell Lane will be required to be widened to 4.1m width with a 1.2m footpath. John Paine Farms supports the allocation but states that the requirement for a masterplan would be an obstacle to housing delivery.

4.33 In relation to the South of Kitewell Lane site, Southern Water states that access to underground infrastructure will be required for maintenance purposes. Two comments state that access is inadequate, there is no capacity in the sewerage system and education and health facilities are overstretched.

4.34 In relation to the Peak Welders site, KCC objects to the allocation on the grounds that there is no potential for a footpath to be provided to access the site.

4.35 In general comments to policy RM7, KCC suggests amendments to wording relating to archaeology. Natural England states that, given proximity to protected sites, connection to sewerage drainage should be provided and sufficient capacity at local treatment works should be confirmed. Kent Wildlife Trust states that the sites are close to a Local Wildlife Site and there should be no increase in recreational pressure or disturbance. The Environment Agency highlights proximity to a historic landfill site and states that contamination may need to be addressed. A comment supports the allocation of brownfield sites in Lydd in preference to development along the coast, if infrastructure is provided.

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

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

- 4.37 Policy RM8 allocates the site for 85 dwellings. Criteria cover: highway improvements; access; public transport; pedestrian movement; parking spaces; flood risk; play areas; impacts on protected wildlife sites; and archaeological potential. (Planning permission 07/1566/SH has been granted for 85 dwellings.)
- 4.38 An objecting comment raises issues of lack of affordable housing, poor design of recent developments and lack of health facilities. Another comment states that, while the allocated site has been granted planning permission, the adjacent land - the former Rugby Club campsite - should be protected for future leisure and community use.
- 4.39 KCC suggests amendments to wording related to archaeology. Southern Water requires connection to the local sewerage system. Natural England states that, given the proximity to protected sites, connection to the sewerage drainage system should be provided and sufficient capacity at local treatment works should be confirmed.

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

- 4.40 Policy RM9 allocates the site for five dwellings. Criteria cover flood risk, the existing river culvert, design, biodiversity and archaeology. Four comments have been submitted to this policy.
- 4.41 Shepway District Council Strategic Development supports the policy and states that it is a previously developed site in a sustainable location.
- 4.42 Two objecting comments state that there is insufficient health or education infrastructure and that development along the coast should be resisted.
- 4.43 Natural England states that, given the proximity to protected sites, connection to the sewerage drainage system should be provided and sufficient capacity at local treatment works should be confirmed.

Policy RM10: Car park, Coast Drive, Greatstone

- 4.44 Policy RM10 allocates the site for 16 dwellings. Criteria require a traffic assessment, surface water drainage strategy, biodiversity enhancements and consideration of archaeological potential. 32 comments have been submitted to this policy.
- 4.45 Shepway District Council Strategic Development supports the allocation and states that the site could comfortably accommodate 20 dwellings.
- 4.46 New Romney Town Council objects to the policy and states that it should be removed from the plan. CPRE Shepway objects on the grounds that: there is significant local opposition; it is a well-used car park, the loss of which would damage local businesses; the site is prone to flooding; and drainage is inadequate.
- 4.47 26 objecting comments have been submitted raising issues including: flooding; loss of the car park with resultant impacts on the tourist economy,

local businesses and disabled access; additional traffic on already congested roads; inadequate vehicle access; lack of health and education facilities; impacts on local wildlife and the adjacent Site of Special Scientific Interest (SSSI); increased light pollution; and unexploded ordnance.

- 4.48 Westward Planning Ltd has submitted comments on behalf of The Campaign Against the Development of Coast Drive Car Park and ten named objectors raising objections on the grounds that: the allocation is outside the settlement boundary and contrary to Core Strategy policies; the site is at high risk of flooding; it would have harmful impacts on the adjacent SSSI; and development would be detrimental to the amenity of local residents.
- 4.49 The Environment Agency (EA) has submitted an objection, due to the proximity of the proposal to the seafront and the reliance the development would have on the continued maintenance of the beach. The EA states that it wishes to see the site deleted from the plan and refers to its objections to the planning application (16/1017/SH).
- 4.50 KCC states that the car park provides valuable access and that any development should protect the route of the England Coast Path and retain some public parking. Natural England states that, given the proximity to protected sites, connection to the sewerage drainage system should be provided and sufficient capacity at local treatment works should be confirmed.

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

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

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

- 4.55 Policy RM12 allocates two sites for a total of 25 dwellings: 15 dwellings at land to the north of Rye Road; and 10 dwellings at land to the south. Criteria require: a masterplan; landscaping; a surface water drainage strategy; and open and play space. Impacts on archaeology, the setting of Listed Buildings and the Conservation Area and protected species should also be addressed. Nine comments have been submitted to this policy.
- 4.56 The Crown Estate supports the policy. Invicta Self and Custom Build Ltd also supports the policy; it intends to develop the land to the south for self-build housing and states that the site could accommodate as many as 16

dwellings. A supporting comment states that the sites are suitable for development with good road links but will need screening from the A259.

- 4.57 CPRE Shepway objects to the allocation, maintaining that the site is too prominent and that there are problems of drainage, safe access and harm to the historic environment; the loss of agricultural land is also highlighted. Two objecting comments state that the site lies outside the settlement boundary and within a protected Local Landscape Area.
- 4.58 KCC suggests amendments to wording related to archaeology and states that the 30mph speed restriction would need to be extended. Southern Water states that it will require access to existing underground sewerage infrastructure for maintenance. Historic England states that the setting of the Grade I Church will need particular care in the design of any new development.

#### Policy RM13: Land adjacent to Moore Close, Brenzett

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

## **5. North Downs Character Area (Chapter 7)**

### **Summary of consultation comments**

- 5.1 This chapter sets out 13 site allocations for the North Downs Area. A number of comments have been made against the supporting text:
- The Kent Downs AONB Unit states that: the Council should have regard to the purpose of conserving and enhancing the Kent Downs AONB in exercising its functions; recognition should be given to countryside to the south of the AONB, which forms part of its setting; and proposals for major development should be referenced as should the AONB Management Plan;
  - E Charlier and Sons Ltd states that the AONB Management Plan does not form part of the development plan for the district and that the chapter should explain the site selection process the Council has undertaken to minimise impacts on the AONB;
  - CPRE Shepway states that there is insufficient information to judge the need for housing within the AONB; it must therefore object to the allocations in the plan. It also maintains that infrastructure has not kept pace with development, particularly in Hawkinge;

- A comment states that Hawkinge has been ruined by modern development;
- A comment states that Sellindge has suffered from too much development and there is always gridlock in the village when there is an accident on the M20;
- Comments express objection to development proposals at the former Folkestone Racecourse and the lorry park; and
- Some detailed wording changes are suggested by the Kent Downs AONB Unit and Historic England.

Policy ND2: Former Officers' Mess, Aerodrome Road, Hawkinge<sup>1</sup>

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

Policy ND3: Mill Lane rear of Mill Farm, Hawkinge

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

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

- 5.7 Policy ND4 allocates the site for 100 dwellings. Criteria cover: impacts on the AONB; design and street layout; open spaces; landscape; vehicle access; contamination; archaeology and heritage assets; and pollution prevention. 56 comments have been submitted to this policy.
- 5.8 50 comments raise objections regarding: impact on the adjacent Kent Battle of Britain Museum; the loss of the nation's historic wartime sites; loss to the tourist industry and local economy; unexploded ordnance; heavy contamination; and inadequate facilities at Hawkinge.

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

- 5.9 The Kent Battle of Britain Museum charity requests that the allocation is withdrawn and the land be made available for the Museum to buy; it states that it has funds to purchase the site which it has been raising over the last decade.
- 5.10 The Trustees of Hawkinge Activity and Adventure Centre Ltd support the allocation, stating that the site provides an opportunity to provide homes in a sustainable location. The Trustees state that attempts to enter into discussion with the Museum Trustees have not had a response.
- 5.11 The Kent Downs AONB Unit states that development should not extend to the south western part of the site to keep a buffer between new housing and Gibraltar Lane and respect the existing settlement pattern of Hawkinge.
- 5.12 KCC suggests that the wording of the policy be amended to ensure that the character of the new development is informed by its wartime history; amendments are also sought to wording related to archaeology. Southern Water states that a connection should be provided to the local sewerage system.

#### Policy ND5: Land at Duck Street, Elham

- 5.13 Policy ND5 allocates the site for five dwellings. Criteria highlight: impacts on the AONB; landscape; access; and archaeological potential. 21 comments have been submitted to this policy.
- 5.14 A supporting comment states that the site would integrate well into the area, if developed sensitively. The landowner supports the allocation and maintains that adequate visibility splays can be achieved.
- 5.15 Elham Parish Council objects to the site on the grounds of unsafe access, flood risk and inadequate sewerage infrastructure. CPRE Shepway objects to the site, saying that access, highway safety, sewerage capacity and surface water runoff present problems that will be difficult to resolve. 16 objecting comments raise concerns about: flooding; highway safety; ecological and landscape impacts; and sewerage and health infrastructure.
- 5.16 KCC objects to the policy, stating that adequate visibility splays cannot be provided; an amendment to the wording on archaeological potential is sought if the policy is to be retained.

#### Policy ND6: Land south of Canterbury Road, Lyminge

- 5.17 Policy ND6 allocates the site for 30 dwellings. Criteria cover: impact on the AONB and nearby heritage assets; the provision of self- and custom-build plots; trees and hedgerows; landscape; open space; access; traffic calming; enhancing public rights of way; archaeological potential; and pollution prevention. 13 comments have been submitted to this policy.
- 5.18 Kent Planning Ltd objects, stating that Land adjacent to Lyndon Hall, Lyminge is preferable, being better screened and closer to village facilities. CPRE Shepway objects to the policy, stating that there is insufficient

information on housing provision to judge whether the allocation is necessary. Four objections raise concerns about: loss of greenfield land within the AONB; design of the development; traffic impacts; and adequacy of sewerage and health infrastructure.

- 5.19 Two supporting comments argue that the site would be ideal for starter homes, provided a footpath, health facilities and an extension to the surgery car park are delivered. Sellwood Planning supports the allocation. Lyminge Parish Council supports the allocation, provided that the development preserves the rural character of the site and a footpath is provided; the Parish Council considers that the site could also be considered for extra-care sheltered accommodation.
- 5.20 KCC comments that traffic calming measures will need to be introduced. The County Council suggests amended wording related to buried archaeological remains and highlights the potential to create a new public access route along the old railway line between Lyminge and Penne. Southern Water requests that a connection is provided to the local sewerage system.
- 5.21 Natural England states that the site represents a significant extension of the existing settlement in the AONB. The Kent Downs AONB Unit states that development here would be contrary to national policy relating to major development in the AONB.

Policy ND7: General Sellindge policy

- 5.22 Policy ND7 allocates five sites in Sellindge for a total of 54 dwellings: The Piggeries, Main Road (eight dwellings); Land West of Jubilee Cottage, Swan Lane (15 dwellings); Land to the rear of Brook Lane Cottages, Brook Lane (11 dwellings); Land at Barrow Hill (15 dwellings); and Silver Spray (five dwellings). 20 comments have been submitted to this policy.
- 5.23 Two general objections state that Sellindge does not have sufficient health and education facilities. Comments from the Kent Downs AONB Unit add that mitigation of impacts on the setting of the AONB would be necessary for the Swan Lane sites. Other comments state that road safety is a key concern for local people.
- 5.24 Southern Water states that connections to the local sewerage system will be required. KCC proposes amendments to wording regarding archaeological potential of the sites.
- 5.25 In relation to The Piggeries, KCC also states that access is only acceptable for five dwellings and it would object to eight dwellings on the site.
- 5.26 In relation to Land West of Jubilee Cottage, two objections state that the land is liable to flooding. The Environment Agency highlights that the allocation is adjacent to a historic landfill site and the contamination may need to be addressed.

- 5.27 In relation to Land rear of Brook Lane Cottages, an objection states that access is dangerous. Natural England highlights that the site is adjacent to the Gibbin's Brook SSSI; pollution prevention measures would therefore be needed. KCC states that it objects, as suitable access cannot be provided for 11 dwellings.
- 5.28 In relation to Land at Barrow Hill, three objectors state that development will destroy the character of the area and bring in more traffic and create an unwanted access onto the A20. CPRE Shepway states that the site is remote from services and not sustainably located and could impact on a Bronze Age burial mound.
- 5.29 A supporting comment states that the Barrow Hill site is well located to existing housing and accessible to local facilities.

#### Policy ND8: Former Lympne Airfield

- 5.30 ND8 allocates the site for 125 dwellings. Criteria cover: trees and hedgerows; open spaces; the provision of self- and custom-build plots; junction improvements; footpaths; vehicle access; waste water infrastructure; contamination; and heritage assets. (Pre-application discussions are being held relating to this site.) 21 comments have been submitted to this policy.
- 5.31 Ten objecting comments have been submitted which raise issues of: previous refusals and appeals on the site and Inspectors' comments about the impacts of rejected schemes; the lack of reference to Otterpool Park; loss of a buffer between the village and the employment park; impact on the setting of the AONB; impact on the compact nature of the village; and impacts on sewerage, traffic and school places.
- 5.32 Shepway Green Party objects to the allocation, citing previous refusals on the site. Lympne Parish Council is strongly opposed, and states that the land would be the only buffer between Lympne village and the proposed development at Otterpool Park. CPRE Shepway also objects, stating that there is insufficient information on housing provision to know whether a development of this scale is needed in the North Downs area. Shepway Environment and Community Network states that the proposal is bitterly opposed by the large majority of residents and cites loss of the airfield's military heritage.
- 5.33 Phides strongly supports the policy but seeks an amendment to the requirement for self-build plots to allow greater flexibility. A comment of qualified support has also been submitted.
- 5.34 Historic England states that there will be some archaeological potential to take into account. Natural England states that the allocation represents a significant extension of the western boundary of the village that may be visible from the AONB. The Kent Downs AONB Unit states that development would fail to conserve and enhance the AONB's setting.

- 5.35 Southern Water states that a connection to the local sewerage system will be required. KCC requires the provision of emergency access and suggests amendments to reflect the site's World War II heritage.

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

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

Policy ND10: Land at Folkestone Racecourse

- 5.39 Policy ND10 allocates the site for 11 dwellings. Criteria relate to: design; trees and hedgerows; open spaces; parking and street design; impacts on water quality; archaeological potential; and impacts on the setting of Westenhanger Castle. Nine comments have been submitted relating to this policy.
- 5.40 Two objections state that the allocation does not make sense in the context of proposals for Otterpool Park and that the development would impact on footpaths linking to the station. CPRE Shepway objects, arguing that it is not possible to determine the impact on the AONB with such a loosely defined allocation.
- 5.41 Historic England highlights the importance of other heritage assets in addition to the castle, such as military artifacts and racecourse buildings. Southern Water states that a connection needs to be provided to the local sewerage system. KCC states that footpath links should be provided to the station; amended wording is also suggested relating to impacts on Westenhanger Castle and archaeological potential.
- 5.42 The Arena Racing Company Ltd, while supporting the allocation, states that it is unlikely to come forward as anticipated given the Government's support for Otterpool Park.
- 5.43 The Kent Downs AONB Unit has submitted two comments supporting the low density nature of the allocation and the requirement for a frontage onto Stone Street.

#### Policy ND11: Camping and Caravan Site, Stelling Minnis

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

#### Policy ND12: Land adjoining 385 Canterbury Road, Densole

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

#### Policy ND13: Etchingill Nursery, Etchingill

- 5.52 Policy ND13 allocates the site for 30 dwellings. Criteria cover: impacts on the AONB; landscape; access; footpaths; archaeology; design; and effects on the nearby SSSI. 14 comments have been submitted to this policy.
- 5.53 E Charlier and Sons Ltd supports the policy. Lyminge Parish Council supports the policy, highlighting criteria relating to open space and footpaths.

- 5.54 Southern Water seeks inclusion of a requirement for connection to the local sewerage system. KCC suggests amendments to the point related to archaeology.
- 5.55 Five objections, including one from the Kent Downs AONB Unit, state that development of this size would be contrary to national AONB policy. Other objections maintain that access onto Canterbury Road is dangerous and flood risk would be increased. CPRE Shepway objects to the allocation, stating that without information on housing supply in the North Downs Area it is not possible to demonstrate a need for the development. Natural England objects to the allocation, stating that it would represent a significant extension to the settlement and be visible from the North Downs Way National Trail.
- 5.56 Three comments argue that any development needs to reinstate a buffer to the countryside and protect views from existing houses. Two comments highlight the need for traffic calming in the village and to keep existing trees on the site. A further comment calls for a high standard of development to preserve Etchinghill's character.

Policy ND14: Land adjacent to the Golf Course, Etchinghill

- 5.57 Policy ND14 allocates the site for 11 dwellings and includes criteria relating to archaeology, landscape impacts and the Kent Downs AONB. Seven comments have been submitted to this policy.
- 5.58 Pentland Homes Ltd supports the policy. Lyminge Parish Council supports the policy and wishes to see enhanced green spaces and planting within the site, and for the site to form an appropriate entrance to the village.
- 5.59 Southern Water states that it requires access to underground sewerage infrastructure for maintenance. KCC suggests amended wording relating to archaeology.
- 5.60 Two objections have been received citing impacts on the AONB and precedent for future development on the golf course. A comment highlights the need for traffic management in the village.

## **PART TWO – DEVELOPMENT MANAGEMENT POLICIES**

### **6. Introduction (Chapter 8)**

#### **Summary of consultation comments**

- 6.1 The Introduction to Part Two – Development Management Policies stresses that the policies provide a basis for considering planning applications for development within the whole plan area. The text emphasises that the PPLP should be read as a whole, with reference to all relevant policies. Two comments have been submitted to the Introduction.

6.2 Hythe Civic Society states that the plan gives insufficient attention to infrastructure needs and inadequate infrastructure will be compounded by the level of new development. London Ashford Airport states that it is imperative that policies should be supportive of new development and not be unduly prescriptive.

## **7. Housing and Built Environment (Chapter 9)**

### **Summary of consultation comments**

7.1 This chapter sets out 11 development management policies relating to: design; development affecting residential gardens; alterations and extensions; space standards; and gypsy and traveller accommodation.

7.2 Four general comments state that:

- A new policy is needed to ensure that a mix of housing types, tenures and sizes is provided;
- Policy requirements will mean that lengthy negotiation will be needed on proposed schemes;
- There is a need for a policy to protect residential amenity; and
- The expansion of London Ashford Airport and its potential impacts needs to be taken into account when considering amenity.

7.3 Five comments have been made in relation to the supporting text, Accessible Dwellings and Water Efficiency (paragraphs 9.46-9.49). Rother District Council states that it is also seeking higher levels of water efficiency. The Home Builders Federation states that the policy is contrary to national policy. CPRE Shepway states that the policy needs clarifying. The Environment Agency provides detailed comments on the standards proposed. A comment states that the requirement is unclear and likely to be contrary to national policy. (Some of these comments are repeated in responses to policy CC2: Sustainable Construction – see below.)

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

#### Policy HB1: Quality places through design

7.5 Policy HB1 sets out a number of general design criteria to guide developments. 19 comments have been made to this policy.

7.6 Comments raise a number of issues including the need for accurate drawings on submission of planning applications and for development to sit well with neighbouring properties; Hythe is highlighted. Comments state that high quality materials are essential and that maintenance should be considered at the outset; the Bayeuxfields development in Hawkinge is mentioned in this regard.

- 7.7 A comments state that traffic impacts have been ignored, while another comment states that cycling is emphasised to the detriment of other forms of transport.
- 7.8 CPRE Shepway states that greater emphasis should be given to local distinctiveness and issues such as light pollution and tranquillity.
- 7.9 A comment highlights the increasing demand for retirement accommodation.
- 7.10 Sandgate Parish Council welcomes reference to the Sandgate Design Statement in supporting text. Hythe Town Council supports the policy, while New Romney Town Council considers it could be improved by reference to Town and Village Design Statements and Neighbourhood Plans. A comment states that it would be helpful if a general design guide were in place for Shepway District.
- 7.11 A comment states that Village Design Statements and Neighbourhood Plans should supplement the policy rather than seek to inform it. A respondent objects to the statement that single aspect north-facing dwellings should be avoided, claiming that this is not justified by any evidence.

#### Policy HB2: Cohesive design

- 7.12 Policy HB2 sets out more detailed design considerations based on Building for Life 12 standards. Six comments have been made regarding this policy.
- 7.13 KCC states that greater emphasis should be given to the role of heritage assets. CPRE Shepway states that the policy should highlight the need for new developments to respond to landscape character and that more sustainable forms of travel should be promoted. A comment states that public transport is unsuitable for some groups, such as the elderly, and another respondent maintains that too much emphasis is placed on cycling in the PPLP. A comment adds that amenity space needs to accommodate areas for outdoor facilities to dry clothes naturally.
- 7.14 Hythe Town Council supports the policy.

#### Policy HB3: Development of residential gardens

- 7.15 Policy HB3 sets out criteria to judge proposals for the development of residential garden land. Six comments have been submitted relating to this policy.
- 7.16 The Sandgate Society states that the starting point of the policy should be that development proposals are not permissible in residential gardens. The Kent Downs AONB Unit argues that proposals should only be considered if they are within an existing town or village, rather than dwellings in the open countryside.
- 7.17 KCC states that greater emphasis should be given to the role of heritage assets.

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

Policy HB4: Alterations and extensions to existing buildings

- 7.19 Policy HB4 sets out criteria for judging proposals to alter or extend existing buildings, covering overshadowing, the design and scale of the extension, loft conversions, the location of garages and other considerations. Four comments have been submitted to this policy.
- 7.20 KCC maintains that the policy should take account of the historic environment in altering and converting buildings, and that garages should be set back at least six metres from the edge of the highway boundary.
- 7.21 Hythe Town Council supports the policy and Rother District Council notes that it is generally consistent with its own emerging Local Plan policy.

Policy HB5: Internal and external space standards

- 7.22 This policy requires that development meets or exceeds nationally described internal space standards. Four comments have been submitted to this policy.
- 7.23 Hythe Town Council states that the needs of people suffering from dementia need to be considered in the design of new communities. Rother District Council notes that the policy is generally consistent with its own emerging Local Plan policy.
- 7.24 The Home Builders Federation objects, stating that developers cannot be required to exceed national space standards. The Federation states that no justification for the policy is given and that it should be deleted.

Policy HB6: Self- and custom-build development

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

Policy HB7: Local housing needs in rural areas

7.28 Policy HB7 sets out criteria for assessing proposals for local needs affordable housing in rural areas, as an exception to policies restricting development. Criteria in the policy cover: local needs; the scale of development; siting; and the control of occupancy, so that the homes remain available to meet local need. Four comments have been submitted to this policy.

7.29 The Kent Downs AONB Unit and Hythe Town Council support the policy. KCC states that reference should be added to the historic environment. CPRE Shepway makes several comments, stating that reference should be made to *Rural Homes: Supporting Kent's Rural Communities*, that Parish Council support should be required and that some element of cross-subsidy may be appropriate.

#### Policy HB8: Residential development in the countryside

7.30 Policy HB8 sets out criteria for proposals for replacement dwellings in the countryside. Three comments have been submitted to this policy.

7.31 KCC maintains that development between villages and among farm buildings may sometimes be consistent with the historic character of the area, and reference should be made to the Kent Farmsteads Guidance produced by Historic England, KCC and the Kent Downs AONB Unit. CPRE Shepway states that policies need to be developed to cover proposals for rural workers' dwellings, the reuse of redundant buildings and the development of buildings of exceptional quality. Hythe Town Council supports the policy.

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

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

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

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

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

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

#### Policy HB11: Accommodation for Gypsies and Travellers

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

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

## **8. Economy (Chapter 10)**

### **Summary of consultation comments**

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

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

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

8.3 At the end of the chapter seven options are given, which were presented in the Issues and Options PPLP and informed the development of the Preferred Options plan. London Ashford Airport has submitted comments on this section which argue that:

- Economic development proposals outside town centres, particularly innovative and knowledge-based developments, should not be restricted;
- Businesses should not be burdened with environmental regulations as viability is marginal in the district; and
- A flexible approach is needed to secure investment, particularly for small- and medium-sized businesses.

### Policy E1: Employment sites

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

#### Policy E2: Tourism

- 8.8 Policy E2 contains criteria relating to development for hotels, guesthouses, bed and breakfast, self catering accommodation and new visitor attractions. Seven comments have been submitted to this policy.
- 8.9 A comment from the Kent Downs AONB Unit states that the policy needs to consider proposals for sustainable tourism in the AONB but that any proposals should conserve and enhance the landscape and scenic beauty of the AONB. Hythe Town Council states that the 'five stars' in Hythe need to be integrated (the beach, the canal, the Romney Hythe and Dymchurch Railway, the High Street and St Leonard's Church).
- 8.10 CPRE Sheway strongly objects, arguing that the policy does not provide sufficient safeguards to ensure that development is sustainably located. London Ashford Airport also objects, maintaining that the airport should be identified in this section as an important business within the district.
- 8.11 A comment expresses disappointment at a perceived lack of support for tourism within the district; an unwillingness to support the business plans of the Shornccliffe Trust is highlighted. Comments of Shepway HEART Forum also raise the efforts of the Shornccliffe Trust and state that developers have been permitted to dictate the form of development at the Garrison.
- 8.12 KCC maintains that the district's heritage is one of its strongest attractions and this should be recognised in the policy.

#### Policy E3: Hotels and guest houses

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

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

Policy E4: Touring and static caravan sites

- 8.15 Policy E4 sets out a number of criteria to manage the upgrading of existing caravan sites and changes of use to residential. Three comments have been submitted to this policy.
- 8.16 Hythe Town Council supports the policy. A supporting comment from the Kent Downs AONB Unit suggests amended wording to protect landscape character. CPRE Shepway objects, stating that owners of caravan sites proposing a change to residential use should have to demonstrate that they have marketed the site appropriately before permission would be granted.

Policy E5: Farm diversification

- 8.17 Policy E5 sets out a number of criteria to manage proposals for farm diversification, such as landscape character, access, parking and viability of the farm unit. Two comments have been submitted to this policy.
- 8.18 Hythe Town Council supports the policy. CPRE Shepway objects, stating that the policy needs to reference the impact of traffic on rural lanes and historic assets and their setting.

Policy E6: Farm shops

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

Policy E7: Reuse of rural buildings

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

Policy E8: Broadband provision

8.23 Policy E8 seeks provision of highest speed broadband infrastructure as part of new developments. Two comments have been submitted to this policy.

8.24 Hythe Town Council supports this policy. KCC states that the policy's wording would miss opportunities to significantly improve infrastructure; the County Council highlights Ashford Borough Council's broadband policy as a good example to follow.

## **9. Community (Chapter 11)**

### **Summary of consultation comments**

9.1 This chapter sets out five policies covering: public art; the protection of community facilities; the provision of open space; the provision of formal play space; and Local Green Spaces.

9.2 A number of comments have been made to the supporting text of the chapter:

- Sport England highlights that the Council's existing Playing Pitch Strategy dates from 2011 and warns that it is likely to object to any local plan that comes forward without a robust evidence base;
- London Ashford Airport states that the Council should not regulate development unless absolutely necessary;
- KCC states that it is undertaking work with other districts and the Kent Garden Trust to identify Local Green Spaces and would like to work with Shepway District Council on the survey. The County Council also states that the historic environment is vital in creating a sense of place;
- A comment nominates the former Rugby Club grounds at Dymchurch Road, St Mary's Bay as a Local Green Space;
- Two comments state that the Open Space Study needs to be completed before the Council allocates sites for development, and a comment states that the space at Princes Parade is vital for local people;
- A comment states that the Council is delaying the identification of Local Green Spaces as planning applications are made on them; and
- A comment objects to reference to sports facilities at Princes Parade, stating that it is an excellent natural open space.

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

#### Policy C1: Creating a sense of place

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

9.5 Hythe Town Council supports the policy. The Home Builders Federation objects, stating that there is duplication with the Community Infrastructure

Levy (CIL) Regulation 123 list, which also seeks contributions to public realm improvements. These objections are echoed by London Ashford Airport. Taylor Wimpey suggests wording changes to bring the policy into line with national policy, which allows for other ways to create a sense of place, and to stress links with applicants' Design and Access Statements.

#### Policy C2: Safeguarding community facilities

- 9.6 Policy C2 seeks to prevent the loss of community facilities and requires that they have been marketed at an appropriate price and that alternative facilities are provided.
- 9.7 One comment of support, from Hythe Town Council, has been submitted to the policy.

#### Policy C3: Provision of open space

- 9.8 Policy C3 requires the provision of open space as part of new developments of five or more dwellings, in accordance with Fields in Trust guidance. Three comments have been submitted to this policy.
- 9.9 Shepway Green Party objects, stating that meaningful consultation on the policy cannot be undertaken without the updated requirements from the latest open space study. Hythe Town Council considers that the statement allowing transfer of spaces to Town or Parish Councils "*in certain cases*" needs clarification. The Home Builders Federation states that the policy is unsound because it would not meet the tests of necessity in the NPPF; it notes that the CIL Regulation 123 list already requires contributions to open space.

#### Policy C4: Formal play space provision

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

#### Policy C5: Local Green Spaces

- 9.12 Policy C5 sets out that Local Green Spaces will be protected from development other than in certain limited circumstances. Seven comments have been submitted to this policy.
- 9.13 A comment states that the policy should be stricter and no development should be allowed on the spaces. A comment states that proposals for Princes Parade (policy UA25) would be inconsistent with this policy.

- 9.14 Hythe Town Council considers that the point relating to loss of ecological habitats is too strict and that the policy should allow for compensatory habitat to be provided elsewhere. Hythe Neighbourhood Plan Group states that the Green Infrastructure Strategy needs to be completed before Local Green Spaces can be identified.
- 9.15 Southern Water objects to the policy, arguing that it would restrict the delivery of essential infrastructure. KCC seeks inclusion of heritage assets and their setting within the policy.

## **10. Transport (Chapter 12)**

### **Summary of consultation comments**

- 10.1 This chapter sets out five policies covering topics including street layout, residential parking, residential garages, lorry parking and cycle parking.
- 10.2 33 comments are made relating to the general text of the chapter, including a number of detailed points regarding traffic and parking problems in Hythe.
- 10.3 Other comments argue that:
- Proposals to encourage more sustainable transport must be put into practice at an early stage in every development;
  - Developments should provide open 'car port' structures rather than garages, street furniture should be dealt with through reserved matters to avoid clutter, bin stores should be provided and developers should be required to upgrade bus stops where these fall below standard;
  - There is an over-emphasis on cycling, as the topography of the district does not support cycling;
  - Parking guidance is inadequate and standards should encourage more spaces serving larger dwellings to deter on-street parking;
  - The importance of London Ashford Airport needs to be recognised and supported in policy; and
  - Reference should be made to *Rural Streets and Lanes: A Design Handbook* (Kent Downs AONB Unit).

### Policy T1: Street hierarchy and site layout

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

#### Policy T2: Residential parking

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

#### Policy T3: Residential garages

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

#### Policy T4: Lorry parking

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

#### Policy T5: Cycle parking

- 10.16 Policy T5 sets out standards for the provision of cycle parking as part of new developments. Four comments have been submitted to this policy.

10.17 Two comments support the policy, although one maintains that retail developments also need to provide cycle parking.

10.18 A comment states that covered cycle parking needs to be provided in town centres, particularly Hythe. One comment states that requirements relating to the design of cycle parking facilities and the size of garages are overly prescriptive.

## **11. Natural Environment (Chapter 13)**

### **Summary of consultation comments**

11.1 This chapter contains nine policies dealing with a range of topics including: managing access to the natural environment; biodiversity; landscape; equestrian development; light pollution; land stability; contamination; and coastal management.

11.2 A number of general comments have been made in relation to the supporting text of this chapter:

- Natural England states that a number of sites proposed in the plan could impact on local biodiversity and considers that greater importance should be given to Green Infrastructure;
- CPRE Kent states that an additional policy is needed to ensure that development is only permitted if there is no adverse impact on internationally designated sites and that a coordinated approach is needed to marine planning;
- Kent Wildlife Trust considers that greater clarity is needed regarding the management of access to Dungeness;
- The Environment Agency suggests a number of detailed amendments to the supporting text;
- KCC stresses that landscape character is the result of thousands of years of interaction between the natural environment and human action;
- A respondent states that Princes Parade should be added to the list of coastal sites given protection in the plan;
- The Kent Downs AONB Unit states that text relating to dark skies should include reference to the AONB; and
- London Ashford Airport states that the Council should avoid regulating development unless it is absolutely necessary.

### Policy NE1: Enhancing and managing access to the natural environment

11.3 Policy NE1 highlights opportunities to improve access to the natural environment as part of new developments. 11 comments have been submitted to this policy.

11.4 Hythe Town Council supports the policy. Another supporting comment draws attention to the Cinque Ports Cycleway. The Environment Agency supports the policy, as does KCC, which wishes to see reference to its Countryside and Coastal Access Plan added. Kent Wildlife Trust supports

the policy and proposes amended wording to add clarity. Rother District Council supports reference to the Sustainable Access Strategy for the Dungeness Complex. Natural England welcomes the policy and believes that it will also relieve pressures on other designated sites, such as the Folkestone to Etchingill Escarpment Special Area of Conservation.

- 11.5 Other comments state that management of spaces cannot be achieved through the planning system and the policy therefore serves little purpose. CPRE Kent objects, stating that it considers that there is insufficient evidence to show that development will not have an adverse effect on internationally designated sites. Another comment states that not enough priority is given to protecting natural open space.

#### Policy NE2: Biodiversity

- 11.6 Policy NE2 sets out criteria that development must meet to safeguard and enhance biodiversity assets. 13 comments have been submitted to this policy.
- 11.7 The Environment Agency supports the policy but highlights other documents, such as the River Basin Management Plan, that could be referenced. Natural England supports the wide ranging considerations that the policy references.
- 11.8 KCC considers that the policy should be redrafted to be more specific and begin *“Planning permission will not be permitted unless ...”* rather than *“Planning permission will be granted ... where it can be demonstrated ...”* Rother District Council supports reference to the joint Sustainable Access Strategy work for the Dungeness Complex. Kent Wildlife Trust welcomes the policy and suggests detailed changes to wording. A comment supports the requirement to create new pollinator habitats.
- 11.9 Hythe Town Council considers that the policy should explain in what circumstances the benefits of development could outweigh adverse impacts on biodiversity. Two comments reference Princes Parade and state that development on that site would be ruled out by the policy. CPRE Kent states that the policy needs to provide more detailed guidance and additional references, for example to ancient woodland.
- 11.10 London Ashford Airport states that biodiversity analysis can only work on a case-by-case basis. The Home Builders Federation argues that the policy does not meet national guidance and is too broadly drawn, encompassing all development proposals regardless of impact.

#### Policy NE3: To protect the District’s landscapes and countryside

- 11.11 Policy NE3 sets out criteria relating to development affecting the Area of Outstanding Natural Beauty, Special Landscape Areas and Local Landscape Areas. Nine comments have been submitted to this policy.

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

#### Policy NE4: Equestrian development

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

#### Policy NE5: Light pollution and external illumination

- 11.16 Policy NE5 applies to applications for major development incorporating significant external lighting. The policy requires that applications include a lighting assessment and sets out a table of different zones where different lighting levels would be appropriate. Five comments have been submitted to this policy.
- 11.17 Shepway Green Party and Hythe Town Council support the policy. The Environment Agency states that the policy needs to refer to water courses as well as other habitats. CPRE Kent states that the policy should be amended to refer to local character, the amenity of residents and wildlife habitats for feeding, roosting and breeding. London Ashford Airport considers that the policy is too restrictive and would impact on the airport's operations. Highways England comments on supporting text and expresses concerns that restrictions will impact on the safe and efficient operation of the strategic road network.

#### Policy NE6: Land stability

- 11.18 Policy NE6 sets out requirements relating to development proposals in areas of land instability. In these circumstances a land stability or slope stability risk assessment is necessary. Three comments have been submitted in relation to this policy.

- 11.19 Hythe Town Council supports the policy. A comment states that development at Princes Parade would not conform to the policy. London Ashford Airport states that the policy is too prescriptive.

#### Policy NE7: Contaminated land

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

#### Policy NE8: Integrated Coastal Zone Management

- 11.23 Policy NE8 sets out general objectives relating to development in coastal areas, and promotes Integrated Coastal Zone Management with partner organisations. Six comments have been submitted regarding this policy.
- 11.24 The Marine Management Organisation has submitted a standard response, referring to its work producing Marine Plans. Rother District Council welcomes the policy. KCC seeks reference to the English Coast Path National Trail in the wording and states that flood mitigation measures need to take account of heritage assets as many of Shepway's most important assets are located along the coast. The Environment Agency gives its qualified support but emphasises that marine wildlife needs to be considered.
- 11.25 Other comments give support to the Cinque Ports Cycleway and state that air pollution from shipping needs to be considered in the policy.

#### Policy NE9: Development around the coast

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

## **12. Climate Change (Chapter 14)**

### **Summary of consultation comments**

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

#### Policy CC1: Reducing carbon emissions

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

#### Policy CC2: Sustainable construction

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

- 12.10 The Environment Agency states that there is confusion over the standards for water use specified in the policy. KCC welcomes reference to the historic and built environment in the policy and states that Climate Change Risk Assessments are needed for new developments.

Policy CC3: Sustainable Drainage Systems (SuDS)

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

Policy CC4: Wind turbine development

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

Policy CC5: Domestic wind turbines and existing residential development

- 12.19 Policy CC5 sets out criteria for development involving wind turbines to serve existing dwellings, including impacts on nearby dwellings, heritage

assets, the AONB and other considerations. Three comments have been submitted to this policy.

- 12.20 The Kent Downs AONB Unit supports the policy and suggests wording changes to reference landscape character. Hythe Town Council considers that the policy should take into account impacts on electrical and communications systems. CPRE Kent objects to the policy stating that it is unclear.

#### Policy CC6: Solar farms

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

### **13. Health and Wellbeing (Chapter 15)**

#### **Summary of consultation comments**

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

#### Policy HW1: Promoting healthier food environments

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

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

13.5 Policy HW2 requires that residential developments of 100 or more dwellings or non-residential developments in excess of 1,000sqm will require a Health Impact Assessment. Four comments have been received relating to this policy.

13.6 Hythe Town Council supports the policy. A comment states that smaller developments cumulatively contribute to pressure on services, such as hospital capacity, and these developments also need to be considered. Other comments state that air quality needs to be monitored to protect residents' well being.

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

13.7 Policy HW3 seeks to provide for and protect areas for food growing, such as allotments and the best and most versatile agricultural land. Five comments have been submitted to this policy.

13.8 Folkestone Town Council seeks the protection of Park Farm Road and Tile Kiln Lane allotments. Hythe Town Council supports the policy. Other comments state that demand for allotments will increase with an increasing population and that proposals such as the lorry park run counter to the intention to protect agricultural land.

Policy HW4: Protecting and enhancing rights of way

13.9 Policy HW4 seeks the provision of new cycling and walking routes as part of new development and aims to protect existing routes. Three comments have been submitted to this policy.

13.10 Hythe Town Council supports the policy. One comment suggests that reference should be made to the Council's approved Cycle Plan. An objector states that there is an over-emphasis on cycling in the plan.

## **14. Historic Environment (Chapter 16)**

### **Summary of consultation comments**

14.1 This chapter contains four policies which deal with: heritage assets; archaeology; the Local List of buildings and sites of architectural or historic interest; and communal gardens.

14.2 A number of general comments have been made against the supporting text of this chapter:

- CPRE Kent considers that more guidance is needed on the consideration of setting in decision making, significance of the asset, cumulative change and substantial harm;
- Go Folkestone Action Group states that insufficient attention is given to the heritage of Folkestone;
- Historic England makes a number of points including that: the historic environment is a part of the environmental dimension of sustainable

development; more reference needs to be made in diagrams and text to scheduled monuments; the Kent Historic Towns Surveys mentioned in the text are not comprehensive and up-to-date; detail wording changes are also suggested;

- KCC and Historic England state that undesignated archaeological assets need to be taken into account and also have protection;
- KCC makes a number of points relating to the Heritage Strategy and Local List guidance and urges the Council to adopt these documents as Supplementary Planning Documents (Tunbridge Wells Borough Council's Local List document is cited as a good example);
- Other comments state that heritage considerations have not been given weight in decisions on Shorncliffe Garrison or proposals for Princes Parade and Sandgate is suffering from piecemeal destruction of its Conservation Area; and
- Respondents argue that the public should be involved in determining which assets are included on the Local List and that it would be more meaningful to have the Heritage Strategy in place before consultation on the PPLP.

#### Policy HE1: Heritage Assets

- 14.3 Policy HE1 encourages the reuse of heritage assets to prevent damage through neglect. Seven comments have been submitted to this policy.
- 14.4 Two comments state that the development of Princes Parade will not meet the requirement of the policy to protect and conserve heritage assets. Another comment states that the principles behind the policy have not been observed in the development of Shorncliffe Garrison or proposals for Princes Parade.
- 14.5 Hythe Town Council supports the policy. Historic England states that the wording needs to be tightened to state that some assets need to be conserved for their significance alone rather than their potential for reuse. KCC states that the policy should be modified to emphasise that it is the *significance* of the heritage asset which needs to be considered in decision-making. Shepway HEART Forum states that it supports the creation of Local Lists and argues that the re-use of historic buildings should be fully explored before proposals for demolition are considered.

#### Policy HE2: Archaeology

- 14.6 Policy HE2 requires assessment of archaeological assets, field evaluations and the preservation of archaeological remains, where appropriate. Six comments have been submitted to this policy.
- 14.7 A comment states that the development of Princes Parade would not be in accordance with this policy.
- 14.8 Hythe Town Council supports the policy. Historic England states that the policy is acceptable. Kent County Council welcomes the policy, but suggests detailed wording changes to stress that it is the *significance* of the

archaeological asset that needs to be considered. Shepway HEART Forum states that it supports the creation of Local Lists and the re-use of historic buildings before proposals for demolition are considered.

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

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

Policy HE4: Communal Gardens

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

**Appendix 4: Summary of Comments Received During 2016 Preferred Options  
PPLP Consultation Exhibitions**

### **Urban Area (Hythe) – Princes Parade**

- The need for more houses is not a sufficient reason to ruin Princes Parade NO houses should be built on Princes Parade
- What will the effect of the weight and pressure on the waste disposal site and water table at Princes Parade
- Please do not ruin for ever Princes Parade which will happen if you build along our lovely seafront
- Princes Parade not a viable option
- Please build on land that people do not use i.e. do not reduce the amount of land available for human use. From your map Princes Parade is one of these sites that should not be changed
- Save Princes Parade because children play there and we need more green space!
  - The swimming pool is a Trojan Horse to build 150 houses with concrete garden.
  - Princes Parade is unsuitable for housing development also for a swimming pool and sports centre. Some years ago a pool was built on a former landfill site near Dartford – it sank... The proposed plans for development around the town do not consider the effect on traffic. Hythe is full to bursting already!
  - What about land contamination; traffic issues for Princes Parade and Seabrook Road area?
  - Swimming pool need to be located to the West of Hythe to be accessible to residents of Romney and Dymchurch
  - Is the land cap going to be soil? This would not be suitable to contain gases

### **Urban Area – Other**

- Improvement to main road (Seabrook Road)
- Horn Street Bridge completely inadequate
- East Folkestone – put the station back so East Folkestone can have easy access to rail travel
- Infrastructure for traffic wholly inadequate – traffic lights at Stade Street A259 junction
- Junction of Hospital Hill and Horn Street – 1200 houses
- Need to sort infrastructure out before any proposed new development. Hythe cannot cope now
- All developments proposed for Hythe make sense
- ONE road serves Hythe, Dymchurch and New Romney. Infrastructure needed
- A259 new crossing needed Prince of Wales Pub
- Build ring road to avoid A259 bottle neck at Scanlon's Bridge – Plans were made some years ago? Botolph's Bridge

### **Romney Marsh**

- Swimming pool needs to be located to the West of Hythe to be accessible to residents of Romney and Dymchurch
- ONE road serves Hythe, Dymchurch and New Romney. Infrastructure needed
- RM4 land ownership issues and investigation of pond on site

- RM5 land ownership issues
- Traffic congestion issues at junction of Station Road, High Street & Dymchurch Road in New Romney

### **North Downs**

- No huge housing development at Westenhanger (or Lorry Park either)

### **General Comments**

- What impact will there be on school places, hospitals and other services?
- Map should have key to identify sites – so difficult to comment
- Essential to get transport infrastructure in place BEFORE considering any further developments as per NPPF paragraph 32
- Any development of 80+ dwellings should have a full transport assessment which should assess traffic impact and transport integrity

**Appendix 5: Meeting the District's Housing Needs  
2017 Submission Draft Places and Policies Local Plan**

## Meeting the District's Housing Needs

The Core Strategy sets out the broad framework for new housing development across the district and this is broken down proportionally for the different character areas as follows:

- Urban Area - 75 per cent of new residential development (to the nearest 5 per cent);
- Romney Marsh Area - 10 per cent of new residential development (to the nearest 5 per cent); and
- North Downs Area - 15 per cent of new residential development (to the nearest 5 per cent).

The table below sets out the housing land supply position for the Submission Draft Places and Policies Local Plan, using information from the monitoring year 2015/16 (this will be updated as new monitoring information becomes available).

The table shows the Core Strategy housing requirement for the three character areas in the left hand column (column A). The table then totals the new housing development that has already taken place since the base date of the Core Strategy in 2006 through completed dwellings, as well as sites under construction and unimplemented permissions at 2016 (columns B, C and D). To this total is added the allocations in the Submission Draft Places and Policies Local Plan and an allowance for the Core Strategy strategic site at New Romney, excluding those sites that had planning permission in 2016 (column E).

An allowance is made for 'windfall' delivery (small sites of 1 to 4 dwellings that are not allocated but continue to come forward for development) in accordance with the Core Strategy (column F). The right hand column (column G) gives the total projected supply over the Core Strategy plan period (2006-2031).

Regarding the figures it should be noted that:

- An allowance of 10 per cent has been made for non-delivery for permissions that have not started on site (column D) and for the Local Plan and Core Strategy allocations (column E). The allowance for non-delivery is a conservative estimate to take account of planning permissions that may lapse (where development does not start before the date specified in the permission) and allocated sites that may be developed for fewer homes than identified in the relevant policy or where delivery extends beyond the end of the plan period;
- Smaller sites have been deducted from the outstanding permissions (column D) to avoid any potential double-counting with the windfall allowance (column F); and
- The windfall allowance is as set out in the Core Strategy and supporting evidence, where just under 1,000 dwellings is allowed for the final 13 years of the plan period (2018/19-2030/31).

Comparison of columns A and G shows that the Core Strategy's minimum housing land requirements will be met for all three character areas, with sufficient flexibility to take account of unforeseen circumstances.

<b>Places and Policies Local Plan - Housing Land Supply Position 2006-31</b>						
<b>Minimum Targets</b>	<b>Supply and Total Projected Delivery</b>					
<b>Number of homes (A)</b>	<b>(B) Completions 06/07-15/16</b>	<b>(C) Under construction at 2016</b>	<b>(D) Permissions not started at 2016</b>	<b>(E) Places &amp; Policies Local Plan/Core Strategy</b>	<b>(F) Windfall</b>	<b>(G) Total projected delivery (B + C + D + E + F)</b>
<b>Urban Area - 75 per cent of total (+/- 5 per cent)</b>						
<b>6,563</b>	1,713	629	3,063	927	637	<b>6,969</b>
<b>Romney Marsh Area - 10 per cent of total (+/- 5 per cent)</b>						
<b>875</b>	392	56	163	551	195	<b>1,357</b>
<b>North Downs Area - 15 per cent of total (+/- 5 per cent)</b>						
<b>1,313</b>	519	40	367	365	143	<b>1,434</b>
<b>District Total</b>						
<b>8,750</b>	2,624	725	3,593	1,623	975	<b>9,760</b>

**Appendix 6: New Sites Submitted During the 2016 Preferred Options Places  
and Policies Local Plan Consultation**

Ref	Title - land name	Address (rest of)	Approx. number dwellings	Site size (ha)	Assessment summary
PO1a	Sellindge West	Ashford Road Sellindge	10	0.52	<p>The site is open countryside and an outlying greenfield gap in the linear and sporadic development which has taken place along the Ashford Road (A20) in Sellindge. These gaps allow views to further open countryside and towards the AONB beyond, helping to maintain the rural feel and character of the village. The infill would merge two small pockets of existing development. However the Core Strategy (2013) focused on creating a central village core and a broad location was allocated. It was further suggested that the outlying pockets of development might have their settlement boundaries removed in the future. The allocation of this site would further reinforce the linear nature of the village and the lack of identify this has created in the past.</p> <p>The site is a fair walk away from the central Sellindge area where most of the facilities are located; however it is only a short walk away from the Church, Public House and Potten Farm shop.</p>
PO1b	Sellindge West	Ashford Road Sellindge		3.16	<p>The site is open countryside and an outlying greenfield gap in the linear and sporadic development which has taken place along the Ashford Road (A20) in Sellindge. These gaps allow views to further open countryside and the AONB beyond, helping to maintain the rural feel and character of the village. The infill would merge two small pockets of existing development. The site also extends further back and is not just infill but a large extension into the open countryside and the setting of the AONB beyond.</p> <p>The Core Strategy (2013) focused on creating a central village core and a broad location was allocated. It was further suggested that the outlying pockets of development might have their settlement boundaries removed in the future. The allocation of this site would further reinforce the linear nature of the village and the lack of identify this has created in the past.</p> <p>The site is a fair walk away from the central Sellindge area where most of the facilities are located however it is only a short walk away from the Church, Public House and Potten Farm shop.</p>

Ref	Title - land name	Address (rest of)	Approx. number dwellings	Site size (ha)	Assessment summary
PO3	Hawkinge East Revised	Hawkinge	50 (suggested by agent)	2.51	<p>The site adjoins the settlement boundary of Hawkinge, a rural centre in the North Downs Character Area with good facilities and transport links. The site is relatively close/ walkable to the centre of Hawkinge.</p> <p>The site has once again been revised and reduced in size to respond to the previous SHLAA conclusions, coming down from 10ha to 2.5ha. However the site is a greenfield expansion within the Kent Downs AONB and sequentially would not be a preferred site while there remain brownfield sites or sites within the settlement boundary.</p>
PO4	Land South West of Canterbury Road	Lyminge	50 (suggested by agent)	3.8	<p>The site would go against the current urban form in the area: to the south west the pattern of development is currently more open, resulting in encroachment into the countryside. In addition the site's impact on the AONB, potential archaeology and access difficulties require specific consideration and investigation.</p> <p>However Lyminge is a rural centre and has good facilities and transport links; this site adjoins the settlement boundary and is in easy walking distance to all the facilities. Subsequently further investigations needs to be carried out to explore if there are any options to accommodate five (or more) dwellings plus significant landscaping and open spaces in a low density scheme.</p>
PO5	Site at Red House Lane	Lyminge	8-10 (suggested by agent)	0.8	<p>This site is 'the wrong side' of the former Elham Valley Railway and development here would be encroachment into the countryside/AONB as there is very limited development to the East of Lyminge.</p>
PO8	Land rear of Touchwood	Stanford		0.9	<p>This is backland development located behind houses fronting Stone Street, so bounded by gardens on two sides and open countryside. Although centrally located in the village, it would act as a freestanding estate and there are very few facilities in Stanford.</p>
PO18	Land between Hillside and Brandet House	Rhee Wall Road, Brenzett		0.29	<p>The site is adjacent to open fields and development on the site would introduce built up development in an otherwise open landscape with sporadic housing outside the main built form of Brenzett. However, an adjacent site has been allocated as a preferred option and this would lessen the impact of the development of this frontage site on the wider landscape. These two sites could come forward together for a more cohesive</p>

Ref	Title - land name	Address (rest of)	Approx. number dwellings	Site size (ha)	Assessment summary
					layout.
PO19	Land adjacent to Framlea	Rye Road, Brookland	4	0.15	Despite not meeting the size threshold, there is potential for this site to come forward with the larger site allocated as a 'preferred option' to the north. These two sites could come forward together for a more cohesive layout. The site is in a sustainable location adjacent to existing residential use. Planning permission has previously been granted on the site for four dwellings.
PO20	Cherry Gardens	Littlestone		0.6	This site could be well integrated into the existing fabric and there are very few constraints apart from the protected trees running along the south east boundary. However, the site is not in close proximity to essential services.
PO21	Land behind Village Hall Car Park	Orgarswick Avenue, Dymchurch	8	0.4	The site is located within the settlement boundary of the Urban Centre of Dymchurch. The site is predominately residential in character, although some industrial/commercial use also exists nearby; it also performs well against a number of sustainability criteria, such as proximity to local services. However, the site falls within area of 'significant' flood risk under the SFRA 2115 and there is likely to be sequentially more appropriate alternatives.
PO23	Land at	Harden Road, Lydd		1	The site forms part of an existing employment designation, on the edge of, but within the settlement boundary of the Service Centre of Lydd. The site is in a sustainable location and is predominately residential in character, although some industrial/commercial use also exists nearby. It performs well against a number of sustainability criteria, such as proximity to essential services. Whilst the site is currently protected employment land, if an alternative employment site could be identified then there is potential for the site to come forward for residential use.

Ref	Title - land name	Address (rest of)	Approx. number dwellings	Site size (ha)	Assessment summary
PO24	Land at	Harden Road, Lydd		1.8	<p>The site is located adjacent to the settlement boundary of the Service Centre of Lydd.</p> <p>The site could potentially form an extension to the fairly recent Meadow View development to the west. However, this site is some distance from local services. There is also a slight concern over this site due to the potential for encroachment into the countryside. The light industrial works to the south-west will require some mitigation measures and careful site design/screening.</p> <p>Unlike a lot of land in this area, the site does not fall within Flood Zone 3 and only poses a Moderate Flood Risk the SFRA 2115.</p>
PO25	Land adjacent to	Josephs Way, New Romney		0.62	<p>The site is located within the settlement boundary of the Strategic Town of New Romney.</p> <p>The triangle-shaped former allotment site would form an extension to the recent neighbouring 'Church Lane' development. It represents an infill site that is well-bounded to the east and west by Mountfield Industrial Estate and existing residential areas respectively; therefore having little or no impact on the local landscape.</p> <p>The site performs well against a number of the sustainability criteria especially its proximity to local services within the town. Whilst its compatibility with the neighbouring employment uses has been raised as a potential concern, it is considered that any negative externalities could be minimised and/or mitigated through careful design (including screening).</p>
PO26	Cemex	Station Approach Road, Littlestone		1	<p>The site is located adjacent to the settlement boundary of the Strategic Town of New Romney/Littlestone.</p> <p>Whilst the site appears to be brownfield, it has since become naturalised and blended back into the landscape. The site is likely to require some remediation. Residential development in this location would have the effect of extending the linear development along Station Approach, perpendicular to the existing urban form, gradually increasing the pressure to urbanise the undeveloped area that currently separates Littlestone from Greatstone. The site is within Flood Risk Zones 2 and 3.</p>

Ref	Title - land name	Address (rest of)	Approx. number dwellings	Site size (ha)	Assessment summary
					Even though only within a short distance, the proposed site would be detached from existing properties on Station Approach. It is bounded on two sides by industrial uses and in close proximity to a recycling centre and sewage treatment works resulting in potentially poor residential amenity for future residents. The recent closure of the newsagents in Littlestone means that the site doesn't perform well against sustainability criteria regarding access to local services.
PO27	Dymchurch Recreational Ground	St Mary's Road, Dymchurch	13	1.5	<p>The site is located outside the settlement boundary of the Urban Centre of Dymchurch.</p> <p>The site performs well against a number of sustainability criteria, such as proximity to local services. However, the site falls within area of 'moderate' flood risk under the SFRA 2115 and there is likely to be sequentially more appropriate alternatives.</p> <p>It is also designated an open sports facility and as such any development on it would be contrary to NPPF paragraph 74.</p>
PO28	Land at St Andrew's Road	Littlestone Golf Club, Littlestone	21		<p>The site is located just outside the strategic town settlement confines of New Romney (including Littlestone).</p> <p>Overall, the site performs poorly against a number of the sustainability criteria. A key constraint would be the site's proximity to the adjacent Ramsar and SSSI and the impact any development may have on their associated wildlife and habitats. The site is also not within walking distance of any local facilities, meaning there would be a reliance on private transport and as such this would not constitute a sustainable location.</p> <p>The proposal would result in the net loss of an opens sports facility and the displacement of the existing car park facilities with no evidence about re-provision and would also have a potential impact on landscape. Development would be high density, because of the element of flatted development that would be at odds with the existing urban form which is predominately large detached properties in spacious plots, as well as being 'back land'.</p>

Ref	Title - land name	Address (rest of)	Approx. number dwellings	Site size (ha)	Assessment summary
PO30	Land off	Boarmans Road, Brookland	10	0.4	<p>The site is located in between two separate settlement boundaries for the primary villad of Brookland.</p> <p>Whilst the site appears to have few constraints that would prevent it coming forward for development, there is concern around whether the site is sustainable, in terms of its proximity to local services. The site is not in walking distance of a convenience shop or doctors' surgery; and the local school is also only 'half form' entry and over-subscribed.</p> <p>Unlike the other allocations at Brookland (policies RM11 and RM12), which adjoin existing settlement boundaries, this site is detached and would have the effect of creating a further sporadic cluster of houses.</p>