



Agenda

Meeting: **Cabinet**
Date: **18 March 2020**
Time: **5.00 pm**
Place: **Council Chamber - Civic Centre Folkestone**

To: **All members of the Cabinet**

All Councillors for information

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

This meeting will be webcast live to the council's website at <https://folkestone-hythe.public-i.tv/core/portal/home>. Although unlikely, no guarantee can be made that Members of the public in attendance will not appear in the webcast footage. It is therefore recommended that anyone with an objection to being filmed does not enter the council chamber.

1. **Apologies for Absence**
2. **Declarations of Interest (Pages 5 - 6)**

Members of the Council should declare any interests which fall under the following categories:

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

3. **Minutes (Pages 7 - 12)**

To consider and approve, as a correct record, the minutes of the meeting held on 19 February 2020.

Queries about the agenda? Need a different format?

Contact Jemma West – Tel: 01303 853369
Email: committee@folkestone-hythe.gov.uk or download from our
website
www.folkestone-hythe.gov.uk

4. **Funding for 2020 Folkestone RAF Air Display (Pages 13 - 16)**

This report requests £30,000 for a funding contribution to Folkestone Town Council towards the cost of an RAF Air Display in Folkestone, as part of the Armed Forces Day celebrations.

5. **Investment Strategy 2020/21 (Pages 17 - 32)**

This report sets out the council's proposed strategy for its service and commercial investments in 2020/21 to be approved by full Council.

6. **Capital Strategy 2020/21 (Pages 33 - 46)**

This report sets out the council's proposed strategy in relation to capital expenditure, financing and treasury management in 2020/21 to be approved by full Council. The report also sets out the Prudential Indicators for capital expenditure to be approved by full Council.

7. **Play Strategy Area Strategy 2020-2030 - Consultation responses and outcome (Pages 47 - 176)**

Report No. **C/19/48** considered the draft Play Area Strategy 2020-2030 as presented to Cabinet on 11/12/2019. The report detailed how high quality play areas will be provided and maintained throughout the District over the next ten years. Cabinet resolved:

1. That report C/19/48 be received and noted
2. That the suggestion of sites to be sold in respect of non-strategic play areas be removed
3. That the principles of the draft Play Area Strategy 2020-2030 and associated action plan be approved
4. To proceed to formal consultation
5. That a report be brought back to Cabinet following formal consultation with a view to approving the Strategy from 1st April 2020

These resolutions have been actioned with the formal consultation beginning 20/12/2019 and concluding on 31/01/2020. This report summarises the consultation responses and minor amendments to the strategy.

8. **Report by the Local Government and Social Care Ombudsman - Complaint Investigation, January 2020 (Pages 177 - 200)**

This report sets out details of an investigation completed by the Local Government and Social Care Ombudsman (Ombudsman) about the lack of support that Mr X alleges he received from the Council when he and his family approached the Council for housing assistance. The Ombudsman's report and timeline of this case and outcomes have been fully reviewed by the Council and externally by independent Counsel. It is recommended that the Council does not accept the findings and recommendations of the Ombudsman's report.

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Declarations of Interest

Disclosable Pecuniary Interest (DPI)

Where a Member has a new or registered DPI in a matter under consideration they must disclose that they have an interest and, unless the Monitoring Officer has agreed in advance that the DPI is a 'Sensitive Interest', explain the nature of that interest at the meeting. The Member must withdraw from the meeting at the commencement of the consideration of any matter in which they have declared a DPI and must not participate in any discussion of, or vote taken on, the matter unless they have been granted a dispensation permitting them to do so. If during the consideration of any item a Member becomes aware that they have a DPI in the matter they should declare the interest immediately and, subject to any dispensations, withdraw from the meeting.

Other Significant Interest (OSI)

Where a Member is declaring an OSI they must also disclose the interest and explain the nature of the interest at the meeting. The Member must withdraw from the meeting at the commencement of the consideration of any matter in which they have declared a OSI and must not participate in any discussion of, or vote taken on, the matter unless they have been granted a dispensation to do so or the meeting is one at which members of the public are permitted to speak for the purpose of making representations, answering questions or giving evidence relating to the matter. In the latter case, the Member may only participate on the same basis as a member of the public and cannot participate in any discussion of, or vote taken on, the matter and must withdraw from the meeting in accordance with the Council's procedure rules.

Voluntary Announcement of Other Interests (VAOI)

Where a Member does not have either a DPI or OSI but is of the opinion that for transparency reasons alone s/he should make an announcement in respect of a matter under consideration, they can make a VAOI. A Member declaring a VAOI may still remain at the meeting and vote on the matter under consideration.

Note to the Code:

Situations in which a Member may wish to make a VAOI include membership of outside bodies that have made representations on agenda items; where a Member knows a person involved, but does not have a close association with that person; or where an item would affect the well-being of a Member, relative, close associate, employer, etc. but not his/her financial position. It should be emphasised that an effect on the financial position of a Member, relative, close associate, employer, etc OR an application made by a Member, relative, close associate, employer, etc would both probably constitute either an OSI or in some cases a DPI.

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Minutes

Cabinet

Held at:	Council Chamber - Civic Centre Folkestone
Date	Wednesday, 19 February 2020
Present	Councillors John Collier, Ray Field, Mrs Jennifer Hollingsbee (Vice-Chair), David Monk (Chairman), Stuart Peall, Tim Prater, Lesley Whybrow and David Wimble
Apologies for Absence	Councillors David Godfrey
Officers Present:	Andy Blaszkowicz (Director of Housing and Operations), Cheryl Ireland (Lead Accountant), Amandeep Khroud (Assistant Director), Tim Madden (Director of Transformation and Transition), Susan Priest (Head of Paid Service), Andrina Smith (Chief HR Officer), Charlotte Spendley (Director of Corporate Services) and Jemma West (Committee Service Specialist)

NOTE: All decisions are subject to call-in arrangements. The deadline for call-in is Friday 28 February 2020 at 5pm. Decisions not called in may be implemented on Monday 2 March 2020.

66. **Declarations of Interest**

There were no declarations of interest at the meeting.

67. **Minutes**

The minutes of the meeting held on 21 January were submitted, approved and signed by the Chairman.

68. **Transformation update**

The report gave an update to Cabinet on the Council's Transformation programme as it enters its delivery phase.

Proposed by Councillor Monk,
Seconded by Councillor Peall;

RESOLVED:

That report C/19/65 be received and noted.

(Voting figures: 8 for, 0 against, 0 abstentions).

REASONS FOR DECISION:

Cabinet was asked to agree the recommendations because:-

- (a) FHDC are currently in phase 3 (Implementation) of its ambitious transformation programme. The document provided the conclusions of work through phases 1 and 2 and updated expectations of redesigned Council services and organisational model supported by Cabinet at its meeting in June 2017 and approved by Council at its meeting of February 2018.

The report included details of the future operating model and the supporting organisation model, along with the high-level implementation strategy and governance. It also outlines that by adopting the refreshed ICT Strategy and making an investment in its ICT infrastructure and changing its business operations, the Council can achieve improvements in services for residents and deliver genuine efficiency without cutting services.

69. General Fund Budget and Council Tax 2020/21

The report set out the final General Fund budget and Council Tax requirement for 2020/21, including that part of the local tax covering district and parish services.

The report had also been considered by the Overview and Scrutiny Committee at their meeting on 18 February 2020. Their comments had been circulated to Cabinet Members at the meeting.

Proposed by Councillor Monk,
Seconded by Councillor Peall;

RESOLVED:

- 1. That report C/19/66 be received and noted.**
- 2. That the final 2020/21 General Fund budget, as set out at paragraph 4 of the report, be recommended to Full Council for approval.**
- 3. That a Council Tax requirement for 2020/21 of £13,044,673 be recommended to Full Council for approval.**

(Voting figures: 7 for, 0 against, 1 abstentions).

REASONS FOR DECISION:

Cabinet was asked to agree the recommendations because:

- a) The District Council's General Fund budget and Council Tax requirement must be approved to enable Full Council to set the budget and the council taxes for 2020/21 in accordance with the Local Government Finance Act 1992.

70. **Housing Revenue Account Business Plan Update 2020 - 2050**

The Council is required to produce a comprehensive Business Plan for its housing stock. The Business Plan is focused on improving the quality of the Council's landlord services and sets out the investment priorities for its existing Council housing stock. The document also provides details of the council's new build and acquisition housing programme. In view of policy changes implemented by the Government in 2018 to abolish the HRA borrowing cap, it was possible for the Council to increase its delivery target for new builds and the Business Plan was revised to deliver up to 300 homes by 2024/25. Following further reviews of the HRA financial position, its borrowing capacity and the Council's priorities the Business Plan has been updated to deliver a further 1,000 homes over the 10 year period from 2025/26 to 2034/35. The revised Business Plan also includes capital investment of £10m into existing housing stock. The report provided the details supporting the updated plan.

Proposed by Councillor Prater,
Seconded by Councillor Whybrow; and

RESOLVED:

That recommendation two be amended to read:

"To agree the Council should increase the number of homes delivered through the HRA new build and acquisition programme to 1,200 homes over the period from 2020/21 to 2034/35".

(Voting figures: 8 for, 0 against, 0 abstentions).

Proposed by Councillor Monk,
Seconded by Councillor Peall; and

RESOLVED:

1. **That report C/19/67 be received and noted.**
2. **That Cabinet recommend to Full Council to increase the number of homes delivered through its HRA new build and acquisition programme to 1,200 homes over the period from 2020/21 to 2034/35.**
3. **That Cabinet recommend to Full Council invest £10m into existing housing stock.**
4. **That an update to the text of the HRA Business Plan be considered by Full Council in June.**

(Voting figures: 8 for, 0 against, 0 abstentions).

REASONS FOR DECISION:

Cabinet was asked to agree the recommendations because:

- a) The Council is required by Government to have a comprehensive Business Plan in place for its Housing Stock and other assets within the HRA.
- b) The Council is required to properly plan the repayment of its debt within the HRA. It is essential that it has an effective Business Plan to properly resource its HRA activity.
- c) The Government has announced a number of policy changes in relation to the HRA accounts held by local authorities. It is vital that the council keeps its HRA Business Plan under ongoing review to ensure that it remains fit for purpose. These changes have significantly impacted on the scale of the council's new build and housing acquisition programme.

The meeting was adjourned to allow Full Council to consider the matter prior to the consideration of the item below

71. Housing management options appraisal - outcome of formal consultation

An options appraisal was completed in October 2019, reviewing the delivery of housing management services provided by East Kent Housing (EKH) on behalf of Canterbury City Council, Dover District Council, Folkestone and Hythe District Council and Thanet District Council. The four councils agreed that the preferred option for future service provision to the four councils' tenants and leaseholders is that it should become an in-house service, subject to consultation. This report sets out the outcomes from the formal consultation exercise undertaken with EKH tenants and leaseholders. It proposes that officers from across the four councils be instructed to negotiate ending the agreement with EKH and to make preparations for the housing management service to be brought in-house.

Proposed by Councillor Monk,
Seconded by Councillor Peall; and

RESOLVED:

1. That report C/19/68 be received and noted.
2. That having noted the results of the tenant and leaseholder consultation, the cost/benefit analysis and the risk analysis, it is agreed that the management of the council's housing stock be brought back in-house.
3. That the Director of Transformation and Transition, in consultation with the Portfolio Holder for Housing, Transport and Special Projects be authorised to negotiate and conclude a termination of the management agreement with EKH as soon as practicable.
4. That the Director of Transformation and Transition, in consultation with the Portfolio Holder for Housing, Transport and Special Projects be authorised to take such decisions as may be necessary to facilitate the

process of bringing the housing service in-house in discussion with the appropriate statutory officers.

(Voting figures: 8 for, 0 against, 0 abstentions).

REASONS FOR DECISION:

- EKH has experienced serious performance problems and health and safety non-compliance issues.
- Tenants and leaseholders have expressed their views clearly, that they would prefer their homes to be managed by the individual councils rather than retain the existing Arms-Length Management Organisation structure.
- It is in the best interests of tenants and leaseholders for the four councils to terminate the management agreement and transfer housing services back in-house.
- The integration of the housing management service with each council's remaining housing services would provide a more transparent and accountable structure for the housing service.

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This Report will be made
public on 10 March 2020

Report Number **C/19/71**

To: Cabinet
Date: 18 March 2020
Status: Non- key Decision
Head of Service: Katharine Harvey, Chief Economic Development Officer
Cabinet Member: Councillor Wimble– Cabinet Member for District Economy

SUBJECT: Funding for 2020 Folkestone RAF Air Display

SUMMARY:

This report requests £30,000 for a funding contribution to Folkestone Town Council towards the cost of an RAF Air Display in Folkestone, as part of the Armed Forces Day celebrations.

REASONS FOR RECOMMENDATIONS:

Cabinet is asked to agree the recommendations set out below because a funding contribution from the District Council is required for the RAF Air Display to go ahead in June 2020.

RECOMMENDATIONS:

1. To receive and note report C/19/71.
2. To agree to a funding contribution of £30,000 towards the cost of an RAF Air Display in June 2020.

1. INTRODUCTION

- 1.1 Folkestone Town Council have been liaising with the RAF to organise an air display in Folkestone on the 28th June 2020, as part of the Armed Forces Day.
- 1.2 Over the last 4 years Folkestone has hosted an RAF Air Display. These have been considered to be a success, attracting considerable numbers of visitors to the town.
- 1.3 The Armed Forces Day is an annual event which Folkestone Town Council has organised for a number of years. Last year the RAF Air Display was held on the same day and this was very successful with some estimated 45,000 visitors enjoying the event
- 1.4 It is estimated that the cost of the RAFAT (Royal Air Force Aerial Team) air display this year will be considerably higher than last year at £80,000. This is due to additional security measures as required by the Safety Advisory Group (SAG), which is chaired by FHDC's Corporate Health & Safety Officer, Derrick Miller. This is following the success of last year's event and the high number of visitors.
- 1.5 Folkestone Town Council will lead on this event and has earmarked £22,800 and dedicated officer time towards this. Therefore without significant match funding they will not be able to accommodate an event with an air display like last year.
- 1.6 Folkestone Town Council has estimated that this years Armed Forces Day will attract 60,000 to 65,000 visitors. This highlights the importance of these types of event to the local economy and their contribution to the visitor economy in particular. Published figures from Visit Kent demonstrate the importance of the tourism sector within the district's economy, with some 4.2 million day visitors coming to the district in 2017, generating £122.9 million for the local economy, with the average spend per day visitor £30.
- 1.7 An event such as this attracts significant visitor income into the local economy and adds to the current visitor offer of Folkestone. This serves to enhance the town's attractiveness as a visitor destination by providing a clear reason for visitors to come to Folkestone during the summer and experience our great destination offer.
- 1.8 The Cabinet is requested to agree to a £30,000 funding contribution to Folkestone Town Council towards the 2020 RAF Air Display. If circumstances dictate that the event is required to be cancelled or postponed, then appropriate arrangements will be included in the contract with FTC to safeguard the expenditure of F&H DC funds. It is recognised that some costs may be incurred and the intention would be for those to be incurred proportionally with other funders.

2. RISK MANAGEMENT ISSUES

2.1

Perceived risk	Seriousness	Likelihood	Preventative action
The opportunity to hold a substantial Armed Forces Day and Air Display event is lost for Folkestone	High – the opportunity to attract substantial numbers of visitors into the town and the resulting income generated is lost; Visitors are disappointed by the absence of an air display; Council’s reputation suffers by an unwillingness to contribute to an event welcomed by many residents.	Low	FHDC agrees to make a £30,000 contribution to enable a RAF Air Display as part of Armed Forces Day
The Air Display event is not organized to the appropriate standard	High – there could be substantial reputational damage to the district council as financial contributors, if the organization of this event is sub standard.	Low	<p>FTC is ensuring the effective coordination of the Air Display and Armed Forces Day events through regular meetings with the Air Display organizer and the SAG.</p> <p>All parties are clear about their responsibilities for the events, including the EventsApp submission requirements and deadline dates</p>

3. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

3.1 Legal Officer’s Comments (DK)

Subject to Legal Services (a) having had sight of and approving the contract due to be entered into between Folkestone Town Council and the RAF and (b) agreeing to the text of the grant funding agreement due to be entered into between the Council and Folkestone Town Council, there are no legal implications arising directly out of this report.

3.2 Finance Officer's Comments (LH)

Within the approved Budget for 2019/20 there is £22,000 that has been allocated for the Folkestone Air Display.

3.3 Communication Officer's Comments (MR)

The Air Display is a flagship event in the Folkestone calendar and one which draws enthusiasm from the local population as well as visitors from outside of the district. This funding will enable a 1-hour display which will encourage more visitors and enhance their experience.

3.3 Diversities and Equalities Implications

There are no diversities and equalities implications

4. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

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

Dr. Katharine Harvey, Chief Economic Development Officer

Telephone: 01303 853287

Email: katharine.harvey@folkestone-hythe.gov.uk

This Report will be made public on 10 March 2020



Report Number **C/19/74**

To: Cabinet
Date: 18 March 2020
Status: Key Decision
Head of service: Charlotte Spendley, Director of Corporate Services
Cabinet Member: Councillor David Monk, Leader

SUBJECT: INVESTMENT STRATEGY 2020/21

SUMMARY: This report sets out the council's proposed strategy for its service and commercial investments in 2020/21 to be approved by full Council.

REASONS FOR RECOMMENDATIONS:

Cabinet is asked to agree the recommendations set out below because:-

- a) The Council must have regard to both CIPFA's Prudential Code for Capital Finance in Local Authorities and the Ministry for Housing Communities and Local Government Investment Guidance when carrying out its duties under Part 1 of the Local Government Act 2003.
- b) The Council is required to approve an Investment Strategy for the forthcoming year.

RECOMMENDATIONS:

1. To receive and note report C/19/74.
2. To recommend to Council that the 2020/21 Investment Strategy, including the Investment Indicators, set out in the appendix to this report is approved.

1. INTRODUCTION AND BACKGROUND

- 1.1 In early 2018 the Ministry for Housing, Communities and Local Government (MHCLG) revised their *Statutory Guidance on Local Government Investments* mainly as a response to the increased commercial investment activity in the sector. The MHCLG Guidance requires all local authorities to produce an annual Investment Strategy for their non-treasury management investments which has to be approved by full Council. The MHCLG Guidance also requires local authorities to have regard to the Chartered Institute of Public Finance and Accountancy (CIPFA) publications of *The Prudential Code for Capital Finance in Local Authorities* and *Treasury Management in the Public Services* which both complement it.
- 1.2 The Authority invests its money for three broad purposes:
- because it has surplus cash as a result of its day-to-day activities, for example when income is received in advance of expenditure (known as **treasury management investments**),
 - to support local public services by lending to or buying shares in other organisations (**service investments**), and
 - to earn investment income (known as **commercial investments** where this is the main purpose).
- 1.3 The main purpose of the investment strategy is to identify the level of the authority's service and commercial investments and to set risk management parameters around these.
- 1.4 Treasury management investments and borrowing continue to be covered by a separate annual Treasury Management Strategy Statement which has to be approved by Cabinet as part of the budget process in advance of each new financial year. However, the revised MHCLG Guidance requires some limited treasury management information to feature in the investment strategy, including the level of interest received by the General Fund. Cabinet approved the council's Treasury Management Strategy Statement for 2020/21 on 22 January 2020 (report no. C/19/59 refers)
- 1.5 The investment strategy, set out in the appendix to this report, is based on the authority's existing and planned service-related and commercial investments and is consistent with the proposed General Fund Medium Term Capital Programme approved by full Council on 19 February 2020 (report no. A/19/29 refers).
- 1.6 Being a relatively new requirement on the authority, it is anticipated that the investment strategy will continue to develop and evolve over time in line with the council's own capital investment aspirations and plans. The intention is to review the investment strategy annually as part of the authority's budget setting process. However, if the nature and structure of the authority's proposed service and commercial investments was to change during the year it may be necessary to revise the strategy at the same time.

2. RISK MANAGEMENT ISSUES

- 2.1 The main purpose of the Investment Strategy shown in the appendix to this report is to identify risks associated with the authority's service and commercial investments and to set parameters to help mitigate these. No other risk management issues have been identified as relevant to this report.

3. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

3.1 Legal Officer's Comments (NE)

There are no legal implications arising directly out of this report other than those already stated. For each financial year, the council should prepare at least one Investment Strategy which should contain the disclosures and reporting requirements specified in the Local Government Investment Guidance as published by the MHCLG. The Strategy should be approved by full Council.

3.2 Finance Officer's Comments (LW)

This report has been prepared by Financial Services and there are no direct financial implications arising from it.

3.3 Diversities and Equalities Implications (LW)

There are no direct diversities or equalities issues arising from this report

4. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

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

Lee Walker, Capital and Treasury Senior Specialist

Telephone: 01303 853593

Email: lee.walker@folkestone-hythe.gov.uk

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

Arlingclose Ltd – Investment Strategy Report 2020/21 Template

Appendices:

Appendix 1: Investment Strategy 2020/21

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INVESTMENT STRATEGY 2020/21

1. INTRODUCTION

- 1.1 The Investment Strategy is a requirement of the Ministry for Housing, Communities and Local Government's (MHCLG) *Statutory Guidance on Local Government Investments*. The MHCLG Guidance also requires local authorities to have regard to the Chartered Institute of Public Finance and Accountancy (CIPFA) publications of *The Prudential Code for Capital Finance in Local Authorities* and *Treasury Management in the Public Services* which both complement it.
- 1.2 The council invests its money for three broad purposes:
- because it has surplus cash as a result of its day-to-day activities, for example when income is received in advance of expenditure (known as **treasury management investments**),
 - to support local public services by lending to or buying shares in other organisations (**service investments**), and
 - to earn investment income (known as **commercial investments** where this is the main purpose).
- 1.3 The main purpose of the strategy is to identify the level of the council's service and commercial investments and to set risk management parameters around these. It is based on the authority's existing and planned service-related and commercial investments and is consistent with the General Fund Medium Term Capital Programme approved by full Council on 19 February 2020.

2. TREASURY MANAGEMENT INVESTMENTS

- 2.1 The council typically receives its income in cash (e.g. from taxes and grants) before it pays for its expenditure in cash (e.g. through payroll and invoices). It also holds reserves for future expenditure and collects local taxes on behalf of other local authorities and central government. These activities, plus the timing of borrowing decisions, lead to a cash surplus which is invested in accordance with guidance from the CIPFA. The balance of treasury management investments is expected to fluctuate between £15m and £30m during the 2020/21 financial year.
- 2.2 **Contribution:** The contribution that these investments make to the objectives of the council is to support effective treasury management activities. These investments also contribute an income stream to support the General Fund budget position annually.
- 2.3 **Further details:** Full details of the council's policies and its plan for 2020/21 for treasury management investments are covered in a separate document, the Treasury Management Strategy Statement (TMSS), approved by Cabinet on 22 January 2020 as part of the budget process for 2020/21. The approved TMSS will be published on the council's website.

3. SERVICE INVESTMENTS: LOANS

- 3.1 **Contribution:** The council can lend money to its subsidiaries, its charities where the council is the trustee, its external service providers, local residents and its employees to support local public services and stimulate local economic growth. In the future the council may also lend money to joint ventures it decides to enter into to help deliver its major corporate investment initiatives. Examples of loans the council makes are shown in the table below:

Table 1 – Example of Loans Made for Service Investments

Organisation	Relationship	Purpose	Service Objective
Oportunitas Ltd	Housing and Regeneration subsidiary company	Primarily for the acquisition of residential property for rent	Provision of good quality homes for rent Generate additional revenue stream for the General Fund
Folkestone Parks and Pleasure Grounds Charity	Council is the trustee	Refurbishment and replacement of Beach Huts	Improve the appearance of the district and to improve the financial resilience of the Charity through additional income generated
East Kent Housing Ltd	External Service Provider	Acquisition of new software system (interest free)	Efficient management of HRA properties
Local property owners	Jointly funded empty homes initiative with Kent County Council	Interest free loans to property owners to bring empty properties across the district back in to residential use	Bringing empty residential properties back into use and the provision of additional good quality homes
Otterpool Park LLP	Otterpool Park Delivery Vehicle subsidiary company	Delivery of the Otterpool Park Garden Town development	Provision of new homes, generate economic benefits and provide a financial return to the Council

- 3.2 **Security:** The main risk when making service loans is that the borrower will be unable to repay the principal lent and/or the interest due. In order to limit this risk, and ensure that total exposure to service loans remains proportionate to the size of the authority, upper limits on the outstanding loans to each category of borrower have been set as follows:

Table 2 - Loans for service purposes in £ millions

Category of borrower	31.3.2019 actual			2020/21
	Balance owing £m	Loss allowance £m	Net figure in accounts £m	Approved Limit £m
Subsidiaries	4.069	(0.054)	4.015	9.9
Charity	-	-	-	0.5
External Service Provider	0.278	-	0.278	0.3
Local residents/landlords	4.021	-	4.021	4.1
TOTAL	8.368	(0.054)	8.314	12.8

- 3.3 The approved limit for subsidiaries in 2020/21 includes the increase in loan capital to Oportunitas of £2.47m approved by full Council on 28 February 2018 and £2.2m for the Otterpool Park LLP who will act as the delivery vehicle for the proposed new Garden Town development.
- 3.4 Accounting standards require the authority to set aside loss allowance for loans, reflecting the likelihood of non-payment. No loss allowance has been made for the loans made to local property owners as the majority of these have been secured against property with a low risk of default. Similarly no loss allowance has been made for the loan to East Kent Housing because its value is considered to be relatively low. However, the authority is required to keep the position under review and the figures for loans in the Council's statement of accounts for 2019/20 onwards will continue to be shown net of any loss allowance made if applicable. The authority makes every reasonable effort to collect the full sum lent and has appropriate credit control arrangements in place to recover overdue repayments.
- 3.5 **Risk assessment:** The council assesses the risk of loss before entering into and whilst holding service loans. This includes:
- 3.5.1 Ensuring the authority has the legal power to make the loan to the entity in the first place.
- 3.5.2 Assessing loan applications against the type of market the entity is operating and competing in:
- i) Loans to the council's subsidiary company, charities where it is the trustee, joint ventures or external service providers require a business

case and, possibly, business model to be prepared in advance. This needs to demonstrate the entity's long term financial viability, its ability to meet the loan repayment terms and also the internal governance arrangements in place to support their operations. The entity also needs to demonstrate how it will evolve over time against both market conditions and its customer needs. The entity needs to identify any ongoing or future investment requirements to support it over the term of the loan. The authority's loan agreement may require the entity to provide regular performance information to enable an assessment to be made of their ability to continue to meet its terms and conditions. Unless otherwise agreed, loans made are secured against the property or other assets of the entity to help mitigate the risk of default.

- ii) Loans to local property owners for housing improvements schemes are made in accordance with the criteria of the specific scheme agreed by the council. All previous and existing housing improvement schemes offer interest free loans (soft loans) with the requirement that the principal sum is repaid to the authority at an agreed trigger point such as after an agreed period of time or when the property is eventually sold. Loans are secured as a charge against the property to help mitigate the risk of default.

3.5.3 External advisors can be used to support the council in assessing investment opportunities and preparing loan agreements. This can include advising on investment options appraisal, business plan or case submissions, relevant commercial lending terms, compliance for State Aid, taxation and other statutory issues and reporting obligations for the borrower.

3.5.4 The council has established procurement and contract management procedures to appoint and monitor the performance of external advisors it uses. This can involve:-

- interviewing potential consultants to gain a better understanding of their breadth of experience and knowledge in the specific area,
- liaising with other local authorities through established groups and channels to discuss the suitability of consultants being considered where it is known they have been used before,
- focusing advice on larger firms with the breadth and depth of expertise to minimise risk, and
- utilising our own professional judgement to consider the advice received.

3.5.5 Credit ratings are not currently applicable as part of the assessment process for checking the financial status of entities or individuals who apply for a loan. This may alter if the nature and scope of loans made was to change in the future.

3.5.6 The council may require other sources of information to help assess the suitability of the entity requesting a loan such as financial accounts or a bank reference.

4. SERVICE INVESTMENTS: SHARES

- 4.1 Currently the council only invests in share equity for its wholly owned Housing and Regeneration subsidiary company, Oportunitas Limited. In the future the council may also acquire shares in either other subsidiaries companies it may choose to establish or joint venture companies it decides to enter into to help deliver its major corporate investment initiatives.
- 4.2 **Contribution:** The council's investment in the shares of Oportunitas Limited supports its operational trading activities including its acquisition of residential property to increase the supply of good quality housing for rent to local people. No dividend return is expected in the medium term from this investment, however the council's overall investment in Oportunitas provides an additional revenue stream to the General Fund.
- 4.3 **Security:** One of the risks of investing in shares is that they fall in value meaning that the initial outlay may not be recovered. In order to limit this risk, upper limits on the sum invested in each category of shares have been set as follows.

Table 3 - : Shares held for service purposes in £ millions

Category of company	31.3.2019 actual			2020/21
	Amounts invested £'m	Gains or losses £'m	Value in accounts £'m	Approved Limit £'m
Subsidiaries	0.479	0.821	1.300	6.03
TOTAL	0.479	0.821	1.300	6.03

- 4.4 The approved limit for 2020/21 includes the increase in share equity of £4.43m approved by full Council on 28 February 2018 as part of its future strategy for Oportunitas.
- 4.5 **Risk assessment:** The council assesses the risk of loss before entering into and whilst holding shares of its subsidiaries or joint ventures. This includes:
- 4.5.1 Ensuring the authority has the legal power to acquire the share capital of the entity in the first place.
- 4.5.2 Preparing a long term business case and business model for the company identifying the level, structure and time scale of the investment required to enable it to become financially viable and sustainable and provide the authority with an appropriate financial return
- 4.5.3 Requiring the company to develop and maintain a business plan outlining how it will meet the objectives of the authority as shareholder including identifying associated risks, including market conditions, and measures to mitigate these.
- 4.5.4 Requiring the company in the event it was to cease trading or become insolvent to dispose of its assets and transfer the net receipt to the authority or transfer

the assets to the control of the authority itself, to help mitigate the risk of financial loss.

4.5.5 Using external advisers if required to support the authority in preparing its business planning and modelling to support the creation and development of the company and also structure the shareholder agreement.

4.5.6 Using the authority's established procurement and contract management procedures to appoint and monitor the performance of external advisors it uses. This can involve;-

- interviewing potential consultants to gain a better understanding of their breadth of experience and knowledge in the specific area,
- liaising with other local authorities through established groups and channels to discuss the suitability of consultants being considered where it is known they have been used before,
- focusing advice on larger firms with the breadth and depth of expertise to minimise risk, and
- utilising our own professional judgement to consider the advice received.

4.5.7 Credit rating checks are not applicable as a risk assessment check to support the authority's investment in its wholly owned subsidiary company. This may alter if the nature and scope of the council's acquisition of share capital made was to change in the future.

4.6 **Liquidity:** The council's share equity investment in Oportunitas is a long term commitment with no specified end date. The business case and model supporting the council's investment in Oportunitas is based on a 45 year period. The council's future capital investment plans do not require the repayment of the share equity. As shareholder the council has overall control of the company and can decide if it wants to review the level of its share equity investment. For any future share equity investment in other subsidiary companies or joint ventures it is likely these will also be a long term commitment, however this will be determined at the time the investment is being considered for approval.

4.7 **Non-specified Investments:** Shares are the only investment type that the council has identified that meets the definition of a non-specified investment in the government guidance. The limits above on share investments are therefore also the authority's upper limits on non-specified investments. The council has not adopted any procedures for determining further categories of non-specified investment since none are likely to meet the definition.

5. **COMMERCIAL INVESTMENTS: PROPERTY**

5.1 **Contribution:** The council invests in local commercial and residential land and property with the intention of making a capital gain or generating a new revenue stream that will be spent on local public services. The council currently holds investment property for the following main reasons;

- i) Land and property to support the proposed Otterpool Park Garden Town development of up to 10,000 new homes over an approximate 30 year period. This excludes Westenhanger Castle, which while part of the Otterpool Park Garden Town development, is planned to be used for its community benefit rather than a direct financial return.
- ii) Land for other commercial and residential development, including the Biggins Wood site in Folkestone.
- iii) Commercial and light industrial units for local businesses providing employment opportunities and the authority with a net rental stream.
- iv) The Connect 38 office accommodation in Ashford to provide the authority with an additional net revenue stream.

5.2 The table below summarises the value of the council's investment assets grouped by property type measured against the original purchase or construction cost. For some assets the original purchase or construction cost data is not available in which case the value of the asset at 1st April 2014 has been used as a proxy value with changes since then shown as a gain or loss.

Table 4 - Property held for investment purposes

Property Type	Value at 01/04/2014	Actual Purchase Cost	31/03/2019 (Actual)		31/03/2020 (Projection)	
			Accrued Gains (Losses)	Value in Accounts	Accrued Gains (Losses)	Value in Accounts
			£'000	£'000	£'000	£'000
Commercial and Light Industrial (existing)	1,119	n/a	392	1,511	392	1,511
Land (existing)	85	n/a	172	257	172	257
Land (acquired since 01/04/2014)	n/a	1,112	(55)	1,057	(55)	1,057
Otterpool (acquired to 31/03/19)	n/a	7,335	21,538	28,873	21,538	28,873
Otterpool (planned 19/20)	n/a	27,066	n/a	n/a	-	27,066
Connect 38 Offices	n/a	17,711	n/a	n/a	-	17,711
Total	1,204	53,224	22,047	31,698	22,047	74,475

- 5.3 All land and property classified as Investment Assets is required to be measured at its market value as at 31 March each year for inclusion in the authority's Statement of Accounts. At the time of writing, no information was available regarding potential changes in the market value of these assets as at 31 March 2020 meaning, where appropriate, they are shown at their value as at 31 March 2019 in table 4, above.
- 5.4 **Security:** In accordance with government guidance, the council considers a property investment to be secure if its accounting valuation is at or higher than its purchase cost including taxes and transaction costs. However, it is recognised the council is acquiring land for development reasons and therefore its existing use value as an investment asset may be significantly lower than its future potential value.
- 5.5 A fair value assessment of the council's investment property portfolio has been made within the past twelve months, and the underlying assets provide security for capital investment. Should the 2019/20 year end accounts preparation and audit process value these properties below their purchase cost and there is no reasonable prospect of this being reversed as a result of the council's investment plans, then an updated investment strategy will be presented to full Council detailing the impact of the loss on the security of investments and any revenue consequences arising therefrom.
- 5.6 **Risk assessment:** The council assesses the risk of loss before entering into and whilst holding property investments by preparing a business case to support the proposed investment. This includes:
- 5.6.1 Assessing the current and expected future market demand and need for relevant property by reference to local, regional or national data, including rental and occupancy levels.
- 5.6.2 Assessing the current and expected future market competition for the type of property being considered.
- 5.6.3 Identifying the relevant legal power the authority is using to undertake the purchase and whether or not it may need to purchase and operate it through a separate entity such as a company or joint venture.
- 5.6.4 Identifying how the authority can recover or dispose of its interest in the property without financial loss.
- 5.6.5 Undertaking a whole-life financial assessment for the proposed scheme to identify any on-going investment that may be required.
- 5.6.6 Using specialist external advisors such as, valuers, surveyors, property agents, solicitors and taxation and other finance specialists to help evaluate the proposed investment if required.
- 5.6.7 Using the council's established procurement and contract management procedures to appoint and monitor the performance of external advisors it uses. This can involve;-

- interviewing potential consultants to gain a better understanding of their breadth of experience and knowledge in the specific area,
 - liaising with other local authorities through established groups and channels to discuss the suitability of consultants being considered where it is known they have been used before,
 - focusing advice on larger firms with the breadth and depth of expertise to minimise risk, and
 - utilising our own professional judgement to consider the advice received.
- 5.6.8 Using credit checks if required to assess the financial strength of third parties the council could be exposed to, for instance where the authority proposes to purchase an investment property which has existing commercial tenants. Credit ratings are not applicable as part of the assessment process for property investment.
- 5.6.9 The council has established a proactive risk management culture within the organisation, including all key projects being required to consider risks, as well as quarterly monitoring and reporting of key corporate risks which includes, at times, key investment plans such as the delivery of Otterpool.
- 5.7 **Liquidity:** Compared with other investment types, property is relatively difficult to sell and convert to cash at short notice, and can take a considerable period to sell in certain market conditions.
- 5.8 The council's commercial and light industrial units' portfolio is viewed as a long term commitment providing valuable local jobs and supporting the local economy. Any decision to dispose of existing units would need to be balanced against providing alternative employment opportunities, continuing to support the local economy as well as the direct financial impact to the authority.
- 5.9 Where property is held for future development reasons the council will identify how it intends to recover or access the cost of its capital investment as part of any proposal for the specific development.

6. PROPORTIONALITY

- 6.1 The current Medium Term Financial Strategy (MTFS) does include property and service investment income as part of its projections from schemes and initiatives already in place or agreed. The MTFS currently excludes the benefit from any potential capital gains or new revenue streams from the proposed Otterpool Park development. However, the MTFS is over the medium term in a deficit position of about £4m and the authority is continuing to explore investments to support the closure of this gap (along with an internal Transformation programme). As the plans further develop the Council will further consider its approach to proportionality in respect of investment income to gross service expenditure.

Table 5 - Proportionality of Investments

	2018/19 Actual	2019/20 Forecast	2020/21 Budget	2021/22 Projection	2022/23 Projection
Gross service expenditure	132,061,457	92,053,000	93,894,000	95,772,000	97,688,000
Net investment income to General Fund	(1,047,437)	(1,819,100)	(1,363,000)	(1,157,700)	(1,219,700)
Proportion	0.79%	1.98%	1.45%	1.21%	1.25%

7. CAPACITY, SKILLS AND CULTURE

7.1 Elected members and statutory officers:

7.1.1 All members are provided with a full training session on treasury management and investments by the authority's Treasury Management advisors (Arlingclose Ltd). This is conducted regularly with the next session due later in 2020 and encompasses all members and not just those on the relevant committees. Training is also held on specific issues for nominated councillors (such as on Investment Appraisals) and there are ongoing briefings for individual members with specific responsibilities such as the Finance Portfolio holder, the Chair of the Audit and Governance Committee and the Group Leaders of the political parties represented on the Council. All members have a wide exposure to investment decisions and are able to interrogate officers either formally or informally.

7.2 Commercial deals:

7.2.1 The council has a process in place whereby all proposed capital investment decisions are referred to Financial Services and Legal Services to ensure compliance with the principles of the prudential framework and of the regulatory framework for local authorities. For individual major projects, including commercial property investments, a project board or working group is established at the outset which includes officers from Financial Services and Legal Services who advise on compliance with statutory guidance and regulatory issues.

7.3 Corporate governance:

7.3.1 The council has a clearly articulated corporate plan and associated values which are being refreshed as part its transformation programme. It also has a long standing practice of regular and transparent decisions in relation to investments held for both treasury management purposes and also for investment purposes. The governance structure includes scrutiny of all decisions through the Overview and Scrutiny Committee prior to these being considered by Cabinet. Any new investment decisions need to be approved by Full Council with a full explanation of the benefits, opportunities and risks associated with any proposal. The ongoing performance of investments is

regularly reported back to Members and is subject to ongoing review and monitoring.

8. INVESTMENT INDICATORS

8.1 The council proposes to set the following quantitative indicators to allow elected members and the public to assess the Authority's total risk exposure as a result of its investment decisions.

8.2 **Total risk exposure:** The first indicator shows the authority's total exposure to potential investment losses. This includes amounts the authority is contractually committed to lend but have yet to be drawn down and guarantees it has issued over third party loans.

Table 6 - Total investment exposure in £millions

Total investment exposure £m	31.03.2019 Actual	31.03.2020 Forecast	31.03.2021 Forecast
Treasury management investments	42.2	20.0	20.0
Service investments: Loans	8.4	9.3	12.5
Service investments: Shares	1.3	2.7	6.0
Commercial investments: Property	31.7	74.3	95.9
TOTAL EXPOSURE	83.6	106.3	134.4

8.3 **How investments are funded:** Government guidance is that these indicators should include how investments are funded. Since the council does not normally associate particular assets with particular liabilities, this guidance is difficult to comply with. However, the following investments could be described as being funded by external borrowing. The remainder of the council's investments are funded by usable reserves and income received in advance of expenditure.

Table 7 - Investments funded by external borrowing in £millions

Investments funded by borrowing £m	31.03.2019 Actual	31.03.2020 Forecast	31.03.2021 Forecast
Service investments: Loans	-	-	2.2
Service investments: Shares	-	1.2	2.7
Commercial investments: Property	7.7	52.0	71.6
TOTAL FUNDED BY BORROWING	7.7	53.2	76.5

- 8.4 **Rate of return received:** This indicator shows the investment income received less the associated costs, including the cost of borrowing where appropriate, as a proportion of the sum initially invested. This indicator includes the impact of valuations gains and losses. Note that due to the complex local government accounting framework, not all recorded gains and losses affect the revenue account in the year they are incurred.

Table 8 - Investment rate of return (net of all costs)

Investments net rate of return	2018/19 Actual	2019/20 Forecast	2020/21 Forecast
Treasury management investments	1.5%	2.5%	2.4%
Service investments: Loans	2.1%	2.1%	2.0%
Service investments: Shares	-	(0.7%)	(1.70%)
Commercial investments:			
Otterpool Land and Property	344.5%	104.4%	48.6%
Connect 38 Offices	n/a	6.0%	2.7%
Other Commercial & Light Industrial Property	6.4%	4.3%	2.2%
ALL INVESTMENTS	35.3%	30.5%	21.7%

- 8.4.1 The net return on loans made for service investments includes those that are interest free and are accounted for as 'soft loans', including private sector housing improvement loans.

End

This Report will be made public on 10 March 2020



Report Number **C/19/73**

To: Cabinet
Date: 18 March 2020
Status: Key Decision
Head of Service: Charlotte Spendley, Director of Corporate Services
Cabinet Member: Councillor David Monk, Leader

SUBJECT: CAPITAL STRATEGY 2020/21

SUMMARY: This report sets out the council's proposed strategy in relation to capital expenditure, financing and treasury management in 2020/21 to be approved by full Council. The report also sets out the Prudential Indicators for capital expenditure to be approved by full Council.

REASONS FOR RECOMMENDATIONS:

Cabinet is asked to agree the recommendations set out below because:-

- a) The Council must have regard to both CIPFA's Prudential Code for Capital Finance in Local Authorities and the Ministry for Housing Communities and Local Government Investment Guidance when carrying out its duties under Part 1 of the Local Government Act 2003.
- b) The Council is required to approve a Capital Strategy for the forthcoming year.

RECOMMENDATIONS:

1. To receive and note report C/19/73.
2. To recommend to Council that the 2020/21 Capital Strategy, including the Prudential Indicators, set out in the appendix to this report is approved.

1. INTRODUCTION AND BACKGROUND

1.1 The Capital Strategy is a requirement of the 2017 edition of the Prudential Code. The Prudential Code is a framework which should support local strategic planning, local asset management planning and proper option appraisal. The objectives of the Prudential Code are to ensure, within this clear framework, that the capital investment plans of local authorities are affordable, prudent and sustainable. Authorities are required by regulation to have regard to the Prudential Code when carrying out their duties in England and Wales under Part 1 of the Local Government Act 2003.

1.2 The main purpose of the capital strategy is to provide a high level summary of how capital expenditure, capital financing and treasury management activities contribute to the provision of local public services, along with an overview of how associated risk is managed and the implications for future financial sustainability. It is intended to be written in a way to enhance stakeholders understanding of these sometimes technical areas.

The areas to be covered in this strategy are:

- Capital expenditure
- Borrowing
- Minimum revenue provision
- Investments (treasury, service and commercial)
- Guarantees and loan commitments
- Knowledge and skills

1.3 The capital strategy also includes the Prudential Indicators for capital expenditure that set controls to ensure the Council's capital investment plans are affordable, prudent and sustainable, required under the Prudential Code. The Prudential Indicators, including those projected for 2019/20, are required to be approved by full Council as part of the capital strategy.

1.4 The capital strategy should be considered alongside the investment strategy, due to be considered separately as part of this agenda. Like the capital strategy, the investment strategy is also required to be adopted by full Council.

1.5 The capital strategy is required to be reviewed annually as part of the authority's budget setting process. However, if the nature and structure of the authority's proposed capital expenditure and financing was to change significantly during the year it may be necessary to revise the strategy at the same time.

1.6 The capital strategy contains a number of links to other documents. However, the link for the proposed investment strategy cannot be added at this stage. Once the capital strategy is adopted it is proposed to create to a dedicated web page to provide a link for it together with those for:

- Investment Strategy 2020/21
- Treasury Management Strategy Statement 2021/21
- Medium Term Capital Programme to 2024/25
- HRA Capital Programme 2020/21

2. RISK MANAGEMENT ISSUES

- 2.1 A key element of the capital strategy is to consider the risks associated with our approach to the capital programme, capital financing and treasury management activity. These issues have been addressed in the body of the appendix and no other risk management issues have been identified as relevant to this report.

3. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

3.1 Legal Officer's Comments (NE)

There are no legal implications arising directly out of this report other than those already stated. For each financial year, the council should prepare at least one Capital Strategy which should contain the disclosures and reporting requirements specified Prudential Code. The Strategy should be approved by full Council.

3.2 Finance Officer's Comments (LW)

This report has been prepared by Financial Services and there are no direct financial implications arising from it.

3.3 Diversities and Equalities Implications (LW)

There are no direct diversities or equalities issues arising from this report.

4. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

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

Lee Walker – Capital and Treasury Senior Specialist
Tel: 01303 853593 Email: lee.walker@folkestone-hythe.gov.uk

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

Report A/19/26 – 19/02/2020 - Update to Medium Term Capital Programme and Budget Monitoring 19/20

Report A/19/29 – 19/02/2020 – General Fund Budget and Council Tax 2020/21

Report A/19/27 – 19/02/2020 – HRA Revenue and Capital Original Budget 2020/21

Report A/19/30 – 19/02/2020 – HRA Business Plan Update 2020-2050

Report C/19/59 – 22/01/2020 – Treasury Management Strategy Statement 2020/21

18 March 2020 – Investment Strategy 2020/21 (Draft)

Audited Statement of Accounts 2018/19

Appendices:

Appendix 1: Capital Strategy 2020/21

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Capital Strategy 2020/21

Introduction

This capital strategy report gives a high-level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of local public services along with an overview of how associated risk is managed and the implications for future financial sustainability. It has been written in an accessible style to enhance members' understanding of these sometimes technical areas.

Decisions made this year on capital and treasury management will have financial consequences for the Authority for many years into the future. They are therefore subject to both a national regulatory framework and to local policy framework, summarised in this report.

Capital Expenditure and Financing

Capital expenditure is where the Council spends money on assets, such as property or vehicles, that will be used for more than one year. In local government this includes spending on assets owned by other bodies, and loans and grants to other bodies enabling them to buy assets. The Council has some limited discretion on what counts as capital expenditure, for example assets costing below £10,000 are not capitalised and are charged to revenue in year.

- For details of the Council's policy on capitalisation, see: <https://www.folkestone-hythe.gov.uk/moderngov/documents/s32862/Accounting%20Polices%201920%20-%20Review.pdf>
- Additionally further clarification can be found within the Council's Financial Procedure Rules

In 2020/21, the Council is planning capital expenditure of approximately £51m as summarised below:

Table 1: Prudential Indicator: Estimates of Capital Expenditure in £ millions

	2018/19 actual	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget
General Fund services	2.809	5.081	10.461	16.946	12.477
Council housing (HRA)	5.349	9.027	13.505	16.947	12.184
Capital investments	2.590	53.294	27.078	20.000	20.000
TOTAL	10.748	67.402	51.044	53.893	44.661

The main General Fund capital projects include Coast Protection works at Coronation Parade, Folkestone (£2.38m), Disabled Facilities Grants (£1m) and profiled expenditure on the Princes Parade Leisure Scheme (£2.47m). The main capital investment projects include further expenditure on the Otterpool Park Garden Town Development (£18.57m) and also Oportunitas Ltd (£5m). Further information regarding the capital investments for services and commercial purposes is provided later in the Strategy.

The Housing Revenue Account (HRA) is a ring-fenced account which ensures that council housing does not subsidise, or is itself subsidised, by other local services. HRA capital expenditure is therefore recorded separately, the Council has plans to build 1200 new homes by 2034/35, and the coming financial year includes £6.51m within the HRA Capital programme towards the delivery of this ambition.

Governance: Service managers bid annually in September through the growth proposals to include projects in the Council's capital programme. Bids are collated by the Finance team who review the bids including consideration of the available funding (including external funding). Over the coming 12 months we will be exploring more formal project appraisal and evaluation options to add strength to this process. The Corporate Leadership Team appraises all bids, supported by Finance, based on an evaluation of the projects against corporate priorities and funding availability and makes recommendations to the Cabinet for consideration initially through the Budget Strategy in November. The final capital programme is then presented to Cabinet in January or February and to Council in February each year.

For full details of the Council's capital programme, see:

- General Fund Capital Programme https://www.folkestone-hythe.gov.uk/moderngov/documents/s32668/Council%20Report%20MTCP%2019-02-20_v1.pdf
- HRA Capital Programme <https://www.folkestone-hythe.gov.uk/moderngov/documents/s32667/HRA%20Capital%20App%2020%20FINAL%20020220.pdf>

All capital expenditure must be financed, either from external sources (government grants and other contributions), the Council's own resources (revenue, reserves and capital receipts) or debt (borrowing, leasing and Private Finance Initiative). The planned financing of the above expenditure is as follows:

Table 2: Capital financing in £ millions

	2018/19 actual	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget
External sources	0.984	1.662	6.571	1.269	1.713
Own resources	7.139	12.109	16.645	26.563	8.498
Debt	2.625	53.631	27.828	26.061	34.450
TOTAL	10.748	67.402	51.044	53.893	44.661

Debt is only a temporary source of finance, since loans and leases must be repaid, and this is therefore replaced over time by other financing, usually from revenue which is known as minimum revenue provision (MRP). Alternatively, proceeds from selling capital assets (known as capital receipts) may be used to replace debt finance. The planned MRP and use of capital receipts to replace debt are as follows:

Table 3: Replacement of debt finance in £ millions

	2018/19 actual	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget
MRP	0.373	0.358	0.874	1.053	1.040
Capital receipts	-	-	-	-	2.718
TOTAL	0.373	0.358	0.874	1.053	3.758

- The Council's full minimum revenue provision statement is available here:
<https://www.folkestone-hythe.gov.uk/moderngov/documents/s32664/Appendix%203%20MRP%20Policy%202020-21.pdf>

The Council's cumulative outstanding amount of debt finance is measured by the capital financing requirement (CFR). This increases with new debt-financed capital expenditure and reduces with MRP and capital receipts used to replace debt. The CFR is expected to increase by almost £27m during 2020/21. Based on the above figures for expenditure and financing, the Council's estimated CFR is as follows:

Table 4: Prudential Indicator: Estimates of Capital Financing Requirement in £ millions

	2018/19 actual	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget
General Fund services	11.752	12.534	14.117	14.482	15.626
Council housing (HRA)	47.416	47.416	47.416	52.762	63.013
Capital investments	8.626	61.117	86.488	105.785	125.082
TOTAL CFR	67.794	121.067	148.021	173.029	203.721

In line with the approved HRA Business Plan, the HRA's CFR is expected to continue to increase as it borrows to invest in new stock to meet its aim of building 1,200 new units by 2034/35. In a change from the previous position, the new business plan makes no provision to reduce the HRA CFR in the future. This change helps to support the HRA's financial position over the life of the business plan. The rise in the HRA CFR is expected to be more than offset by an increase in the value of the HRA stock as new units are added.

From 2020/21 accounting changes to leases where the Council is the lessee will require these to be included on the Balance Sheet as assets. These leases, where they are not at a peppercorn rent, are seen as a form of borrowing and will need to be added to the Council's CFR. At this stage the impact of this change to the CFR has yet to be fully assessed although the Council does not have many leases that will be subject to this change.

Asset management: To ensure that capital assets continue to be of long-term use, the Council has an asset management strategy in place. This strategy was adopted in July 2017 by Cabinet and sets out how property asset management is delivered for the Council to meet

its long term objectives and goals. It outlines how the long term objectives for managing the asset portfolio are met, including statutory obligations, stakeholder needs & the overall performance of property within the context of any constraints such as funding. The strategy is supported by the Asset Management Policy & Asset Management Plan also adopted by Cabinet in July 2017.

- The Council's asset management strategy can be read here: <http://www.folkestone-hythe.gov.uk/moderngov/documents/g3223/Public%20reports%20pack%2019th-Jul-2017%2017.00%20Cabinet.pdf?T=10>

Asset disposals: When a capital asset is no longer needed, it may be sold so that the proceeds, known as capital receipts, can be spent on new assets or to repay debt. The Council is currently also permitted to spend capital receipts on service transformation projects until 2021/22. Repayments of capital grants, loans and investments also generate capital receipts. The Council plans to receive £3.545m capital receipts in the coming financial year as follows:

Table 5: Capital receipts in £ millions

	2018/19 actual	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget
Asset sales – Non Housing	0.142	1.120	1.630	0	0
Asset Sales – HRA	2.166	1.926	1.500	1.500	1.500
Loans repaid	1.632	0.655	0.415	0.417	0.170
TOTAL	3.940	3.701	3.545	1.917	1.670

Restrictions apply to the use of capital receipts generated from HRA 'Right to Buy' asset sales meaning they can only be used to support further HRA capital investment.

- The Council's Flexible Use of Capital Receipts Policy is available here: <https://www.folkestone-hythe.gov.uk/moderngov/documents/s20238/rcabt20160914%20MTFS%20Cabinet%20report%2014-9-16.pdf>

Treasury Management

Treasury management is concerned with keeping sufficient but not excessive cash available to meet the Council's spending needs, while managing the risks involved. Surplus cash is invested until required, while a shortage of cash will be met by borrowing, to avoid excessive credit balances or overdrafts in the bank current account. The Council is typically cash rich in the short-term as revenue income is received before it is spent, but cash poor in the long-term as capital expenditure is incurred before being financed. The revenue cash surpluses are offset against capital cash shortfalls to reduce overall borrowing.

Due to decisions taken in the past, the Council as at 31 December 2019 has £56.4m borrowing at an average interest rate of 3.39% and £32.9m treasury investments at an average rate of 2.53%.

Borrowing strategy: The Council's main objectives when borrowing are to achieve a low but certain cost of finance while retaining flexibility should plans change in future. These objectives are often conflicting, and the Council therefore seeks to strike a balance between cheap short-term loans (currently available at around 0.75% to 1% and long-term fixed rate loans where the future cost is known but higher (currently 2.0 to 3.0%).

Projected levels of the Council's total outstanding debt (which comprises borrowing, PFI liabilities, leases are shown below, compared with the capital financing requirement (see above).

Table 6: Prudential Indicator: Gross Debt and the Capital Financing Requirement in £ millions

	31.3.2019 actual	31.3.2020 forecast	31.3.2021 budget	31.3.2022 budget	31.3.2023 budget
Debt (incl. PFI & leases)	56.355	86.219	124.489	160.137	195.527
Capital Financing Requirement	67.794	121.067	148.021	173.029	203.721

Statutory guidance is that debt should remain below the capital financing requirement, except in the short-term. As can be seen from table 6, the Council expects to comply with this in the medium term.

Liability benchmark: To compare the Council's actual borrowing against an alternative strategy, a liability benchmark has been calculated showing the lowest risk level of borrowing. This assumes that cash and investment balances are kept to a minimum level of £15m at each year-end. This benchmark is currently projected to be £82.2m at 31.3.20 and is forecast to rise to £191.5m over the next three years.

Table 7: Borrowing and the Liability Benchmark in £ millions

	31.3.2019 actual	31.3.2020 forecast	31.3.2021 budget	31.3.2022 budget	31.3.2023 budget
Outstanding borrowing	56.355	86.219	124.489	160.137	195.527
Liability benchmark	29.200	82.219	120.489	156.137	191.527

The table shows that the Council expects to remain borrowed above its liability benchmark. This is because the council intends to continue holding £15m of strategic investments in pooled funds over the medium term which should provide returns greater than the expected cost of new borrowing over the same period.

Affordable borrowing limit: The Council is legally obliged to set an affordable borrowing limit (also termed the authorised limit for external debt) each year. In line with statutory guidance, a lower "operational boundary" is also set as a warning level should debt approach the limit. The authorised limit provides for borrowing for capital purposes for one year in advance so is higher than both the operational boundary and the figures shown in the Prudential Indicator for gross debt and the CFR in table 6, above.

Table 8: Prudential Indicators: Authorised limit and operational boundary for external debt in £m

	2019/20 existing limit	2019/20 revised limit	2020/21 limit	2021/22 limit	2022/23 limit
Authorised limit – borrowing	96.5	152.9	178.1	211.5	231.9
Authorised limit – PFI and leases	-	-	2.0	2.0	2.0
Authorised limit – total external debt	96.5	152.9	180.1	213.5	233.9
Operational boundary – borrowing	94.0	122.1	149.0	174.0	204.7
Operational boundary – PFI and leases	-	-	2.0	2.0	2.0
Operational boundary – total external debt	94.0	122.1	151.0	176.0	206.7

The authorised borrowing limit for 2019/20 needs to be increased from its existing limit of £96.5m to £152.9m reflecting the approved changes made to the Council’s capital expenditure plans during the year.

The proposed authorised borrowing limit for 2020/21 of £180.1m is approximately £10m more than indicated in the Treasury Management Strategy Statement approved by Cabinet on 22 January 2020 and incorporates changes to the HRA capital programme agreed by full Council on 19 February 2020.

- Further details on borrowing are in pages 5 to 8 of the treasury management strategy <https://www.folkestone-hythe.gov.uk/moderngov/documents/s32356/Cabinet%20Report%20TMSS%202020-21v2.pdf>

Investment strategy: Treasury investments arise from receiving cash before it is paid out again. Investments made for service reasons or for pure financial gain are not generally considered to be part of treasury management.

The Council’s policy on treasury investments is to prioritise security and liquidity over yield, that is to focus on minimising risk rather than maximising returns. Cash that is likely to be spent in the near term is invested securely, for example with the government, other local authorities or selected high-quality banks, to minimise the risk of loss. Money that will be held for longer terms is invested more widely, including in bonds, shares and property, to balance the risk of loss against the risk of receiving returns below inflation. Both near-term and longer-term investments may be held in pooled funds, where an external fund manager makes decisions on which particular investments to buy and the Council may request its money back at short notice.

Table 9: Treasury management investments in £millions

	31.3.2019 actual	31.3.2020 forecast	31.3.2021 budget	31.3.2022 budget	31.3.2023 budget
Near-term investments	(23.2)	(4.0)	(4.0)	(4.0)	(4.0)
Longer-term investments	(19.0)	(15.0)	(15.0)	(15.0)	(15.0)
TOTAL	(42.2)	(19.0)	(19.0)	(19.0)	(19.0)

- Further details on treasury investments are in pages 8 to 14 of the treasury management strategy <https://www.folkestone-hythe.gov.uk/moderngov/documents/s32356/Cabinet%20Report%20TMSS%2020-21v2.pdf>

Governance: Decisions on treasury management investment and borrowing are made daily and are therefore delegated to the Director of Corporate Services and staff, who must act in line with the treasury management strategy approved by Council. Half yearly reports on treasury management activity are presented to Cabinet. The Overview & Scrutiny Committee are responsible for scrutinising treasury management decisions.

Investments for Service Purposes

The Council can lend money to its subsidiaries, its charities where the Council is the trustee, its external service providers, local residents and its employees to support local public services and stimulate local economic growth. In the future the Council may also lend money to joint ventures it decides to enter into to help deliver its major corporate investment initiatives.

The main risk when making service loans is that the borrower will be unable to repay the principal lent and/or the interest due. In order to limit this risk, and ensure that total exposure to service loans remains proportionate to the size of the authority, upper limits on the outstanding loans to each category of borrower have been set

Additionally the Council can invest in share equity, it currently only does so for its wholly owned Housing and Regeneration subsidiary company, Oportunitas Limited. In the future the Council may also acquire shares in either other subsidiaries companies it may choose to establish or joint venture companies it decides to enter into to help deliver its major corporate investment initiatives. The equated value of investments for service purposes in 2019/20 is approximately £9.55m generating a return of about 1.9%.

Governance: Decisions on service investments are made by the relevant service manager in consultation with the Director of Corporate Services and must meet the criteria and limits laid down in the Investment Strategy. Most loans and shares are capital expenditure and purchases will therefore also be approved as part of the capital programme.

- Further details on service investments are in sections 3 & 4 of the appendix to the Investment Strategy 2020/21 report being considered separately on this agenda. The

Capital Strategy 2020/21 and Investment Strategy 2020/21 will be published together on the Council's website once they are adopted.

Commercial Activities

With central government financial support for local public services declining, the Council is investing in commercial property and land with the intention of making capital gains or generating new revenue streams to spend on local public services. Total commercial investments are currently projected to be valued at £76.5m at 31 March 2020 with the largest being Otterpool Park land (£56m) and the Connect 38 Offices in Ashford (£17.7m). In the case of Otterpool Park, not only does the Council intend to gain a financial return from its investment in the project, it will provide up to 10,000 much needed new homes over an approximate 30 year period and create significant economic benefits to the district. To date the most notable benefit from Otterpool Park has been an unrealised valuation gain of about £22m on the farm land acquired in late 2015.

The total net return after all costs on commercial activities for 2019/20, including unrealised valuation gains, is projected to be approximately 58%.

With financial return being the main objective, the Council accepts higher risk on commercial investment than with treasury investments. The principal risk exposures include fluctuations in future demand of the market including competition, risk of void tenancies, fall in capital values etc. These risks are managed by the project lead as well as assessed through the corporate risk register. The council has an established a proactive risk management framework, which incorporates key projects, and reports quarterly to the Audit & Governance Committee as well as annually to the Cabinet. The council is also working on a council wide transformation programme to support the needs of the medium term revenue position so as to not place sole reliance on the investment plans providing the expected yields within the anticipated timeframes.

Governance: Decisions on commercial investments are made by Cabinet and / or Full Council in line with the criteria and limits outlined within the Constitution, in specific circumstances the Executive have delegated authority to progress certain projects to the Director of Development in consultation with the relevant Portfolio Holder. Property and most other commercial investments are also capital expenditure and purchases will therefore also be approved as part of the capital programme.

- Further details on commercial investments, limits on their use and other risk management controls are in section 5 of the appendix to the Investment Strategy 2020/21 report being considered separately on this agenda. The Capital Strategy 2020/21 and Investment Strategy 2020/21 will be published together on the Council's website once they are adopted.

Liabilities

In addition to debt of £124.5m detailed above, the Council is committed to making future payments to cover its pension fund deficit (valued at £64.9m at 31.3.19). It has also set aside £1.7m to cover risks of the business rates appeals.

Governance: Decisions on incurring new discretionary liabilities are taken by the Director of Corporate Services in liaison with service managers. The risk of liabilities crystallising and requiring payment is monitored by Accountancy and reported through the regular budget monitoring/projected outturn cycle to Cabinet if identified or through the Statement of Accounts process to the Audit & Governance Committee. New liabilities exceeding the auditors materiality threshold would be reported to full council for approval/notification as appropriate.

- Further details on liabilities and guarantees are on pages 34 to 37 of the 2018/19 statement of accounts [https://www.folkestone-hythe.gov.uk/media/1023/Audited-Statement-of-Accounts-2018-19/pdf/FINAL_SoA_2018-19_\(V2\)_Signed_with_Audit_Opinion.pdf?m=637057117859000000](https://www.folkestone-hythe.gov.uk/media/1023/Audited-Statement-of-Accounts-2018-19/pdf/FINAL_SoA_2018-19_(V2)_Signed_with_Audit_Opinion.pdf?m=637057117859000000)

Revenue Budget Implications

Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are charged to revenue, offset by any investment income receivable. The net annual charge is known as financing costs; this is compared to the net revenue stream i.e. the amount funded from Council Tax, business rates and general government grants.

Table 10: Prudential Indicator: Proportion of financing costs to net revenue stream

	2018/19 actual	2019/20 forecast	2020/21 budget	2021/22 budget	2022/23 budget
Non-HRA Financing costs (£m)	0.64	1.15	2.19	0.75	0.80
Proportion of net revenue stream	3.6%	8.4%	15.3%	5.2%	5.4%
HRA Financing costs (£m)					
HRA Financing costs (£m)	3.83	4.10	8.3	11.6	5.44
Proportion of net revenue stream	24.1%	25.3%	50.6%	67.8%	30.8%

The increase the HRA financing costs for 2020/21 and 2021/22 reflects the level of revenue funding planned to be used towards the HRA capital programme for the two years.

- For the General Fund the revenue implications of capital expenditure are included in the 2020/21 revenue budget <https://www.folkestone->

[hythe.gov.uk/moderngov/documents/s32687/202021%20FINAL%20Council%20Tax%20Report%20-%20Council%20190220.pdf](https://www.folkestone-hythe.gov.uk/moderngov/documents/s32687/202021%20FINAL%20Council%20Tax%20Report%20-%20Council%20190220.pdf)

- For the HRA the revenue implications of capital expenditure are included in the 2020/21 HRA revenue budget <https://www.folkestone-hythe.gov.uk/moderngov/documents/s32666/HRA%20Revenue%20App%201%20FINAL%20020220.pdf>

Sustainability: Due to the very long-term nature of capital expenditure and financing, the revenue budget implications of expenditure incurred in the next few years will extend for up to 50 years into the future. The Director of Corporate Services is satisfied that the proposed capital programme is prudent, affordable and sustainable because it has been evaluated and risk assessed, it is considered to be a balanced portfolio with minimal risks.

Knowledge and Skills

The Council employs professionally qualified and experienced staff in senior positions with responsibility for making capital expenditure, borrowing and investment decisions. For example, the Director of Corporate Services is a qualified accountant with 20 years' experience, and the Director of Development has a degree in Estate Management, is RICS qualified and has 30 years experience in both the private and public sector. The Council pays for staff to study towards relevant professional qualifications including ACCA, ACT (treasury).

Where Council staff do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field. The Council currently employs Arlingclose Limited as treasury management advisers, Savills and Montague Evans as property consultants as well as other bodies on an ad hoc basis. This approach is more cost effective than employing such staff directly, and ensures that the Council has access to knowledge and skills commensurate with its risk appetite.

- Further details on staff training can be found within the People Strategy which was considered by Personnel Committee in June 2019 <https://www.folkestone-hythe.gov.uk/moderngov/documents/s30459/Report%20-%20HR%20Annual%20Review%202018-19%20-%20App2%20People%20Strategy%20-%20June%202019.pdf>

This Report will be made public on 10 March 2020.



Report Number **C/19/75**

To: Cabinet
Date: March 18th 2020
Status: Key Decision
Responsible Officer: Andy Blaszkowicz – Director, Housing & Operations
Cabinet Member: Cllr John Collier, Cabinet Member for Property Management & Grounds Maintenance

SUBJECT: PLAY AREA STRATEGY 2020-2030 –
CONSULTATION RESPONSES & OUTCOME

SUMMARY: Report No. **C/19/48** considered the draft Play Area Strategy 2020-2030 as presented to Cabinet on 11/12/2019. The report detailed how high quality play areas will be provided and maintained throughout the District over the next ten years. Cabinet resolved:

1. That report C/19/48 be received and noted
2. That the suggestion of sites to be sold in respect of non-strategic play areas be removed
3. That the principles of the draft Play Area Strategy 2020-2030 and associated action plan be approved
4. To proceed to formal consultation
5. That a report be brought back to Cabinet following formal consultation with a view to approving the Strategy from 1st April 2020

These resolutions have been actioned with the formal consultation beginning 20/12/2019 and concluding on 31/01/2020. This report summarises the consultation responses and minor amendments to the strategy.

REASONS FOR RECOMMENDATIONS:

Current play area provision across the district is unsustainable. The Play Area Strategy 2020-2030 outlines how the Council will work with partners to provide a sustainable network of Priority and Strategic Play Areas across the District. Cabinet are asked to consider the responses to the formal consultation, the minor amendments to the draft strategy and approve the draft strategy which sets out clear direction of how these important community facilities will be managed, maintained and enhanced over the next ten years.

RECOMMENDATIONS:

- 1. To receive and note report C/19/75.**
- 2. To note the consultation responses to the draft Play Area Strategy 2020-2030 and associated action plan.**
- 3. To note the minor amendments to the draft Play Area Strategy 2020-2030 and associated action plan.**
- 4. To approve the draft Play Area Strategy 2020-2030 and associated action plan and provide delegated authority to the Director, Housing & Operations to implement the draft Play Area Strategy 2020-2030 from 1st April 2020.**
- 5. To note and approve the proposed amount of up to £250k for Dowry payments to Town and Parish Councils for the transfer of SIPA and NSPA designated play areas to be met from the General Fund Vehicles, Equipment and Technology Reserve.**

1. INTRODUCTION

- 1.1 The Play Area Strategy 2020-2030 follows on from the report Planning for Play in Shepway 2007-2012 which was developed by Folkestone & Hythe District Council (F&HDC) and the Shepway Play Partnership (a range of organisations and agencies involved in the Play sector) in response to a commitment from central Government to raise the national profile of Play. Since the 2007 Strategy was adopted by F&HDC there have been many improvements to play provision in the district as well as changes to the available resources to manage and maintain features. It is therefore now timely to review and update the Strategy which will guide the management and maintenance of play spaces in Folkestone & Hythe District over the next 10 years.

2. BACKGROUND

- 2.1 There are 85 play areas in the Folkestone & Hythe District. Of these 48 are owned by FHDC corporately or through the HRA. The other play areas are in the ownership of a multitude of other organisations including Town and Parish Council's and Housing Associations. FHDC have further agreements in place to manage and maintain some of these play areas on behalf of the other organisations.
- 2.2 With the exception of the play areas at the Coastal Park and the Royal Military Canal (Seabrook) the Council has a maintenance budget of £20k. With aging play areas this is clearly not a sustainable position.

3. THE PLAY AREA STRATEGY 2020-2030

- 3.1 The Strategy is set out in three parts; the vision which sets out FHDC's aim for the future of play provision within the District; the objectives of the Strategy which set out how we will implement the vision and an action plan which sets out how we will achieve the objectives. The full draft strategy is included as **Appendix 2** of this report.

3.2 Vision:

Play experiences are fundamental to the health and development of children and young people. Folkestone & Hythe District Council will therefore seek to ensure all residents are able to access a high quality and high value play area. We will work with town and parish councils, together with other providers, to create play spaces which offer challenging and exciting environments for children and young people of all ages and abilities.

- 3.3 The Shepway Play Area Review (2017) provides an assessment of play areas in the district in terms of quantity, accessibility, location, value and quality.
- 3.4 National guidance suggests that play strategies should be based on locally derived standards. These standards are determined through analysis of

existing provision of play spaces, consideration of local and national standards for play and an understanding of local need. The proposed standards for Folkestone & Hythe District are set out in the Shepway Play Area Review (2017) and Section 4 of the Strategy.

- 3.5 FHDC acknowledges that, due to ongoing financial constraints facing local authorities, achieving these standards in the Folkestone & Hythe District will be a challenge. It is therefore proposed that any investment will be prioritised on the management and enhancement of play areas where there is considered greatest need i.e. play spaces located in areas with the largest concentration of children and young people. Based on this assessment 9 play areas have been identified as being priorities for FHDC known as Priority Play Areas (PPAs). The Strategy identifies another 5 PPA's within the district in other ownership. FHDC will work with town and parish councils to identify priority play spaces in their areas.
- 3.6 In addition FHDC will work in partnership with Town and Parish Councils, together with housing trusts and other community groups, to deliver a network of Strategically Important Play Areas (SIPAs). The network of SIPAs has been identified with the aim of ensuring the majority of the district's residents live within a 15 minute walk of a high quality and high value play area. FHDC will look to transfer these sites to the Town and Parish Councils who are best placed to provide these facilities for their local residents.
- 3.7 Those play areas not considered to be part of this network will be known as Non-Strategic Play Areas (NSPA) and will be offered to FHDC's partners **and stakeholders** as part of an asset transfer. If after one year no interested parties come forward, play equipment will be removed from these play areas and the ground returned to open space.

3.8 Objectives

The Shepway Play Area Review (2017) identified a need to take a strategic approach to future play area provision in the district. The following objectives and supporting action plan (see Section 7 of the Strategy) have been informed by the findings of the Play Area Review, which involved desk based analysis, stakeholder consultation and an audit of play areas

- 3.9 The Strategy includes 6 objectives that are set out to deliver the vision; how each objective is achieved is set out in detail in the Strategy and subsequent action plan.
- **Objective 1:** Improve the location, quality, value and accessibility of play provision for all children and young people
 - **Objective 2:** Effectively utilise planning policy to benefit play provision
 - **Objective 3:** Raise awareness of play opportunities and the importance of play
 - **Objective 4:** Maximise funding opportunities for the maintenance and enhancement of play areas

- **Objective 5:** Communicate and engage with key partners and stakeholders
- **Objective 6:** Ensure appropriate and regular communication and review

3.10 **Action Plan;** this sets out the programme of actions which will be carried out to meet the vision for play in Folkestone & Hythe District. It lists each management objective, how each will be achieved and who is responsible for achieving them. Where appropriate a priority level is indicated and further considerations highlighted. The programme will be reviewed annually and targets monitored to ensure actions have been achieved.

4. CONSULTATION

4.1 The consultation commenced 20/12/2019 and concluded 31/01/2020.

4.2 The consultation documents were published on the FHDC website with all affected organisations, stakeholders and partners notified by email.

4.3 Consultees included; KCC, all Town and Parish Councils, RDH Charitable Trust, all known community groups with an interest in play provision, NHS and other stakeholders.

4.4 A summary of the consultation responses and recommended actions is set out below with the full consultation results detailed in Appendix 1 of this report.

4.5 In total **83 responses** were received by the Council which are summarised below.

4.6 1 to purchase land.
Responses from 4 Town or Parish (Burmarsch/Hythe/Hawkinge/St Mary's in the Marsh)
1 from the Labour Party
1 from KCC Member
2 Charitable Sector

4.7 Responses stating individual parks;

Pine Way – 5 responses
Densole Way – 1
Oakham Drive - 11
Brabner Park - 1
Campbell Road - 1
Atkinson Road - 8
Country's field - 1
Wraightsfield - 1
George Gurr - 5
Oakland's - 6
Heron Forstal - 1

Mackenzie Drive - 3
Peregrine Close - 1
Reachfields - 1
Southern Way - 1
Jefferstone Lane -1
Meads Way – 1
Oak Drive – 1

In addition to this there were many responses for Hawkinge on the whole, with the vast majority received after factually incorrect signs were posted by an unknown person or persons.

4.8 Themes and recommended actions

- Ownership corrections (2 of these which will be amended within the strategy)
- Play provision – The type and amount of equipment found within parks was commented on, responses pointed towards different parks offering different ages of equipment, which was seen both as a positive and negative item. No action is needed with regards to the strategy.
- Closure – The vast majority of responses (49) came after signs which contained false information were put up at all parks by an unknown person or persons. FHDC does not want to close any parks, and is working with Towns and Parishes to avoid this. No action is needed with regards to the strategy. It should be noted that none of these responses referred directly to the Play Area Strategy.
- Designation – Comments came in regarding re-designating parks as some felt the importance of their local park was not recognised. However the parks have all been put through the same process to be designated appropriately. See strategy for methodology and reasoning.
- Funding - A number of consultees were seeking information regarding how funding could be sought in the long term. Parish and Town Councils are able to work with the charitable sector to secure funding and will also receive their share of CIL funding. It should be noted that both Towns and Parish councils can apply for further CIL funding when available. No action is needed with regards to the strategy.
- Accessibility – a comment was received highlighting a lack of accessible equipment, and this is noted within the strategy and action plan. Before any major updates all parks will receive a fully accessibility audit as per the action plan. No action is needed with regards to the strategy.
- Budget – A number of comments referred to the budget the Town and Parish Councils would need to manage the parks should they transfer. FHDC will provide Dowry's based on a 5 year maintenance contribution payable upon transfer. Detail has been added to the strategy page 29, Objective 4, No.7. No budget provision exists in the General Fund for the Dowry payments and

it is estimated the total cost could be up to £250k. It is proposed to meet the cost from the Council's Vehicles, Equipment and Technology Reserve.

- Developer Management of play areas – A comment was received regarding previous parks where management companies and developers had dissolved and therefore leaving parks unmanaged and neglected. This will be picked up with strict planning policy. No action is needed with regards to the strategy.
- Consultation Duration – a number of comments were made with reference to the consultation period including the Christmas and New Year period. All written with the same wording. The consultation timeframe was carefully considered and appropriate. No action is needed with regards to the strategy.

5. ENGAGEMENT

- 5.1 Throughout the consultation period discussions have continued to take place with Town and Parish Councils regarding the transfer of Play Areas. Officers feel that the conversations have been really positive.
- 5.2 The transfer of 8 play areas has been agreed with Folkestone Town Council.
- 5.3 The transfer of 1 play area has been agreed with Sandgate Parish Council.
- 5.4 The transfer of 1 play area has been agreed in principal with New Romney Town Council.
- 5.5 The transfer of 5 play areas is ongoing with Lydd Town Council.
- 5.6 Discussions are taking place with other Town and Parish Council's over the transfer of other play areas across the district.

6. RISK MANAGEMENT ISSUES

Perceived risk	Seriousness	Likelihood	Preventative action
Play Area Strategy not adopted	High	Low	Detailed and thorough ongoing consultation with all stakeholders to ensure strategy is adopted
Town and Parish Councils not willing to adopt play areas	High	Low	Detailed and thorough ongoing consultation with all stakeholders to ensure strategy is adopted and dowry's sufficient to cover maintenance costs

Insufficient funding to maintain Priority and SIPA networks	High	Low	Work internally with planning to ensure S106 and CIL payments are directed to the right projects. Work with external partners and community groups to explore all funding opportunities
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6. CONCLUSION

- 6.1 Officers have concluded that the consultation responses and the discussions that have been taking place during the consultation period have generally been positive and supportive of the strategy. No responses have been received that would require any material changes being made to the strategy.
- 6.2 The majority of responses that were received were in response to signs which contained false information that were put up at all parks by an unknown person or persons or relating to single play areas and the fear of them closing. Officers have been working hard with Town and Parish Councils over the potential transfer of the SIPA and NSPA sites which will alleviate these fears.
- 6.3 Following the consultation period, the responses received and the ongoing discussions with Town and Parish Councils, Officers recommend that the Play Area Strategy 2020-2030 is approved and should be implemented on 1st April 2020.

7. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

7.1 Legal Officer's Comments (NE)

There are no legal implications arising directly from this report. However, legal will be involved in relation to any transfers or leases of the play parks to third parties.

7.2 Finance Officer's Comments (LW)

The financial implication of providing the proposed Dowry payments is outlined in the report. Adequate provision is available within the General Fund Vehicles, Equipment and Technology Reserve to meet the cost of up to £250k. There are no other financial implications arising directly from this report.

7.3 Diversities and Equalities Implications (AB)

The Strategy sets out a clear vision to develop a network of Priority and Strategically Important Play Areas so all residents have access to high quality, high value play areas. All new and refurbished play areas will

undergo an equalities impact assessment during the design process to ensure that they meet the needs of all of our residents.

7.4 Communications Implications (KA)

This will need to be handled with care and a communications plan has been developed to mitigate the communications implications arising from this strategy.

8. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

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

Andy Blaszkowicz, Director – Housing & Operations

Telephone: 01303 853684

Email: andy.blaszkowicz@folkestone-hythe.gov.uk

Appendices:

Appendix 1: Play Area Strategy 2020-2030 full consultation results

Appendix 2: Draft Play Area Strategy 2020-2030

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Whom	Owner	Park	Town / Parish	Comment	Themes	FHDC Comment
Individual	Places for Homes LTD	Pine Way LEAP NSPA Transfer to FTC or close	Folkestone Town Council	The park next to Harcourt primary school would very much appreciate some funding. Currently it is used so much by the local community but there is hardly anything for the kids to play on. As long as it is dry then children leaving Harcourt school use this every day. I previously asked for a bench and this was granted. Sadly this was vandalised overnight. It's a small park but if you were to come to see it on a dry day the local community are using it so much. Any new equipment or facilities given would be so gratefully received.	Play Provision	This park is close to Harcourt Primary school and is in a convenient location for children before and after school. It is also close to Firs Lane Play Area and contains a larger array of equipment. This area is within the catchment area of Cheriton Recreation Ground, which is the designated PPA. Folkestone Town Council have agreed to adopt this park.
Burmarsh Parish Council	Burmarsh Children Fund	Burmarsh Recreation Ground NEAP SIPA	Burmarsh	Thank you for the opportunity to see this Play Area Strategy document. I am writing to correct the reference to the Burmarsh Recreation Ground Play Area in Appendix 2. The ownership and management of the play area is the responsibility of the Burmarsh Children's Fund, which is an independent charity separate from the parish council. I hope this is helpful and that the information can be corrected in the final document.	Ownership	FHDC will update the strategy as necessary.

Roger De Haan Charitable Trust	N/A	N/A	Charity	<p>I represent The Roger De Haan Charitable Trust and wish to respond to the consultation on the play area strategy. By way of context this charity has donated £1,757,294 to playparks in this district since 2008. With this in mind it is felt that the strategy does not place sufficient emphasis on the role of the charitable sector in assisting the council in this task. There are a couple of mentions but more could be made of this.</p> <p>We remain open to further bids providing a maintenance body and strategy is in place. We are pleased to note that the ones we have funded remain in the plans for district, town or parish maintenance. One major point to note is that this charity along with the Shepway Sports Trust will be opening the £16m Urban Sports Park in Tontine Street this coming summer – to be known as F51. Accommodating skate boarding, scooting, cycling, climbing, bouldering and boxing this will be a centre of national significance. The core facilities will be available to local school children at only £1 per month.</p> <p>This will address managed risk, healthy pursuits and facilities for teenagers and young adults like no other district in the land. This impact has clearly not yet been understood. We were also the major donors to Payers Park which is the best example in the district of teenage and young adult play. Unfortunately the aspirations for embracing the risk benefit approach are not embraced by other parts of the council with a role in this. Both of</p>	Charitable Sector contributions	FHDC understands the importance of the charitable sector in funding and maintaining parks. The Roger De Haan Trust has provided great and considerable support to play within the District and will continue to be a strategic partner in the future. However FHDC is unable to include F51 as part of this strategy as it is not a free to use park.
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				these facilities are in the heart of the district's most deprived ward. Subject to these comments the strategy adequately explains the council's approach to managing resources and expectations going forward.		
Individual	FHDC Housing	Densole Way LEAP SIPA	Folkestone Town Council	Please could you consider updating the park in Densole Way as it's dilapidated & boring! I heard that it was going to be done in 2018 but was halted due to residence objecting as they were concerned Teenagers might hang out there? Ridiculous! Any how we have more under 13 year olds on the estate now so they need it.	Play Provision	Densole Way is a SIPA and is the only play area identified within Densole. Folkestone Town Council have agreed to adopt this park.
Hythe Town Council	N/A	N/A	Hythe Town Council	<ol style="list-style-type: none"> 1. P&W expresses concern over the possible outcomes for "non-strategic play areas" that are not adopted within 12 months and seeks reassurance that processes will be put in place to ensure that there is no sudden abandonment of such areas. 2. P&W expresses approval that St George's Place is designated as a strategic play area but queries why Oakland's Park playground is not similarly designated. 3. Otherwise, P&W expresses no objection to the Play Area Strategy. 	Closure Designation	<ol style="list-style-type: none"> 1. NSPA play areas that are not adopted will be shut as per that strategy, however FHDC seeks to avoid this. 2. St Georges place is identified as a SIPA because it is the largest and most equipped park in that area. Oakland's park is found within the catchment areas of both The Green which is a PPA and Hythe Skate park which is a SIPA

<p>Hawkinge Town Council</p>	<p>HTC</p>	<p>N/A</p>	<p>Hawkinge Town Council</p>	<p>1. Are we as a Town Council eligible to secure external funding? 2. How was the community funding for Radnor Park Play Area achieved? 3. Is it possible to request Blenheim Drive and Kettle Drive to become Priority Play Areas, with a special interest in creating a skate park?</p>	<p>Funding Designation</p>	<p>1. Parish and Town Councils are free and eligible to secure external funding to support play area improvement. 2. Radnor park funding was achieved through collaboration with the community group who sought external funding, the Roger De Haan charitable trust, FTC and a s106 contribution. 3. There is currently no PPA within Hawkinge, because of the abundance of other play areas locally. It may be that future funding is designated to certain parks and the need for a PPA is identified. FHDC will continue to work with HTC with regards to play area improvements, transfers and designation.</p>
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Labour Party	N/A	N/A	N/A	<p>Folkestone and Hythe Labour party would much rather have seen a strategy which seeks to improve and extend play provision as well as working towards making the existing provision consistent in quantity, quality, repair and appearance; at the same time working towards the District's Corporate Plan to improve and maintain the health of residents, including children and young adults.</p> <p>Instead the strategy reads as a cost cutting exercise, by transferring responsibility onto Town and Parish Councils without meaningful funds from the District, reducing any opportunities to improve health through physical exertion /exercise.</p> <p>If some play areas are cleared and possibly sold then it will be even harder to achieve the Field in Trust benchmark of 0.25 hectares per 1000 head of population for equipped/ designated play areas which is something the Council should be seeking to achieve. The District seem to be retaining the best and well maintained play areas going forward, this is unfair. The previous report (2017) undertaken by LUC, highlighted ALL the play areas needing remediation work (because every play area was visited and reported on) and this proposed strategy is a poor response.</p> <p>Unless the consultation period is extended beyond 31st January 2020 it is unlikely the Council will receive many responses to it, as much of the consultation window has been during the holiday</p>	Funding / Designation of Parks	<p>The play strategy has been designed to ensure there is suitable play provision considering the demography of the district. Such is the demand on the budget, play parks must be aligned with the demand and the funding requirements to make all parks the same quality as the PPA's would be unviable. By focusing on the PPA sites FHDC can ensure quality and standards of play. It can then work with the Parish and Town Councils to deliver the SIPA and NSPA sites that are suitably provisioned considering the catchment areas. FHDC is proposing a dowry to be provided with each park to support the Parishes and Towns with the adoption.</p>
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				<p>period, therefore reducing time for people to thoroughly read and respond at all.</p>		
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Individual				<p>The strategy outlines the Council's explanation as to why it is taking this approach, to save money by devolving responsibility to local TCs and PCs in a very short time frame i.e. to start this year April 2020.</p> <p>The approach set out seems to be rushed leaving little time for PCs and TCs to fully understand the implications at a local level, let alone the residents impacted. This consultation may have started December 19th 2019 but realistically 2 weeks of that was a holiday period, so not a lot of time for people to respond. I must have missed the challenging circumstances identified at a national level.</p> <p>The idea to transfer responsibility for play areas to the local town council or parish council could be seen as a double edged sword, they can and will do a good job but they'll need the funds from the DC budget. There is no mention of any monies attached to any transfer. The DISTRICT Council has neglected many play areas, which seem to be located in the most deprived area of the district, over many years. This is only highlighted in the report as a problem resulting from extremely low overall SUCCESS. Will there be a central maintenance issue/s reporting facility as TCs and PCs TCS are not as available as District. It seems the 106 funding stream will be controlled by District with no say by the TCs I do not understand why capital has not been set aside for play areas as the District has spent millions on other projects.....so the play area strategy is where exactly on the list of priorities? Will the TCs and PCs own the grounds</p>	Funding	<p>Discussion with Town and Parish Councils have been on going and remain positive. Dowries will be included in any transfer. Land will be leased.</p>
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				<p>once transferred? In conclusion on the surface the strategy seems clear but on further reading there are many unanswered questions so I would hope the strategy is rejected at this stage. It cannot be morally right to potentially remove/lose 50 play areas.</p>		
Individual				<p>What would be good accessibility for all within the final park, the wheelchair swing in Radnor park is great but to the side of everyone else playing and not anything else really. New Romney's swing is alongside the other swings and is a seat with harness also can just about get a small wheelchair on the roundabout but that's about it.</p>	<p>Accessibility</p>	<p>As per the strategy - before any large refurbishment or investment takes place a full equalities assessment will take place.</p>

<p>Southern Housing Group</p>	<p>Southern Housing Group</p>	<p>Daglish Close NSPA</p>	<p>New Romney</p>	<p>The play area in Daglish Close, New Romney Kent is actually owned by Southern Housing Group.</p> <p>The play area was built before I took over management for the area and the land was purchased by us from yourselves I believe in order for us to create affordable housing. It would appear that at some stage during us purchasing the land from yourselves that an agreement was made for you to maintain the park, the park does have signs on stating that you are responsible however a land registry search has shown the land to be ours. We have not been able to find a management agreement and nor have yourselves as to why or how it was agreed the LA would manage this park.</p> <p>Obviously this has been deemed a NSPA. However as the land belongs to us we would look to take this back to our management.</p>	<p>Ownership</p>	<p>The strategy will be updated to reflect this. We are working with Southern Housing Group to ensure future maintenance.</p>
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<p>St Mary's in the Marsh Parish Council</p>				<ol style="list-style-type: none"> 1. The draft strategy is vague on finance. 2. Two play areas in the parish, both the responsibility of the district council, have been taken out of use over the last 3 years as they have both been neglected and allowed to fall into disrepair. Consequently the district council's vision for play provision 'Play experiences are fundamental to the health and development of children and young people. District Council will therefore seek to ensure all residents are able to access a high quality and high value play area' would appear to be contradictory to its actions. 3. For this reason this parish council would like to be guaranteed its fair share of the budget to ensure the play parks are repaired and put back into use. 4. The district council must acknowledge its responsibilities and provide adequate budget provision for maintaining its responsibilities and any form of devolvement to the parish council will be resisted as this will be considered double taxation. 5. With regard to new development, put in place a long-term solution for the upkeep of any play park provision that forms part of a planning development. As time moves on, these companies who are responsible for maintenance are no longer operational and consequently the play areas are left to deteriorate. 	<p>Budget Developers long term management</p>	<p>A budget has been designated for dowry payment, which includes 5 years' worth of maintenance payments. Two play areas have been have been closed due to a lack of funding to support the parks, the strategy aims to stop this happening in the future. The strategy will put in place funding mechanisms to ensure it is directed to the appropriate areas. It is aimed that there are secure mechanisms in place to ensure the longevity of any parks.</p>
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MOD	MOD	Mackenzie Drive	N/A	It has been brought to my attention that the council have attached a notice to our MOD owned play park on Mackenzie Drive stating that the play park is to be asset-stripped, closed and sold. This play park is owned by the MOD and as such you have no right to close it. I have read through your play park strategy 2020-2030 and it clearly states that this play park is owned by the MOD. I would appreciate a call back asap and in the mean time I will endeavour to contact you by phone.	Ownership	The sign mentioned in this response was not attached by FHDC and stated incorrect facts. A response has been sent to the MOD.
Individual	FHDC Housing	Oakham Drive NSPA	Lydd	My children have just found out that their local park may be closing. They are so disappointed and question why anyone would take a park away from children - it's hard to explain to a child that it's because money is more important than them - so they wanted to try and help save their park!	Closure	Oakham Drive is a NSPA site and is found within the catchment area of The Rype which is a PPA.
Individual	N/A	N/A	Hawkinge	Why is this happening its wrong once again Hawkinge gets the dirty end of the stick don't tell me it's not just Hawkinge I'm not worried about them just where I live so a response please.	Closure	FHDC is working closely with Hawkinge Town Council to ensure the asset transfers are efficiently and effectively achieved.

Individual	FHDC Housing	Brabner Park	Folkestone Town Council	I have just seen a sign for the closure of this park to be sold I personally feel this would be a terrible mistake this park is a good size for plenty of children to play safely at once and also encourage children who don't know each other play together many times I have popped to this park and the children don't want to leave because they enjoy the children who got to this park it has the fence all the way round Radnor Park don't. I can't let my young children run at Radnor is why we choose this park if u take away the parks you have more n more children getting into trouble with nowhere to go more n more children are being told they are overweight yet u take away places that can help maintain a healthy weight I don't have the money to go to fancy days out I will not take my children to the coastal park because it's a perfect place for ppl to use drugs easy to disappear to beach I can't watch all the children at once time at this park again y we use the park at bottom of Capel hill I feel a toilet block and cafe or something all in one would be better use of this park better maintained park makes it more attractive to all please reconsider closing this park.	Closure	The sign mentioned in this response was not attached by FHDC and stated incorrect facts. There is no plan to close or sell Brabner Park. It is a designated Public Open Space a SIPA and a PPA
Individual	Hawkinge Town Council	Campbell Road Park, LEAP NSPA	Hawkinge	I see a sign today stating that the park will be removed but it's a massive asset to this part of Hawkinge. I don't agree with the fact it should close What else will local kids do except vandalise? Massive way to crush the community.	Closure	The sign mentioned in this response was not attached by FHDC and stated incorrect facts. The play area is within the catchment area of the SIPA Kettle Drive. Both are managed by Hawkinge Town Council and therefore FHDC

						has no plans to shut them as part of this strategy.
Individual	Hawkinge Town Council	Atkinson Road, LAP	Hawkinge	I have just seen on Hawkinge Residents page on Facebook that plans are afoot to close the play area located in Page Road. A lot of residents are understandably upset at this as there are not enough play areas in a vastly populated place such as Hawkinge as it is, especially for under 5's. Whilst my grandchildren, that visit regularly, are not able to use that facility as they are under 5 and the equipment is not suitable, there will come a time shortly that we would have visited it to let them play there. We are now most concerned that removing an existing, albeit very small play area is a total contravention to your stated policy that we have looked at online. Please reassure me that the facilities in Hawkinge will improve rather than disappear.	Closure	The strategy has been put in place considering the fact that the towns and Parishes can deliver the local requirements of the area. The play park referred to is Atkinson road which is managed by Hawkinge Town Council, therefore FHDC has no plans to close this park.

Individual	N/A	N/A	Hawkinge	<p>I live with my family in Hawkinge. We have two small children one is one the other is three. Both love outdoor play. What made Hawkinge an appealing area to live in was the variety of parks it has to offer. My daughter loves to choose where to play and explore. It means we have activities on our doorstep which are free, promote exercise and do not require a car to travel to. We often see her nursery friends at the parks which promotes social inclusion, boosts emotional wellbeing and adds to the wonderful community spirit. Hawkinge is a more expensive area to live in but we did not mind as Hawkinge is family friendly with parks for children to play and a children's centre for structured activities. We, along with our friends in Hawkinge cannot see any positive outcome to closing our parks. My daughter would be so upset if I had to tell her much loved parks had gone. I sincerely hope this will not happen. Where else can we walk to exploring wildlife on the way? This decision has a big impact on all family members. Please advise on what we can do to keep our parks which add so much to our children's happiness.</p>	Play Provision	<p>Hawkinge has an array of parks, many of which are already managed by Hawkinge Town Council. Discussions have been ongoing with Hawkinge Town Council and remain positive.</p>
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Individual	N/A	N/A	Hawkinge	<p>As a resident of Hawkinge with small children, I want to voice my concern about the plans to transfer the Hawkinge play parks over to HTC and have the prospect of these being asset striped and closed if no committee/group takes over the running of these. Play parks are an essential part of the community. In Hawkinge we are lucky enough to have a few small local parks - there are very few which are suitable for under 6s. My 2 daughters love going to the park, and being able to walk to the park means it more accessible and easy for us to go when we want for 20-30 mins. It's easy to meet other local kids there and they are a vital part of our community.</p> <p>Going to the larger parks in Folkestone means driving there, finding parking. These parks are often busy which makes supervising smaller kids more difficult and they tend to get pushed and knocked out of the way by the bigger kids - not a great experience. It is not possible for kids to play safely outside most houses on Hawkinge -. Cars are parked on pavements, it is unsafe - as a parent I am happier knowing that there are safe play spaces available - why close them?</p> <p>In an age where we are trying to get kids out, playing and away from screens, the parks should be excluded from any cuts. If you want to cut costs, try removing the outside gym from the corner of Page Road - on 5 years living here I've never seen anyone use it.</p>	Play Provision	<p>Asset stripping formed part of the blanket signs attached to play areas by an unknown individual or group that stated incorrect facts. Hawkinge has a large quantity of parks and discussions with Hawkinge Town Council regarding transfer have been positive. The play strategy also highlights the importance of local play areas, and we are working with Towns and Parishes to deliver these.</p>
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Individual	Hawkinge Town Council	Atkinson Road, LAP	Hawkinge	<p>I have been made aware of the below sign on the children’s playground off page road in Hawkinge. I am absolutely appalled that this park is being considered for removal. We take our two young children to this park regularly, despite living near the Pannell Drive park. The page road park is ideal for smaller children and is well equipped with number of apparatus (the Pannell Drive park just has a net and slide and is not great fir a 5 year old).</p> <p>Being at the end of a long path cycle path it’s also perfect for children to cycle to....a great incentive for children just starting to cycle independently. The cycle path connects the park and the primary school, so a number of school children use this. Considering the amount of houses and children there are in Hawkinge, it is shocking that children’s playgrounds are being considered for removal. If anything I would have thought there was need for more parks / better equipped parks suitable for all ages and not just for older children. I sincerely hope you reconsider.</p>	Closure	<p>The sign mentioned in this response was not attached by FHDC and stated incorrect facts. The strategy has been put in place considering the fact that the towns and Parishes can deliver the local requirements of the area. The play park referred to is Atkinson road which is managed by Hawkinge Town Council, therefore FHDC has no plans to close this park.</p>
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Individual	FHDC	Pine Way LEAP NSPA	Folkestone Town Council	<p>My name is xxx and I am a resident on Pine Way. I am disclosing this immediately as I appreciate I do have a specific area of local knowledge. I am concerned that looking at the plans it appears that the Pine Way park is not included. I appreciate that everyone would like a park very close by and that actually a 15 minute walk to reach one is reasonable. However, this 15 minute walk is straight line and does not look at the demographic/ safe walk etc. from house to park. I think that the Pine Way park should be kept. It is immediately next door to Harcourt Primary school and it is used before school and after school EVERY dry school day, and actually a number of wet school day too. With the increase in childhood obesity this is one of those parks that directly impacts on a large number of local children. This park is also designated as dog free which on a personal level has been excellent for my child who is quite timid around dogs. As a busy working parent having somewhere so close to school means that the 30 or so minutes running around after school is practical and convenient, as someone is picking up the child and is able to immediately access the space- so it only adds 30 minutes for a 30 minute run around. In a housing area with very small or limited gardens this may be the only time on a weekday the children have.</p> <p>On a practical “parent “level we also used this park for the children to learn to ride their bikes and scooters. It has the long path through it which is perfect. Cheriton park does not have such a good</p>	Play Provision	<p>This park is close to Harcourt Primary school and is in a convenient location for children before and after school. It is also close to Firs Lane Play Area and contains a larger array of equipment. This area is within the catchment area of Cheriton Recreation Ground, which is the designated PPA. Folkestone Town Council have agreed to adopt this park.</p>
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				<p>area for this as the concrete area is mostly used by older ball players, and the paths are less straight. A number of people also use Cheriton park as a cut through / walk through to the dog exercise area which is again off putting when teaching a child to ride. We use the Pine Way park several times a week for bike riding. Sadly I am not an expert in policy making nor statistics. However, I do believe that this parks location would make it a sad loss to the local residential community and also the school user community. I would also be concerned as to what would happen to the land in the event of losing the park facilities. Thank you for taking the time to read this. It is the first time I've ever taken the time to respond to this type of consultation or to email my local councillor. So hopefully it all makes sense.</p>		
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Individual	FHDC	Oakham Drive. LEAP NSPA	Lydd Town Council	<p>I would like to express my disappointment that you have chosen to close down the play park in Lydd in the Oakham Drive, Romney Marsh, Kent. I have friends in this area who I spend a lot of time in the area, the freedom this gives to their children and in a world where we are no unsafe to let our children play this is a huge disappointment and means now her children with have nowhere to go.</p> <p>With the population of children being branded as obese and unhealthy the council is no longer supporting parents as you are taking away activities that get the kids out playing with their friends rather than sitting in on the computer. I appreciate the funding however with council tax keep going up! And what for. Areas like this need to be for our kids of the future, the wildlife as well in this area will be disturbed all for it to become nothing. Come on surely this can be changed!!</p>	Closure	<p>Oakham Drive is a NSPA site and is found within the catchment area of the Rype which is a PPA.</p> <p>Discussions are ongoing with Lydd Town Council over the potential transfer of this and the other play areas in Lydd.</p>
Individual	(Country's field) Orbit Housing Association / (Wraights wright play area) FHDC	Country's Field. LAP SIPA / Wraightswright Play Area. LEAP SIPA	Dymchurch Parish Council	<p>Having just been made aware of a consultation on your Play Area Strategy 2020-2030 I am very concerned that the window of consultation included Christmas and New Year leaving little time for me to properly consider the strategy and respond in full. I hope you will extend this period. However, with my brief understanding I am concerned that many play areas for children will be closed reducing opportunity for the benefits of outside play and exercise. In Dymchurch the playgrounds which may be under threat are the ones in Countries Field by Dymchurch School and Salbris Close near Wraightsfield. This goes against one of your strategic objectives in your corporate</p>	Consultation duration Closure Budget	<p>The consultation period was of a suitable timeframe. As part of the strategy FHDC will work with Parishes and Towns to provide suitable and quality play. Dowries will be discussed with the appropriate bodies. Both Country's field and Wraightsfield are SIPA parks and FHDC will be working closely with Dymchurch Parish Council to support the adoption of these.</p>

				plan for “health matters”. Secondly as a council you have declared a climate crisis and yet the closure of local play facilities will surely mean that families will have to drive to ‘destination’ play areas. Finally, there is no mention of funding being transferred with the parks to the Town and Parish Councils so how will they be maintained?		
Individual	FHDC	George Gurr LEAP NSPA	Folkestone Town Council	We as a family of 6 regularly use this park as do so many other children/families from this area. It would be a great shame to remove this where else are the children to play? On the streets?	Closure	George Gurr is a NSPA because it is within the catchment area of the PPA Brabner Park. Folkestone Town Council have agreed to adopt this park.
Individual	FHDC	George Gurr LEAP NSPA	Folkestone Town Council	Please see attached letter opposing the closure of George Gurr park. One from my 9yr old daughter Eden and another from her 8yr old friend and neighbour Sky. They regularly use this park and were so upset to read the notice on the gate. It would be amazing if you could reply to them personally as they are very passionate about the matter and have said to myself that they’ll even clean the apparatus and keep the park tidy if it was to stay! Thank you for your time	Closure	George Gurr is a NSPA because it is within the catchment area of the PPA Brabner Park. Folkestone Town Council have agreed to adopt this park.

Individual	FHDC	George Gurr LEAP NSPA	Folkestone Town Council	<p>I am writing to oppose the pending closure of George Gurr Park. This is a well-used park by not only myself and my family but many residents of George Gurr Crescent. It would have a serious detrimental effect if it were to close. Many residents of George Gurr are not in the wealthy financial bracket and this park offers the children of this neighbourhood the opportunity to physically and mentally stimulate their children through play without a cost. It's a great social area for all and I know is well respected and looked after.</p> <p>Those without children use this park regularly to exercise their dogs and for some of the elderly their only way to see someone friendly all day.</p> <p>My children have hugely benefited from the park being such a close distance from their home and have formed firm friendships from this. They love the surrounding area and have learnt so much about the amazing wildlife we experience there also. This park is used all year round and in the summer we come together as a community for neighbourhood picnics whilst the children are safe playing on the apparatus. If anything we would like to see the swings reinstalled and definitely not the park stripped. My 9yr old is so passionate about keeping this park that she has organised with her friend to write a letter herself which I will be forwarding on to yourselves. We as a community are deeply saddened at this proposal to close our park and hope that now you see how important it is to us that you will withdraw to proceed.</p>	Closure	George Gurr is a NSPA because it is within the catchment area of the PPA Brabner Park. Folkestone Town Council have agreed to adopt this park.
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				Thank you for your time in reading my letter.		
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Individual	FHDC	George Gurr LEAP NSPA	Folkestone Town Council	<p>I am writing to express my concern of the closure of George Gurr Park. At the top of George Gurr Crescent is a park which is well used (everyday twice a day for myself and my family). It needs to stay. Anyone who knows George Gurr Crescent and the surrounding roads will know it is very hilly and a lot of the gardens in George Gurr are not usable as a play area for the families they serve. Play is important for children as is physical activity. You state in your own strategy about the importance of play. It is beneficial to children to have an accessible outside space for their mental as well as their physical health. In a world where children are leading more sedentary lifestyles it is important that we do not deprive them of the outside space they need to grow and learn. Children develop gross motor skills if they have the space to run skip (or roll down a hill). This in turn allows children to burn calories and develop better sleep patterns as well as developing a better attitude towards a healthy lifestyle as they grow into adults.</p> <p>There are sights, such as the horse who likes to walk along the footpath at the top, smells, as well as the sound of birdsong. The area is also rich in wildlife. There are squirrels, foxes, mice as well as numerous species of birds a hawk and tits included. There are daisies which cover the grass in spring and summer as well as blackberry bushes and a footpath for walks up in the hills. My daughter is a lot more aware of wildlife since moving here and enjoys putting the bird feeder out to watch them.</p>	Closure	George Gurr is a NSPA because it is within the catchment area of the PPA Brabner Park. Folkestone Town Council have agreed to adopt this park.
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				<p>Neighbours meet each other in the park and children play together. I trust my daughter to go out with a friend to George Gurr park because it is yards from my house. I would not allow her to go to the next nearest park (Brabner) a 4 minute walk because it feels too far.</p> <p>Another worry is what will happen to the land? Who will buy it? And what will they do with it? More houses is definitely not a way forward because we already have too many cars parked on the road for the amount of room there is to park as well as the disruption it would cause to those that already reside here.</p> <p>George Gurr park needs to stay.</p>		
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Individual	Places for Homes LTD	Pine Way LEAP NSPA Transfer to FTC or close	Folkestone Town Council	<p>I am really concerned about the proposal to consider Harcourt park on Bigginswood road one of the parks that may potentially have its play equipment removed. I do understand what it who an interested party is or means...however your term of an asset transfer sound dubious. My family and my 3 children use this park every day. We are already really upset that play equipment has been removed and downgraded over the years. 2 of my 3 children have autism, we rely heavily on parks with play equipment that are able to meet their needs. Although an adapted the new play area in Radnor Park is noisy and populated for them.</p> <p>Removing Harcourt park would remove the possibility of my children walking to the park, due to their disability. I would have to drive them to even our closest park in Stanley road. I find this very upsetting. This park is so important to my community and our primary school, I see no value or gain to our community to have this vital play area removed. I use the park most days for sensory de-escalation when my youngest finishes school, just as many of the other parents do to. When will I be informed of the outcome of your decision? If anything Harcourt park requires more investment not less</p>	Closure	This park is close to Harcourt Primary school and is in a convenient location for children before and after school. It is also close to Firs Lane Play Area. This play area has more equipment than FIR's lane. This area is within the catchment area of Cheriton Recreation Ground, which is the designated PPA. Folkestone Town Council have agreed to adopt this park.
Individual	N/A	Hawkinge	Hawkinge Town Council	I want to save Hawkinge parks! My children are young and I want to be able to take them to their local parks!	Closure	FHDC is in talks with Hawkinge Town Council regarding adopting the parks and talks have been positive.

Individual	N/A	Hawkinge	Hawkinge Town Council	It's come to my attention that you plan to close the majority of parks in Hawkinge. I just cannot understand your reasoning for doing so. In a day and age where children are morbidly obese from a young age, where children sit indoors on devices you are encouraging these very things. It's incredibly sad that the vast amount of children in this area will now not be able to access any sort of outdoor play activity within walking distance. The population of Hawkinge has increased so much with a huge percentage being families and yet you plan to take away one of the most simple free pleasures in life which is the moment as a parent you say to your child 'shall we walk to the park today' and the joy on their faces when they get so excited to do so. What a shame for the children who live around here. You are going to devastate so many of them.	Closure	FHDC is in talks with Hawkinge Town Council regarding adopting the parks and talks have been positive.
Individual	N/A	Hawkinge	Hawkinge Town Council	Can you please advise me on how to object to the parks in Hawkinge being taken down? I and my family strongly object to this as my two small children use them all the time, I can't understand what benefit there possibly is to removing them!!	Closure	FHDC is in talks with Hawkinge Town Council regarding adopting the parks and talks have been positive.
Individual	N/A	Hawkinge	Hawkinge Town Council	Just an email regarding the closures of the parks in Hawkinge. This simply can't happen. The majority of Hawkinge is family based being ideal for young and growing families. The parks are so important to Hawkinge and the community even if it doesn't look like they are taken care of. A clean and upgrade only needs to take place once every 5-10 years. These parks must remain in Hawkinge. They must. Absolutely ridiculous to close them.	Closure	FHDC is in talks with Hawkinge Town Council regarding adopting the parks and talks have been positive.

Individual	N/A	Hawkinge	Hawkinge Town Council	We have lived in Hawkinge for 18 years and have seen the development of Hawkinge and have welcomed each of the play areas. We now have grandchildren so we often walk to the play areas for the children to play, get fresh air, socialise with other children and get some exercise. We have seen more and more houses being built and more families moving in so we need these facilities to remain and indeed ideally be updated and renewed for our community. Please review and think about how important these areas are for the amount of people, families and children that live in Hawkinge. We all pay enough council tax to ensure these facilities remain for us to use.	Closure	FHDC is in talks with Hawkinge Town Council regarding adopting the parks and talks have been positive.
Individual	N/A	Hawkinge	Hawkinge Town Council	I have learnt today that you plan to close most of the play parks in Hawkinge. I am both disappointed and find it difficult to understand how such drastic decisions have been made with little consultation with local residents. From reading your play area strategy I understand that no priority play areas are planned for Hawkinge. One of the only parks to be saved in Pannell Drive is unsuitable for young children meaning that that the only alternative is Kettle Drive which for young children is a long walk from West Hawkinge. Do you intend to develop Pannell Drive so that it is suitable for toddlers and young children? Corbett Road and Atkinson Road parks are a valuable place for toddlers and young children to play, they do however require maintenance and upgrading with a toddler swing. I would strongly encourage you to reconsider closing so many parks in Hawkinge and ensure there is ample social space for families to enjoy.	Closure	FHDC is in talks with Hawkinge Town Council regarding adopting the parks and talks have been positive. There are no PPA sites within Hawkinge as there is a large quantity of alternative sites available, covering use by various age groups.

Individual	N/A	Hawkinge	Hawkinge Town Council	<p>I am very disappointed to read your play area strategy and am sending this email to formally notify you of my strong objection. The plans state that the number of play areas in the Hawkinge area will potentially be reduced to 2 which is completely unacceptable for an area with so much housing and so many families. I live opposite the Heron Forstal Avenue Park and see how much the park is used, especially in the summer. This is despite the poor condition of it and lack of repairs and maintenance. It is so important nowadays more than ever that children are given ample areas to play outside and to encourage activity.</p>	Closure	FHDC is in talks with Hawkinge Town Council regarding adopting the parks and talks have been positive.
Individual	N/A	Hawkinge	Hawkinge Town Council	<p>I have today heard the news that you are planning to close most of the parks in Hawkinge and I'm struggling to understand how this decision was made with little consultation from local residents. I have read your Play Area Strategy and quite frankly appalled that Hawkinge has no Priority Play Areas planned. In fact, one of the only parks to be 'saved' is in Pannell Drive and it is totally unsuitable for those under 7. Your document suggests that there should be a park in walkable distance for ages 0-25 and this will not be the case if Pannell is kept the same.</p> <p>Generally speaking, the parks in Hawkinge have not been maintained well and there needs to be serious investment into a large communal space that is suitable from ages 0+ (similar to the Radnor Park development), however I would argue that a few small parks are beneficial for those with younger children who are intimidated by large</p>	Closure	FHDC is in talks with Hawkinge Town Council regarding adopting the parks and talks have been positive. There are no PPA sites within Hawkinge as there is a large quantity of alternative sites available, covering use by various age groups.

				<p>crowds and older children. The park at Corbett Road is the perfect place for this, although the equipment does need updating with a baby swing and a smaller climbing frame for toddlers. In a world where many children spend hours on tablet computers and in front of the TV, please do not take away such a valuable resource that is within walking distance, encouraging people to get outside with their children. I would implore you to reconsider closing so many parks in Hawkinge and include one large play area in Hawkinge as a Priority Park Area, making a social space for all ages to enjoy together.</p>		
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Individual	N/A	Hawkinge	Hawkinge Town Council	<p>It is completely unacceptable or acceptable that you are proposing to decommission the playgrounds in Hawkinge. These are used by children of all ages throughout the year and provide them with exercise and stimulation. Not only that but for many of the mums and dads these provide a reason to take the kids outside and get valuable fresh air and exercise. If they are to be taken away it will have a negative impact on the local commas a whole. Not only that but these are social meeting places for parents, some of who one have mental health problems and find these areas provide friendships, support and escape from the rigors of daily life.</p> <p>There is no justified argument for the selling and dismantling of these play grounds as their cost to maintain and up keep is minimal. The main cost is their construction in the first place but as this is not a factor why are they to be torn down? The cost to dismantle would pay for their upkeep for several years anyway. We all pay our taxes and as a tax pay I do not consent my contributions not going towards their upkeep anymore! I object on behalf of all the local residents with children in the town of Hawkinge unconditionally!</p>	Closure	FHDC is in talks with Hawkinge Town Council regarding adopting the parks and talks have been positive.
Individual	Hythe Town Council	Oakland's LEAP NSPA	Hythe Town Council	I'm writing to you reference Oakland's Play Park, to ensure I express how important this area is for the young children and parents of Hythe, the park is always busy and an essential area needed for this area which is local to the people of Hythe other parks would otherwise be in Folkestone that are suitable for toddlers.	Closure	Oakland's Play area is maintained by Hythe Town Council, therefore FHDC has no plans to close this park.

				I have been unaware of these plans until today, the day before the consultation ends and I'm sure lots of others will be too, but this park really is so important to the town.		
Individual	FHDC	Oakham Drive. LEAP NSPA	Lydd Town Council	<p>Please do not close & sell off this playground which is used by the locals. There are few playgrounds and greenery left. Plus, The Rype in Lydd can get very busy and means Oakham drive residents have to walkover a busy road to get to it.</p> <p>Why does every bit of green land have to be sold off? There will be nothing left soon bar roads & houses.</p>	Closure	<p>Oakham Drive is a NSPA site and is found within the catchment area of the Rype which is a PPA.</p> <p>Discussions are taking place with Lydd Town Council over the transfer of this and the other play areas in Lydd.</p>
Individual	FHDC	Oakham Drive. LEAP NSPA	Lydd Town Council	<p>Hi my name is xx and lived in Lydd nearly my whole life. this park was built when I was a small child and was the only park I was allowed to go to on my own with my friends, as the other parks were As my mum would say "too far away" and this park was literally 1 minute walk from my house... why would you want to close a park!!! there's not a lot of places for kids to go as it is this is just going to encourage children/teenagers to walk the streets and possibly get into trouble...so unless you're going to close it to build a centre where all kids of all ages can go to meet other children and stay off the streets then please don't close the park! The park is a good place for people to let their children burn off some energy (encouraging exercise!)</p>	Closure	<p>Oakham Drive is a NSPA site and is found within the catchment area of the Rype which is a PPA.</p> <p>Discussions are taking place with Lydd Town Council over the transfer of this and the other play areas in Lydd.</p>

Individual	FHDC	Oakham Drive. LEAP NSPA	Lydd Town Council	<p>We need to have this play area on this small estate as there are two major roads to cross to get to any other play area in Lydd. The children and parents from Harden Road and the roads off of this use this play area also, so we have a reasonably large catchment area. If the drainage of the area was sorted out has been promised and arranged with F&H this is due to be started within two months from now, there would be more children able to visit this area and actually use it during the wet winter months.</p> <p>Unless you can guarantee two sets of pedestrian pelican crossings to allow a safe crossing point it would put children in dangerous situations trying to cross the mentioned roads. These roads are used by very large lorries coming from Brett's Quarries / Dungeness Power Stations and the Robin Hood Road area industries. I have spoken to Councillors Tony Hills / Clive Godden and David Wimble who seemed to know nothing of this strategy. We do not see on your strategy many parks under threat in the Folkestone and Hythe areas, I wonder why this is!! So please leave things alone, Us Marsh Peasants know our place and make do with what we have, and what we will fight very hard to keep. We know we are long way from Folkestone and are a forgotten part of your district, but what we have we would like to keep in place thank you. We will wait and see what decisions are made before we contact the HSE for their advice and proposed action.</p>	Closure	<p>Oakham Drive is a NSPA site and is found within the catchment area of The Rype which is a PPA. There has been no promise to relieve the drainage due to the lack of possible methods to do this.</p> <p>Discussions are taking place with Lydd Town Council over the transfer of this and the other play areas in Lydd.</p>
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Individual	FHDC	Oakham Drive. LEAP NSPA	Lydd Town Council	<p>Please accept this email as a rejection to the proposed selling of the park at Oakham Drive, Lydd. We are outraged that this notice has only just appeared on a late Friday evening when no one is in the office to answer concerned residents questions. Leaving only 5 working days' notice to raise an objection to something so vital to many Lydd residents is beyond me. We would like to raise our disgust in this proposal. Our children, aged 5 and 7 use this park and playing field on a regular basis. We live not too far away and find this park and location a must safer area to play than The Rype in Lydd that is near numerous busy roads and is not sectioned off for child safety. Although our children at present do not go to this park without an adult, in years to come my son will definitely have the freedom to go and meet his friends there for a game of football. There is no way he will be able to go further afield for a park and a game of football unattended. Removing parks in residential scheme is removing a lot of freedom our children desperately need to grow and thrive.</p> <p>It is essential that we encourage our children to get out in fresh air and enjoy the playgrounds close to their homes, not ripping them down for the sake of a few pounds in someone else's pockets. For some in Lydd, these parks are essentially the only outside safe space they have outside of school.</p> <p>We are in an extremely deprived area, with many children and families below the poverty line. Our</p>	Closure Play Provision	<p>Oakham Drive is a NSPA site and is found within the catchment area of The Rype which is a PPA.</p> <p>Discussions are taking place with Lydd Town Council over the transfer of this and the other play areas in Lydd.</p>
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				<p>school has a significantly high number of underprivileged children, many having to resort to food banks as a means to eat, never mind having the funds to take their children on days out. Many families do not own cars, meaning they are restricted to the boundaries of Lydd. We are very limited to what you can do with your children in Lydd. These parks are vital for them to access a free outside safe space to enjoy being children away from the worries of home. I really hope and pray that this decision is reconsidered and the children of Lydd are deemed more important than another development opportunity to increase someone's revenue.</p>		
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Individual	FHDC	Oakham Drive. LEAP NSPA	Lydd Town Council	Could you please send me the minutes of the consultation meeting regard the closure of are park. Also can you please help me in finding the deeds of Oakham drive as I would like to see if the park area is covered in them? I can truthfully say that every child in the close use this park on a daily bases. If you remove this park we you fit better vehicle management I.e. pedestrian traffic lights, speed humps to slow vehicles down on Harden road so the children can cross the road safely to enter the park on The Type. Also why was these signs only put up on the 24th January when it all started on the 20th December that has only left 1week to stress their feelings. Looking forward to your quick response.	Closure	Oakham Drive is a NSPA site and is found within the catchment area of The Rype which is a PPA. Discussions are taking place with Lydd Town Council over the transfer of this and the other play areas in Lydd.
Individual	FHDC	Oakham Drive. LEAP NSPA	Lydd Town Council	With regards to the impending closure of Oakham Drive Park in Lydd I'd like to contest this. I live in lydd approx. 5 -10min walk away from this park I choose to walk to this one with my children mainly because there is just enough there to keep my children amused and most importantly it is fenced in for safety, I feel secure with my children in this park whereas the other most local park to me on lydd Rype, is open without a gated fence so often puts me on edge with cars driving past. I feel.it would be such a shame if this little community park were to close for our young children.	Closure Play Provision	Oakham Drive is a NSPA site and is found within the catchment area of The Rype which is a PPA. Discussions are taking place with Lydd Town Council over the transfer of this and the other play areas in Lydd.

Individual	FHDC	Oakham Drive. LEAP NSPA	Lydd Town Council	I am utterly disgusted with the plans to close down our park. I have an autistic child who plays here as we live on the estate. He is capable of getting to this park but can't imagine letting him off the estate to get to another park. You will be limiting his outside time. We have at least 15 children on the estate that use this park, a lot of them are not old enough to take themselves to the ripe. In essence you're ruining the community we have. It's so nice to see kids outside when we are all so obsessed with technology. I urge you to reconsider.	Closure	Oakham Drive is a NSPA site and is found within the catchment area of The Rype which is a PPA. Discussions are taking place with Lydd Town Council over the transfer of this and the other play areas in Lydd.
Individual	FHDC	Oakham Drive. LEAP NSPA	Lydd Town Council	L think it is absolutely disgusting that you are even considering asset striping this play park to sell the land. This is Public land, where do you think the children of today are going to play. The park is used by so many youngsters & babies. L suppose this is another ploy for the council to accuse cutbacks & enjoy money. L believe you will get a fight on this the people of Lydd need some recreational ground. I am disgusted & I only visit the area.	Closure	Oakham Drive is a NSPA site and is found within the catchment area of The Rype which is a PPA. Discussions are taking place with Lydd Town Council over the transfer of this and the other play areas in Lydd.
Individual	Hythe Town Council	Oakland's LEAP NSPA	Hythe Town Council	I find it very disheartening to find out today that you wish to close the park at Oakland's. I regularly take my son here (he's 2) as it's the perfect equipment for his age in comparison to other parks. Every time we go there are always other parents and children there, it's a great spot for the community as its right by Age UK so the elderly also get to benefit from engaging with the children. This will help all round with different aspects of development! This park is at the heart of a community and it	Closure	Oakland's Play area is maintained by Hythe Town Council, therefore FHDC has no plans to close this park.

				would be very sad to see it close, I hope you will reconsider		
Individual	Hythe Town Council	Oakland's LEAP NSPA	Hythe Town Council	<p>I am opposed to the proposed, possible closure of Oakland's Park, Hythe, and feel that it should be protected. Having not long moved to Hythe with a young toddler, I found Oakland's to be the perfect park. Although Hythe is listed as having 4 parks, the others are not suitable for young children. Oakland's is the perfect size for toddlers and would be a great loss for mums of young children who are looking for a safe, enclosed area to play with their children. Also I feel that it's worth noting that the location encourages families to access the library, which can only be a good thing, and also being in such close proximity to the canal opens up great opportunities for nature and exploration in the early years. I cannot count the times I've taken my son for walks to the park, and ended up feeding the ducks and looking at the different leaves and plants along the canal path.</p>	Closure Play provision	Oakland's Play area is maintained by Hythe Town Council, therefore FHDC has no plans to close this park.
Individual	Hythe Town Council	Oakland's LEAP NSPA	Hythe Town Council	<p>What can do to assist in keeping Oakland's park kids play area open? I use the park frequently with my 2 children. I also think the parks link to the age UK centre is good for the community.</p>	Closure	Oakland's Play area is maintained by Hythe Town Council, therefore FHDC has no plans to close this park.

<p>Individual</p>	<p>Hawkinge Town Council</p>	<p>Atkinson Road, LAP</p>	<p>Hawkinge</p>	<p>I understand that there is a plan to close the large Page Road park and I must be honest this concerns me considering this is one of only 2 parks close to our home. There are many families with small children in this area and this park is a firm favourite of my 8 and 3-year-old alone. I am confused as to why you choose to close a park that caters for this large area of housing, are there plans to enhance the park along Pannell Drive? If so I would fully support closing this park on the basis a larger more varied park for many age groups was in your plans.</p> <p>Children need a place to go where they are safe and can be 'young', please do not take away one of the only places they can do this without being a 'nuisance' to the residence around them. I hear both sides of the story and I'm told there are older children/teens that maybe being unruly for not having use of a better word. Maybe CCTV would assist or at least signs to say they were in place to deter them?</p> <p>Houses there would spoil one of the only places the children can enjoy the outdoors, I beg you to rethink and help us raise children who are able to play outside rather than be cooped up in their bedrooms playing computer games and detaching from society because there is nowhere safe they can go. I vote no to the closure....unless you expand</p>	<p>Closure</p>	<p>The strategy has been put in place considering the fact that the towns and Parishes can deliver the local requirements of the area. The play park referred to is Atkinson road which is managed by Hawkinge Town Council, therefore FHDC has no plans to close this park.</p>
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Individual	Hawkinge Town Council	Atkinson Road, LAP	Hawkinge	<p>I've just discovered that it's your intention to remove at least one of the two children's playgrounds in Hawkinge West. I've skimmed through the play area strategy 2020-2030 which infers that your strategy is "F&HDC acknowledges the importance of play to the health and well-being of its residents. F&HDC is therefore committed to ensuring all residents are able to access high quality and high value play provision. Subsequently F&HDC's vision for play provision is as follows:</p> <p>Play experiences are fundamental to the health and development of children and young people. Folkestone & Hythe District Council will therefore seek to ensure all residents are able to access a high quality and high value play area. We will work with town and parish councils, together with other providers, to create play spaces which offer challenging and exciting environments for children and young people of all ages and abilities."</p> <p>Removing either of the existing, albeit very small, play areas is a total contravention to your stated strategy. You may have conducted a limited public consultation but I have so far not found a single resident likely to be impacted by this decision who was aware of any such consultation. Surely part of a consultation process is to ask the tax payers in the immediate areas that could be affected by your decisions.</p> <p>Many of the families in the area are those with young children, or like my wife & I, grandparents with young children to care for. Unless you are</p>	Closure	<p>The strategy has been put in place considering the fact that the towns and Parishes can deliver the local requirements of the area. The play park referred to is Atkinson road which is managed by Hawkinge Town Council, therefore FHDC has no plans to close this park.</p>
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				<p>planning on immediately replacing the existing play area(s) with something better then all you will be doing is removing the ability for local residents to have the facilities that were available at the time of purchasing a property in the area. The facilities for children under the age of five is almost non-existent, removing play structures as opposed to adding or improving them is contrary to the supposed aims of the council. The existing areas receive minimal maintenance and therefore a minimal financial burden for their upkeep. Please do not remove the existing play area(s), thereby, in your own words, “ensuring all residents are able to access high quality and high value play provision”.</p>		
Individual	Hawkinge Town Council	Atkinson Road, LAP	Hawkinge	<p>To it may concern I just seen the notification that the playground is at risk of closer. I am a local resident with three children one of which is autistic and Regularly use the playground. I would strongly object to this play ground being sold off there needs to be areas for kids to play. If a site needs to</p>	Closure	<p>The strategy has been put in place considering the fact that the towns and Parishes can deliver the local requirements of the area. The play park referred to is</p>

				go why not look at the small play ground near Atkinson road.		Atkinson road which is managed by Hawkinge Town Council, therefore FHDC has no plans to close this park.
Individual	Hawkinge Town Council	Atkinson Road, LAP	Hawkinge	I am deeply concerned by the apparent closure of the park on Page Road in Hawkinge and very much hope it will be a temporary measure. There are not enough decent areas for children in Hawkinge to play; certainly not in ratio to the number of houses built. There need to be more improved play parks and facilities, certainly not fewer. Judging by the comments on the Hawkinge Facebook page this is a very shared by many people up here. I hope you will consider my view as part of the consultation.	Play provision Closure	The strategy has been put in place considering the fact that the towns and Parishes can deliver the local requirements of the area. The play park referred to is Atkinson road which is managed by Hawkinge Town Council, therefore FHDC has no plans to close this park.

Individual	FHDC	Oakham Drive. LEAP NSPA	Lydd Town Council	<p>I am emailing you regarding the possible closure of the play park that is situated at Oakham Drive, Lydd. I would like to express my deepest concerns about this subject as I believe a play park is imperative for children's health and development. Having access to a gated play park is a necessity, it provides children with a safe place to play, gives them access to develop physically, provides them with opportunities to take risks that are crucial to becoming a more resilient adult and could possibly provide them with a safe environment when home life could be challenging. Taking away the play park could potentially have catastrophic effects on children's health and wellbeing, especially in today's society where technology seems to be an overpowering issue which leads to children become disengaged from a variety of daily activities.</p> <p>If the play park at Oakham Drive is to be taken away it will mean that the children who live there will no longer be able to socialise as easy as they do when the park is open, parents who arrange group activities for their little children will no longer be able to access a gated park and coordinate play dates and the children will have less reason to venture outside causing a variety of development and social issues. I hope this park can remain open, it is in the children's best interest. I am emailing you regarding the possible closure of the play park that is situated at Oakham Drive, Lydd. I would like to express my deepest concerns about this subject as I believe a play park is imperative for children's health and development.</p>	Closure Play provision	<p>Oakham Drive is a NSPA site and is found within the catchment area of The Rype which is a PPA.</p> <p>Discussions are taking place with Lydd Town Council over the transfer of this and the other play areas in Lydd.</p>
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Individual	FHDC	Heron Forstal LEAP NSPA	Hawkinge Town Council	<p>I have just been made aware that my local park is on the list to be closed. (Heron Forstal Avenue, Hawkinge)</p> <p>The planned closure of all but 2 Hawkinge parks is unacceptable. This would leave 1 park on the east of Hawkinge and 1 on the West for thousands of children! Living opposite the Heron Forstal park I see the volume of people using this throughout the weeks in all weathers and use this every weekend with my children. During the lighter evenings we use the park after school several times a week too. How can you justify keeping just 2 parks in the town open? They will be seriously overcrowded not to mention quite a trek to get to for many. There has been no communication on the intention of Hawkinge Town council so I do not know if they intend to take over any of the parks but I strongly object to these planned closures. Please register this email as a formal objection to the plans.</p>	Closure	FHDC is in talks with Hawkinge Town Council regarding adopting the parks and talks have been positive.
Individual	N/A	Lyminge	Lyminge Parish Council	<p>I saw this email address to voice an opinion on the closure of the local parks. I live in Lyminge and frequently use at least 2 of the 3 parks on your list, as well as many other families. For what it is worth I think closure of any (let alone all) of the parks in Lyminge would be very sad indeed! Having said that I am in no doubt that the park in mount pleasant close is long overdue an upgrade and would probably be used more if invested in!</p>	Closure	FHDC will undertake talks with Lyminge Parish Council about potential asset transfer.

Individual	Hawkinge Town Council	Atkinson Road, LAP	Hawkinge	I have been advised that you are due to close a park in Hawkinge on Corbett Road/Page road. Please don't close this park. My 2 children play in here on a regular basis and it seems so unfair to take it away from the nice families who use it properly.	Closure	The strategy has been put in place considering the fact that the towns and Parishes can deliver the local requirements of the area. The play park referred to is Atkinson road which is managed by Hawkinge Town Council, therefore FHDC has no plans to close this park.
Individual	N/A	N/A	N/A	<p>Having just been made aware of a consultation on your Play Area Strategy 2020-2030, I am very concerned that the window of consultation including Christmas and New Year has left little time for me to properly consider the strategy and respond in full. I hope you will extend this period.</p> <p>My understanding of your strategy so far makes me concerned that many play areas for children will be closed, reducing opportunity for the benefits of outside play and exercise. This goes against one of your strategic objectives in your corporate plan for "health matters". In addition, as a council you have declared a climate crisis and yet the closure of local play facilities will surely mean that families will have to drive to 'destination' play areas. Finally, there is no mention of funding for the parks being transferred to the Town and Parish Councils so how will they be maintained?</p>	Closure	FHDC will work closely with Parish and Town Councils to transfer assets.

Individual	N/A	N/A	N/A	Think it's disgusting that you are closing a lot of parks in the area not everyone can take their kids to busy parks in the holidays especially those with Autism or other disabilities also not everyone drives or can afford the fuel. Plus it's good to get the kids out walking if the park is in walking distance. Now people will have nowhere to go.	Closure	FHDC will work closely with Parish and Town Councils to transfer assets.
Individual	MOD	Mackenzie Drive LEAP NSPA		<p>I am highly disappointed to see the list of parks to be possibly demolished for open spaces within the coming years. I do not often comment on plans but with 2 young children and many friends who have children too, the parks we have locally are so important for the community and a free and fun place for children and families to visit. I used to work in the NHS and now in KCC and have seen many examples of children who do not get the outdoor space and fun they should be experiencing, therefore leading to mental health and weight problems. Shutting down 24 parks is only going to increase this for the future. I thought we were trying to cut obesity in children not worsen it?</p> <p>I am aware of all these parks, and the one that upsets me the most is the McKenzie drive one. We visit here 1-2 times a week (when the weather is well) and the park is used regularly by the Nepalese families who live in the surrounding houses, these families are here to support us and have very little activities they can join in, why remove one of them which they can use? For free! Please re think this, it's so important the parks stay for the children and families.</p>	Closure	FHDC will work closely with Parish and Town Councils to transfer assets. Mackenzie drive is owned and managed by the MOD, therefore FHDC has no plans to close this park.

Individual	N/A	Hawkinge	N/A	Please do not close any of our children's parks in Hawkinge or Folkestone. They are much loved resources and one of the reasons why we love living here!	Closure	FHDC is in talks with Hawkinge Town Council regarding adopting the parks and talks have been positive.
Individual	Places for Homes LTD	Pine Way LEAP NSPA Transfer to FTC or close	Folkestone Town Council	<p>I've seen that the play park on Bigginswood road, next to Harcourt school, is on the list of closures. This really surprises me and is quite concerning that you want to close this park, considering it is right next to a primary school. This park is used every day by a lot of the children from the school, even in bad weather.</p> <p>As I'm sure you are aware Harcourt has a high number of disadvantaged family's that belong to the school, and this park is a place for children to play, who might not have gardens or have parents/guardians that take them to another park further away. As this park is literally on the way out of school.</p> <p>It also serves as a great way for the school community to grow as it gives a chance for parents to chat whilst the children play. If anything this park needs updating with more facilities as in the summer you can have over 100 children using it! If you sent your counsellors out to the park on any school day from 3.30 pm you will see for yourselves how much this is used. I look forward to your response</p>	Closure	This park is close to Harcourt Primary school and is in a convenient location for children before and after school. It is also close to Firs Lane Play Area. This play area has more equipment than FIR's lane. This area is within the catchment area of Cheriton Recreation Ground, which is the designated PPA.

Individual	N/A	N/A	N/A	<p>As made clear on p20 in the document the key issue to address through the pay strategy is</p> <ul style="list-style-type: none"> • Insufficient budget to support the ongoing management and maintenance of play areas which has resulted in a backlog of repairs. The impact of continued reduction in play space will exacerbate the decline in play value and quality in Folkestone & Hythe District. <p>These proposals address the insufficient budget by reducing expenditure on play space. It is a cut in provision because there is less money available from central government due to the cut in local government budgets. This should be challenged by the council especially through their MP as the country recently elected a government that promised increased expenditure on public services. As part of the consultation the reason for this cut in services should be explained to the communities who use the play areas through a programme of engagement and ask them if they would prefer the council to increase the budget spent on play areas and how that would best be paid for. There appears to be no attempt to have surveyed use of play areas, run community fun days to engage people in the management of the spaces. More worryingly this consultation does not seem to be valid in that there has been no attempt to ask the users of the play areas what they think about the proposals. This would be a perfect opportunity for the council to show community leadership and work with parish councils and local nurseries/school and community groups to respond to the challenges of the budget.</p>	Closure	FHDC will work closely with Parish and Town Councils to transfer assets.
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				<p>I also think the lack of response to this consultation – sorry an assumption but it would be surprising due to the window available, the lack of awareness in communities and the time of year (eg over Christmas New Year) if there were many responses to this – should reinforce the need to properly involve communities in these decisions. People do not know that these proposals are being made about their local play parks so this consultation can in no way be seen as representative of the views of local residents. A programme of community consultation should be carried out before a decision is made</p>		
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Individual	N/A	Hawkinge	N/A	<p>I have only just learnt about the notices put up on most of the children's play areas around Hawkinge. Are we all understanding correctly that these areas could be shut down and removed? Hawkinge residents are mainly families with children. It seems absolutely absurd to remove play areas when there is little else for children to do and when we are all aware the children should be encouraged to get outdoors and play more. We originally bought off plan and as we had children it was important that the building plans included play areas. We now have grandchildren that we take to most of the play parks in Hawkinge.</p> <p>Where else can we take small children that is safe and fun to play that is also walking distance from home so we do not have to use the car?</p> <p>Hawkinge is still growing, there is still more housing being built so we need more facilities for children NOT LESS!! This is shameful!!! I can only say that myself, my family and the majority of Hawkinge residents OBJECT STRONGLY to any play area being closed and shut down. If money needs to be saved then perhaps removing our Town Mayor and the costs involved with that position should be considered instead!!</p>	Closure	<p>The sign mentioned in this response was not attached by FHDC and stated incorrect facts. FHDC will work closely with Parish and Town Councils to transfer assets. As areas continue to grow funding will be directed accordingly.</p>
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Individual	N/A	N/A	N/A	Having just been made aware of a consultation on the your Play Area Strategy 2020-2030 I am very concerned that the window of consultation included Christmas and New Year leaving little time for me to properly consider the strategy and respond in full. I hope you will extend this period. However with my brief understanding I am concerned that many play areas for children will be closed reducing opportunity for the benefits of outside play and exercise. This goes against one of your strategic objectives in your corporate plan for "health matters". Secondly as a council you have declared a climate crisis and yet the closure of local play facilities will surely mean that families will have to drive to 'destination' play areas. Finally there is no mention of funding being transferred with the parks to the Town and Parish Councils so how will they be maintained? "	Closure Play provision Budget	The consultation period was of a suitable timeframe. As part of the strategy FHDC will work with Parishes and Towns to provide suitable and quality play, both through PPA but locally through the SIPA and NSPA network. Funding dowries will be discussed with the appropriate bodies.
Individual	N/A	N/A	N/A	Having been made aware of a consultation on your Play Area Strategy 2020-2030, I am very concerned that the window of consultation included Christmas and New Year leaving little time for me to properly consider the strategy and respond in full. I sincerely hope that you will extend this period. However, with my brief understanding, I am concerned that many play areas for children will be closed, therefore reducing their opportunities to reap the numerous benefits of outside play and exercise. This goes against one of your strategic objectives in your corporate plan for "health matters". Secondly, as a council you have declared a climate crisis, yet the closure of local	Closure Play provision Budget	The consultation period was of a suitable timeframe. As part of the strategy FHDC will work with Parishes and Towns to provide suitable and quality play, both through PPA but locally through the SIPA and NSPA network. Funding dowries will be discussed with the appropriate bodies.

				play facilities will mean that families will have to drive to 'destination' play areas. Finally there is no mention of funding being transferred with the parks to the Town and Parish Councils so could you please explain how they will be maintained?		
Individual	N/A	N/A	N/A	Having looked in detail at your proposals I believe they are flawed. Where existing play areas are well maintained/financed by those with respective responsibility there is not a problem. Likewise where Town and parish councils are clearly able to accept a managed, properly financed take over there should be little difficulty. The problems will arise where the handover is unwanted and/or poorly financed. This is most likely to occur in the least advantaged areas of the district. Think twice about handing a valuable asset over to developers using the review as the vehicle.	Closure Play provision Budget	The consultation period was of a suitable timeframe. As part of the strategy FHDC will work with Parishes and Towns to provide suitable and quality play, both through PPA but locally through the SIPA and NSPA network. Funding dowries will be discussed with the appropriate bodies.

Individual	N/A	N/A	N/A	having just been made aware of a consultation on the your Play Area Strategy 2020-2030 I am very concerned that the window of consultation included Christmas and New Year leaving little time for me to properly consider the strategy and respond in full. I hope you will extend this period. However with my brief understanding I am concerned that many play areas for children will be closed reducing opportunity for the benefits of outside play and exercise. This goes against one of your strategic objectives in your corporate plan for "health matters". Secondly as a council you have declared a climate crisis and yet the closure of local play facilities will surely mean that families will have to drive to 'destination' play areas. Finally there is no mention of funding being transferred with the parks to the Town and Parish Councils so how will they be maintained? Any dowry being offered clearly does not meet the cost of maintenance, replacement of play equipment, cutting of grass, painting and repairing fences etc. yet alone the inspection fees.	Closure Play provision Budget	The consultation period was of a suitable timeframe. As part of the strategy FHDC will work with Parishes and Towns to provide suitable and quality play, both through PPA but locally through the SIPA and NSPA network. Funding dowries will be discussed with the appropriate bodies.
Individual	N/A	Hawkinge	Hawkinge Town Council	It would appear from your very confusing policy documents regarding the future of play areas in the District that many/most of the play areas in Hawkinge will have their play equipment removed and no maintenance will be carried out. This presumably will include mowing, rubbish removal, perimeter fencing as well as H&S responsibilities. I find this ridiculous if this is the intention - there are innumerable children of all ages in Hawkinge and none of the houses have sufficient garden space	Closure	Sites that are not transferred will be maintained as open spaces, this will mean all other activities will continue.

				for young children to play. Please could you let me know whether my understanding is correct?		
Individual	N/A	N/A	N/A	<p>Having just been made aware of a consultation of your Play area Strategy 2020-2030, I am very concerned that the window of consultation included a Christmas and New Year, leaving little time to properly consider the strategy and respond accordingly in full. I am hopeful that you will extend this period, however with my brief understanding I am concerned that many play areas for children will be closed reducing opportunity for the benefits of outside play and exercise. This goes against one of your strategic objectives in your corporate plan for 'health matters'. Secondly, as a council, you have declared a climate crisis and yet the closure of local play facilities will surely mean that families will have to drive to a 'designated play area'.</p> <p>Finally there is no mention of funding being transferred with the parks and the Town and Parish Councils, so how will they be maintained</p>	Closure Play provision Budget	The consultation period was of a suitable timeframe. As part of the strategy FHDC will work with Parishes and Towns to provide suitable and quality play, both through PPA but locally through the SIPA and NSPA network. Funding dowries will be discussed with the appropriate bodies.

Lyminge Youth Action	N/A	Lyminge	Lyminge Parish Council	<p>Having read through your strategic document we can see that three of the four play parks we have in Lyminge are in line for closure if no transfer to a local partner can be found. This is obviously disappointing, especially with Lyminge having a thriving pre-school and primary school, meaning that the village has over 300 under 11s visiting it each week day (most of whom live in or within walking distance of the village, and also use the current parks on the weekend & in school holidays). Whilst it is understandable (given how outdated & unsafe against modern standards the other three are) why the one has been selected to remain under F&H Council management, this park only has equipment for very small children (under 5) & a skate park for more older children (mostly used by children 10+). This leaves a significant gap in provision for the 200+ primary school aged children we have in the village each weekday. We, therefore, wonder what provision will be made available in the village for these children if no one takes up management of the other three parks in the village that do cater for this age group? We also wondered, where Parish councils or partners are willing to take on the future management of these parks (which will mean a significant long-term financial commitment for insurance & on-going upkeep), whether F&H Council will provide some one-off funding or make a pot of money available for application should the park equipment be damaged or require some one-off improvements to remain safe & useable?</p>	Closure	Discussions with the Parish council will be undertaken to asset transfer the parks this will include a dowry payment.
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				<p>With this in mind, as you may be aware, Lyminge Youth Action (in partnership with Lyminge Parish Council) have applied to rebuild one of the play parks in Tayne Field. Making it a play park for all children regardless of age, as well as a community space. Given F&H Council's desire to transfer management of this; Lyminge Parish Council's agreement to do so on conclusion of the rebuild (as they then have the security of the installers lengthy warranty); & our desire to ensure at least one park for children aged 5+ remains in the village, would F&H Council be willing to support our rebuild with some one-off funding? We certainly feel such support will go a significant way to compensate for the potential loss of the other two parks - something we know a large proportion of the village are unhappy about. It may be, as part of our rebuild, we can look at removing the equipment of the other two parks & making them in to open spaces, as per the strategy you have. Making the situation a win for all parties concerned. We would be more than happy to discuss this matter further. We look forward to your response.</p>		
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Individual	Places for Homes LTD (Pine Way) / FHDC (George Gurr)	Pine Way LEAP NSPA / George Gurr LEAP NSPA	Folkestone Town Council	<p>I write with comments and questions on the play strategy proposed.</p> <p>Whilst it is a fantastic strategy in principle, myself and my children directly benefiting from the development of jocks pitch. I do find some of the parks 'going' will impact others negatively far greater than myself positively.</p> <p>The play park on pine way/Biggins wood road. This park is used daily, before and after school by children that attend Harcourt primary school. This school has a higher than average percentage of disadvantaged children. These children need the outside space to play! Parents are unlikely to travel the extra distance to Cheriton Park, many driving to school from work, as the convenience of before and after school is what works for them. The preschool children who attend Playbox nursery also visit this park daily, and siblings of all these children spend much time in the park.</p> <p>The benefits of outside play and learning are crucial for the development into healthy independent adults. This park also falls in the middle of an under privileged area. Many of these children need that park in the school holidays, as their only form of outside entertainment.</p> <p>This park forms an integral part of the school community, with children given the opportunity to play together outside of the school environment. For the same reasons above the park in George Gurr should also stay. There is nowhere safe to walk in 15 minutes from there for the children, without having to cross the busy bypass, at least 30 minutes to Canterbury road/Radnor park, and back</p>	Closure	Pine Way is close to Harcourt Primary school and is in a convenient location for children before and after school. It is also close to Firs Lane Play Area. This play area has more equipment than FIR's lane. This area is within the catchment area of Cheriton Recreation Ground, which is the designated PPA.
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				<p>up the hill even longer! Unfortunately, money will not come from out of thin air, and the parks being sold onto developers in return for investment into the strategic play parks should be better 'advertised' People naively believe they will just remain, unmaintained.</p> <p>What parks do developers have interest in, all the non-strategic areas of play? What can we expect to be built? Housing?</p>		
Individual	MOD	Mackenzie Drive LEAP NSPA		<p>I'm emailing regarding the children's play park at McKenzie Drive, Shorncliffe, and Folkestone. I don't understand why it's down for closure. It's very popular with locals, especially the Gurkha community. It's had a fantastic revamp in the last year too. Please save it!</p>	Closure	<p>FHDC will work closely with Parish and Town Councils to transfer assets. Mackenzie drive is owned and managed by the MOD, therefore FHDC</p>

						has no plans to close this park.
Individual	Hythe Town Council	Oakland's LEAP NSPA	Hythe Town Council	<p>Am writing to add my voice to those asking your team to find an alternative funding solution so that you can avoid closing playgrounds in and around Folkestone and Hythe. The health and development benefits of outdoor play for young children are undisputed, as well as the benefits to community cohesion that shared spaces can bring: the playground by Age UK in Hythe is a particularly lovely example of this, as it sees young children playing next to the cafe and meeting hub for elderly care, helping to remove barriers between the generations.</p> <p>I appreciate that budgets are becoming more and more restricted, and that many of the grants focusing on recreational spaces that would have previously been available for the council to apply for will no longer be an option when we leave the EU, but letting such vital community asset disappear due to an administrative paper-shuffle about 'asset transfer' is nothing short of negligence. I apologise that I have not been able to include links to research supporting my points- I only learned of the plans today, and I am writing this while clearing up breakfast for my 3 year olds! I'm also sorry if this email is just the latest in the line of 'disgruntled of Hythe' responses you are fielding, but frankly it seemed the only recourse available at 8am the morning the consultation</p>	Closure	Oakland's Play area is maintained by Hythe Town Council, therefore FHDC has no plans to close this park.

				closed. Please could you let me know how I might stay up to date on the progress of this issue?		
Individual	N/A	N/A	N/A	I live at xxxxx, this piece of land is at the back of my property and have I been trying to get in contact the owner since I bought the property as we are very interested in purchasing the land. We have recently had a baby and would love to have the land to extend our garden. It would mean we could live in this house and extend our family before moving anytime soon. Please could someone call me as I am very interested?	N/A	N/A

Individual	N/A	N/A	Hawkinge	I live at xx Heron Forstal Avenue, Hawkinge and write in the strongest opposition to the removal of any of the play equipment in Hawkinge. I regularly take my granddaughter to all play areas in Hawkinge and have been disgusted at the lack of suitable play equipment for babies and young children! Hawkinge needs more equipment not less for the many families in the area and all my family feel upset that this is possibly to be removed. Why are families and children not catered for? Totally wrong and mean decision.	Closure / play provision	The strategy has been put in place considering the fact that the towns and Parishes can deliver the local requirements of the area.
Individual	Hawkinge Town Council	Atkinson Road, LAP	Hawkinge	I am emailing to express my concern over the decision to potentially close a number of the children's recreation areas in Hawkinge. In particular as a resident of Trunley Way I am very sad to learn that the Atkinson Road site is one of those due to be removed .Since we moved to the area 5 years ago we have used this park often but in particularly over the last 3 years, since our youngest son was born, we have used this area almost daily. There are no other parks suitable for this age group on this side of Hawkinge. I feel it is a real shame to be removing amenities from such young children. My front door directly faces the park and my son asks every day without fail to "slide" when he sees the park. I find the decision to close both Atkinson and Corbett road sites strange as the most troublesome park would almost certainly be the one on Pannell Drive. This park attracts hordes of teenagers (well out of the suitable age range) who sit there using foul language, vandalising and leaving broken glass etc. everywhere. This has meant for myself and others	Closure	The sign mentioned in this response was not attached by FHDC and stated incorrect facts. The strategy has been put in place considering the fact that the towns and Parishes can deliver the local requirements of the area. The play park referred to is Atkinson road which is managed by Hawkinge Town Council, therefore FHDC has no plans to close this park. With regards to the other parks we are working closely with Hawkinge Town Council regarding asset transfer and the collaboration remains positive.

				<p>this park is unusable as it is both intimidating and at times dangerous! Can I please ask how the decision has been reached to keep this park yet remove others on the area? I note the other nearby suitable park (located at the end of Uphill) is also war marked for closure. Where are you proposing we take our toddlers when you are leaving absolutely no facilities for them in this area? I really hope you receive enough objections to these proposals to rethink your plans. These areas are one of the reasons we chose to move to Hawkinge and it will be a great shame for the community to lose them. Thank you for your time. I welcome any comments you may have.</p>		
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Individual	Hythe Town Council	Oakland's LEAP NSPA	Hythe Town Council	<p>I wish to comment on the reasons why I do not agree with the committee's "non-strategic" evaluation of No. 55, Oakland's play park. This toddler park is extensively used throughout the winter and summer. If the evaluation has been undertaken through questionnaires from few streets surrounding the park then this is not a true representation of the many users of this park. The houses directly adjacent the park are mainly retirement. However, we and many other parents live walking distance from the park and frequently walk to the park after a visit to the library. Then in the summer we and so many other families have picnicked in Oakland's and the play park has been so full you had to wait to use the equipment; on many occasions.</p> <p>The only other play park in walking distance to us is number 27 The Green, but this is for mixed ages and the toddler area is in the middle of the gated area and therefore not as comfortable for the younger children who constantly use Oakland's. Has the "non-strategic" evaluation taken into consideration that this play park has been sited adjacent age concern, presumably for intergenerational reasons?</p> <p>Surely, a measure of the requirement for a play park would be to assess its use over a period of set time? This play park is used too frequently to be judged "non-strategic". It is unclear in the councils strategy how this play park has been determined "non-strategic" and I strongly disagree with this determination</p>	Designation	Oakland's Play area is maintained by Hythe Town Council, therefore FHDC has no plans to close this park. It is also found within the catchment area of the Green PPA and Hythe Skate Park SIPA.
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KCC	FHDC (Peregrine Close) / FHDC Housing (Reachfields)	Peregrine Close LAP NSPA / Reachfields LEAP NSPA	Hythe Town Council	<p>I am writing as the KCC member for Hythe West in response to the FHDC Play Area Strategy 2020-2030.</p> <p>I am concerned about the designation of both the Peregrine Close and Reachfields play areas in Hythe as Non-Strategic. Both are heavily used and important facilities for their local communities. While the Reachfields play area is relatively close to the play facilities on the Green in Hythe, it is located within an estate with relatively high levels of deprivation and many of the facilities, particularly the enclosed pitch, are much more suitable to older age group children than is the case with the Green play facilities.</p> <p>As such, I would request that the NSPA designation of both is revised to Strategically Important, thereby removing the threat of potential loss of equipment if the town council declines to take over the assets.</p> <p>Overall, I am concerned about the potential loss of facilities across the district. The physical and mental health benefits of outside play are well understood and there is a dearth of activities and facilities for young people.</p>	Designation	Designations are reached considering locations, other facilities, and requirements.
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Individual	FHDC	Heron Forstal LEAP NSPA	Hawkinge Town Council	<p>I want to express my disappointment in the council wishing to close down and sell all the assets in Uphill Park Hawkinge!! I strongly disagree with this and cannot understand the stupidity of doing such a thing!</p> <p>When childhood obesity is high and continuing to rise why you would take away outdoor spaces for children to play in! As a resident of a house that overlooks the park I am very concerned about antisocial behaviour of an empty park that will attract teenagers and travellers again! Yet again you don't care about residents!!!</p> <p>It's the reason we moved to Hawkinge for the beautiful spaces and parks you have for our children!!! I will protest this and save our park!!!!!! I want an available reason as to why you are closing our parks</p>	Closure	<p>Discussions have been going on with Hawkinge Town Council over the asset transfer of this park and they remain positive.</p>
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Individual	FHDC	Southern Way LEAP NSPA	Folkestone Town Council	<p>I have read the Council's proposals for play areas in the FHDS District and would make the following comments.</p> <ul style="list-style-type: none"> • The response time of 20 December to 31 January, which includes Christmas and New Year, and of which I have not heard until now - near the end of that time - is too short, and typical of other public consultations the Council has organised. I hope this will be extended and the public properly informed. • Most of the section on the value of play is commendable, though it is interesting that the value of "natural play" sites coincides with the financial advantage to the Council. Which of those advantages have particularly driven this strategy? • There is no mention of the status of funding where PAs are to be transferred to town and rural councils. • The "non-strategically important" play areas are to be transferred as assets or revert of open spaces. In other words closed. These more local areas have the advantage of being more likely to attract walking to them. Closing them would make use of cars more likely to reach the nearest play area remaining open. This goes against the Council's environmental and health policies. Specifically, the Southern Way play area was, as you acknowledge, an initiative of local schoolchildren. The map suggests this is classified as NSPA. Shouldn't the Council be maintaining its positive response to such public initiatives? Incidentally, I don't see this site in the final list of ownership, management responsibilities and classifications. 	Closure Play provision Budget	<p>The consultation period was of a suitable timeframe. As part of the strategy FHDC will work with Parishes and Towns to provide suitable and quality play, both through PPA but locally through the SIPA and NSPA network. Funding dowries will be discussed with the appropriate bodies. The review completed by LUC has discussed the importance of natural play, and the huge benefits this has. Southern Way park is also known as the Danni James Community Park and it written as this in the strategy.</p>
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<p>Individual</p>	<p>Jefferstone Lane (St Mary's in the Marsh Parish Council) Meads Way & Oak Drive (FHDC)</p>	<p>Jefferstone Lane LEAP SIPA / Meads Way LAP SIPA / Oak Drive LEAP SIPA</p>		<p>I write further to you publication regarding your plans on redeveloping play parks and would like to draw your attention to 3 areas within Romney marsh, St Mary's bay that has been neglected for years. My children regularly play there as there is literally nowhere else for them to play as of late they have been abandoned had fencing around them and are completely cut off from use. I have emailed this address several times.</p> <p>Area 1 mead way, TN29 0hb. A small play park on our estate that is always full of children.</p> <p>Area 2 St Mary's bay village hall. A busy little play park been out of proper use for over a year</p> <p>Area 3 Jefferstone lane recreational ground again neglected now fenced off. A place where children can play enclosed with very bad maintenance. Always used by locals and the tourists in the summer.</p> <p>Can you advise what is going to happen to these areas? As I noted on your report it says</p> <p>Dymchurch parish council are responsible for 1 New Romney responsible for 1 (there is 2 one inside the medical Centre opposite the marsh academy) St Mary's in the marsh 1 area.</p> <p>None of the above appear to be included.</p>	<p>Closure</p>	<p>Jefferstone Lane is managed by St Mary's in the Marsh Parish Council, Meads Way and Oak Drive are both SIPA and FHDC understands the importance of these. It will work collaboratively with St Marys in the Marsh Parish Council to ensure a smooth transition.</p>
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Folkestone & Hythe Play Area Strategy

2020-2030



Project Title: Folkestone & Hythe Play Area Strategy

Client: Folkestone & Hythe District Council

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Folkestone & Hythe District Play Area Strategy

Prepared by LUC
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1 Introduction

- 1.1 This document follows on from the report *Planning for Play in Shepway 2007-2012* which was developed by Folkestone & Hythe District Council (F&HDC) and the Shepway Play Partnership (a range of organisations and agencies involved in the Play sector) in response to a commitment from central Government to raise the national profile of Play. Since the 2007 Strategy was adopted by F&HDC, there have been many improvements to play provision in the district as well as changes to the available resources to manage and maintain features. It is therefore now timely to review and update the Strategy which will guide the management and maintenance of play spaces in Folkestone & Hythe District.
- 1.2 The Shepway Play Area Review (2017) assesses the current provision of play spaces across the district. The findings of the review have provided a foundation for this Play Area Strategy. This report therefore outlines the aspirations for play provision in Folkestone & Hythe District, in the context of what is achievable and realistic.
- 1.3 Following the completion of the Play Area Review the following key aspects should be considered within the Strategy:
 - Ensure play provision meets the recreation needs of the community for the period 2020 – 2030 linked to the Council’s priorities, in particular improving health and wellbeing for not just children and young people, but adults and older people.
 - Develop a prioritised network of strategic and non-strategic sites to ensure all residents are able to access a good quality and good value play space.
 - Develop a robust mechanism for consulting towns, parishes and communities about the provision of play in their local areas.
 - Establish a framework to guide the future ownership and sustainable management of play provision in Folkestone & Hythe District.
 - Utilise the assessment of the volume of play provision for all age groups across the district within the Play Area Review to identify those areas of under and over provision.
 - Consider the financial position of providing play areas with currently available resources and into the future.
 - Consider and utilise the standards of provision to take forward alongside setting key objectives.
 - Raise the overall quality and value of a network of identified strategic and priority play area facilities within the district.
 - Develop a mechanism for securing developer contributions towards the provision and maintenance of a strategic play network e.g. Section 106 planning obligations and Community Infrastructure Levy (CIL) charges.
- 1.4 Relevant guidance has been referred to whilst compiling this Strategy including *Planning for Play - Guidance on the development and implementation of a local play strategy (2006)*.¹

¹ National Children’s Bureau / Big Lottery Fund, 2006. *Planning for Play - Guidance on the development and implementation of a local play strategy Guide* [pdf] Available at: <http://www.playengland.net/wp-content/uploads/2015/09/planning_for_play.pdf> [Accessed 12/01/2017].

2 Benefits of play

- 2.1 This section sets out the latest research and evidence on the importance of providing play opportunities for children and young people. It sets out the definition of play and how play supports the development of children and young people. Details of the type of play that can be provided, together with the respective benefits, are also set out. The section concludes with an examination of the importance of ensuring play opportunities are inclusive, accessible to all, and include elements of risk-taking.

The definition of play

- 2.2 The Playwork Principles were drawn up by the Playwork Principles Scrutiny Group in 2004; the Principles establish the professional and ethical framework for playwork. Playwork is the work of creating and maintaining spaces for children to play. Notably Play Principle 2 states:

*"Play is a process that is freely chosen, personally directed and intrinsically motivated. That is, children and young people determine and control the content and intent of their play, by following their own instincts, ideas and interests, in their own way for their own reasons."*²

- 2.3 Play behaviours include things like running, chasing, climbing, play fighting, shouting, role playing, fantasy and imagination, creating and destroying, using all sorts of 'objects' in new ways, games where children are in control and make their own rules, dressing up and playing with identity, taking risks. Play is different from organised sports, groups, clubs and classes, which have external rules and definitions, and are usually controlled by adults.

Play and child development

- 2.4 It is important to recognise the significance of play in children's **physical and emotional health development**. The development of key skills obtained from play can improve a child's self-esteem and encourage exploration of their environment whilst improving social interactions, fitness, stamina and agility.
- 2.5 Play can be divided into the following three main types:
- **Imaginative play:** A child takes objects or an environment and imagines it is something else. Imaginative play is a key factor in healthy brain development.
 - **Physical play:** Graded challenges allow the child to understand risk, conquer fear and develop physical skills. Physical play is vital to help develop coordination and confidence in the body.
 - **Social play:** A child learns turn taking, looking after others, delayed gratification and many other skills essential to forming successful adults.
- 2.6 Good play design allows aspects of all three types of play to develop and furthermore allows multiple modes of use to allow problem solving and creativity on the part of the child. Play provision can take many forms and does not simply happen in designated playgrounds or play areas.

² Play by nature: policy and planning for play website, 2016. Available at: <<http://playbynature.org/what-are-the-playwork-principles-2/>> [Accessed 11/01/2017]

Natural Play

- 2.7 Benefits of natural play are widely recognised. By its very nature play equipment has associated maintenance requirements, which in turn have an associated cost. Natural play is about children and young people experiencing play in natural environments.
- 2.8 Play England highlights the following values and benefits of natural play:

"Natural environments support a wide range of children's play. The diverse, dynamic and flexible features that can be found in natural spaces afford opportunities for extensive intentional play behaviours.

Whilst children do not necessarily differentiate between natural and artificial elements in their play, predominantly natural outdoor settings are more likely to be perceived by children as free from adult agendas and thus more open to the possibilities of play.

Playing in natural spaces offers possibilities for: control and mastery, construction of special spaces, manipulating loose parts, different ways of moving, risk-taking etc. Childhood experiences of playing with nature also instil a sense of wonder, stimulating creativity, imagination and symbolic play.

Children's opportunities to playfully access their immediate natural environments support the development of a sense of place and attachment. Playing in natural spaces also supports child's sense of self, allowing children to recognise their independence alongside an interdependence and connectedness with their ecological worlds.

The powerful combination of a diversity of play experiences and direct contact with nature has direct benefits for children's physical, mental and emotional health. Free play opportunities in natural settings offer possibilities for restoration, and hence, well-being. Collectively, the benefits fully support the outcomes established in Every Child Matters.

Playful, experiential and interactive contact with nature in childhood is directly correlated with positive environmental sensibility and behaviour in later life."³

- 2.9 Adding natural play to the portfolio of play provision across the district will introduce a variation of play experiences that is currently lacking. Resulting in an increased quality and value of play areas for the benefit of the community. In addition, the Play England review quotes The Dissolution of Children's Outdoor Play: Causes and consequences' presentation to 'The Value Of Play', Frost (2006) which "contrasts the high cost and maintenance associated with 'mammoth, multi-tiered structures that have little play value' and the reduced expenditure associated with play spaces that use natural materials, plentiful loose parts and 'wisely selected built or purchased equipment' (Frost, 2006:14)."⁴ A natural play approach with robust features could potentially result in more creative, stimulating and challenging play provision and reduce the Council's expenditure on maintenance.

³ Play England, 2007. *Play Naturally* [pdf]. Available at: <http://www.playengland.org.uk/wp-content/uploads/2007/11/play_naturally_a_review_of_childrens_natural_play.pdf> [Accessed 02 February 2017].

⁴ Frost, J., 2006 'The Dissolution of Children's Outdoor Play: Causes and consequences', presentation to 'The Value of Play'; a forum on risk, recreation and children's health, 31 May 2006 [pdf]. Available at: <<http://www.fairplayforchildren.org/pdf/1291334551.pdf>> [Accessed 02 February 2017].



"Natural play" sand play features at the Lower Leas Coastal Park (Picture: LUC)

The importance of risk in play

- 2.10 Risk taking enables children and young people to extend skills, develop physical and emotional capacities, challenge themselves in new ways, and gain direct experience of the consequences of their actions. Being brave and conquering fears helps children to grow.
- 2.11 In 2002, the Play Safety Forum endorsed by the Health and Safety Executive agreed that:

"Children would never learn to walk, climb stairs or ride a bicycle unless they were strongly motivated to respond to challenges involving risk or injury. All children need and want to take risks in order to explore limits, venture into new experiences and develop their capacities, from a very young age and from their earliest play experiences. Disabled children have an equal if not greater need for opportunities to take risks, since they may be denied the freedom of their non-disabled peers.

Children need and want to take risks when they play and good play provision should enable this by offering stimulating and challenging opportunities and environments. The level of risk should be managed to ensure that children are not exposed to unacceptable risks or dangers such as death or serious injury."⁵

- 2.12 The Health and Safety Executive stated in 2005:

"Sensible health and safety is about managing risks, not eliminating them all. HSE is not in the business of stamping out simple pleasures wherever they appear and at whatever cost. We recognise the benefits to children's development of play, which necessarily involves some risk, and this shouldn't be sacrificed in the pursuit of the unachievable goal of absolute safety."⁶

- 2.13 It is therefore recommended that all of Folkestone & Hythe District's play sites should balance risk with the developmental benefit and wellbeing of children.

⁵ Ball D, Gill T, Spiegel B (Play Safety Forum), 2012. *Managing Risk in Play Provision – Implementation Guide* [pdf] Available at: <<http://www.playengland.org.uk/media/172644/managing-risk-in-play-provision.pdf>> [Accessed 11/01/2017].

⁶ Play Wales: Play and change website, 2016. Available at: <<http://www.playwales.org.uk/eng/playandchallenge>> [Accessed 11/01/2017]

Play deprivation

2.14 As highlighted in 2003 by Bob Hughes, a writer and researcher on children's play:

*"play deprivation is the name given to the notion that not playing may deprive children of experiences that are regarded as developmentally essential and result in those affected being both biologically and socially disabled."*⁷

2.15 Studies have shown that the effects of play deprivation are devastating to children. If normal play experiences are absent throughout a child's life, that child is more likely to become highly violent and anti-social. This may also manifest itself in symptoms ranging from aggression, repressed emotions and social skills, to an increased risk of obesity. As adults, they are more likely to suffer from depression and anxiety.⁸

2.16 It is therefore vital that all children and young people have a wide range of places and opportunities to play. Play is an essential part of children's and young people's healthy development.

Inclusive play

2.17 Inclusive play means children having access and the opportunity to play together regardless of disability, race or gender. However there can be barriers to the provision of inclusive play opportunities, such as accessibility, funding and staffing. There have been no significant issues of lack of inclusivity identified within Folkestone & Hythe District. However it will be necessary to investigate ways to address any identified shortfalls in disabled access and for children getting to play areas so that F&HDC works towards all play being inclusive. An example of good practice of inclusive play in the district would include Lower Leas Coastal Park.

2.18 In line with the Equality Act (2010) play provision should be as fully inclusive as possible with all ages catered for, particularly up to the age of 25.

2.19 Groups that are considered "hard to reach" and therefore not able to access play provision as easily include:

- Children and young people that have been excluded from school - these people are unable to access any school-based services and therefore are less likely to be accessing play opportunities.
- Teenagers and young adults - frequently these groups are excluded due to lack of provision of appropriate facilities such as skate parks, youth shelters and multi-use games areas.
- Children and young people from traveller communities.
- Children of different ethnicities with cultural barriers preventing access to play, particularly for girls.
- Young carers – with many responsibilities at home, young carers often miss out on opportunities that other children and young people have to play and learn.

⁷ Play Wales: Play deprivation website, 2016. Available at: <<http://www.playwales.org.uk/eng/playdeprivation>> [Accessed 11/01/2017],

⁸ Manwaring B, Taylor C (The Community and Youth Workers Union & Skills Active). *The Benefits of Play and Playwork – Recent evidence-based research 2001-2006 demonstrating the impact and benefits of play and playwork* [pdf] Available at: <<http://www.playscotland.org/wp-content/uploads/assets/Documents/CYWURResearchComplete.pdf>> [Accessed 11/01/2017].

3 Local and national context

- 3.1 This section sets out the local and national context relating to provision of play opportunities in Folkestone & Hythe District. Consideration is firstly given to the national context including Article 31 of the United Nations Convention on the Rights of the Child. Details of how play is promoted are also set out together with the latest best practice guidance on play. Further detailed information is contained within the Shepway Play Area Review (2017).

International and national context

- 3.2 The importance of providing children and young people with opportunities for play is endorsed by national and international policies including the following:

United Nations Convention on the Rights of the Child

- 3.3 Article 31 of The United Nations Convention on the Rights of the Child (ratified by the UK Government in December 1991) states:

"Parties recognise the right of the child to rest and leisure, engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts."

National Planning Policy Framework, Department for Communities and Local Government, March 2012

- 3.4 The National Planning Policy Framework includes a specific requirement for planning policy 'to be based on a robust and up to date assessment of the needs for open space, sports and recreation facilities and opportunities for new provision' (para. 73). This Strategy, combined with the *Play Area Review (2017)*, provides that evidence base.

The Play Strategy, Department for Children's Schools & Families and Department for Culture, Media and Sport, 2008

- 3.5 The Strategy sets out the Government's vision and commitments for better play opportunities for children and young people in England. A robust strategy for future provision of play in Folkestone & Hythe District needs to consider this together with factors such as ensuring:

"Play spaces are attractive, welcoming, engaging and accessible for all local children and young people."

Every Child Matters, Department for Education & Skills, 2004

- 3.6 The UK government initiative acknowledges that play is fundamental to a healthy happy childhood and the Government recognises its importance to outcomes for children and young people.

Guidance for Outdoor Sport and Play – Beyond the Six Acre Standard, Fields in Trust, 2015

- 3.7 The document sets out a benchmark for the provision of outdoor sport and play and, in so doing, seeks to secure the opportunities for future provision to help build healthy neighbourhoods. Benchmarks, standards and classifications are detailed further within the *Shepway Play Area Review (2017)*.

Managing Risk in Play Provision, Play Safety Forum, 2012

- 3.8 The guide suggests “how play providers can develop an approach to risk management that takes into account the benefits to children and young people of challenging play experiences, as well as the risks.”

Chief Medical Officer of England

- 3.9 In the Chief Medical Officer of England’s report of 2012 ‘*Our Children Deserve Better: Prevention Pays*’, published in August 2013, there are key messages for organisations forming strategies and policy that focus on providing facilities and services to young people that help to prevent physical, mental, educational and social health problems in later life.
- 3.10 In summary the report recommends approaches toward promoting and providing opportunities to access formal and informal physical activity in the local community. Children and young people should be enabled to build resilience and positive capacities through play and exercise. By specifically equipping children and young people with these opportunities they can fully explore their own personal and social behaviours. Furthermore the benefits of a healthy diet will be fully realised when complimented with physical activity and go a long way towards tackling long term obesity.
- 3.11 Providing the environment for children and young people to build self-esteem, self-confidence, skills, physical and social experience and knowledge, gives them the tools for coping with demands at home and school, and later on at work, whilst making the transition into adulthood.

Play England

- 3.12 Play England is a registered charity which aims to ensure everybody is able to fully enjoy their right to play throughout their childhood and teenage years. The organisation achieves this through awareness raising and campaigns as well as supporting research and sharing best practice.

Design for Play: A Guide to Creating Successful Play Spaces, Play England, 2008

- 3.13 The guidance sets out a framework and principles for the design of play spaces, based around the “golden rule” that “a successful play space is a place in its own right, specially designed for its location, in such a way as to provide as much play value as possible.”
- 3.14 The achievement of this vision is supported by 10 core principles:

1. Imagine a play space designed to enhance its setting.
2. Imagine a play space in the best possible place.
3. Imagine a play space close to nature.
4. Imagine a play space where children can play in different ways.
5. Imagine a play space where disabled and non-disabled children play together.
6. Imagine a play space loved by the community.
7. Imagine a play space where children of all ages play together.
8. Imagine a play space where children can stretch and challenge themselves in every way.
9. Imagine a play space maintained for play value and environmental sustainability.
10. Imagine a play space that evolves as children grow.

- 3.15 These values and principles have been used as a foundation for evaluating and understanding the quality and value of play area provision across Folkestone & Hythe District.

Sowing the seeds: reconnecting London's children with nature, GLA, 2011

- 3.16 Within this report, Tim Gill, one of the UK's leading thinkers on childhood, provides an analysis of children's engagement with nature. The Report does this in three ways:
- Summarising the wealth of previous research into the benefits of children's engagement in nature.
 - Analysing the numerous activities to engage in nature currently taking place in London.
 - Recommending a clear vision that every London child has the chance to experience nature as part of their everyday lives, and a range of policy and practical recommendations in order to achieve this vision.
- 3.17 The report suggests that giving children access to nature promotes their mental and emotional well-being and may have a positive effect on the behaviour of some children.
- 3.18 Information is provided on measuring progress by setting out useful existing spatial standards and possible metrics and performance indicators.

Local context

- 3.19 The Places and Policies Local Plan, Submission Draft (2018) (PPLP) has two policies that directly relate to the provision of play opportunities in the district. Firstly Policy C3, provision of open space, which was informed by the Shepway Open Space Review and Strategy (2017 and is set out below.)
- 3.20 "To meet the additional need in open space generated by new residential developments the Council will require proposals of 20 or more dwellings to provide for open space in accordance with the standards set out in Table 12.1 of the PPLP.
- 3.21 Where full provision on-site would not be appropriate or desirable, or the proposed development is less than 20 dwellings, the space needed may be met by commuted sum payment towards the provision or improvement of open space nearby on a scale related to the size and scale of the development.
- 3.22 This gross open space calculation may include provision of publicly available:
- Sustainable Drainage Systems (SuDS), provided they do not compromise the safety of open space users;
 - Informal sports pitches; and
 - Formal play spaces.
- 3.23 Any new open space should be transferred to and maintained in perpetuity by a management company or, if agreed, the local Town or Parish Council, the District Council or appropriate community group or charity, subject to payment of a commuted sum.
- 3.24 Existing open spaces, as defined on the Policies Map, will be safeguarded. Development proposals that would result in the loss of open spaces will be granted provided that:
1. An assessment has been undertaken which clearly identifies the open space is surplus to requirements; or
 2. The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of the standards set out in Table 12.1 of the PPLP; or
 3. The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss."
- 3.25 The second Places and Policies Local Plan Policy is Policy C4 children's play space, which has been informed by The Shepway Play Area Review (2017) and is set out below:
- 3.26 To meet the additional need for children's play space generated by new residential developments, the Council will require proposals of 10 or more family dwellings (2 or more bedrooms) to provide for child play space in accordance with the standards set out in Table 4.1 of this document.
- 3.27 Areas should be set out and located so as to minimise loss of amenity for nearby occupiers, maximise children's safety and be visible from neighbouring properties.

Where full provision on-site would not be appropriate or desirable, the space needed may be met by commuted sum payment towards the provision or improvement of play space nearby on a scale related to the size and scale of the development.

- 3.28 Any new play space should be transferred to and maintained in perpetuity by a management company or, if agreed, the local Town or Parish Council, the District Council or appropriate community group or charity, subject to payment of a commuted sum.
- 3.29 In addition Shepway Core Strategy Local Plan (2013), Policy SS5 District Infrastructure Planning, is relevant. It sets out the approach to overseeing the delivery of new or upgraded infrastructure (including play space) alongside development.

Kent Children and Young People's Plan

- 3.20 The draft Kent Children and Young People's Plan – Working Together to Improve Outcomes 2016-2019 sets out the shared ambition of public and voluntary sector partners to improve the lives of children and young people growing up in Kent. The following themes with supporting indicators are outlined:
- Children and young people grow up in safe families and communities
 - Children and young people have good physical, mental and emotional health
 - Children and young people learn & have opportunities to achieve throughout their lives
 - Children and young people make safe and positive decisions⁹

Local Children's Partnership Groups

- 3.21 Local Children's Partnership Groups' primary purpose is to drive improvement in specific outcomes for local children and young people. The work of Local Children's Partnership Groups support both the development and delivery of Kent's Children and Young People's Plan - which will be aligned to aims and ambitions of the Kent 0-25 Health and Wellbeing Board (Kent 0-25 HWB). LCPGs play a key role in relation to safeguarding and promoting the welfare of children and young people, and as such provide an important link between the Kent Safeguarding Children Board (KSCB) and local services and organisations working with children and young people.

Kent Community Safety Agreement

- 3.22 The Kent Community Safety Agreement 2014-17¹⁰ highlights priorities (updated in 2016) and cross-cutting themes including safeguarding children and young people and early intervention, prevention and education. The agreement also aims to deliver against the three countywide ambitions set out in the Vision for Kent 2012-22: to grow the economy; to tackle disadvantage; and to put citizens in control. These themes and ambitions link directly to play provision in the area.

South Kent Coast Health and Wellbeing Strategy

- 3.23 The Health and Wellbeing Strategy highlights several priorities which have been produced by the South Kent Coast Health and Wellbeing Board. The Board consists of members from Folkestone & Hythe District Council, Dover District Council, Kent Public Health, South Kent Coast Clinical Commissioning Group (CCG) and the voluntary sector. It will be important to align the relevant priorities within play provision.
- 3.24 The South Kent Coast Health and Wellbeing Strategy has identified the following six priorities (from the localised Kent Joint Strategic Needs Assessment):

⁹0-25 Health and Wellbeing Board & Local Children's Partnership Groups, 2016. Draft - *Kent Children and Young People's Plan – Working Together to Improve Outcomes 2016-2019* [pdf]. Available at: <<http://committeedmz.dartford.gov.uk/documents/s53736/Kent%20CYPP%20DRAFT%20Young%20Peoples%20Plan.pdf>> [Accessed 11/01/2017].

¹⁰ Kent County Council Community Safety Unit, 2014 (updated 2016). *Kent Community Safety Agreement 2014-17* [pdf]. Available at: <https://www.kent.gov.uk/__data/assets/pdf_file/0019/6184/Kent-Community-Safety-Agreement.pdf> [Accessed 12/01/2017].

Priority 1: Tackling Health Inequalities
Priority 2: Urgent Care - Avoiding unnecessary hospital admissions
Priority 3: Supporting Children and Families
Priority 4: Healthy Living and Quality of Life (Prevention of Illness)
Priority 5: Improving Long-Term Conditions
Priority 6: Improving Mental Health and Wellbeing¹¹

3.25 It will be important to align the relevant priorities within play provision.

Corporate Plan

- 3.26 F&HDC's Corporate Plan outlines the vision and priorities for the Council through its Strategic Objectives. The Corporate Plan 2017-2020 – Investing for the next generation – delivering more of what matters, outlines priorities based around supporting local economic growth, developing housing provision, fostering localism, maintaining an attractive district and providing local people with value for money. The six strategic objectives include: more homes; more jobs; appearance matters; health matters; achieving stability and delivering excellence¹².
- 3.27 The objectives contribute in some way to securing the shared commitment to providing good quality play provision particularly in reference to appearance, health matters and delivering excellence.
- 3.28 Work is currently underway to develop a new Corporate Plan for the period 2020-2030. Early indications are that there will be support for accessible, quality open spaces and play provision as well as collaborative working with Town & Parish Councils.

Shepway Play Area Review

- 3.29 The Shepway Play Area Review compiled in 2017 outlined the approach taken during the assessment of provision and sets out the current situation and proposed standards for play provision across the district. The results of the review provided a foundation for this Play Area Strategy.

Additional relevant local strategies

- 3.30 The following documents have also informed the preparation of this report:
- Shepway Open Space Strategy 2017
 - A Needs Assessment relating to the Provision of Natural Greenspace in areas with Low Levels of Physical Activity – Shepway District Council 2016
 - Shepway Core Strategy Local Plan 2013
 - Planning for Play in Shepway 2007 – 2012
 - Shepway Open Spaces: Sports and Recreation Report 2011
 - Shepway LDF 'Open Space Audit' 2011
 - Green Infrastructure Report 2011
 - A Playing Pitch Strategy Update 2011
 - Shepway District Local Plan Review (2006) 'Saved' Policies

¹¹ Shepway District Council: Health and wellbeing website, 2016. Available at: <<http://www.shepway.gov.uk/community/health-and-wellbeing>> [Accessed 12/01/2017].

¹² Shepway District Council, 2017. *The Corporate Plan 2017-2020 – Investing for the next generation – delivering more of what matters* [pdf]. Available at: <https://www.shepway.gov.uk/media/4222/corporateplan2017/pdf/Corporate_Plan_2017-2020.pdf> [Accessed 31/05/2017].

Population and socio-economic deprivation

- 3.31 According to the census, the population of Folkestone & Hythe District in 2011 was 107,969. Of which 49.2% are males and 50.8% are females¹³. The more recent 2015 Mid Year Estimates from The Office for National Statistics (ONS) indicates that Folkestone & Hythe District's population was 110,03414.
- 3.32 The Indices of Deprivation (IMD) 2015 data reveals that Folkestone & Hythe District is the third most deprived area in Kent, ranking 113 out of 326 local authority districts nationally. 21.6% of the population of children in Folkestone & Hythe District are being brought up in poverty; this is the third highest rank in Kent and higher than the overall average in Kent of 18.4%¹⁵. In addition 20.6% (206) of children who are in school year 6 are classified as obese.¹⁶ Further population and socio-economic context is set out within the Folkestone & Hythe District Council document *Shepway in Context: A Socio-Economic and Property Analysis (2015)* and the *Shepway Play Area Review (2017)*.

¹³ Shepway District Council, 2015. *Shepway in Context: A Socio-Economic and Property Analysis* [pdf]. Available at: <<https://www.shepway.gov.uk/moderngov/documents/s16097/rcabt20150225%20app%20%20Draft%20Final%20Shepway%20in%20Context%20Report.pdf>> [Accessed 31 October 2016].

¹⁴ Office for National Statistics Website, 2016. *Ward Level Mid-Year Population Estimates*. Available at: <<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental>> [Accessed 27 October 2016].

¹⁵ Kent County Council, 2016. *Business Intelligence Statistical Bulletin – Children living in low income families in Kent* [pdf]. Available at: <http://www.kent.gov.uk/__data/assets/pdf_file/0009/7956/Children-in-poverty.pdf> [Accessed 23 February 2017].

¹⁶ Shepway District Council: Places and Policies Local Plan Preferred Options – 15 Health and Wellbeing website, 2017. Available at: <http://consult.shepway.gov.uk/portal/pplp/preferred_options?pointId=ID-3549432-POLICY-HW3> [Accessed 21/07/2017]

4 Summary of Play Area Review

- 4.1 The Strategy has been informed through the Shepway Play Area Review (2017) which involved consultation with residents and key stakeholders to understand local need. This consultation exercise was supplemented through an audit of each play area in Folkestone & Hythe District. The results of this assessment and analysis will help to determine standards of future provision and inform decision making. This section summarises the key findings from this work with further information on the methodology and analysis of results contained within the Shepway Play Area Review (2017).

Consultation results

Household survey

- 4.2 Public consultation was undertaken through an online survey. The scope of this questionnaire covered the frequency of use, perceived value and satisfaction with the quality and quantity of open spaces and play areas within the district. The survey elicited responses from 380 people.
- 4.3 Of those who stated that they do not use parks and open spaces regularly:
- 19% of respondents cited lack of play facilities.
 - 19% of respondents felt litter, anti-social behaviour and the appearance deterred visits.
 - 43% of respondents highlighted other reasons for not visiting including poor weather, time at work and general lack of time.
- 4.4 Just over 60% of respondents confirmed that they use equipped play facilities in Folkestone & Hythe District. Results indicate:
- 24% of respondents use equipped play areas once a week.
 - 23% of respondents use equipped play areas 2-3 times a week.
 - 20% of respondents use equipped play areas once a fortnight.
- 4.5 The majority of respondents access local play facilities on foot and for 80% of respondents it takes less than 15 minutes to travel to the play facility they visit most often.
- 4.6 The play facilities that respondents visited most often include:
- Lower Leas Coastal Park
 - Radnor Park
 - Cheriton Park
- 4.7 Responses to the household survey indicate that overall there are high levels of satisfaction with the amount and quality of play in Folkestone & Hythe District. However responses to questions relating to play opportunities for 11+ years indicate there is a need for improvement.
- 4.8 Respondents were provided with the opportunity to provide further comments on play facilities in Folkestone & Hythe District. Many of the comments cited site specific issues however general comments included:
- A recommendation to increase play facilities for 11+ age groups and under 5's.
 - Increase toilet facilities at destination sites.
 - Improve the speed in which maintenance issues are addressed.
 - Lower Leas Coastal Park and Brockhill Country Park are recognised as being good sites for play.

Telephone/email consultation

- 4.9 Consultation with stakeholders revealed that respondents are generally positive about the district's flagship play areas such as Lower Leas Coastal Park and Brockhill Country Park although issues such as litter and vandalism were a common theme with one respondent noting "Parents seem to prefer play areas which are safe, not strewn with litter (especially dog waste and needles) and where the play equipment is not broken or otherwise rendered unsafe".
- 4.10 Some further interesting opportunities for improving play provision in Folkestone & Hythe District identified by stakeholders are summarised below:
- Use local ward member grants and trust funds, such as those offered by The Roger De Haan Charitable Trust, to improve play provision.
 - Improve CCTV coverage or increase supervision of play areas to reduce incidents of anti-social behaviour.
 - Improve street lighting along the coastline.
 - Encourage community groups to take responsibility for supervising and maintaining play areas alongside community fundraising.

Workshop with local authority officers and stakeholders

- 4.11 The majority of play areas within Folkestone & Hythe District are managed by F&HDC. However the workshop revealed that there is a desire to increase community involvement in the delivery of play provision in Folkestone & Hythe District with town and parish councils expressing interest in managing play areas.
- 4.12 The workshop highlighted issues with the condition of play areas across Folkestone & Hythe District including ageing equipment and vandalism. Budget restrictions were noted as reasons for some of these issues. Attendees identified a need to share knowledge on the management play areas as well as external funding streams which could support enhancement projects.

Audits and results

- 4.13 In consideration of the latest FiT guidance¹⁷ and Play England guidance¹⁸ the following classifications of play area were assessed as part of the *Shepway Play Area Review (2017)*:
- Type A: **Local Areas for Play (LAPs)**.
 - Small, low-key games area (may include "demonstrative" play features);
 - Minimum activity zone of 100sqm.
 - Type B: **Local Equipped Areas for Play (LEAPs)**.
 - Approximately five types of equipment;
 - Minimum activity zone of 400sqm.
 - Type C: **Neighbourhood Equipped Areas for Play (NEAPs)**.
 - Approximately eight types of equipment;
 - Kickabout and/or wheeled activities;
 - Minimum activity zone of 1,000sqm comprising an area for play equipment and structures;
 - Hard surfaced area of at least 465sqm (the minimum needed to play five-a-side football).
 - Type D: **Destination Play Space**.

¹⁷ Fields in Trust, 2015. *Guidance for Outdoor Sport and Play – Beyond the Six Acre Standard* [pdf]. Available at: <<http://www.fieldsintrust.org/Upload/file/PAD/FINAL%20ONLINE%20Planning%20Guidance%20for%20Outdoor%20Sport%20and%20Play%20Provision%20Oct%202015.pdf>> [Accessed 8 September 2016].

¹⁸ Play England, 2009. *Tools for evaluating local play provision: A technical guide to Play England local play indicators* [pdf]. Available at <http://www.playengland.org.uk/media/202750/tools-for-evaluating-play-provision.pdf> [Accessed 8 September 2016].

- Play spaces which can attract visitors for a wider catchment, usually within larger parks they often have supporting facilities such as car parking, catering and toilets.

4.14 The Play Area Review identified and assessed 85 equipped play areas in Folkestone & Hythe District in accordance with the latest guidance. The scoring system developed from the FiT and Play England guidance enabled the assessments of play area quantity, accessibility, quality, value and location.

Overview of audit findings

4.15 All play areas included in the Review are publicly accessible, 43 of the play areas were a standalone space with the primary typology of 'Provision for children and young people'. The remainder of the equipped play provision were located within larger open spaces and primarily within parks and gardens.

4.16 Not all of the district's residents are within easy walking distance of a suitable facility. This was also highlighted as an issue through stakeholder consultation and confirmed by the mapping of accessibility catchments. The Play Area Review identified particular deficiencies in play areas within the centre of New Romney, intermittent areas along coastal residential areas in Romney Marsh, to the south-east of Folkestone Harbour and within Broadmead. It also discovered that a variety of play areas were considered to have better location and play values when compared to quality which was generally of a lower standard.

Play area provision for age groups

4.17 The Play Area Review revealed that the distribution of play provision in Folkestone & Hythe District is generally good. However the Review identified a shortage of play areas catering for the 11+ age group. While 86.8% of play areas have provision suitable for 5-11 age groups, only 41.2% have equipment that would appeal to older children/young people (11+). However, it should be noted that older children/young people are likely to be more able to travel further to access suitable play provision such as multi use games areas (MUGAs) and skate parks. There is generally good provision for 0-11+ age groups throughout most wards however Broadmead and Folkestone Harbour have no provision for 11+ age groups with potential for greater quantities of 11+ provision in Cheriton and North Downs West. There is a lack of provision for the youngest age category (LAPs) in the southern half of the district. Adding to this, the condition of the existing sites are mainly average, poor or very poor throughout the district.

Proposed local standards for play area provision

4.18 Following the site audit process as part of the *Shepway Play Area Review (2017)*, proposed standards for play provision were formulated and these are set out in **Table 4.1**. The standards were calculated based on current provision and using the population figures of 110,034 as set out in the 2015 Mid-Year Estimates from The Office for National Statistics (ONS)¹⁹.

¹⁹ Office for National Statistics Website, 2016. *Ward Level Mid-Year Population Estimates*. Available at: <<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental>> [Accessed 27 October 2016]

Table 4.1: Proposed standards for play provision in Folkestone & Hythe District

Type of standard	Proposed standard	Justification
Quantity	Destination: 0.003 hectares per 1,000 population NEAP: 0.080 hectares per 1,000 population LEAP: 0.077 hectares per 1,000 population LAP: 0.005 hectares per 1,000 population	This is based on the current provision of play spaces in Folkestone & Hythe District. Setting the standard at this level of provision will ensure that provision should (as a minimum) not fall below the existing quantity per 1,000 population as the population grows. Guided by the Fields in Trust guidance <i>Guidance for Outdoor Sport and Play – Beyond the Six Acre Standard</i> ²⁰
Accessibility	Destination 1000m (15 minute walk) NEAP 600m (10 minute walk) LEAP 240m (5 minute walk) LAP 60m (1 minute walk)	Straight line distance outlined by the Fields in Trust guidance <i>Guidance for Outdoor Sport and Play – Beyond the Six Acre Standard</i> ²¹ A new district wide standard of play provision being “that most residents across the district will live within 15 minute walk of a high quality and high value play area.” Many will live closer than a 15 minute walk. It is deemed reasonable provision within easy reach for all age groups.
Location	Destination 85.71% - Exemplar: Lower Leas Coastal Park Fun Zone NEAP 74.29% - Exemplar: Canterbury Road Recreation Ground LEAP 62.86% - Exemplar: Tayne Field (adjacent public house) LAP 62.86% - Exemplar: Megan Close Play Area	Expected score for a good well located site
Value	Destination 74% - Exemplar: Brockhill Country Park NEAP 72% - Exemplar: Canterbury Road Recreation Ground LEAP 68% - Exemplar: Elmfields LAP 55% - Exemplar: Megan Close	Expected score for a good value site
Quality	Destination 65.71% - Exemplar: Brockhill Country Park NEAP 60% - Exemplar: Cheriton Recreation Area LEAP 54.29% - Exemplar: Newington Village Hall LAP 52% - Exemplar: Atkinson Road Play Area	Expected score for a good quality site

4.19 The FIT recommended benchmark quantity standard is 0.25 hectares per 1,000 head of population for equipped/designated play areas. The Folkestone & Hythe District standards fall below this standard. However there a number of local factors which explain this, including Folkestone & Hythe District’s older population and rural character. The FIT standards are aspirational and have limitations because they are often seen as undeliverable, and can result in a proliferation of play areas that can be difficult to maintain, as well as setting unrealistic aspirations in the urban context

²⁰ Fields in Trust, 2015. *Guidance for Outdoor Sport and Play – Beyond the Six Acre Standard* [pdf]. Available at: <<http://www.fieldsintrust.org/Upload/file/PAD/FINAL%20ONLINE%20Planning%20Guidance%20for%20Outdoor%20Sport%20and%20Play%20Provision%20Oct%202015.pdf>> [Accessed 8 September 2016].

²¹ Fields in Trust, 2015. *Guidance for Outdoor Sport and Play – Beyond the Six Acre Standard* [pdf]. Available at: <<http://www.fieldsintrust.org/Upload/file/PAD/FINAL%20ONLINE%20Planning%20Guidance%20for%20Outdoor%20Sport%20and%20Play%20Provision%20Oct%202015.pdf>> [Accessed 8 September 2016].

where insufficient land is available. The FiT standards could be a long term aim but the priority should be to work towards ensuring the standards in Table 4.1 are met.

Contribution criteria for strategic decision making

- 4.20 Alongside guidance on location, quantity, quality, value and accessibility aspects, a range of data sources can be used to inform the decision making process.
- 4.21 **Table 4.2** below summarises a range of considerations that impact on how a play area contributes to its local community and outlines an indicative sliding scale from those aspects which lead to reduced contributions to greater contributions for the community. This should be referred to whilst reviewing the findings of the *Shepway Play Area Review (2017)* to ascertain contribution levels and therefore help to inform F&HDC’s decisions over whether certain play areas should be retained, removed, modified or enhanced.
- 4.22 For example regarding the criteria of proximity, those sites with a larger number of accessibility buffers overlapping will invariably have good levels of existing play area provision and subsequently a reduced contribution. This is in contrast to an area with a single play area and no accessibility buffer overlaps which is likely to provide a greater contribution to its local community.

Table 4.2: Contribution criteria of play areas

Criteria	Reduced contribution	Greater contribution
Accessibility	Limited or no access	Unrestricted
Proximity	Based on GIS Analysis using FIT Accessibility Standard Buffers. Increased overlaps	Based on GIS Analysis using FIT Accessibility Standard Buffers. No overlaps
Quantity	Based on level of provision at ward level assessed against FIT standard quantity benchmark. Greater Ha	Based on level of provision at ward level assessed against FIT standard quantity benchmark. Reduced Ha
Hierarchy	Based on prescribed typology derived from audit. LAP	Based on prescribed typology derived from audit. Destination NEAP LEAP
Deprivation	Percentile of deprivation with reference to percentage of children and teenagers: <i>Index of Multiple Deprivation</i> <i>Health Deprivation</i> <i>Living Environment Deprivation</i> Least deprived	Percentile of deprivation with reference to percentage of children and teenagers: <i>Index of Multiple Deprivation</i> <i>Health Deprivation</i> <i>Living Environment Deprivation</i> Most deprived

5 Local provision and management

- 5.1 The following section sets out the current supply of play areas by parish and town. It also identifies ownership and management responsibilities with an overview of some of the key issues affecting play area provision. Brief summaries are provided of recent play area enhancements within the district.

Current play provision

- 5.2 There are a total of 85 play areas in Folkestone & Hythe District which were recorded as part of the 2016 audit. The majority are owned and managed by F&HDC as shown in Table 5.1 below.

Table 5.1: Ownership and management of play areas in Folkestone & Hythe District

Ownership/management	Number of play areas
Burmarsh Parish Council	1
Dymchurch Parish Council	1
Elham Parish Council	1
Hawkinge Town Council	6
Hyde Housing	1
Hythe Town Council	4
Ivychurch Parish Council	1
Kent County Council	1
Lydd Town Council	1
Lyminge Parish Council	5
Lympne Parish Council	1
Ministry of Defence	3
New Romney Town Council	2
Newchurch Parish Council	1
Newington Parish Council	1
Orbit Housing Association	1
S106 - With Developer	1
Saltwood Parish Council	1
Sandgate Parish Council	1
F&HDC	40
F&HDC Housing	8
Sellindge Parish Council	1
St Mary in the Marsh Parish Council	1
Unknown ownership	1
Total number of play areas in Folkestone & Hythe District	85

- 5.3 **Appendix 2** details the ownership and management responsibilities by site.

Inspection, management and maintenance

Folkestone & Hythe District Council

- 5.4 The maintenance of the play areas managed by F&HDC is carried out by a maintenance team.
- 5.5 Each play area is inspected on a weekly basis by RoSPA trained personnel this is known as the visual inspection. These inspections assess the safety of the equipment and form the basis of maintenance schedules.

- 5.6 Every play area is inspected on a quarterly basis by a RoSPA trained personnel this is known as the operational inspection. These inspections are more meticulous inspecting bearings and other hidden elements, records are provided using a risk based approach.
- 5.7 An annual independent inspection takes place looking at all Folkestone & Hythe District's play areas by Zurich Insurance Inspectors, in order to satisfy our insurance requirements. From these inspections Crimson Reports are generated which then inform the work plan in terms of ongoing maintenance and renewal of equipment. Crimson Reports can be used to assess the number of defects in a play area. A scale from A-D is used to indicate the seriousness and urgency of a defect.
- 5.8 F&HDC are currently following recent inspection guidance from RoSPA which advises additional quarterly inspections which are more detailed, and encompass all moving parts.
- 5.9 In general, most repairs can be undertaken quickly and cost effectively however, where an item is irreparable or past its useful life, it will be removed without replacement.
- 5.10 Sustainability of play areas is being addressed internally by implementing the following requirements for new play provision:
- No varnished finishes, avoid painted finishes.
 - Recycled products or sustainably sourced timber.
 - Timber to only be used when pressure treated.
 - All moving parts to be accessible and not hidden.
 - Grass matting should be used where appropriate and wet pour surfaces should be seamless and not involve the use of tiles.
 - Replacement parts should be universal and available through many suppliers to remain competitive.
- 5.11 F&HDC also advise outside organisations including town and parish councils on suitable arrangements for play facilities.

Parish and town councils

- 5.12 Parish and town councils are responsible for coordinating the inspection, maintenance and insurance of play areas under their management. Many of the councils hire a private contractor to undertake these works although management arrangements vary.
- 5.13 Parish councils can access a wide variety of community funding sources towards the upkeep and development of play facilities under their management. Ongoing consultation and sharing of information is vital to help secure external funding. This could be achieved through play forums and appropriate conduits/officers to link various groups and management approaches. Further useful information is contained within Play England guidance *Parish councils and children's play – Community play briefing 7 (2011)*²².

Other

- 5.14 Other free play areas in the district are managed independently. Many of these are currently managed by developers as part of Section 106 agreements on new housing developments. Three play areas are managed by the Ministry of Defence.

Overview of current play area issues

- 5.15 The following key issues have been identified through the *Shepway Play Area Review (2017)* assessment:
- Insufficient budget to support the ongoing management and maintenance of play areas which has resulted in a backlog of repairs. The impact of continued reduction in play space will exacerbate the decline in play value and quality in Folkestone & Hythe District.

²² Play England, 2011 *Parish councils and children's play – Community play briefing 7* [pdf]. Available at: <http://www.playengland.org.uk/media/283002/parishcouncils_ver4%20-%20final.pdf> [Accessed 12 June 2017].

- Problems with anti-social behaviour and litter at a number of sites.
 - Gaps in provision due to a lack of identified on-site play areas.
 - A need to share relevant knowledge and skills between play area stakeholders.
- 5.16 While the majority of play spaces can be accessed by children and young people with disabilities, there is limited play equipment for these groups to engage with. Play England's vision is supported by an objective to "*imagine a play space where disabled and nondisabled children play together*"²³, a focus on fewer sites could enable improvements to play value and to increase play opportunities for children and young people with disabilities.

Summary of recent play area enhancements

- 5.17 Recent play area enhancement projects in Folkestone & Hythe District are described briefly below by ward. These examples help to highlight the community interest and support in play area management and also the desire for play areas to provide a good range of features and facilities. Information is largely drawn from the series of Folkestone & Hythe District Ward Profile documents prepared by Folkestone & Hythe District Council in 2015.

Cheriton

- 5.18 Cheriton has strong community involvement which influences play areas within the ward. Cheriton Young Persons Working Group looked at regeneration of parks and leisure space in Cheriton. In addition South Cheriton Action Group is a community group, set up by residents in the immediate vicinity of the proposed Shorncliffe development. The group has a Facebook page and a page on Cheriton Matters. Cheriton Recreation Ground, in recent years has had new play equipment and street lighting. Future plans, might include a skate park.
- 5.19 Firs Lane Play Area has a play unit including a slide and a climbing wall. There are also two swings, spinning stools and bench seating. Harcourt Primary School raised the funds for the equipment at this park and the children chose the design of the equipment.

East Folkestone

- 5.20 Canterbury Road Residents Group was formed in 2007 with the aim of improving the area and the lives of local families. The group secured a large amount of external funding to revamp Canterbury Road Recreation Ground including play areas. Improvements that were implemented included a multi-use games area (MUGA) and additional practice area, teen shelter, practice running track, new play equipment for older children and young people, and improvements to the toddler play area. Other improvements were made to footpath lighting and litter bins. A dog mess bag dispenser, benches, signs and seating were also installed. Since then the residents have planted daffodils all around the recreation ground. The group are currently seeking funding to run a youth scheme at the recreation ground to support young people to take ownership of the park and ensure that it used positively. It is hoped the scheme will discourage anti-social behaviour and encourage young people to participate in positive activities.
- 5.21 Creteway Estate Residents Association similarly contributed to Brabner Park's enhancements through planting saplings during national tree week and organising estate clean up days. At present the Association is considering undertaking a project to add extra play equipment for the younger children at the George Gurr Crescent Play Area.

Folkestone Central

- 5.22 The Lower Leas Coastal Park was redeveloped between 2000 and 2006 into a unique undercliff with pine avenues, flower gardens, historic Zig Zag path (c. 1921), a labyrinth and picnic areas leading down to the sea. Also the park contains the largest free children's adventure playground in the south east complete with zip wires, slide tubes, a toddler's builder's yard and a pirate ship. The

²³ Play England, 2008. *Design for Play: A Guide to Creating Successful Play Spaces* [pdf]. Available at: <<http://www.playengland.org.uk/resource/play-naturally-a-review-of-childrens-natural-play/>> [Accessed 02 February 2017].

regeneration of the park, once a derelict and undesirable part of the town, was funded by the Heritage Lottery Fund, SEEDA, F&HDC and the European Union.

- 5.23 In 2007, the Coastal Park received four awards, including the Green Flag Award, best regional and best overall Regeneration Project from the Royal Town Planning Institute 2007. It was also winner in the Landscape category of the 2007 Kent Design Awards. More recently in 2013 the Coastal Park was awarded the Trip Advisor Certificate of Excellence and has retained the accolade each year since. The park now features in their Hall of Fame, having maintained the Certificate of Excellence for the last 7 years. It continues to receive the Green Flag Award annually and is now flying the flag for the 13th consecutive year.



Lower Leas Coastal Park (Picture: LUC)

- 5.24 A flagship project at Upper Radnor Park saw recent play equipment improvements with an official opening on July 2017. The project has been developed with support of multiple organisations and partners, and nearly £400,000 of funding. This funding included the renovation of the Lodge House which is now a tea room and the complete refurbishment of the Victorian drinking fountain and statue of St Eanswythe.
- 5.25 Significant additional funding for the play equipment has come from the efforts of the Radnor Park Community Group. The new play area includes; a railway themed zone for toddlers, with a climbing train and carriages, a tunnel, tracks, turntable roundabout and a station; a raised hill with places for scrambling, perching and climbing and a striking centre piece and; exciting and challenging climbing equipment for 8-12 year olds including a 6 metre high net pyramid and 20 metre long zip line.²⁴
- 5.26 Further funding in excess of £50,000 was raised in 2019 from Cabinet Member environmental improvement grants, local ward member grants, KCC member grants and a contribution from the Radnor Park Community Group to install an outdoor adult gym and a wheel chair swing.

²⁴ Shepway District Council website, 2017. *Contract awarded for play equipment at Radnor Park*. Available at: <<https://www.shepway.gov.uk/news/radnor-park/play-equipment>> [Accessed 08/06/2017]



Radnor Park Playground Opening (Picture: Shepway District Council)

Folkestone Harbour

- 5.27 St Mary’s Church of England Primary Academy was involved in a local community project to renovate a piece of Southern Water land into a children’s play area in 2005 known as the Southern Way Play Park. The project involved the local community and the staff and children at St Mary’s Church of England Primary Academy. The Southern Way and St Mary’s Community Association was set up to facilitate the project and was chaired by the Chief Executive of the school. Pupils from the Academy were involved in the whole process including choosing all the equipment installed in the play area. The community group no longer assists, passing a small one-off maintenance budget to FHDC. The play park has been in constant use since the renovations were completed.

Hythe Rural

- 5.28 Lympne Village Hall Playground is designed for younger children and there is currently a group who are fundraising to add new play equipment and skate facilities.

Hythe

- 5.29 Hythe has a skatepark known as The Hythe Golden Jubilee Skatepark, located close to the Cricket Ground, near Wakefield Walk within South Road Recreation Ground. Recently Hythe Town Council installed two new pieces of equipment a grind box and rail. The Skatepark has its own Facebook page. Hythe also has numerous play areas distributed across the town.

North Downs East

- 5.30 Hawkinge has several newer play areas serving the recent housing developments and containing a range of equipment. These are located at Stombers Lane, Campbell Road, Proctor Walk, Kettle Drive, Haven Drive, Millfield, St Luke’s Walk, Megone Close, Heron Forstal Avenue, Harvest Way, and Blenheim Drive. King George V Play Area is a fenced site located in Elham, and benefits from a range of modern play equipment to suit all ages. There are flat, cradle and basket swings, two slides, climbing areas, zip slide as well as seating and picnic areas. There is also a football pitch with goals.

Romney Marsh

- 5.31 Dymchurch Recreation Ground includes a play area which contains several innovative forms of equipment together with a De Haan Charitable Trust funded multi use games area.

Walland and Denge Marsh

- 5.32 The triangular common in Lydd is known as the Rype, and was given to the men of Lydd by the Archbishop of Canterbury in 905AD for having repulsed the Danes. It is now managed by Lydd Town Council and contains a popular play area. There has been recent investment through trust funds including those from the De Hann Charitable Trust which have transformed the play facility.

6 The Strategy

- 6.1 This section sets out the vision and objectives for future play provision in Folkestone & Hythe District. These have been informed through consideration of existing levels of play in the district together with understanding the current management context. Funding and developer contributions are discussed separately.

Vision

- 6.2 F&HDC acknowledges the importance of play to the health and well-being of its residents. F&HDC is therefore committed to ensuring all residents are able to access high quality and high value play provision. Subsequently F&HDC's vision for play provision is as follows:

Play experiences are fundamental to the health and development of children and young people. Folkestone & Hythe District Council will therefore seek to ensure all residents are able to access a high quality and high value play area. We will work with town and parish councils, together with other providers, to create play spaces which offer challenging and exciting environments for children and young people of all ages and abilities.

Applying Play Area Provision Standards

The *Shepway Play Area Review (2017)* provides an assessment of play areas in the district in terms of quantity, accessibility, location, value and quality.

National guidance suggests that play strategies should be based on locally derived standards. These standards are determined through analysis of existing provision of play spaces, consideration of local and national standards for play and an understanding of local need. The proposed standards for Folkestone & Hythe District are set out in the *Shepway Play Area Review (2017)* and **Section 4** of this Strategy.

F&HDC acknowledges that, due to ongoing financial constraints facing local authorities, achieving these standards in Folkestone & Hythe District will be a challenge. It is therefore proposed that any investment will be prioritised on the management and enhancement of play areas where there is considered greatest need i.e. play spaces located in areas with the largest concentration of children and young people. Based on this assessment 9 play areas have been identified as being priorities for F&HDC known as **Priority Play Areas (PPAs)**. The Strategy identifies another 5 PPA's within the district in other ownership. F&HDC will work with town and parish councils to identify priority play spaces in their areas.

In addition F&HDC will work in partnership with parish and town organisations, together with housing trusts and other community groups, to deliver a network of **Strategically Important Play Areas (SIPAs)**. The network of SIPAs has been identified with the aim of ensuring the majority of the district's residents live within a 15 minute walk of a high quality and high value play area. FHDC will look to transfer these sites to the Town and Parish Councils who are best placed to provide these facilities for their local residents.

Those play areas not considered to be part of this network will be known as **Non-Strategic Play Areas (NSPA)** and will be offered to F&HDC's partners as part of an asset transfer. If after one year no interested parties come forward, play equipment will be removed from these play areas and the ground returned to open space.

Appendix 2 outlines those sites which form part of the PPA, SIPA and NSPA network with locations shown within **Appendix 3**.

NB In reference to national guidance, proposed local standards should strive to be met in the first instance with the accessibility requirement that residents across the district will live within 15 minute walk of a play area. Many will live closer than a 15 minute walk. It is deemed reasonable provision within easy reach for all age groups. As a visual guide the Destination Play Space accessibility threshold of 1000m represents a 15 minute walk and caters for a range of age groups including 0 to 11+.

6.3 To achieve the Vision, F&HDC will deliver the following objectives.

Objectives

6.4 The *Shepway Play Area Review (2017)* identified a need to take a strategic approach to future play area provision in the district. The following objectives and supporting action plan (see **Section 7**) have been informed by the findings of the Play Area Review, which involved desk based analysis, stakeholder consultation and an audit of play areas. Each play area in the district was assessed to record:

- Location: Safety and security, accessibility (including disabled access) and extent of use.
- Quantity: Amount of play areas by classification.
- Quality: Care and maintenance of equipment and facilities.
- Value: Provision of equipment offering a variety of challenging play and movement incorporating natural features and offering value to a range of age groups and abilities.
- Accessibility: FiT guidance²⁵ provides a benchmark for accessibility catchments.

Objective 1: Improve the location, quality, value and accessibility of play provision for all children and young people.

To be achieved by:

1. Referring to the **standards within the *Shepway Play Area Review (2017)*** and set out in **Table 4.1** of this Strategy when planning play area enhancement projects. It will be important to ensure any new residential development in the district provides or contributes towards sufficient play space to achieve the play area standards. New play provision should cater for children and young people of all ages based on the characteristics of the population within the proposed development as well as to meet any deficiencies within the wider area. F&HDC will also strive to improve the location, quality, value and accessibility of each play area. Where appropriate recommendations for play areas are set out within the action plan (see **Section 7**).
2. Continuing to **maintain and seeking to enhance the Priority Play Areas (PPAs)** as identified in this Strategy.
3. **Supporting the provision of a network of Strategically Important Play Areas (SIPAs)** to ensure the majority of the district's residents are within a 15 minute walk of a high quality and high value play space, which meets the needs of the community.
4. Ensuring the provision of new play areas considers the **design principles** outlined in Play England's *Design for Play: A Guide to Creating Successful Play Spaces (2008)*, which advocates that "a successful play space is a place in its own right, specially designed for its location, in such a way as to provide as much play value as possible."²⁶

²⁵ Fields in Trust, 2015. *Guidance for Outdoor Sport and Play – Beyond the Six Acre Standard* [pdf] available at: <<http://www.fieldsintrust.org/Upload/file/PAD/FINAL%20ONLINE%20Planning%20Guidance%20for%20Outdoor%20Sport%20and%20Play%20Provision%20Oct%202015.pdf>> [Accessed 8 September 2016].

²⁶ Play England, 2008. *Design for Play: A Guide to Creating Successful Play Spaces* [pdf]. Available at: <<http://www.playengland.org.uk/resource/play-naturally-a-review-of-childrens-natural-play/>> [Accessed 02 February 2017].

5. **Creating additional play sites** where there is an identified lack of provision in the SIPA network. These will be delivered in partnership with others and as part of new developments.
6. Offering Strategically Important Play Areas (SIPA's) as identified within this Strategy to the Town and Parish Council's, community groups and partners as part of an **asset transfer**.
7. Offering Non-Strategic Play Areas as identified within this Strategy to Town and Parish Councils, the community and partners as part of an **asset transfer**. Where an asset transfer is not possible, the play area will be removed and returned to open space. Reference should be made to the *Asset Management Strategy 2017-2022*²⁷.
8. Incorporating **play opportunities for all age groups and abilities** in the design of new or refurbished play spaces.
9. **Conducting an audit of play provision every ten years** in reference to the previous Play Area Review assessments and in accordance with the latest best practice guidance.

Objective 2: Effectively utilise planning policy to benefit play provision.

To be achieved by:

1. Using planning policy to **support a response to addressing the identified need** for play in the district and to take a strategic approach to provision, enabling targeted improvements to the quality and value of play areas across Folkestone & Hythe District.
2. **Embedding the principles of the PPA and SIPA network**, together with the play area standards (as set out in **Table 4.1**), within F&HDC's development plans. This in turn will inform the collection of contributions for on-site and off-site Section 106 contribution requests.

Objective 3: Raise awareness of play opportunities and the importance of play.

To be achieved by:

1. **Improving promotion of the distribution and features of play areas** throughout the district. Methods could include producing an online map, newsletters and leaflets to be distributed at children's centres, schools, libraries and youth facilities.
2. **Creating greater awareness of the benefits of play** to a child's development. This could be achieved through promotional material and supporting parent/carers to access play provision.
3. **Highlighting the risk benefit approach** during the play area decision making process.
4. **Promoting natural play opportunities** and highlighting their importance and value.

Objective 4: Maximise funding opportunities for the maintenance and enhancement of play areas.

To be achieved by:

1. **Reviewing appropriate developer contributions** and re-evaluating formulae for maintenance contributions to ensure that these are sufficient to meet the costs of wear and tear during the play areas life time (25 years).
2. **Utilising design guidance** to formulate a landscape approach to play which reduces annual maintenance costs and provides a challenging and exciting space for children and young people of all ages and abilities.

²⁷ Shepway District Council, 2017. *Asset Management Strategy 2017-2022* [pdf]. Available at: <https://www.shepway.gov.uk/moderngov/documents/s24160/ros20170711%20app%20%20to%20asset%20management.pdf> [Accessed 04 October 2017].

3. Ensuring **Section 106 planning obligations** are secured to enable the delivery of appropriate play improvements to the network of SIPAs and/or PPAs at or close to the proposed development.
4. **Securing funding through CIL.** It will be important for Engineering & Buildings to ensure that Destination play areas are included on the “123” list which will define CIL spending across the district. CIL will also be used to secure the future of key play sites across the district. CIL contributions could also be used to support parish and town councils deliver play area improvement projects.
5. Seeking **alternative funding initiatives**, such as government funding schemes and Landfill Communities Fund, to support play area enhancement projects. Other funding sources may be identified through searching online with GRANTfinder and through the Association of Play Industries.
6. Using the **Shepway Play Area Review (2017)** and the results of the play area assessments to prioritise funding to PPA sites.
7. **Dowry payments** will be made available from FHDC on completion of transferring SIPA and NSPA play areas. Dowry payments will be calculated on the basis of the next five years maintenance amount that the Council would be liable for. Calculation would include an amount to rectify any outstanding faults, 5 years maintenance, 5 years inspections and an amount per year for vandalism. The Dowry payment may be reduced if there is S106 money available on transfer.

Objective 5: Communicate and engage with key partners and stakeholders.

To be achieved by:

1. **Consulting on the findings of the Shepway Play Area Review.**
2. **Consulting with parish and town councils on Strategic Play Areas (SIPA) and Non-Strategic Play Areas (NSPA)** to identify opportunities for asset transfer of play areas.
3. **Encouraging Friends and community groups** to support the development and enhancement of play spaces across the district, by tapping into funding schemes that F&HDC is unable to access.
4. **Encouraging management companies and parish and town councils** to take ownership of local play areas.
5. Making reference to actions and recommendations within the forthcoming **Heritage Strategy for Shepway together with the draft Destination Management Plan for Shepway – Folkestone, Hythe, Romney Marsh and North Downs – Executive Summary 2016-2020 (2016)**²⁸.
6. **Engaging in a programme of consultation with users and residents** to ensure proposed play area improvement projects are responding to local need. A comprehensive programme of consultation will also encourage positive community participation in the delivery of local projects.
7. **Strengthening links with the South Kent Coast Health and Wellbeing Board.** Seek opportunities to secure funding for health and well-being priorities. The benefits offered by good quality open space should be promoted to this Board as a potential mechanism for delivering its objectives.

Objective 6: Ensure appropriate and regular communication and review.

To be achieved by:

²⁸ Shepway District Council, 2016 *Draft Destination Management Plan for Shepway – Folkestone, Hythe, Romney Marsh and North Downs – Executive Summary 2016-2020* [pdf]. Available at: <<http://folkestone.works/wp-content/uploads/2016/10/Shepway-Destination-Management-Plan-Draft-Executive-Summary-03.10.16.pdf>> [Accessed 02 May 2017].

1. **Ensuring data is maintained and kept up to date** so that it can be used to support decision making, strategy and funding applications. F&HDC Environment & Corporate Assets and Communities will put in place a system for ensuring data is updated as changes occur and reviewed on a regular basis.
 2. **Sharing information**, including the findings of the Play Area Review and Strategy, with other F&HDC departments and organisations. This will support a strategic approach to play area provision which is based on existing data and current policy and thinking.
 3. **Ensuring appropriate consultation** with the community prior to the removal or any significant alteration of play areas.
- 6.5 Further actions which will support the vision and objectives set out above are contained within **Section 7** of this Strategy.

Funding and developer contributions

- 6.6 F&HDC's Engineering & Buildings Service is under pressure from increasing budget demands. In response, the Service is considering options to support day-to-day maintenance operations and one-off improvement projects. However there is a range of external funding schemes that could be used to support the maintenance and enhancement of play areas in Folkestone & Hythe District. The following paragraphs outline possible sources of external funding.

Landfill Communities Fund

- 6.7 The Landfill Communities Fund is a tax credit scheme which enables landfill operators to support the delivery of community projects. The Fund is available to community groups, charities and other voluntary organisations. At present there are limited community groups and charities actively involved in the management of play areas in the district. An exception is the Folkestone Parks & Pleasure Grounds (FPPG) Charity, which aims to ensure the maintenance of parks and recreation grounds in Folkestone and Sandgate are managed appropriately. Open spaces that fall under the FPPG Charity include:
- Canterbury Road Recreation Ground, Folkestone
 - Morehall Recreation Ground, Cherry Garden Lane, Folkestone
 - The Lower Leas Coastal Park, Folkestone
 - Radnor Park, Folkestone
 - Jocks Pitch, East Cliff, Folkestone
- 6.8 The Landfill Communities Fund is not available to local authorities or parish and town councils.
- 6.9 Friends groups have the potential to support the management and enhancement of play provision in Folkestone & Hythe District, through raising funds for capital investment. However the council has limited capacity to support the development of new groups.

Ward Member Grants and Trust Funds

- 6.10 Each Ward Member holds a fund which may be used to support projects within their ward.
- 6.11 A number of sites have received recent investment through trust funds including those from The Roger De Hann Charitable Trust supported by local groups and town and parish councils.

Section 106 planning obligations and Community Infrastructure Levy

- 6.12 F&HDC receives funding for open space improvements through the collection of 'Section 106 planning obligations and contributions'. Section 106 planning obligations or 'commuted sums' are legal agreements negotiated by the local planning authority with the developer (or landowner) of a proposed development. In relation to the provision of play areas, commuted sums must be spent on improvements at existing sites at or close to the development that gave rise to the funding. Recommendations that are in compliance with the relevant planning policy are put to the Area Committee in which the development occurred. Commuted sums in the form of Section 106 are

critical to the enhancement and development of play areas across Folkestone & Hythe District. Contributions secured through Section 106 can be used as match funding to support the delivery of larger projects.

- 6.13 Section 106 planning obligations sit alongside the Community Infrastructure Levy (CIL), described below, but will be restricted to the infrastructure required to directly mitigate the impact of a proposal. Further information on Section 106 planning obligations is available on the Folkestone & Hythe District Council website²⁹.

Community Infrastructure Levy

- 6.14 Improvement projects for parks and play areas may also be funded through the collection of CIL. CIL charges are based on simple formulae that relate to the size and character of the associated development. The proceeds from the levy can be spent on local and sub-regional infrastructure, including parks and play areas. F&HDC's Regulation "123" list defines the type of infrastructure and projects that will be funded through CIL in the district. The funding can be directed to parish and town council's to deliver projects within their jurisdiction. Further information on CIL is available on the Folkestone & Hythe District Council website²⁹.

CASE STUDY: Hawkinge Town Council

"Hawkinge Town Council had Section 106 funds available for community projects and after consultation with the local community we were looking for sites to install some multi use games areas on.

We contacted Folkestone & Hythe District Council and arranged to take over the management and control of five open and play spaces. We have provided two multi user sports areas and other outdoor fitness equipment at some of the sites.

The advantage of having control of the sites for us is that we can maintain them to a high standard for the local community and it gives us flexibility over how they are used.

The regular maintenance is included within our grounds maintenance contract and funds were transferred to us on a sliding scale which helped incorporate the future maintenance in our budget.

We have since taken on five additional open/play spaces from the developers. These sites are also included in our grounds maintenance contract meaning that we work hard to maintain them to a good standard for local residents to enjoy. The more sites we incorporate into our maintenance contact, the better deal we can negotiate.

We have taken ownership of the amenities in our community and this helps us create a sense of buy-in from the community who help with litter picking and other volunteering."

Provision of play facilities and enhancement

- 6.15 New play area provision will be considered where there is a new development and a planned increase in population, and/or an existing deficiency in supply or access to facilities exists.
- 6.16 Sufficient supply or under supply of play areas for each agreed area or ward can be calculated based on the standards in **Table 4.1**. The amount of play facilities required for the increased population can also be calculated using the quantity standards. The use of the quantity standards should be considered alongside the access standards. For example, even though quantity standards may be met locally, there may be gaps in access and therefore new provision may still be required.
- 6.17 The *Shepway Play Area Review (2017)* and **Appendix 3** provides mapping which show where there are deficiencies and potential over supply of play facilities. This information can be used alongside

²⁹ Shepway District Council website, 2017. *Community infrastructure Levy (CIL)*. Available at: <<https://www.shepway.gov.uk/planning/planning-policy/community-infrastructure-levy>> [Accessed 08/06/2017]

the quantity standards to determine if new provision of a particular classification should be provided or improved accessibility is required. These gaps could be met by a residential development.

Delivering new provision and enhancements to existing provision

- 6.18 The future provision of play in Folkestone & Hythe District will be guided by locally derived standards as set out in Table 4.1. These standards have been developed through the Shepway Play Area Review (2017) and will apply to proposals of over 10 dwellings. The locally derived standards setting out quantity and accessibility standards propose quantities of play space by play area classification which should be delivered on-site where feasible. Where full provision on-site would not be appropriate or desirable, the space needed may be met by commuted sum payment towards the provision or improvement of play space nearby on a scale related to the size and scale of the development.
- 6.19 In assessing the requirement for play space provision, this will be based on the number of properties with two or more bedrooms in the proposed scheme. The requirement for any proposed developments will be based on the current provision identified in the Play Area Review. For example, if a scheme is located within 240m of an existing LEAP, then a commuted sum could be provided to upgrade that facility to meet the additional demand from the new development. In some cases it may be appropriate for youth or adult equipment (such as 'outdoor gyms') to be provided.
- 6.20 Areas should be set out and located so as to minimise annoyance to nearby occupiers, maximise children's safety and be visible from neighbouring properties.
- 6.21 Any new play space should be transferred to and maintained in perpetuity by a management company or, if agreed, the local town or parish council, subject to payment of a commuted sum.
- 6.22 *The Places and Policies Local Plan, Submission Draft (2018)* contains Policy C4 Children's Play Space; which highlights current requirements for developer contributions, these closely relate to the latest Fields in Trust guidance. The standards aim to ensure any deficiencies are met, as well as providing for an increase in population with development.

Protecting existing play area provision or judging surplus to requirements

- 6.23 Reference should be made to the PPA, SIPA and NSPA approach, *Shepway Play Area Review (2017)* and the contribution criteria shown in **Table 4.2**.
- 6.24 F&HDC will seek to protect existing open spaces and play areas in line with the National Planning Policy Framework (NPPF). Any assessments for the loss of open space should draw on the latest F&HDC Open Space Strategy and Play Area Review/Strategy and the provision at that time in the first instance.
- 6.25 Development proposals that that would result in the loss of open spaces and play areas will be granted provided that:
1. An assessment has been undertaken which clearly identifies the play area is surplus to requirements; or
 2. The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of the standards in **Table 4.1** above; or
 3. The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Calculating on-site contributions:

- 6.26 The requirement for play areas and open space should be based upon the number of persons generated from the net increase in dwellings in the proposed scheme, using the average household occupancy rate in the UK of 2.32 persons per dwelling as derived from Census data. On this basis, 1,000 persons at 2.32 persons per household represent 431 dwellings.
- 6.27 To calculate the play area requirement by classification per dwelling, this is calculated by multiplying 431 (dwellings) x the appropriate provision per dwelling by classification (if appropriate).

6.28 Using NEAPs as an example, the recommended standard is 0.077 ha per 1,000 population (770 sq. metres per 1,000 population) or 431 dwellings. Therefore, by dividing 770 sq. metres by 431 dwellings a requirement for 1.79 sq. metres of LEAPs per dwelling is obtained for the district.

Calculating off-site contributions

6.29 Where it is not realistic for new provision to be provided on-site, it may be more appropriate to seek to enhance the existing quality of provision and/or improve access to sites. Standard costs for the enhancement of existing open space and provision of new open spaces should be clearly identified and revised on a regular basis by F&HDC.

6.30 Costs have been calculated using F&HDC costings information (informing policies LR9 (open space) and LR10 (equipped play areas)) and based on known industry standards. Contributions towards the provision or improvement of play areas are calculated using the capital cost of provision. Contribution per person is taken to be a reasonable measure of impact irrespective of whether there is new provision or improvement of existing facilities and features. A summary of the costs are outlined in **Table 6.3** below.

Table 6.1: Costs for providing equipped play areas

Classification of play areas	Standard m ² per person	Cost of provision per m ² (£)	Contribution per person (£)
Destination	0.03	170	5.10
Neighbourhood Equipped Areas for Play (NEAPs)	0.8	170	136.00
Local Equipped Areas for Play (LEAPs)	0.77	170	130.90
Local Areas for Play (LAPs)	0.05	170	8.50
Total contribution			280.50

6.31 F&HDC will seek to secure £280.50 per person to provide new play areas to meet the required standard. These calculations will be used to calculate developer contributions for on-site provision and where feasible any off-site projects.

Maintenance contributions

6.32 If a development is required to provide play areas on-site, the developer will normally be expected to maintain the play area for an agreed minimum period (typically one year). For larger open space sites a management plan should have been submitted and approved by F&HDC as a planning condition.

6.33 If the play area is to be adopted by the Council, a commuted sum may be accepted and arrangements made for management and maintenance of the play area through the council or third party. The amount payable for the commuted sum for all classifications of play area will be calculated using the figure of **£4.59 m² per annum** for all classifications of play area. The figure has been calculated from average unit rates for maintenance of different classifications of play areas drawn from *SPON'S External Works and Landscape Price Book (2017)*³⁰ as well as indicative maintenance costs supplied by F&HDC with appropriate inflationary uplift. Commuted sum to be reviewed as per action 2.6 in the Action Plan.

³⁰ AECOM (Editor), 2017. *SPON'S External Works and Landscape Price Book 2017: 36th edition*. Taylor and Francis: Abingdon

7 Action Plan

7.1 This section sets out the programme of actions which will be carried out to meet the vision for play in Folkestone & Hythe District. It lists each management objective, how each will be achieved and who is responsible for achieving them. Where appropriate a priority level is indicated and further considerations highlighted. The programme will be reviewed annually, and targets monitored to ensure actions have been achieved.

7.2 The essential actions have been prioritised on criteria of importance and urgency as follows:

- **Low:** Actions which have a low impact on play area provision
- **Medium:** Actions which have a moderate impact on play area provision
- **High:** Actions which have a significant impact on play area provision

Table 7.1: Action Plan

Objective 1: Improve the location, quality, value and accessibility of play provision for all children and young people					
Reference	Action	Implementation/Task if applicable	Resources	Priority	Notes & Considerations
1.1	F&HDC will continue to maintain and seek to enhance the Priority Play Areas (PPAs) as identified in this Strategy.		F&HDC	High	
1.2	Work with Town & Parish Councils to provide a network of Strategically Important Play Areas (SIPAs) based on a 15 minute walking time across the district that meets the needs of residents. FHDC will seek to transfer these assets to Town & Parish Councils with an appropriate Dowry payment. (See objective 4 of the strategy).		F&HDC	High	
1.3	The Non-Strategic Play Areas (NSPAs) identified will be offered out to Town and Parish Councils, the community and partners for asset transfer, and where this isn't possible will be removed and returned to open space. Where transfer can be agreed an appropriate Dowry payment will		F&HDC	High	

	be paid upon completion. (See objective 4 of the strategy).				
1.4	Ensure play areas meet or exceed the required location, quality and value score benchmarks.	Review findings and standards identified through the Play Area Review and Strategy.	F&HDC	Medium	
1.5	Ensure all Wards achieve the minimum standard for provision.	Ensure any new development provides sufficient play space to achieve the standard for quantity of play and should provide for all age groups where appropriate. NB Proposed standards shown in Table 4.1 .	F&HDC	Medium	
1.6	Where feasible residents should be within the catchment area of at least one play area offering features for all age groups and abilities.	Review accessibility buffers and classifications with the <i>Shepway Play Area Review (2017)</i> to inform F&HDC decision making. Where there is an identified lack of provision through gaps in the SIPA network the creation of additional play sites will be recommended, wherever possible, in partnership with others and as part of new developments.	F&HDC	Medium	There is currently generally good provision but some sections of the population are still not in reach of a play space. Broadmead and Folkestone Harbour have no provision for 11+ age groups with potential for greater quantities of 11+ provision in Cheriton and North Downs West.
1.7	Deliver current commitments to improve play areas including Radnor Park, Coastal Park as well as play areas within New Romney.		F&HDC	High	
1.8	Retain all Destination play areas as core hubs for play and offering well respected play experiences within the wider community.		F&HDC	High	Opportunities for expansion at the Royal Military Canal Area following Princes Parade Development.
1.9	Consider creating new Destination play areas.	Destination play areas should be located in or adjacent to larger open spaces. Consider options in East Folkestone, New Romney and Broadmead. Options at East Cliff and Morehall Recreation Ground which currently offer limited play interest for all age groups, and at The Greens or Greatstone Car Park. Options as	F&HDC	Medium	Destination play spaces are currently limited in terms of play value for all age groups. Reference should be made to actions and

		Dungeness Nature Reserve would cater for anticipated increase in use.			recommendations within the forthcoming Heritage Strategy for Folkestone & Hythe District and the draft <i>Destination Management Plan for Shepway – Folkestone, Hythe, Romney Marsh and North Downs – Executive Summary 2016-2020 (2016)</i> ³¹
1.11	Ensure Strategic/Destination quality play areas are provided within the Shorncliffe Garrison development.		F&HDC	High	
1.12	Seek opportunities to provide natural play features and alternatives to fixed play within informal open spaces including natural and semi-natural green space, green corridors and amenity green space.	Review those sites which are closed for maintenance or requiring enhancement in values referring to the <i>Shepway Play Area Review (2017)</i> .	F&HDC	Medium	Engage with RoSPA Playsafety to review designs ensuring they meet applicable standards, but also that they best suit the play space and budget.
1.13	Conduct an audit of play provision every 10 years.	Carry out regular audits in reference to the previous assessment and the latest best practice guidance.	F&HDC	Medium	Consider seasonal aspects and variation of use
1.14	Address the barriers to access and comply with the Equality Act (2010) through a disability and access audit.	Produce a disability and access audit for new sites or those sites due for refurbishment.	F&HDC /Land managers	Low	
1.16	Increase the level of play provision for the 11+ age group.	Refer to the <i>Shepway Play Area Review (2017)</i> and coordinate future decisions with reference to the contribution criteria shown in Table 4.2 .	F&HDC	Medium	
1.17	Greater investment required in the management, maintenance and improvement of play spaces throughout the district	Refer to the <i>Shepway Play Area Review (2017)</i> and coordinate future decisions with reference to the contribution criteria shown in Table 4.2 .	F&HDC	High	F&HDC can't afford to manage the current levels of provision.

³¹ Shepway District Council, 2016. *Draft Destination Management Plan for Shepway – Folkestone, Hythe, Romney Marsh and North Downs – Executive Summary 2016-2020* [pdf]. Available at: <<http://folkestone.works/wp-content/uploads/2016/10/Shepway-Destination-Management-Plan-Draft-Executive-Summary-03.10.16..pdf>> [Accessed 02 May 2017].

1.18	Review maintenance arrangements to ensure high standards are achieved.		F&HDC	High	
1.19	Improve supervision, policing and oversight (e.g. through appropriate vegetation clearance) of public space.		F&HDC	High	
1.20	New play areas should be sensitively designed to reflect sensitivities of landscapes as well as character of the local Kent coastal area.		F&HDC/Land managers	Medium	Future play provision should follow the latest best practice guidance to ensure play spaces are suitable for all abilities and age groups.
1.21	Encourage the community to report issues relating to play areas to F&HDC to enable a quick response to problems.	Advertise appropriate contact details within play areas.	F&HDC	Low	
Objective 2: Effectively utilise planning policy to benefit play provision					
Reference	Action	Implementation/Task	Resources	Priority	Notes & Considerations
2.1	Through housing development sites look to enhance current provision for the benefit of both the existing and new community as well as creating new play areas.		F&HDC	High	
2.2	Increase communication and closer working between the planning team and E&B team.		F&HDC	High	
2.3	Consider the appropriateness of LAPs (increased maintenance costs) at some locations where other classifications of play areas are suitably catering for younger age groups within its catchment.	Refer to the <i>Shepway Play Area Review (2017)</i> and coordinate future decisions with reference to the contribution criteria shown in Table 4.2.	F&HDC	Medium	
2.4	Aim to create a Supplementary Planning Document (SPD) document: Recreation Open Space Provision & Commuted Space Payments.		F&HDC	Low	This process could take considerable time and will require consultation.

2.5	The E&B and planning teams should work together to re-evaluate developer contributions.		F&HDC	Medium	
2.6	Re-classify and/or review sites for new policy formation.	Refer to the <i>Shepway Play Area Review (2017)</i> .	F&HDC	Medium	
2.7	Seek opportunities to secure land for play area provision.		F&HDC	Medium	
2.8	Create and use policy to support a response to identified need and take a district wide strategic approach to play. This will enable targeted improvements to the quality and value of sustainable play provision across Folkestone & Hythe District.		F&HDC	High	Further useful information within Play England guidance <i>Better Places to Play Through Planning (2009)</i> ³²
Objective 3: Raise awareness of play opportunities and the importance of play					
Reference	Action	Implementation/Task	Resources	Priority	Notes & Considerations
3.1	Future plans should be disseminated clearly to the public.	Media options to share information on future plans: <ul style="list-style-type: none"> • existing play facilities • newsletters and leaflets • posters • children's centres, schools and youth facilities • libraries • local authority website • local media (TV, radio and newspapers) 	F&HDC	High	DCSF has produced Outdoor play: A communications toolkit for local authorities (see: http://webarchive.nationalarchives.gov.uk/20090813152455/http://www.dcsf.gov.uk/campaigns/outdoor_play/index.cfm). The toolkit is designed to help authorities to engage with local parents and communities on issues relating to outdoor play.

³² Play England, 2009. *Better Places to Play Through Planning* [pdf]. Available at: <<http://www.playengland.org.uk/media/82621/better-places-to-play-through-planning.pdf>> [Accessed 12 June 2017].

3.2	Support parent/carers to access play provision; for example through publicising existing play areas with an online map.	Produce an online map of existing provision and make available to schools, play providers and other outlets.	F&HDC	Medium	
3.3	Highlight the risk benefit approach during the play area decision making process.		F&HDC	Low	
3.4	Natural play opportunities and their importance and value should be encouraged.		F&HDC	High	
Objective 4: Maximise funding opportunities for the maintenance and enhancement of play areas					
Reference	Action	Implementation/Task	Resources	Priority	Notes & Considerations
4.1	Review capital investment and separate play budget to inform capital plan for ageing equipment.	Refer to the <i>Shepway Play Area Review (2017)</i> and coordinate future decisions with reference to the contribution criteria shown in Table 4.2 .	F&HDC	Medium	
4.2	Maximise and protect the potential of Section 106 (S106) and Community Infrastructure Levy (CIL) Funding.		F&HDC	High	Utilise scores by ward contained within the <i>Shepway Play Area Review (2017)</i> and present data to town and parish councils. Opportunity to link to CIL revenue.
4.3	Review appropriate developer contributions.		F&HDC	High	
4.4	Seek fundraising opportunities and funding through the Landfill Communities Fund. Other funding sources may be identified through searching online with GRANTfinder and through the Association of Play Industries.		F&HDC	Medium	Grantfinder: http://www.idoxgroup.com/funding-solutions/professional-funding-tools/grantfinder.html API: http://www.api-play.org/resources/funding

4.5	Seek Government funding schemes if available.		F&HDC	High	Government funding towards pathfinder and playbuilder developments through the Play Strategy is intended to enhance and improve local authority provision. Local authorities should not be using this funding to replace or otherwise scale back on local play funding and budgets.
4.6	The E&B service should work to ensure Destination play areas are included in the 123 list to shape and define CIL funding.		F&HDC	High	
4.7	Re-evaluate formulae for maintenance contributions.		F&HDC	Medium	
4.8	Utilise design guidance to formulate a landscaped approach which reduces maintenance costs and provides an interesting space for play.		F&HDC	Medium	
4.9	Potential for reduction in LAPs and subsequent maintenance liability.	Refer to the <i>Shepway Play Area Review (2017)</i> and coordinate future decisions with reference to the contribution criteria shown in Table 4.2 .	F&HDC	Low	
Objective 5: Communicate and engage with key partners and stakeholders					
Reference	Action	Implementation/Task	Resources	Priority	Notes & Considerations
5.1	Consultation of SIPAs & NSPAs for asset transfer options. Potential stakeholders invited to presentation sessions.		F&HDC	High	
5.2	Work with town and parish councils to ensure there is suitable play provision		F&HDC	High	Further useful information within Play England guidance <i>Parish</i>

	within their area of interest and encourage local ownership.				<i>councils and children's play – Community play briefing 7 (2011)</i> ³³
5.3	Engage in a programme of user and resident consultation to understand if proposals would be responded to positively and reflect community need. It will also encourage positive community participation in the delivery of local projects.		F&HDC	High	
5.4	Collaborate with providers.		F&HDC	Medium	
5.5	If decommissioning sites are proposed, consultation with stakeholders including adjacent residents will be required.		F&HDC	Medium	
5.6	Work with other play providers such as Housing Associations and the MoD to ensure their provision is secured.		F&HDC	Medium	
5.7	Encourage responsibility through Trusts and Residents Groups.		F&HDC	Medium	
5.8	Encourage community groups to take responsibility for supervising and maintaining play areas alongside community fundraising.		F&HDC	Medium	Further useful information within Play England guidance <i>Managing play provision in the community and voluntary sector – Community play briefing 6</i> ³⁴ . For information about the Engaging Communities in Play programme visit: www.playengland.org.uk/our-

³³ Play England, 2011. *Parish councils and children's play – Community play briefing 7* [pdf]. Available at: <http://www.playengland.org.uk/media/283002/parishcouncils_ver4%20-%20final.pdf> [Accessed 12 June 2017].

³⁴ Play England, 2011. *Managing play provision in the community and voluntary sector – Community play briefing 6* [pdf]. Available at: <http://www.playengland.net/wp-content/uploads/2015/09/managingplay_ver4-final.pdf> [Accessed 12 June 2017].

					work/engaging-communities-in-play
5.9	Strengthen links with the South Kent Coast Health and Wellbeing Board. They may assist in allocating funding for health and well-being priorities. The benefits offered by good quality open space should be promoted to this Board as a potential mechanism for delivering its objectives.		F&HDC	Medium	
Objective 6: Ensure appropriate and regular communication and review					
Reference	Action	Implementation/Task	Resources	Priority	Notes & Considerations
6.1	Implement the Strategy and make available to staff at all levels and by different stakeholders.		F&HDC	High	
6.2	Ensure effective monitoring of the Strategy.	A partnership between Environment and Corporate Assets and Communities should put in place a system for ensuring that data is updated as changes occur and reviewed on a regular basis.	F&HDC	Medium	
6.3	Ensure management is financially sound. F&HDC to commit to provide necessary funding to maintain to necessary standard.		F&HDC	Medium	
6.4	Provide a presentation to Planning colleagues on the new Play Area Strategy.		F&HDC	Medium	
6.5	Ensure that if sites are to be removed or altered significantly there should be appropriate consultation with the community.		F&HDC	High	

8 Evaluation plan

- 8.1 This section describes how the Strategy will be used and the arrangements for its ongoing review and monitoring.

Outcomes

- 8.2 At a national level, play is increasingly recognised as being important not only in its own right but also in helping to achieve wider objectives including the development of healthy, vibrant and sustainable communities. The benefits of children's play are closely linked to the five outcomes for children and young people that form the core of Every Child Matters, namely: being healthy, staying safe, enjoying and achieving, making a positive contribution and achieving economic well-being. The *Shepway Play Area Review (2017)* and supplementary Strategy aims to address issues and targets based upon the current evidence base.

Benchmarks

- 8.3 It will be necessary to co-ordinate ongoing data collection as required and evaluate performance against strategic indicators and benchmarks which are set as outlined further within the *Shepway Play Area Review (2017)*.

Indicators

- 8.4 To effectively review the Strategy, F&HDC will aim to monitor performance by agreed indicators as listed below. The data collection for local play indicators should seek to measure the extent to which children and young people have access to spaces and facilities for play and informal recreation that:

1. Are free of charge, allowing children the freedom to come and go, and where children are free to play as they choose (the 'three frees');
2. Are accessible, welcoming and engaging for all, including those who are disabled or have specific needs and wishes;
3. Allow for the needs of different ages of children.

- 8.5 Potential key Play England indicators and corresponding data collection methods are as follows:

- Participation – household survey
- Access to a variety of facilities and spaces – open space and play strategy audits
- Quality of facilities and spaces – quality assessment tool, GIS mapping
- Satisfaction – Questionnaire survey of children and young people

Review

- 8.6 This Strategy and action plan will be monitored through F&HDC's Performance Management Framework and reviewed at least annually. This will include an assessment of progress against targets and whether these need to be modified in the light of changing circumstances. Changes to relevant legislation, funding, linked strategies and planning will be noted and the Strategy modified as appropriate.

8.7 The cycle for the Strategy is to:

- Write and adopt the Strategy
- Operate according to the aims and objectives held within the Strategy
- Monitor the operation of the Strategy
- Review the working of the Strategy
- Revise and improve the Strategy where necessary to reflect on-going developments such as further consultation findings, changes to sites and revised financial circumstances and projections.

8.8 The Strategy covers a period of 10 years up to 2030. It will be subject to continual review as it is used and F&HDC will carry out a full review annually to enable any improvements and alterations to be made as necessary.

Appendix 1: Workshop attendees

Name	Organisation
Cllr; Berry, Ann	F&HDC
Cllr; Dearden, Malcolm	F&HDC
Cllr; Hollingsbee, Jenny	F&HDC
Cllr; Lawes, Mary	F&HDC
Karen Lewis	Dymchurch Parish Council
Neil Jones	Folkestone Town Council
Lynne Martin	Hawkinge Town Council
Nick Hilditch	Hythe Town Council
Ben Geering	F&HDC- Head of Planning
Andy Blaszkowicz	F&HDC- Head of Commercial and Technical Services
Sarah Robson	F&HDC- Head of Communities
Karen Weller	F&HDC- Environmental Protection
Jess Harman	F&HDC- Communities Officer
Laura Pinkham	F&HDC- Grounds Maintenance Manager
Piran Cooper	F&HDC- Landscape and Urban Design Officer
Rebecca Chittock	F&HDC- Planning Policy
Isabelle Hills	F&HDC- Planning Policy
Jo Clifford	Folkestone Sport Centre
Ivan Rudd	KCC- Public Health Specialist
Brigitte Orasinski	Strange Cargo
Jon Clarke	East Folkestone Together
Matthew Parkhill	LUC
Sebastian West	LUC

Appendix 2: Ownership, management responsibilities and classifications of play areas

Site ID	Site name	Classification	Ownership/Management	SIPA or NSPA	PPA
1	Atkinson Road Play Area	Type A: LAP	Hawkinge Town Council	NSPA	
2	Blenheim Drive	Type A: LAP	F&HDC	NSPA	
3	Brabner Park	Type C: NEAP	F&HDC	SIPA	PPA
4	Brockhill Country Park	Type D: Destination	Kent County Council	SIPA	PPA
5	Bufs Avenue	Type B: LEAP	Ministry of Defence	SIPA	
6	Burmarsh Recreation Ground Play Area	Type C: NEAP	Burmarsh Children's Fund	SIPA	
7	Campbell Road Play Area	Type B: LEAP	Hawkinge Town Council	NSPA	
8	Canterbury Road Recreation Ground	Type C: NEAP	F&HDC	SIPA	PPA
9	Cheriton Recreation Area	Type C: NEAP	F&HDC	SIPA	PPA
10	Coniston Road (Summer Lees)	Type A: LAP	F&HDC	SIPA	
11	Corbett Road Play Area	Type B: LEAP	Hawkinge Town Council	NSPA	
12	Country's Field	Type A: LAP	Orbit Housing Association	SIPA	
13	Daglish Close	Type B: LEAP	Southern Housing Group	NSPA	
14	Densole Way	Type B: LEAP	F&HDC Housing	SIPA	
15	Downs Road	Type A: LAP	F&HDC	SIPA	
16	Dymchurch Recreation Ground	Type C: NEAP	Dymchurch Parish Council	SIPA	PPA
17	Elmfields	Type B: LEAP	F&HDC Housing	SIPA	
18	Enbrook Valley Play Area	Type B: LEAP	F&HDC	SIPA	
19	Etchinghill Cricket Field	Type B: LEAP	Lyminge Parish Council	SIPA	
20	Fairfield Recreation Ground	Type C: NEAP	New Romney Town Council	SIPA	PPA
21	The Rype	Type C: NEAP	Lydd Town Council	SIPA	PPA
22	Firs Lane	Type A: LAP	F&HDC	NSPA	
23	George Gurr Crescent	Type B: LEAP	F&HDC	NSPA	
24	Grange Road Play Park	Type C: NEAP	Saltwood Parish Council	SIPA	
25	Greatstone Car Park	Type C: NEAP	F&HDC	SIPA	
26	Harvest Way	Type B: LEAP	F&HDC	NSPA	
27	Heron Forstall Avenue	Type B: LEAP	F&HDC	NSPA	
28	Horn Street	Type B: LEAP	Hythe Town Council	SIPA	
29	Hythe Skate Park	Type C: NEAP	Hythe Town Council	SIPA	
30	Ivychurch Play Area	Type B: LEAP	Ivychurch Parish Council	SIPA	
31	Jefferstone Lane	Type B: LEAP	St Mary in the Marsh Parish Council	SIPA	
32	Jocks Pitch	Type A: LAP	F&HDC	SIPA	PPA
33	Jubilee Field	Type C: NEAP	Lyminge Parish Council	SIPA	
34	Kettle Drive Play Area	Type C: NEAP	Hawkinge Town Council	SIPA	
35	King George V Playing Field	Type C: NEAP	Elham Parish Council	SIPA	
36	Lade Fort	Type B: LEAP	F&HDC	SIPA	
37	Lower Leas Coastal Park Fun Zone	Type D: Destination	F&HDC	SIPA	PPA
38	Lower Radnor Park Play Area	Type B: LEAP	F&HDC	SIPA	
39	Lympne Village Hall	Type B: LEAP	Lympne Parish Council	SIPA	
40	Manor Farm Close	Type B: LEAP	F&HDC	SIPA	
41	McKenzie Drive	Type B: LEAP	Ministry of Defence	NSPA	

42	Meads Way	Type A: LAP	F&HDC	SIPA	
43	Megan Close	Type A: LAP	F&HDC	SIPA	
44	Megone Close Play Area	Type A: LAP	S106 - With Developer (overgrown/disused)	NSPA	
45	Meriden Walk	Type B: LEAP	F&HDC	SIPA	
46	Millfield	Type A: LAP	F&HDC Housing	NSPA	
47	Moore Close	Type A: LAP	F&HDC Housing	SIPA	
48	Morehall Recreation Ground	Type B: LEAP	F&HDC	SIPA	
49	Mount Pleasant Close	Type A: LAP	F&HDC	NSPA	
50	Naseby Avenue	Type A: LAP	F&HDC	SIPA	
51	Newchurch Playing Field	Type B: LEAP	Newchurch Parish Council	SIPA	
52	Newington Village Hall	Type B: LEAP	Newington Parish Council	SIPA	
53	Oak Drive	Type B: LEAP	F&HDC	SIPA	
54	Oakham Drive	Type B: LEAP	F&HDC	NSPA	
55	Oaklands	Type B: LEAP	Hythe Town Council	NSPA	
56	Palmarsh (St George's Place Play Area)	Type B: LEAP	F&HDC Housing	SIPA	
57	Pannell Drive Play Area	Type C: NEAP	Hawkinge Town Council	SIPA	
58	Payers Park	Type B: LEAP	F&HDC	SIPA	PPA
59	Peregrine Close	Type A: LAP	F&HDC	NSPA	
60	Pine Way	Type B: LEAP	F&HDC	NSPA	
61	Pond Hill Road	Type A: LAP	Ministry of Defence	SIPA	
62	Queensway	Type B: LEAP	F&HDC	SIPA	
63	Reachfields	Type B: LEAP	F&HDC Housing	NSPA	
64	Rhodes Minnis Recreation Ground	Type B: LEAP	Lyminge Parish Council	SIPA	
65	Roman Way	Type B: LEAP	F&HDC	SIPA	
66	Royal Military Canal Play Area	Type D: Destination	F&HDC	SIPA	PPA
67	Salthouse Close	Type B: LEAP	F&HDC Housing	SIPA	
68	Sandgate Recreation Ground	Type C: NEAP	Sandgate Parish Council	SIPA	
69	St. Luke's Walk Play Area	Type A: LAP	Hawkinge Town Council	NSPA	
70	Station Road	Type B: LEAP	F&HDC	SIPA	
71	Stomers Lane	Type B: LEAP	F&HDC	NSPA	
72	Swan Lane	Type B: LEAP	Sellindge Parish Council	SIPA	
73	Tayne Field	Type B: LEAP	Lyminge Parish Council	NSPA	
74	Tayne Field (adjacent public house)	Type B: LEAP	Lyminge Parish Council	NSPA	
75	The Waltons	Type A: LAP	Hyde Housing	SIPA	
76	The Danni & James Community Friendship Park	Type B: LEAP	F&HDC	NSPA	
77	The Derrings	Type B: LEAP	F&HDC	SIPA	
78	The Green	Type C: NEAP	Hythe Town Council	SIPA	PPA
79	The Greens	Type C: NEAP	New Romney Town Council	SIPA	PPA
80	The Ridgeway Trim Trail	Type B: LEAP	F&HDC	SIPA	
81	Turnpike Hill	Type A: LAP	F&HDC	SIPA	
82	Underwood Play Area	Type B: LEAP	Hawkinge Town Council	NSPA	
83	Upper Radnor Park	Type A: LAP	F&HDC	SIPA	PPA
84	Widgeon Walk	Type B: LEAP	F&HDC	SIPA	
85	Wraightsfield Play Area	Type B: LEAP	F&HDC	SIPA	
N/A	Shornccliffe	Committed development with planned play area provision at Shornccliffe Garrison. Classification to	To be confirmed once installed. (should be FHDC)	SIPA	PPA

		be fully confirmed.			
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Appendix 3: Locations of SIPAs, NSPAs and PPAs

This Report will be made public on 10 March 2020



Report Number **C/19/76**

To: Cabinet
Date: 18 March 2020
Status: Non key
Responsible Officer: Amandeep Khroud, Assistant Director, Governance and Law
Cabinet Member: Councillor David Godfrey, Cabinet Member for Housing and Special Projects

SUBJECT: Report by the Local Government and Social Care Ombudsman – Complaint Investigation, January 2020

SUMMARY: This report sets out details of an investigation completed by the Local Government and Social Care Ombudsman (Ombudsman) about the lack of support that Mr X alleges he received from the Council when he and his family approached the Council for housing assistance. The Ombudsman's report and timeline of this case and outcomes have been fully reviewed by the Council and externally by independent Counsel. It is recommended that the Council does not accept the findings and recommendations of the Ombudsman's report.

REASONS FOR RECOMMENDATIONS:

- a) Officers have fully reviewed the timescale of this case and the assistance provided to Mr X and does not accept the findings of the Ombudsman's report.
- b) Mr X was asked to provide all necessary documentation to support his Housing Waiting List application and became un-cooperative when asked to provide information to support his application, including details of his income, and failed to provide this information.
- c) The Council provided temporary accommodation for Mr X and his family to occupy, when he provided a notice to quit from his landlord.
- d) Mr X declined the offer of temporary accommodation and alleged the accommodation was unclean and not fit for him and his family to live in. Subsequent investigations by the Council show this to be unfounded.
- e) The Council has kept in regular contact with Mr X regarding both his housing waiting list application and subsequent homelessness application.
- f) The Council has passed the details of this case for independent legal assessment, and this fully supports the Council's position.
- g) In response to Ombudsman's report, officers have reviewed its Homelessness and Housing Waiting List Services, including the support

- given to Mr X throughout his contact with the Council and it is clear that all necessary actions and procedures were followed by the Council's officers.
- h) The Council is drafting a further factsheet for clients, which will be available both online and front of house, advising clients of the possible implications of not fully working with the Council in a Housing Options Appraisal.
 - i) The Council's Cabinet is required to consider the Ombudsman's report and the Council is required to confirm the action it has taken or proposes to take to the Ombudsman.
 - j) The Ombudsman cannot force a Council to comply with their recommendations, as they are just that a recommendation not an Order that can be enforced.

RECOMMENDATIONS:

- 1. To receive and note report C/19/76.**
- 2. To agree the Council's response that it does not accept the findings of the Ombudsman's investigation into the complaint raised by Mr X about the lack of support he and his family received when he approached the Council for housing assistance. The Council should not, therefore, apologise to Mr X and should not pay the £100 compensation proposed by the Ombudsman.**

1. BACKGROUND

- 1.1 This report sets out details of an investigation completed by the Local Government and Social Care Ombudsman (Ombudsman) about the lack of support that Mr X alleges he received from the Council when he and his family approached the Council for housing assistance in 2019.
- 1.2 The Ombudsman's report concludes that the Council is at fault and has caused injustice to Mr X. As a result of the fault alleged, the Ombudsman has concluded the Council should:
- Write to Mr X to apologise for the delays in providing him with assistance with his housing situation.
 - Pay Mr X £100 to recognise the uncertainty and distress this has caused him and his family.
 - Review its processes for handling requests for housing assistance to ensure it deals with cases based on waiting time and urgency.
 - Review resources available to its housing department to ensure it is meeting its duties to people.
- 1.3 The Ombudsman has also alleged that the Council has, at times refused to respond to their enquiries and questioned their authority to investigate parts of the complaint. A copy of the Ombudsman's report and their covering letter are set out in Appendices 1 and 2 of this report.
- 1.4 The Ombudsman's report and timeline of this case and outcomes have been fully reviewed by the Housing and Inclusion Manager. They have also been reviewed by independent legal Counsel. Both reviews have concluded that the Council's Housing Options team responded appropriately and took all necessary action to respond to Mr X's request for housing assistance.

2.0 Summary of the Case -Timeline

- 2.1 The timeline of Mr X's Housing Waiting List and subsequent homelessness application is as follows:
- 7th January 2019- Mr X applied to join the Council's Housing Waiting List. He indicated in his application he would be homeless from the 15th January 2019.
 - 8th January 2019 – The Council wrote to Mr X to provide him with further advice on his housing options, providing links to the Council's website to access advice about finding alternative housing. He was also advised to telephone or email the Council if he was homeless or threatened with homelessness and needed further housing assistance.
 - 4th February 2019 - Mr X visited the Council's offices to provide further evidence in support of his housing application.
 - 12th February – Mr X emailed the Council to advise he was living in overcrowded conditions in his current home and advised a health visitor had written to the Council regarding his living conditions.

- 18th February- Mr X visited the Council to chase his application and was advised it was in the waiting list to be processed and he would be contacted if any further information was required from him.
- 25th February 2019 – Mr X visited the Council with a letter from his landlord saying he had to leave his accommodation by 1 March 2019. He completed a Housing Options Assessment Form. The Council emailed Mr X and advised it had been unable to make contact with his landlord and requested that he ask his landlord for a further 7 days' notice to leave, to enable more time for his circumstances to be assessed. Mr X provided further documentation to confirm that he had been granted leave to remain in the UK and that his wife had applied for leave to remain in 2018.
- 27th February 2019 – Mr X's Housing Waiting List Application was removed as he had failed to provide the necessary documentation for his wife, he subsequently provided a copy of his wife's identity card by email on the 28th February.
- 1st March 2019 – Mr X telephoned the Council and said he had to leave his home that day. Mr X's landlord then confirmed he could remain in the property until 4th March.
- 4th March – Mr X attended a Housing Options Interview and provided limited information about his circumstances. He was reluctant to provide information about his earnings and his wife's leave to remain status. Temporary accommodation was offered to Mr X, but he refused this, stating that he did not want help and left the building without completing the application. A social services referral was made by the Council.
- 12th March – the Council issued a Notice to confirm that S189B(2) Homelessness Relief Duty had come to an end as Mr X had withdrawn his application by failing to complete the interview on the 4th March, therefore, preventing the completion of his Homelessness Application and Personal Housing Plan. Information was also provided about the Council's review process.
- 18th March 2019 – Mr X made a new housing application and was offered temporary accommodation in Dover. He subsequently left the accommodation after 40 minutes. He then re-registered to join the Housing Waiting List. Credit checks completed by the Council revealed that Mr X has 4 previously undisclosed bank accounts and an income double that which he had actually declared in his application.
- 19th March 2019 – Mr X visits the Council and claims the mattress in the temporary accommodation was blood stained, the carpet was dirty and that he had found a hypodermic needle in the room. Mr X refused to return to the accommodation. Checks with the landlord confirmed that there was a burn mark in the carpet, but the other allegations were unfounded.
- 20th March - Mr X made his complaint to the Ombudsman.
- 27th March 2019 – The Council completed Mr X's assessment and Personal Housing Plan in respect of his Homelessness Application and wrote to him to request that he make contact in order to complete the Personal Housing Plan process.
- 1st April 2019 – the Council advised Mr X it had ended its duty to provide interim accommodation to him. He was advised he could seek legal advice to challenge the decision.

- 4th April 2019 – The Council wrote to Mr X to issue a warning that his actions meant he was failing to address the tasks set out in his Personal Housing Plan. He was given a further 7 days for compliance.
 - 12th April 2019 – The Council issued its decision to end its homelessness duty to assist Mr X, due to his refusal to co-operate.
 - 5th August 2019 – The Council issued its Housing Review Final Decision, upholding its previous decision and again advised Mr X of his judicial right of appeal.
- 2.2 The Council has also offered Mr X assistance through its Rent in Advance Deposit Fund to assist him to access alternative accommodation in the private rented sector.
- 2.3 The Council’s independent legal review by Counsel has concluded that the Ombudsman’s decision is incorrect in several material particulars as regards the history of this case. It has identified that Mr X’s early contacts with the Council were in respect of his Housing Waiting List Application and there was no confirmed indication of homelessness (threatened or imminent) until the 25th February. At this point the Council’s immediate action was to secure the existing accommodation until the 4th March to enable Mr X to make a homeless application. Mr X was then offered temporary accommodation on the 4th March.

3. OPTIONS

- 3.1 The Council has two options in respect of its response to the Ombudsman’s findings. These are:
- 1) To accept the Ombudsman’s findings and to apologise to Mr X and make the £100 compensation payment to him.
 - 2) Secondly, to advise the Ombudsman’s it does not accept its findings in respect of this case. However, the Council has reviewed its Homelessness and Housing Waiting List Services, including the assistance provided to Mr X throughout his contact with the Council and it is clear that all necessary actions and procedures were followed by the Council’s officers.
- 3.2 The Council is also drafting a further factsheet for clients, which will be available both online and front of house, advising clients of the possible implications of not fully working with the Council in a Housing Options Appraisal process.
- 3.3 The Local Government Ombudsman’s powers arise from the Local Government Act 2014 (as amended). They cannot force a Council to comply with their recommendations as they are just that a recommendation not an Order that can be enforced. They can, however, ask a Council to revisit a matter and then invoice the council for their time incurred. The Council therefore need to be aware that by refusing to comply a bill of costs could be raised together with any adverse publicity that may arise.

- 3.4 Our independent legal advice, recommends that the Council follow option 2. The Ombudsman has already published their findings on this case. A proposed draft response to the Ombudsman is set in Appendix 3 of this report.

4. RISK MANAGEMENT ISSUES

- 4.1 There are no specific risk management issues arising from this report.

5. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS

5.1 Legal Officer's Comments (AD)

The Local Government Ombudsman's powers arise from the Local Government Act 2014 (as amended). They cannot force a Council to comply with their recommendations as they are just that a recommendation not an Order that can be enforced. They can, however, ask a Council to revisit a matter and then invoice the council for their time incurred. The Council therefore need to be aware that by refusing to comply a bill of costs could be raised together with any adverse publicity that may arise. Save for any issues that may arise from the same no further implications as far as Legal are concerned.

5.2 Finance Officer's Comments (LH)

There are no initial financial implications arising from this report however, if we are asked by The Local Government Ombudsman to revisit this matter then there could be costs to the council which are unknown at present and would have to be evaluated at the time.

5.3 Diversities and Equalities Implications (AH)

All applicants approaching the Council for housing assistance are required to co-operate with the Council and provide the necessary information to support their housing application. T

6. CONTACT OFFICERS AND BACKGROUND DOCUMENTS

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

Adrian Hammond (Lead Housing Specialist)

Telephone: 01303 853392

Email: Adrian.hammond@folkestone.gov.uk

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

None

Appendix 1: Report by the Local Government and Social Care Ombudsman

Appendix 2: Letter from the Local Government and Social Care Ombudsman

Appendix 3: Draft proposed response to the Ombudsman

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**Report by the Local Government and Social Care
Ombudsman**

**Investigation into a complaint against
Folkestone & Hythe District Council
(reference number: 18 018 663)**

2 January 2020

The Ombudsman's role

For more than 40 years the Ombudsman has independently and impartially investigated complaints. We effectively resolve disputes about councils and other bodies in our jurisdiction by recommending redress which is proportionate, appropriate and reasonable based on all the facts of the complaint. Our service is free of charge.

Each case which comes to the Ombudsman is different and we take the individual needs and circumstances of the person complaining to us into account when we make recommendations to remedy injustice caused by fault.

We have no legal power to force councils to follow our recommendations, but they almost always do. Some of the things we might ask a council to do are:

- > apologise
- > pay a financial remedy
- > improve its procedures so similar problems don't happen again.

Section 30 of the 1974 Local Government Act says that a report should not normally name or identify any person. The people involved in this complaint are referred to by a letter or job role.

Key to names used

Mr X The complainant

Report summary

Housing - Homelessness

Mr X complains about the lack of support he received from the Council when he and his family became homeless.

Finding

Fault found causing injustice and recommendations made.

Recommendations

The Council should take the following action to remedy the injustice caused to Mr X as a result of the fault we have identified.

- Write to Mr X to apologise for the delays in providing him with assistance with his housing situation.
- Pay Mr X £100 to recognise the uncertainty and distress this caused him and his family.

The Council should take this action within three months of the date of this report.

The Council should also take the following action to improve its services.

- Review its processes for handling requests for housing assistance to ensure it deals with cases based on both waiting time and urgency.
- Review resources available to its housing department to ensure it is meeting its duties to people who are threatened with homelessness and people who are homeless under the 1996 Housing Act (as amended).

The Council should report back to us the outcome of both these reviews, including details of any actions it intends to take, within three months of the date of this report.

The Council must consider the report and confirm within three months the action it has taken or proposes to take. The Council should consider the report at its full Council, Cabinet or other appropriately delegated committee of elected members and we will require evidence of this. (*Local Government Act 1974, section 31(2), as amended*)

The complaint

1. Mr X complains the Council failed to provide him with assistance when he became homeless. Mr X says the Council offered him and his family unsuitable bed and breakfast accommodation which was in a poor state of repair. Mr X says the Council withdrew its support when he declined the accommodation offered and went to stay between various friends.

Legal and administrative background

The law and the Ombudsman

2. We investigate complaints about 'maladministration' and 'service failure'. In this report, we have used the word 'fault' to refer to these. We must also consider whether any fault has had an adverse impact on the person making the complaint. We refer to this as 'injustice'. If there has been fault which has caused an injustice, we may suggest a remedy. (*Local Government Act 1974, sections 26(1) and 26A(1), as amended*)
3. The law says we cannot normally investigate a complaint when someone could take the matter to court. However, we may decide to investigate if we consider it would be unreasonable to expect the person to go to court. (*Local Government Act 1974, section 26(6)(c), as amended*)

Homelessness law

4. Councils must take reasonable steps to secure accommodation for any eligible homeless person. When a council decides this duty has come to an end, it must notify the applicant in writing. (*Housing Act 1996, section 189B*)
5. Statutory guidance on homelessness says:
"Applications can be made to any department of the local authority and expressed in any particular form; they need not be expressed as explicitly seeking assistance under Part 7 [of the Housing Act 1996]. As long as the communication seeks accommodation or assistance in obtaining accommodation and includes details that give the housing authority reason to believe that they might be homeless or threatened with homelessness, this will constitute an application." (*Homelessness code of guidance for local authorities, 2018 paragraph 18.5*)
6. The statutory guidance also says:
"Housing authorities should take particular attention to identify instances where information on an inquiry about a social housing allocation scheme, or an application for an allocation of housing under Part 6, provides reason to believe that the applicant might be homeless or threatened with homelessness. This should be regarded as an application for homelessness assistance." (*Homelessness code of guidance for local authorities, 2018 paragraph 18.6*)
7. Councils must complete an assessment if they are satisfied an applicant is homeless or threatened with homelessness. The Code of Guidance says, rather than advise the applicant to return when homelessness is more imminent, the housing authority may wish to accept a prevention duty and begin to take reasonable steps to prevent homelessness. Councils must notify the applicant of the assessment. Councils should work with applicants to identify practical and reasonable steps for the council and the applicant to take to help the applicant

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- keep or secure suitable accommodation. These steps should be tailored to the household, and follow from the findings of the assessment, and must be provided to the applicant in writing as their personalised housing plan. (*Housing Act 1996, section 189A and Homelessness Code of Guidance paragraphs 11.6 and 11.18*)
8. A council must secure interim accommodation for applicants and their household if it has reason to believe they may be homeless, eligible for assistance and have a priority need. (*Housing Act 1996, section 188*)
 9. Examples of applicants in priority need are:
 - people with dependent children;
 - pregnant women; and
 - people who are vulnerable due to serious health problems, disability or old age.
 10. The law says councils must ensure all accommodation provided to homeless applicants is suitable for the needs of the applicant and members of his or her household. This duty applies to interim accommodation and accommodation provided under the main homelessness duty. (*Housing Act 1996, section 206 and (from 3 April 2018) Homelessness Code of Guidance 17.2*)
 11. Bed and breakfast (B&B) accommodation can only be used for households which include a pregnant woman or dependent child when no other accommodation is available and then for no more than six weeks. B&B is accommodation which is not self-contained, not owned by the Council or a registered provider of social housing and where the toilet, washing, or cooking facilities are shared with other households. (*Homelessness (Suitability of Accommodation) (England) Order 2003 and from 3 April 2018 Homelessness Code of Guidance paragraph 17.32*)
 12. Homeless applicants may request a review within 21 days of being notified of certain decisions including:
 - their eligibility for assistance;
 - what duty (if any) is owed to them if they are found to be homeless or threatened with homelessness;
 - the steps they are to take in their personalised housing plan at the prevention duty stage;
 - giving notice to bring the prevention duty to an end;
 - the steps they are to take in their personalised housing plan at the relief duty stage;
 - giving notice to bring the relief duty to an end;
 - giving notice in cases of deliberate and unreasonable refusal to co-operate; and
 - the suitability of accommodation offered to the applicant after a homelessness duty has been accepted (and the suitability of accommodation offered under section 200(3) and section 193). Applicants can request a review of the suitability of accommodation whether or not they have accepted the offer.
 13. If a person is not happy with a council's decision on review they may appeal to the County Court on a point of law.
 14. There is no right to request a review of the suitability of interim accommodation provided by a Council under section 188 of the Housing Act 1996.

How we considered this complaint

15. We produced this report after examining relevant documents and interviewing the complainant.
16. We gave the complainant and the Council a confidential draft of this report and invited their comments.

What we found

What happened

17. Mr X has been living in a single room in a house as a lodger since 1998. In 2015 Mr X brought his wife from overseas. They later had a child together in 2017 and a second child in 2018. They all continued to live in the single room together.
18. On 8 January 2019 Mr X applied to the Council for housing. An internal Council memo said Mr X stated he and his family would be homeless on 15 January 2019.
19. The Council wrote to Mr X on the same day and provided him with links to websites with more information about finding housing. The Council said if he needed more help, he could contact it by telephone or e-mail.
20. Mr X visited the Council's offices on 4 February 2019 and provided evidence to support his housing application.
21. Mr X e-mailed the Council on 12 February 2019 to say he was living in overcrowded conditions. He said health visitors had written to the Council to say that the accommodation wasn't *"liveable"*. Mr X said he had been trying to contact the Council by telephone but had not been able to get through. He said if he did not hear from the Council by the end of the week he would go to his solicitor or local MP for help.
22. Mr X visited the Council's offices again on 18 February 2019. The Council advised Mr X that his application was *"waiting to be looked at"* and the Council was working on *"information provided in date order"*. The Council said it would contact Mr X if it needed more information.
23. Mr X visited the Council's offices on 25 February 2019 with a letter from his landlord saying he had to leave the accommodation *"in the next few days"*. Mr X completed a *"housing options assessment form"*.
24. The Council e-mailed Mr X on 25 February 2019. It said it had not been able to speak to his landlord by telephone. The Council told Mr X to ask his landlord for a further seven days notice to allow it to *"assess your situation"*.
25. Mr X phoned the Council on 1 March 2019 to say his family had to leave their accommodation that day. The Council spoke to the landlord who said the family could stay until the following Monday.
26. Mr X visited the Council's offices on 4 March 2019. The Council interviewed Mr X about his housing situation. The Council asked Mr X questions about his wife's right to reside in the UK. Mr X became upset by this. The Council offered to provide Mr X and his family with accommodation whilst it considered if they were eligible for assistance. The Council explained it would need proof of the family's income so it could claim housing benefit for any accommodation it provided. It explained Mr X would have to pay £30 a night for the accommodation if he did not claim housing benefit.

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27. Mr X left the Council's offices and said he did not want any help.
 28. The Council wrote to Mr X on 12 March 2019 to say it could not issue him with a personalised housing plan as he had left its offices during an interview. The Council said it had ended its relief duty to Mr X and his family. The Council explained Mr X could ask for a review of its decision and explained how to do so.
 29. Mr X approached the Council on 18 March 2019 and asked for accommodation. The Council provided Mr X with accommodation in a bed and breakfast.
 30. Mr X visited the Council's offices on 19 March 2019. He said he did not stay in the accommodation as it was dirty. Mr X said there were bloodstains on the bedding and he had found a hypodermic needle. The Council offered to investigate but Mr X left its offices.
 31. The Council spoke to the accommodation provider on the same day. The accommodation provider said the room was clean and provided photographs. The accommodation provider said Mr X had not mentioned finding a needle but had only stayed on the premises for approximately 40 minutes.
 32. The Council wrote to Mr X on 27 March 2019. The Council provided Mr X with a personalised housing plan and explained it was under a duty to help him secure suitable accommodation. The Council explained that Mr X could ask it for a review if he disagreed with his personalised housing plan.
 33. The Council wrote to Mr X on 1 April 2019 to say it had ended its duty to provide him with accommodation under section 188 of the 1996 Housing Act. The Council said this was because it had offered Mr X accommodation at the bed and breakfast "*which fully meets our legal duty*" and it was satisfied "*the offer of accommodation was both suitable and reasonable for you to accept*".
 34. The Council said there was no right to review the decision to end its duty under section 188. The Council explained Mr X could challenge its decision by judicial review and he should contact a solicitor for advice.
 35. The Council wrote to Mr X again on 4 April 2019 to issue him with a warning for "*unreasonably and deliberately refusing to take any steps as outlined in the Assessment and Personal Housing Plan*". The Council said Mr X had not taken any of the steps to secure housing as set out in his personalised housing plan. The Council said Mr X had seven days to take the steps required. This included making contact with the Council to discuss his efforts to find housing and provide up to date information about his whereabouts and living situation on his housing application.
 36. On 23 May 2019 Mr X's representatives e-mailed the Council to ask for a review of its decision of 12 March 2019 to end its duty to Mr X and his family. Mr X's representatives said they were not clear if the warning letter of 4 April 2019 superseded the March decision and said they reserved the right to make submissions on that basis at a later date. The Council did not realise it had received this e-mail until 21 June 2019 when it located it after searching for Mr X's name in an e-mail inbox.
 37. The Council wrote to Mr X's representatives on 5 August 2019 to say it had upheld its decision to end its relief duty to Mr X and his family on review. The Council also said it had reviewed its decision on the suitability of the bed and breakfast accommodation it offered to Mr X and his family. The Council said the "*accommodation was both available and suitable for [Mr X's] household occupation for a short term period of less than 6 weeks*".

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38. The Council says it has no records of other accommodation available on the day Mr X approached. The Council says families generally only stay in bed and breakfast accommodation for up to five days, if at all, before being moved into self-contained accommodation.
39. The Council said it would still provide Mr X with assistance through its “*Rent in Advance Deposit Funds*” if he could find a suitable and affordable private rented property.

Findings

40. We cannot investigate the personalised housing plan or the Council’s decision to end its relief duty to Mr X and his family in this complaint. This is because Mr X has already reviewed the Council’s decision to end its relief duty. Mr X now has a right to appeal to the County Court and we consider it reasonable for him to use that right of appeal.
41. There were delays in the Council providing assistance to Mr X and his family. Mr X first contacted the Council about his situation on 8 January 2019. An internal Council memo says Mr X’s application said he would be homeless on 15 January 2019. The Council wrote to Mr X on the same day advising him how to access its services. It is not clear what advice Mr X was given or what assistance he sought from the Council when he visited its offices on 4 February 2019.
42. However, Mr X asked the Council for assistance on 12 and 18 February 2019. There is no record of the Council attempting to contact Mr X on 12 February. On 18 February the Council told Mr X his case was “*waiting to be looked at*” even though Mr X had told the Council he had been asked to leave his accommodation when he made his application on 8 January 2019 and said he was living in overcrowded accommodation on 12 February 2019. This is fault.
43. On 12 February 2019 Mr X said he was living in one room with his family and had been advised by health visitors that he couldn’t continue living there. There is no evidence the Council considered Mr X’s circumstances at the time. Had the Council done so it seems likely it would have given it enough reason to believe that Mr X was homeless or threatened with homelessness within 56 days.
44. Mr X had already told the Council he was threatened with homelessness when he applied for housing on 8 January 2019. The Council should have revisited this information when Mr X contacted it on 12 February 2019. If the Council had done so it seems likely it would have contacted him to carry out an assessment of his housing situation.
45. Statutory guidance is clear that Mr X was not required to make a formal request for assistance under Part 7 of the 1996 Housing Act and that information provided under Part 6 regarding the allocation of social housing may be enough to trigger the Council’s duties under homelessness legislation. The Council failed to consider the information Mr X provided on 12 February 2019. If it had done so it would have taken steps to arrange to carry out an assessment of Mr X’s housing situation. This may have involved speaking to him by telephone or arranging for him to visit its offices for an appointment. This is because the Council would have had enough information to have reason to believe that Mr X was threatened with homelessness within 56 days.
46. There is no fault in the Council failing to carry out an assessment of Mr X’s housing situation when he made his housing application on 8 January 2019. This is because the Council wrote to Mr X and advised him how to make contact if he

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- required further assistance. However, when Mr X contacted the Council after being invited to do so it failed to provide him with assistance.
47. The Council had three weeks to provide Mr X with help finding alternative accommodation for his family. However, the Council did not provide Mr X with assistance until he was actually homeless. This means Mr X was left in an uncertain situation and cannot know whether his situation might have been improved if the Council had offered him help sooner.
 48. When the Council did offer Mr X help he left its offices because he was not happy with questions about his wife's eligibility. Council officers were entitled to ask questions about her immigration status. By this point Mr X was faced with the imminent threat of homelessness and was upset about the lack of support he had received to date. However, it was Mr X's decision to refuse to accept the Council's assistance. Therefore, the injustice caused to Mr X as a result of the delays in the Council dealing with his situation is limited to the period 12 February 2019 to 4 March 2019.
 49. The Council says Mr X accused officers of being racist by asking for details of his wife's eligibility. The Council says this constitutes abusive behaviour and we should take this into account when considering the injustice caused to Mr X. Mr X was entitled to express his opinion of the officers' behaviour and officers were entitled to refute that they were acting in this way. The Council has not provided us with any evidence that Mr X was abusive.
 50. The Council provided Mr X with accommodation in a bed and breakfast on 18 March 2019. Bed and breakfast accommodation is not suitable for households with dependent children. However, the law says this does not apply where there is no other accommodation available so long as the family are not placed in the bed and breakfast for more than six weeks.
 51. The Council does not have records of what other accommodation was available on the day it placed Mr X in bed and breakfast accommodation. However, the Council placed other families in bed and breakfast accommodation, and it seems unlikely it would have done so if it had other accommodation available.
 52. However, Mr X may not have required bed and breakfast accommodation at all had the Council intervened sooner to provide him with assistance with his housing difficulties.
 53. There was no fault with the way the Council dealt with Mr X's complaints about the bed and breakfast accommodation. The Council offered to investigate the issues raised by Mr X but he left its offices.

Conclusions

54. The Council is at fault as it delayed providing help to Mr X with his housing situation. Because of this Mr X was left in an uncertain situation and cannot know whether his situation might have been improved if the Council had offered him help sooner.

Recommendations

55. The Council should take the following action to remedy the injustice caused to Mr X as a result of the fault we have identified.
 - Write to Mr X to apologise for the delays in providing him with assistance with his housing situation.

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- Pay Mr X £100 to recognise the uncertainty and distress this caused him and his family.
56. The Council should take this action within three months of the date of this report.
57. The Council should also take the following action to improve its services.
- Review its processes for handling requests for housing assistance to ensure it deals with cases based on both waiting time and urgency.
 - Review resources available to its housing department to ensure it is meeting its duties to people who are threatened with homelessness and people who are homeless under the 1996 Housing Act (as amended).
58. The Council should report back to us the outcome of both these reviews, including details of any actions it intends to take, within three months of the date of this report.
59. The Council must consider the report and confirm within three months the action it has taken or proposes to take. The Council should consider the report at its full Council, Cabinet or other appropriately delegated committee of elected members and we will require evidence of this. (*Local Government Act 1974, section 31(2), as amended*)

The Council's responses to our enquiries

60. The law gives us the same powers as the High Court to obtain evidence for our investigations. If a person, without lawful excuse, obstructs us from investigating a complaint we may apply to the High Court to find that person in contempt. (*Local Government Act 1974, section 29(7) & (8)*)
61. The Council has, at times, refused to respond to our enquiries and questioned our authority to investigate parts of the complaint. This resulted in us having to threaten to issue a summons requiring the Council to attend our offices.
62. In this case the Council produced the evidence we requested. However, we should not have had to threaten the Council with a summons in the first place.
63. We would ask the Council to reflect on how it has responded to our enquiries in this case and put measures in place to ensure we receive an appropriate response to any future investigations.

Decision

64. We have completed our investigation as we have found fault causing injustice. The action we have recommended is a suitable to remedy this.

2 January 2020

Ms Susan Priest
Head of Paid Service
Folkestone & Hythe District Council
Civic Centre
Castle Hill Avenue
Folkestone
CT20 2QY

Our ref: 18 018 663

(Please quote our reference when contacting us and, if using email, please put the number in the email subject line)

If telephoning please contact: Mr McInerney on 0330 403 4293

If e-mailing: d.mcinerney@coinweb.lgo.org.uk

Dear Ms Priest

[REDACTED]

We have now completed the investigation of the complaint by [REDACTED] and enclose a copy of the final report. We are also sending a copy to [REDACTED].

Section 30(3) of the Local Government Act 1974 requires us to report without naming or identifying the complainant or other individuals. The people involved in this complaint are therefore referred to by a letter or job role. You must not disclose any information to third parties that could identify the complainant or other individuals referred to in the report.

We will provide you with a publication date for the report in due course. The publication date is likely to be mid-February 2020. We may distribute copies of the report and a press release in advance of the publishing date, under an embargo. This means the media could have sight of the report and make enquiries before the publishing date, but are expected to withhold publishing anything until after we have published the report.

Section 30 of the 1974 Act requires your Authority to place two public notice announcements in local newspapers/ newspaper websites. To complete your statutory requirements on this matter you should place these announcements within two weeks of us publishing the report. We enclose a specimen public announcement notice at the end of this letter which you may find helpful. Please let us know when you have made this announcement. You should also make copies of the report available free of charge at one or more of your offices.

Our finding is *Report issued: upheld; maladministration and injustice*. Since we have found that [REDACTED] has suffered injustice as a result of fault, under Section 31(2) of the 1974 Act, the report must

be laid before the authority concerned. Please arrange for the report to be considered at either full Council, Cabinet or another Committee with delegated authority and tell us, within three months of receiving it (or a longer period we may agree in writing) the action it has taken or proposes to take. Please let us know by 2 April 2020 when the Authority will consider the report and when we may expect to receive a response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. King', with a stylized flourish at the end.

Michael King
Local Government and Social Care Ombudsman for England

Enc: Final report
Specimen public announcement notice

Folkestone & Hythe District Council

Report of Local Government and Social Care Ombudsman

The Local Government and Social Care Ombudsman has issued a report following its investigation of a complaint against Folkestone & Hythe District Council. The complaint was about *Housing* matter. The Ombudsman found that there had been fault on the part of the Council, and this had caused injustice to the complainant.

@Folkestone & Hythe District Council has agreed to take action which the Ombudsman regards as providing a satisfactory remedy for the complaint.

@The Council must now consider the report @and tell the Ombudsman within three months (or such longer period as the Ombudsman may agree) what it proposes to do.

Copies of the report will be available for public inspection during normal office hours at [main office address] and at [details of other offices] for three weeks starting on [date]. Anyone is entitled to take copies of the report or extracts from it. Copies will be supplied free of charge.

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Appendix 3

Your ref: 18 018 663
Our ref: LS 01008
Direct dial: 01303 853421
E-mail: alastair.delacey@folkestone-hythe.gov.uk
Date:



Local Government & Social Care Ombudsman
P.O. Box 4771
Coventry
CV4 0EH

DRAFT LETTER TO LGO TO BE SENT FOLLOWING CABINET MEETING

Dear Sirs,

Re: Your reference: 18 018 663

We refer to your letter 2nd January 2020 seeking a response by 2nd April 2020 and have now reviewed its content and in accordance with the time limits delineated therein please find our response below.

We note that you have now published your decision and you have no doubt seen the Councils response to the same. If you require a copy of the Councils response please refer to the writer (**or we can attach if preferred by Cabinet**)

The Council maintain their stance that Mr X declined to co-operate with Council Officers during a Housing Options interview, withheld financial and personal information needed to support his application and left the offices before the application could be completed. The Council has reviewed its front of house services relating to the Councils waiting list and Homelessness and are satisfied that suitable accommodation was offered to Mr X. The checks showed no evidence of disrepair and that the accommodation offered was in a clean and fully reasonable condition. In the circumstances the Council does not accept that Mr X is entitled to either an apology or any compensation.

With regard to the reviews recommended: Folkestone and Hythe District Council have, following advice received from the Local Government Ombudsman Service, carried out a review of the front of house services pertaining to homelessness and the Council Housing Waiting List.

The review's conclusions seek to ensure good quality coherent communication is in place so that if a client reports being threatened with homelessness (particularly if within 56 days), the client is referred to the Housing Options Service.

In additional we are in the process of drafting a further Factsheet for our clients which will be available both online and front of house, advising clients of the possible



implications of not fully completing and working with us in a Housing Options assessment so that either a Homeless Prevention or Relief Plan can be put in place and implemented going forward, and of the need for reasonable conduct in interviews.

Your final recommendation with regard to reviews is currently being dealt with. A report will now be prepared following this matter being discussed at a Cabinet Meeting on 18th March 2020. We will provide a copy of the report to provide proof as requested by you.

This now concludes this matter and it can be seen that we have taken your comment's on-board and acted upon the same.

Yours faithfully

Legal Services
Folkestone & Hythe District Council