



FOLKESTONE & HYTHE DISTRICT CORE STRATEGY REVIEW REGULATION 18 DRAFT

Summary of Consultation Comments

JULY 17, 2018

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1. Introduction

- 1.1. The Folkestone & Hythe District Core Strategy Review Regulation 18 Version was published for consultation between **29 March** and **18 May 2018**.¹

Breakdown of comments by section

- 1.2. A total of **746 comments** were made to the Core Strategy Review (including Appendices) from 109 individuals and organisations. The representations were broken down by section as shown in Table 1.

Section		Number of comments
	Comments on the plan as a whole	1
1	Introduction	
1.1	About the Core Strategy	39
1.2	About Folkestone and Hythe	46
2	Strategic Issues	
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¹ After the consultation opened, on 1 April 2018, the local planning authority changed its name from Shepway District Council to Folkestone & Hythe District Council.

Table 1: Breakdown of comments by section	
Section	Number of comments
Appendix 2: Glossary of Terms and Technical Studies	2
Total number of comments	746

Breakdown of comments by policy

- 1.3. Policies for the new garden settlement (SS6-SS9) received the most responses (105 in total) along with Policy CSD9: Sellindge Strategy (27 comments).
- 1.4. Numbers of comments received against each policy are set out in Table 2. (This table does not include numbers of comments made against the supporting text of the policies; these are detailed in the sections that follow.)

Table 2: Comments by policy	
Title	Number of comments
Policy DSD: Delivering Sustainable Development	7
Policy SS1: District Spatial Strategy	13
Policy SS2: Housing and the Economy Growth Strategy	11
Policy SS3: Place-Shaping and Sustainable Settlements Strategy	8
Policy SS4: Priority Centres of Activity Strategy	6
Policy SS5: District Infrastructure Planning	8
Policy SS6: New Garden Settlement – Development Requirements	48
Policy SS7: New Garden Settlement – Place-Shaping Principles	19
Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles	18
Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management	20
Policy SS10: Spatial Strategy for Folkestone Seafront	8
Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone	7
Policy CSD1: Balanced Neighbourhoods	10
Policy CSD2: District Residential Needs	5
Policy CSD3: Rural and Tourism Development	1
Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation	6
Policy CSD5: Water and Coastal Environmental Management	3
Policy CSD6: Central Folkestone Strategy	4
Policy CSD7: Hythe Strategy	4

Policy CSD8: New Romney Strategy	8
Policy CSD9: Sellindge Strategy	27

Comments on accompanying documents

- 1.5. In addition to the comments on the Core Strategy Review itself, **eight comments** were received on the accompanying documents, as shown in Table 3.

Title	Number of comments
Core Strategy Review Sustainability Appraisal	6
Core Strategy Review Habitats Regulations Assessment	2
Total number of comments	8

2. Comments on the Plan as a Whole

- 2.1. One comment was received against the plan as a whole. This states that the National Grid has reviewed the plan and has no comments to make.

Part 1 – Introduction

3. Section 1.1: About the Core Strategy

- 3.1. 39 representations were received relating to Section 1.1. These raise the following issues:
- Keen to ensure that the historic environment is taken into account (Historic England);
 - Kent County Council supports the council's growth ambitions and supported its expression of interest for the locally-led garden villages, towns and cities prospectus for Otterpool Park;
 - Concerned that the Core Strategy Review does not contain a policy for London Ashford Airport (London Ashford Airport);
 - Canterbury Diocese has a key role to play in the formation of communities and is keen to work with the council;
 - A single local plan document would be clearer and more consistent for the development industry;
 - The relationship between the Places and Policies Local Plan and Core Strategy Review is unclear and the production of the plans is out of sequence;
 - The council should undertake a complete review of the Core Strategy rather than a partial review;
 - The vision for the district is not ambitious enough;
 - The evidence base is incomplete and needs to be updated;
 - The housing market area should include Ashford;
 - Lack of justification for the increase in housing – the council should challenge government requirements;
 - Empty buildings should be taken into account;
 - More truly affordable homes are needed;
 - Community Infrastructure Levy (CIL) should be payable over the whole district;
 - Support amendment to exclude the garden settlement from the application of CIL (Quod on behalf of landowners);
 - Object to the despoliation of the Area of Outstanding Natural Beauty (AONB), destruction of wildlife, increased light pollution, disruption due to building works, impacts on property values, impacts on mental health, increased crime and loss of community cohesion;
 - Publicity for the plan has been poor and the consultation portal is inadequate; residents cannot respond to the revised National Planning Policy Framework and Core Strategy Review at the same time;
 - Proposals in the Core Strategy Review are unsustainable, undeliverable, unpopular and divisive;
 - Houses will only be for out-of-town buyers and second-home owners; and
 - Infrastructure cannot cope (water, roads and health infrastructure).

4. Section 1.2: About Folkestone & Hythe

4.1. 46 representations were received relating to Section 1.2.

4.2. 41 representations were received relating to the text. These raise the following issues:

- There is no mention of the district's historic defensive role over centuries, including at Seabrook and Shorncliffe;
- The Royal Military Canal is under threat of development;
- Cultural heritage is a strength and should be recognised in Table 1.1: Folkestone;
- The plan does nothing to address deprivation in inner and north Folkestone;
- The creative industries and Folkestone Triennial benefit incomers rather than residents;
- The constraints in Table 1.3: Romney Marsh are 'strengths' not 'weaknesses', as they inhibit development;
- Romney Marsh needs its own tourism strategy;
- Strengths of Romney Marsh include agricultural industry, tourism and balanced towns and villages; weaknesses include housing inappropriate for local needs and isolated developments;
- Flood risk is not limited to coastal flooding – fluvial flooding is also a risk;
- Local roads are inadequate, particularly the A259, and access to London Ashford Airport is poor;
- There should be a specific policy to support the expansion of London Ashford Airport as an opportunity location to build on the district's economic strengths;
- The 'weaknesses' of the North Downs (Table 1.4: North Downs Area) help to preserve its 'strengths';
- The potential despoliation of the AONB is the reason planning inspectors have refused development at Lympne;
- A good, integrated public transport system needs to link to Ashford railway station to give access to the high speed railway service;
- Water, sewerage, broadband and power infrastructure is poor; and
- The high speed route is nearing capacity and any additional stops would add to the journey time for Folkestone and Dover residents.

4.3. An additional five representations put forward site submissions:

- Booker Wholesale, Park Farm Industrial Estate, Folkestone;
- Three Acre Estate and Five Acre Estate, Park Farm Road, Folkestone (two sites);
- Land North of Cockreed Lane, New Romney – states that this represents a sustainable location and should be included as part of Policy CSD8;
- The Piggery, Ashford Road, Sellindge²; and
- Land adjoining Etchinghill Nursery, Etchinghill.

² Part of area allocated in Regulation 19 Places and Policies Local Plan

Part 2 – Strategic Issues

5. Section 2.1: District Development Challenges and Potential

5.1. 69 representations were received relating to Section 2.1. These raise the following issues:

- There is implacable resistance to house building on anything other than a very modest local scale;
- The council should be spending its limited funds on deprived communities and not engaging in property development;
- The growth strategy is inconsistent with the district's constraints;
- The figures for housing growth need timescales to be meaningful;
- The assumption that the district's spatial strategy should be underpinned by a garden town requires further testing;
- The M20 is already at capacity and the road network cannot cope with the extra traffic generated by 10,000 new households at Otterpool Park;
- B2068 Stone Street to Canterbury will assume greater importance with Otterpool Park;
- Another station at Westenhanger will add to the journey times for Folkestone and Dover residents;
- The benefits of high speed rail are unquantified and a stop at Westenhanger is not guaranteed;
- The area is one of the most water-stressed in the UK;
- From the point of view of water efficiency, the whole of the south east of England is classified as being of "serious" water stress (Environment Agency);
- The water consumption target of 90 litres per person per day is unrealistic when average consumption is currently around 155 litres;
- The Environment Agency's revised flood zones need to be reflected in the plan;
- Development is to serve people migrating from London;
- Infrastructure is inadequate (roads, public transport, healthcare, retail, education and social facilities);
- The solution to 'Operation Stack' may involve additional infrastructure in the district;
- Transport connections need to identify Folkestone West railway station;
- The Folkestone Seafront development should incorporate council-owned car parks to create sufficient car parking;
- Development should be locally-led, with Section 106 requirements for local employment and skills training, with a focus on young people;
- The claim that new house-building brings employment is a fiction;
- The district needs a vibrant popular youth culture, music scene and night-time economy if younger people and cultural creators are to be attracted. The council must provide reasons for generations to stay and build lives in the district;
- The council should encourage higher education institutions;
- More community events, sports, leisure and social activities are needed to bring different generations and people of different backgrounds together; and

- Figures for growth in Canterbury need amending (Canterbury City Council).

6. Section 2.2: Strategic Needs for Sustainable Development

6.1. 29 representations were received relating to Section 2.2 (22 comments to the text and seven comments to Policy DSD).

6.2. Comments on the text raise the following issues:

- Welcome reference to improving educational attainment (Education and Skills Funding Agency);
- Further education is under-supported;
- Economic and social development have to run together to be sustainable;
- The arts must coexist alongside social and leisure facilities, music and late night culture. There need to be reasons for the current and next generation to stay in the area;
- Sustainable development needs the involvement of the community. Investment should be in people as well as buildings;
- More should be made of tourism, working with local trusts, amenity and history societies;
- Heritage assets are undervalued;
- The provision of healthcare is a major concern and the population increase would place overwhelming demands on services;
- Otterpool Park is not needed to meet local housing needs; and
- Affordable housing contributions should be raised to 30 to 50 per cent and not be subject to viability considerations.

Policy DSD: Delivering Sustainable Development

6.3. Seven representations were received relating to Policy DSD. These raise the following issues:

- The Education and Skills Funding Agency recommends the approach of the London Borough of Ealing in planning for school expansions and new sites, and providing development management policies for schools;
- Support the commitment to collaborate through the Duty to Cooperate (Dover District Council);
- The policy should be rewritten to include the transparent and full involvement of local communities;
- The policy should prevent occupation of developments until the required infrastructure is in place;
- The term “sustainable” needs to be defined and reference to “out-of-date” policies should be replaced by “superseded by national policy” (CPRE Shepway);
- It is not clear how proposals will be assessed to ensure that they improve “the economic, social and environmental conditions in the area”; and
- The plan’s policies will destroy social infrastructure and the natural environment.

Part 3 – Aims and Vision for Folkestone & Hythe District

7. Section 3.1: District Planning Aims

- 7.1. 26 representations were received relating to Section 3.1. These raise the following issues:
- There is no evidence to support the sustainability of the aspirations or to demonstrate that the challenges will be met;
 - Documents do not cover transport, roads and parking;
 - Concerns regarding the aim to provide capacity for housing beyond the plan period (Kent Downs AONB Unit);
 - The aim to provide innovative and distinctive architecture has not been met at Shorncliffe, Princes Parade and Folkestone Seafront;
 - Support for the cultural and creative aims - recommend engagement with the trust should proposals for performing arts facilities come forward (Theatres Trust);
 - Add the aim to increase prosperity by capitalising on the district's heritage assets;
 - Existing popular music culture must be respected alongside other cultural offerings as it attracts all ages and classes, with support for a vibrant social scene and night-time economy;
 - Historic venues (Leas Pavilion and Dance Easy) and sites (Royal Military Canal and Shorncliffe Garrison) are not being protected;
 - The term “viable” needs to be explained or removed from paragraph 3.5(1) as financial viability can be manipulated (Theatres Trust);
 - The aim should be to “conserve and enhance” not “manage” the AONB (Kent Downs AONB Unit);
 - Otterpool Park and Folkestone town centre should be used together to improve tertiary education facilities (Go Folkestone Action Group);
 - The Otterpool Park proposals are far too extensive to be sustainable – smaller scale, truly affordable housing is needed to suit the rural character of the North Downs;
 - Healthcare facilities are insufficient to serve Otterpool Park;
 - The Royal Victoria Hospital site should be used for elderly people (Go Folkestone Action Group); and
 - A policy is needed for London Ashford Airport (London Ashford Airport).

8. Section 3.2: Vision for Folkestone & Hythe District

- 8.1. 31 representations were received relating to Section 3.2. These raise the following issues:
- The section lacks substance on delivery and is based on aspirations (e.g. high speed railway serving Westenhanger);
 - Healthcare facilities are inadequate;
 - Support the vision for Folkestone & Hythe, including a new garden settlement (Quod on behalf of landowners);
 - Otterpool Park will not address the lack of affordable homes locally;

- The garden town would not just be visible from the North Downs ridge but from the entire escarpment, much of which has public access (Kent Downs AONB Unit);
- The garden town would pull the population centre away from Folkestone leaving the central area deprived;
- There is no environmental capacity for the garden town;
- Lympne will not be able to maintain its distinct character - proposed mitigation is wholly inadequate;
- Jobs growth will not match population growth in the garden town;
- The garden town will be developer-led rather than community-led;
- Welcome the aspiration for water neutrality, but this needs to be applied at a large scale rather than for individual homes. New water consumption needs to be balanced by reductions elsewhere (Environment Agency);
- It will be difficult to achieve water neutrality; development should aim to be highly water efficient with an aspiration for water neutrality (Quod on behalf of landowners);
- Strongly object to proposals for housing and sports facilities adjacent to the Royal Military Canal, Hythe³ (Historic England);
- Too much development in Hythe will detract from the vision; and
- Hawkinge is a town not a village and it doesn't blend into the landscape as is claimed.

³ An allocation in the Places and Policies Local Plan, Policy UA18.

Part 4 – The Spatial Strategy for Folkestone & Hythe District

9. Section 4.1: District Spatial Strategy

9.1. 54 representations were received relating to Section 4.1 (41 comments to the supporting text and 13 comments to policy SS1).

9.2. Comments on the supporting text raise the following issues:

- The appeal of the district will be lost when villages around the new town merge with Otterpool, losing their identity;
- The development of Otterpool Park has nothing to do with meeting local need and everything to do with creating a commuter town. Building housing promotes immigration which creates problems;
- It is not clear how building a garden settlement will promote social mobility;
- Proper evidence is needed of what housing is required, and where, to avoid creating misplaced communities;
- The remaining coastline should be preserved;
- Could further education provision be used to address the balance between the older and younger population?;
- Figures for housing completions and housing targets are confusing;
- The housing targets are nearly double those of the previous Core Strategy and more than the government requires;
- A legitimate case could be made for the district not to meet its housing need (Kent Downs AONB Unit);
- Object to unrealistic and unsustainable housing targets (CPRE Shepway);
- It is extraordinary that the Strategic Housing Market Assessment does not include Ashford;
- Research is self-serving, unconvincing and incomplete;
- Targets are based on assumptions about in-migration from London which may or may not continue;
- Concern that the plan proposes housing delivery beyond the plan period – there is no justification for this (Kent Downs AONB Unit);
- The council will need to fully consider its housing need when the standard methodology and revised NPPF are formally published. This will likely be supported by new household projections scheduled for release in September 2018 (Gladman Developments Ltd.);
- The increase in housing growth will place significant additional pressure on education facilities – the plan will need to meet infrastructure requirements (Education and Skills Funding Agency);
- Categorising employment as “supporting infrastructure” betrays a “housing first” attitude;
- There is not enough detail about measures to increase employment;
- The town centre needs to be developed to provide opportunities for the daytime and night-time economies;
- An ambitious strategy is needed to improve deprived areas and develop brownfield sites;
- The council proposes to pursue a nuclear waste facility on Romney Marsh against local people’s wishes – this is a major strategic issue and should be subject to consultation;
- The council needs to be open about how the water supply will be dealt with;

- Support the intention that development elsewhere in the AONB will be limited, but this should be explicitly set out (Kent Downs AONB Unit);
- The area between Folkestone and Ashford should not be allowed to join up;
- The plan should be clear and consistent about what is proposed for the rest of the North Downs and AONB;
- If a new railway station is built, Folkestone will be more than one hour from central London;
- Sustainable construction techniques should not only be applied in the Urban Area; and
- The plan should recognise the scope of London Ashford Airport to expand beyond the current capacity, within the plan period.

Policy SS1: District Spatial Strategy

9.3. 13 representations were received relating to Policy SS1. These raise the following issues:

- Evidence suggests that there are significant upwards pressures on housing need which the plan will need to address (The Crown Estate);
- The principle of the creation of a garden settlement is supported (The Aspinall Foundation);
- Support the spatial strategy and the focus on Folkestone Seafront (The Trustees of Viscount Folkestone);
- The spatial strategy based on a new town and the expansion of Sellindge is not supported (Kent Downs AONB Unit);
- There was no meaningful consultation with local residents before the garden town bid was submitted;
- There is no genuine local consent for a garden town; design parameters and infrastructure will be watered down; targets for housing delivery will not be met due to lack of capacity in the housebuilding industry (CPRE Shepway);
- The Kent Downs and Romney Marsh areas are unique and can easily be overdeveloped and spoiled with traffic and pollution;
- The development of a garden town will starve Folkestone of retail and business trade;
- Object to failure to include provision for housing in North Downs rural settlements outside Sellindge and Otterpool (E. Charlier and Sons Ltd.);
- The plan should focus on the harder areas to resolve within Folkestone east and north where the greatest benefits will be found;
- London Ashford Airport should be identified within the policy (London Ashford Airport); and
- References in the policy to “new development” and “commercial development” are too general (CPIII Shopping Folkestone S.A.R.L.).

9.4. Of these 13 comments, five comments promote the development of sites and areas:

- Booker Wholesale, Park Farm Industrial Estate, Folkestone - Park Farm Industrial Estate is changing in nature and appropriate development should be directed there;
- Land north of Aldington Road (zoo car park);

- Land adjoining Etchinghill Nursery, Etchinghill;
- Land at Brookland can assist in meeting development needs; and
- London Ashford Airport.

10. Section 4.2: Housing and the Economy Growth Strategy

10.1. 23 representations were received relating to Section 4.2 (12 comments to the supporting text and 11 comments to policy SS2).

10.2. Comments on the supporting text raise the following issues:

- Support the housing provision set out in Table 4.2 (Quod on behalf of landowners);
- There are so many houses being built in and around Folkestone and Hythe – we do not need any more;
- There is a lack of credibility over the housing figures – Otterpool was first planned for 12,000 homes, then 10,000, now 5,500 up to 2036/37;
- The figure of 5,500 new homes for the garden settlement provides the minimum that could be expected to be delivered from the development (Quod on behalf of landowners);
- The priority should be to create jobs for existing residents rather than built houses for migrants;
- Housing does not contribute to employment, other than through relatively few construction jobs;
- Without a policy to support London Ashford Airport the plan will not be effective in delivering economic growth in an area;
- There is no strong evidence on the drawbacks of existing employment allocations – this risks losing existing employment land to speculative mixed-use developments;
- The masterplan should be informed by the Employment Opportunities Study rather than be required to reflect it (Quod on behalf of landowners);
- The plan focuses on long-term delivery only, through a garden town. This is an excessive spatial focus given uncertainty over the timescale for completions – the plan should look at short-term delivery; and
- A further 900 homes should be delivered in the North Downs area to ensure that housing needs are met while the difficult task of delivering the garden settlement is achieved.

Policy SS2: Housing and the Economy Growth Strategy

10.3. 11 representations were received relating to Policy SS2. These raise the following issues:

- The intention to meet the locally identified housing need of 633 dwellings a year on average is supported (The Aspinall Foundation);
- Support the recognition of the garden settlement as an important element of housing provision (Quod on behalf of landowners);
- The plan will need to demonstrate that it is providing a wide range of sites in a wide range of locations to encourage the widest possible range of housebuilders (Gladman Developments Ltd.);

- The plan needs to include figures for the provision of floorspace for retail and other main town centre uses (CCPIII Shopping Folkestone S.A.R.L.);
- Figures for housing need are not substantiated by evidence of employment opportunities; provision for community facilities is omitted;
- Park Farm Industrial Estate is changing in nature, and this should be reflected in the strategic policy to ensure that previously developed land is utilised;
- The credibility of the plan has been undermined by the decision to promote Otterpool Park before the Core Strategy Review has been completed;
- Concerns over the proposed housing need in view of changes to the government's methodology and spatial implications for the North Downs area (Kent Downs AONB Unit);
- The varying figures for housing need are inconsistent and lack credibility; and
- It is essential that proper consideration is given to water, drainage, schools, medical facilities and roads. Affordable housing should be provided – agreements are often made but not kept. The Kent Downs and Romney Marsh areas are unique and can easily be overdeveloped.

11. Section 4.3: Place Shaping and Sustainable Settlements Strategy

11.1. 20 representations were received relating to Section 4.3 (12 comments to the supporting text and eight comments to policy SS3).

11.2. Comments on the supporting text raise the following issues:

- It is not the case that there is spare capacity in existing infrastructure;
- Text about rural and primary villages is too open-ended and lacks clarity; it seems to indicate that “piecemeal” development will continue regardless of “strategic” development at Otterpool;
- Object to the assertion that the area of the proposed Otterpool development is lower quality than other parts of the region;
- The text needs to make it clear that a sequential approach will be undertaken to ensure that sites at lowest risk are considered first (Environment Agency);
- Paragraphs relating to the sequential approach (paragraph 4.73) and strategic needs and flood risk (paragraph 4.75) should be deleted as they provide get-outs for inappropriate development;
- Tidal flooding is not the only flood risk;
- Reference to the Water Resources Management Plan needs to be updated (Kent County Council);
- The plan should refer to the need to follow the Kent Downs AONB Management Plan and associated Design Guidance (Kent Downs AONB Unit);
- Safeguards are needed over and above planning controls (such as community ownership) to ensure that the highest quality is achieved (CPRE Shepway);
- Welcome the aim to achieve water-neutral development, but this needs to be applied at the large-scale and is not something that can be achieved at

the scale of an individual self-build or custom-build home (Environment Agency); and

- Achieving carbon and water neutrality is challenging. The text should be amended to refer to the aim for the garden settlement to achieve the highest possible standards of energy and water efficiency with an overall aspiration towards carbon and water neutrality (Quod on behalf of landowners).

Policy SS3: Place-Shaping and Sustainable Settlements Strategy

11.3. Eight representations were received relating to Policy SS3. These raise the following issues:

- The principle of creating a garden settlement is fully supported (The Aspinall Foundation);
- Support reference to the garden settlement within the policy (Quod on behalf of landowners);
- The policy to create a garden settlement is noted (Diocese of Canterbury);
- It is not clear whether the policy applies to cultural uses – it should be amended to read “community, cultural, voluntary of social facilities” (Theatres Trust);
- All flood risk criteria should apply (bullet points (c) (i), (ii) and (iii)) (CPRE Shepway);
- Historic features of conservation interest have not been respected at Shorncliffe Garrison and the Royal Military Canal;
- There should be some form of continuous assessment between the local planning authority and developer to see when remedial action is needed to address the impacts of development; and
- The development of previously developed land is likely to be acceptable wherever it lies, not just within “defined settlements”.

12. Section 4.4: Priority Centres of Activity Strategy

12.1. 17 representations were received relating to Section 4.4 (11 to the supporting text and six comments to policy SS4).

12.2. Comments on the supporting text raise the following issues:

- Support identification of a major employment site and town centre within the garden settlement in Table 4.4 and support identification of a proposed strategic town in Figure 4.3 (Quod on behalf of landowners);
- Reference in the text to an “over-arching approach” to town centres should be reinstated;
- A full and robust town centre assessment is needed before a policy promoting these uses in the garden settlement can be found sound. References relating to the garden town not competing with other centres are insufficient to stop significant amounts of retail floorspace coming forward in this location (CCPIII Shopping Folkestone S.A.R.L.);
- The Policies Map needs to be updated to include Primary Shopping Areas for the district’s main town centres, including Folkestone;

- Residents from the garden settlement will not shop at Folkestone, they will go to Ashford;
- The economic survival of Hythe is dependent on their being sufficient car parking space for the town centre;
- The plan does not reflect the surplus, uncertainties and lack of demand for industrial space;
- Providing more employment land will not necessarily lead to more investment or jobs;
- Concern over proposals to provide major employment sites within the new garden settlement and at Hawkinge (Kent Downs AONB Unit); and
- The provision of another railway station will diminish the advantages of High Speed 1 to Folkestone businesses.

Policy SS4: Priority Centres of Activity Strategy

12.3. Six representations were received relating to Policy SS4. These raise the following issues:

- Request that the Policies Map is updated to show the garden settlement as a Priority Centre of Activity (Quod on behalf of landowners);
- Concerns at proposals to provide major employment sites within the garden settlement and at Hawkinge (Kent Downs AONB Unit);
- The policy should state that mixed-use developments will be acceptable where they provide a net gain of suitable local job opportunities (Ravensbourne Investments Ltd.);
- The policy should state that a preference will be given to out-of-centre sites that are accessible by a range of modes of transport other than the car and include consideration of the impact on town centres (CCPIII Shopping Folkestone S.A.R.L.);
- The policy does not provide sufficient flexibility in requiring no net loss of B Class and sui generis employment uses; and
- Work is required to existing towns before a new town is constructed.

13. Section 4.5: District Infrastructure Planning Strategy

13.1. 23 representations were received relating to Section 4.5 (15 to the supporting text and eight to policy SS5).

13.2. Comments on the supporting text raise the following issues:

- National policies relating to the provision of school places should be referenced (Education and Skills Funding Agency);
- The Education and Skills Funding Agency (ESFA) welcomes references to improving educational attainment and the need for development to facilitate improvements. Emerging ESFA proposals for funding schools as part of large residential developments may be relevant;
- A strategy for higher education is missing (CPRE Shepway); and
- Local demands for tertiary education should be examined – the Kent College site could be combined with provision at Otterpool (Go Folkestone Action Group).

- Following work currently being undertaken, look forward to working with the district council to secure essential highway improvements (Kent County Council);
- The omission of a policy dealing with London Ashford Airport is not justified - a policy is needed which supports the airport's continued enhancement and expansion, subject to impacts being acceptable;
- Reference to there being "no adverse environmental consequences" is too onerous – environmental impacts need to be balanced against economic growth in planning decisions;
- Infrastructure in east Folkestone is the priority, rather than Westenhanger station;
- Grave reservations about the ability of roads around the garden settlement to cope with increased traffic, particularly: heavy goods traffic; through-traffic in Sellindge; the increased draw of Westenhanger station; and routes to Hythe and the Marsh;
- Current A20 improvements in Sellindge have not included cycle paths, contrary to the encouragement in the plan for sustainable living; and
- Improvements to Folkestone's one-way system are needed that provide for more two-way traffic; railway lands near Tram Road need to be used for road-widening and car parking; support should be given to the Leas Lift (Go Folkestone Action Group).

Policy SS5: District Infrastructure Planning

13.3. Eight representations were received relating to Policy SS5. These raise the following issues:

- Broadly support the policy (Education and Skills Funding Agency);
- The policy should be amended to ensure that Section 106 negotiations not only take account of viability, but also contributions through the Community Infrastructure Levy (Taylor Wimpey);
- Developments may have the capacity to bring forward new infrastructure that could work alongside existing infrastructure to improve capacity (The Trustees of Viscount Folkestone);
- The creation of new communities may involve reshaping organisations and redrawing boundaries, as well as new resources – the Diocese needs to be fully involved in these plans (Diocese of Canterbury);
- It is not clear what the needs for water, roads, highways, schools and community facilities are;
- The policy needs to be more robust and a more suitable funding model is needed as Section 106 and Community Infrastructure Levy are ineffective;
- There are significant problems with the provision of healthcare; and
- The Infrastructure Delivery Plan should be published.

14. Section 4.6: Strategic Allocations

14.1. 196 representations were received relating to Section 4.6 (76 comments to the supporting text and 120 comments to policies SS6-SS11).

14.2. 19 comments on the general supporting text raise the following issues:

New Garden Settlement

- The site at Otterpool will destroy local communities and continue to develop the area between Folkestone and Ashford;
- The scale of development is unsustainable given constraints and the impacts of growth in Ashford;
- Proposals do not show the context of the settlement regarding the district or wider region;
- Focussing on the garden town is a long-term strategy only; the plan needs to be redrafted to focus on short-term delivery;
- The proposals leave no buffer between the homes in Barrow Hill and the proposed housing development – a clear boundary is needed;
- Development west of Otterpool Lane is too far away from the proposed new town high street and transport/community hub;
- The development will have negative impacts on residents in Barrow Hill through increase traffic;
- The footpath under the Grove Bridge should not be removed just to allow better flow of traffic; and
- Land north of Westenhanger and north west and east of junction 11 should be included – the high street and transport hub would then be in the middle of the new town.

Growth Options Study

- The Growth Options Study is a reiteration of the strategic corridor approach that was soundly rejected by the Inspector at the last Core Strategy process;
- The Growth Options Study includes assumptions that cannot be challenged until detailed plans are available – it needs to be revised;
- Strongly question the study's findings that development in the area to the east of Westenhanger is acceptable and that high density development between Stone Street and the A20 to the east of Westenhanger is justified (Kent Downs AONB Unit);
- The area identified in the Phase Two report is open farmland and cannot be described as “suitable for residential development”;
- The Phase Two report does not detail the necessary improvements to road infrastructure; and
- The Phase Two report does not define what is meant by a “critical mass” – this lends itself to high-density housing on light assumptions.

A Charter for Otterpool Park

- It is disingenuous to state that community involvement has been encouraged from the outset;
- Stakeholder consultation did not include local residents;
- The garden town is supposed to be locally-led but less than two per cent of local residents support it (Monks Horton Parish Meeting and Sellindge and District Residents' Association); and
- The town needs to build on the existing history of the place (Historic England).

Policy SS6: New Garden Settlement – Development Requirements

14.3. 13 comments were made to the supporting text to Policy SS6 and Figure 4.5: Garden Settlement North Downs – Indicative Strategy. These raise the following issues:

- A bypass is needed for Sellindge to accommodate traffic from the new town, improve movements when the M20 is closed and access land west of Harringe Lane;
- A higher percentage of self-build needs to be included; a number of self-build dwellings should be specified;
- The employment study for Otterpool Park has only recently been published;
- Paragraph 4.163 contains aspirations rather than policies;
- A new paragraph is needed to state that the delivery of school places will be managed over the course of construction to be delivered at appropriate points in line with housing (Quod on behalf of landowners);
- The following comments were made relating to Figure 4.5:
 - The notation should be amended to allow for greater flexibility in the location of the town centre (Quod on behalf of landowners);
 - The figure contains errors and needs to be aligned with the draft masterplan;
 - Concern about the use of zoo land, particularly the car park;
 - The use of grey triangles to identify heritage assets is misleading – it only identifies listed buildings, not other types of asset. The grade II listed Royal Oak public house, grade II registered Sandling Park and archaeological remains are not shown (Historic England);
 - Should show the southern entrance to the castle being reinstated and a sufficiently large undeveloped area retained between the A20 and the castle (Historic England); and
 - Currently the plan is just a number of separate housing developments around the villages of Sellindge, Lympne and Westenhanger.

14.4. 48 representations were received relating to Policy SS6. These raise the following issues:

- There has been a lack of consultation with local residents;
- The scale of development is unacceptable and would destroy the character of the area. It would not be in keeping with the Area of Outstanding Natural Beauty and would lead to the loss of agricultural land;
- The council is preparing for a new conurbation, absorbing the local villages and encroaching on Hythe, Folkestone and Saltwood;
- The development is in the wrong place – homes should be built on brownfield sites within Ashford and Folkestone;
- Large communities living close to deprived areas are more prone to antisocial behaviour and a reduced quality of life – small clusters of development would have less impact (Stowting Parish Meeting);
- The garden town is a real opportunity to create a great place to live, rather than extending the urban sprawl of Ashford or Folkestone;
- We must not build another centre of growth so close to Ashford – it will result in a built-up area from Ashford to the coast, mainly consisting of dormitory settlements for people working in London;

- To maintain Lympne as a separate, vibrant village it needs some new houses and space between Lympne and Otterpool;
- The William Harvey hospital and doctor's surgeries are already over-stretched;
- There is insufficient water, sewerage, road or primary health care infrastructure;
- There is the possibility of flooding;
- A bypass is needed for Sellindge – this would help Sellindge residents, the Otterpool development and through-traffic;
- The development will lead to increased congestion in and around Hythe – Hythe will be swamped;
- The amount of development has nearly doubled from the existing Core Strategy and is more than the government requires;
- Plans need to be rethought – no one in Sellindge, Stanford and Lympne wants the development;
- The development will put a huge strain on the water supply in what is already a water-scarce area;
- Not convinced that the aspiration of one job per dwelling will be achieved. The employment opportunities are overstated;
- Homes would not be affordable. It is a common ploy of developers to lower the number of units when permission is granted;
- The affordable housing proportion should be 30 per cent (CPRE Shepway);
- Support the policy, but amendments should be made to:
 - Identify water and carbon neutrality as an aspiration;
 - Provide greater flexibility regarding the mix of housing;
 - Provide greater flexibility in the phasing of development;
 - Provide clarity on the requirement to “meet the needs of the elderly”;
 - Provide greater flexibility regarding the provision of self-build plots;
 - Remove a fixed target for school provision with a requirement to monitor and manage provision over the course of construction and occupation of homes (Quod on behalf of landowners);
- Support the specification of anticipated requirements for new schools – it needs clear explanation how this has been calculated (Education and Skills Funding Agency);
- Insufficient attention has been given to the retail and town centre offer – it could cause significant harm to town centres in the district and beyond (CCPIII Folkestone Shopping S.A.R.L.);
- Object to the proposed allocation; however if it comes forward, it is essential that potential harm to the Area of Outstanding Natural Beauty is addressed in this policy (Kent Downs AONB Unit);
- Welcome the ambition to create a water-neutral development, but this would need to be applied at a large scale, not in the context of individual homes or even a larger new development (Environment Agency);
- Kent County Council has commented as follows:
 - The Rights of Way Improvement Plan should be referenced. This will enable joint working to deliver improvements;
 - The public right of way network can provide opportunities for leisure and recreation within the site and provide access to the wider network;
 - Support criteria related to connectivity (1(d)) and 1(e)) – good connectivity will reduce car reliance from the outset;

- Reference to “community facilities” (criterion 4(a)) is left undefined – this should include provision for the elderly, young people, faith groups, libraries, social care, etc;
- Detailed amendments are suggested to wording relating to education provision; and
- An assessment is needed to determine whether the strategic allocation would be compatible with the permitted waste recovery facility at Otterpool Quarry;
- Canterbury City Council has commented as follows:
 - Further emphasis is needed on the delivery of employment development as part of each phase;
 - Query whether any work has been done to assess the impacts on key routes to Canterbury (Stone Street and Nackington Road) which are already subject to congestion; and
 - Would support the provision of a frequent, high quality bus service between Otterpool and Canterbury connecting to the fast bus route from South Canterbury/Nackington Road to the bus station;
- The settlement will be clearly visible from the escarpment to the north and North Downs Way National Trail. There are potential impacts but also opportunities for enhancement for the Otterpool Quarry and Lympne Escarpment Sites of Special Scientific Interest. There is the opportunity for an ambitious green and blue infrastructure strategy to mitigate impacts and provide net gain. Policy wording should be strengthened to achieve biodiversity gains (Natural England);
- The second paragraph does not reference the historic environment – it should state that the town’s townscape and landscape will be informed by the historic character of the area (Historic England);
- Support the principle of a new garden settlement. A degree of flexibility is needed to enable some peripheral sites to be brought forward earlier in the plan period. The affordable housing contribution should be expressed as a target, rather than a minimum (The Aspinall Foundation);
- The requirement to make stakeholders central to the masterplanning is welcomed (Diocese of Canterbury);
- The delivery of garden settlements is incredibly challenging and will take significant time – a cautious approach is needed to delivery, given the experience of proposals in North Essex (Gladman Developments Ltd.); and
- Strategic scale development must be balanced against the delivery of a range of sites so that smaller housebuilders, as well as national operators, can work together.

Policy SS7: New Garden Settlement – Place Shaping Principles

14.5. 13 comments were made to the supporting text to Policy SS7. These raise the following issues:

- Bridlepaths, footpaths and cycle paths must feature heavily in the new development and be part of phase one;
- Paragraph 4.164 fails to reference the historic environment. It would be better to also reference how other heritage assets (designated or not) can inform the character of the new settlement (Historic England);

- More landscaping is required between the current homes in Barrow Hill and the proposed new estates to ensure existing communities do not lose their identity;
- Doubt whether the new high street will be commercially viable due to lack of footfall;
- Alternatives to a high street should be considered with different layouts such as squares;
- A large town is going to have a town centre that competes with neighbouring towns – look to Marlborough and Poundbury for inspiration;
- A high speed train stopping at Westenhanger would be at the expense of commuters travelling from Folkestone;
- Kent County Council suggests amendments in relation to train operating companies; and
- There should be 40 per cent green space in the development.

14.6. 19 representations were received relating to Policy SS7. The raise the following issues:

- Lympe should not be destroyed as a separate, historic village in order to create a “vibrant new town”;
- There is a lack of clarity regarding revisions and amendments to delivery;
- To overcome traffic congestion in Sellindge, a through-road from the A20, next to Otterpool Lane should be built to access the new development west of Otterpool Lane and west of Barrow Hill. This could then come out onto Harringe Lane and then back onto the A20;
- New rights of way should be in place during the first stage of development;
- Harringe Lane would be more suited to becoming an access-only road to the residents and form part of the new bridlepath and cycle path network;
- Broadly support the policy, but suggest that the term “village” should be removed when describing neighbourhoods (Quod on behalf of landowners);
- A full assessment of the retail requirements of the garden settlement is required before any sound retail and town centre policy can be put forward (CPIII Shopping Folkestone S.A.R.L.);
- It is important that policies relating to retail provision in the new settlement are clear as to the scale and form of facilities required and that they will not be greater than required to meet the day-to-day needs of the new community;
- Criterion 1(a) should require a landscape-led approach that respects historical character;
- Westenhanger Castle should be made part of the project to complete its conservation and be an integral part of the new settlement and should be included within the allocation boundary;
- Historic England suggest amendments to paragraph (d) of SS7 in relation to archaeological and heritage assets;
- The newly discovered Roman Villa should play a major part in shaping the new town, along with the Castle at Westenhanger;
- Kent County Council suggests:
 - Additional text in relation to public rights of way within Policy SS7(1)(v). The Rights of Way Improvement Plan should be referenced;

- High quality, traffic-free walking and cycling routes should be provided within new developments that integrate with the wider transport network (Policy SS7 (6)(e));
- Amendments to Policy SS7(6)(g) in relation to train operating companies;
- Provisions on sustainable access and movement are supported;
- An assessment is needed to demonstrate whether or not the development would be compatible with waste recovery facility at Otterpool Quarry;
- Any upgrades to Westenhanger Station should not impact or degrade the existing high speed provision in Dover (Dover District Council);
- Community formation should be given more prominence to ensure the social dimension of sustainable development has as much priority as economic and environmental aims and objectives (Diocese of Canterbury);
- 40 per cent green infrastructure is missing from this document (CPRE Shepway);
- Natural England advises that the policy should include more reference to the AONB, Green Infrastructure (GI), and long-term stewardship of the GI estate; and
- Kent Downs AONB Unit advises that:
 - The policy fails to incorporate sufficient safeguards to ensure development would mitigate the impacts of the proposal on the Kent Downs AONB;
 - A requirement to improve important gateways into the new town should be included; and
 - The orientation of streets and building heights should be included within the policy to minimise any impact on the AONB.

Policy SS8: New Garden Settlement – Sustainability and Healthy New Town Principles

14.7. Six comments were received to the supporting text of Policy SS8. These raise the following issues:

- Correction to wording to state “serious water stress” rather than “severe” (Environment Agency);
- The environmental dimension of sustainability includes the historic environment and this should be reflected here (Historic England);
- Affinity Water South East region has neither the infrastructure nor water resources to support a new town, which would be twice the size of Hythe (Monks Horton Parish Meeting and Sellindge & District Residents’ Association);
- There is insufficient detail on water use; and
- Safeguarded minerals are not correctly identified (Kent County Council).

14.8. 18 representations were received relating to Policy SS8. These raise the following issues:

- A site-wide heat and power network has the potential to be particularly harmful to the landscape of the AONB (Kent Downs AONB Unit);

- Would like early discussion with the council and other stakeholders to address cross-boundary water supply and quality issues (Dover District Council);
- Insufficient attention has been given to the provision of retail and town centre space – this could cause significant harm to town centres within the district and beyond (CCPIII Shopping Folkestone S.A.R.L.);
- Support ambition for water efficiency and BREEAM standard for non-residential development. Welcome ambition to create a water-neutral development; however this concept should be applied at a large scale, not that of individual homes or even larger developments (Environment Agency);
- The water efficiency target is not achievable;
- The following amendments should be made:
 - The requirement to achieve BREEAM ‘Outstanding’ standard should be replaced by the requirement to achieve ‘Very good’ standard with the aim to meet ‘Excellent’ standard;
 - Water neutrality should be expressed as an “aspiration” rather than an “aim”;
 - Zero carbon standards for community buildings should be an aspiration (Quod on behalf of landowners);
- Kent County Council has commented as follows:
 - The policy refers to achieving water neutrality as an “aim” but elsewhere it is referred to as an “aspiration” – to achieve water neutrality a large proportion of the existing housing stock in the district would need to be retrofitted;
 - The importance of maintaining the “integrity of water quality” should be referred to in the policy, as well as the text;
 - The requirement for non-residential buildings to achieve BREEAM “outstanding” standard will lead to large increase in the build costs of schools, which must be met by the development;
 - In relation to a minerals assessment, particular reference should be made to Policy DM7 of the Kent Minerals and Waste Local Plan 2013-30; and
 - Consideration should be given to the impact of the development on non-motorised users along rural lanes, as these routes provide connections for horse riders and cyclists travelling between public rights of way;
- The formation of communities could be given more prominence – this should be given as much priority as economic and environmental aims and objectives (Diocese of Canterbury); and
- Support the aim for construction to be soil neutral, but some movement of soils may make sense (CPRE Shepway).

Policy SS9: New Garden Settlement – Infrastructure, Delivery and Management

14.9. 13 representations were received to the supporting text of Policy SS9. These raise the following issues:

- Ashford borough residents affected by the development have not been consulted;

- Education contributions by developers need to be sufficient to deliver school places if the plan is to be deliverable;
- Kent County Council has commented as follows:
 - The text will need updating following the announcement on the Housing Infrastructure Fund;
 - The text should refer to informal pedestrian and cycle pathways;
 - The achievement of water neutrality should be an aspiration rather than an aim;
 - Letter received from Kent County Council setting out its General Site Transfer Requirements;
- Large developments should not be 'zero-rated' for the Community Infrastructure Levy (CIL) – CIL should be captured alongside Section 278/Section 106 contributions;
- Support the amendment to exclude the garden settlement from CIL (Quod on behalf of landowners);
- Question why a "tariff-based approach" depends on securing Housing Infrastructure Fund monies;
- Question whether all archaeological studies have been carried out, and if new features are found (e.g. a Roman settlement) how will this affect the design of the town;
- The provision of good broadband services should be delivered, but may be costly over such a wide area; the words "where feasible" should be removed; and
- Some members of the group regard the area as Green Belt, and most believe that water supply will be a problem (Go Folkestone Action Group).

14.10.20 representations were received relating to Policy SS9. These raise the following issues:

- Strongly disagree with the strategy for housing development in rural areas, particularly in respect of Otterpool Park;
- Object that there is no mention of how infrastructure will be funded. Concern that infrastructure costs will exceed funds;
- There needs to be more joined-up thinking between organisations covering emergency services, hospitals and education;
- Nearby villages that fall within Ashford borough should also benefit from Section 106 funding, as they will be directly impacted;
- Insufficient attention has been given to retail and town-centre policies – inappropriate development could cause significant harm to town centres in the district and beyond (CCPIII Shopping Folkestone S.A.R.L.);
- Contributions and improvements should be secured towards the costs of managing increased visitor impacts on the Area of Outstanding Natural Beauty (Kent Downs AONB Unit);
- Support the emphasis on early delivery of critical infrastructure, particularly primary education, and the approach of prioritising Section 106/Section 278 agreements to secure delivery. This will need to be planned carefully to work within pooling constraints (Education and Skills Funding Agency);
- Southern Water has commented as follows:
 - The site is within Southern Water's wastewater service area network – reinforcement will be required at the "practical point of connection";

- There is no provision to support the delivery of wastewater infrastructure which is funded through mechanisms other than CIL or Section 106 agreements;
- Any upgrades to wastewater treatment works would be funded and delivered through the water industry's five yearly price review process;
- Network improvements will be provided through the new infrastructure charge but Southern Water will need to work with the site promoters to understand the development programme;
- Southern Water has limited powers to prevent connections to the sewerage network even when capacity is limited – planning policies and conditions play an important role in coordinating development and infrastructure;
- Southern Water's infrastructure crosses the site and easements will be required as well as buffers around wastewater pumping stations;
- In relation to a Community Trust, there is a need to make provision for a heritage facility, such as a museum/archive storage (Historic England);
- Kent County Council has commented as follows:
 - An assessment is needed to demonstrate whether or not the development would be compatible with the waste recovery facility at Otterpool Quarry;
 - Reference should be made to the county council's Rights of Way Improvement Plan;
 - Criterion 1(a) should include community and waste facilities;
 - Support for criterion 2(a) – this will prevent the need for retrospective installation of fibre to the cabinet;
 - Support for provision for ducting in criterion 2(d) – this will ensure that impacts on the highway are kept to a minimum as a result of maintenance and repairs;
 - In relation to Criterion 3(a) any route that is not a Public Right of Way or cycle route which is adopted highway will not be maintained by the County Council;
 - Criterion 3(b) – the strategy for stewardship could include street furniture and public art;
 - Criterion 3(b)(vi) – in some cases there may be an opportunity for surface water drainage systems to be adopted by the sewerage undertaker; and
- Social infrastructure provisions should be strengthened. The social dimension should have at least as much priority as economic and environmental objectives. The Diocese has the skills to work with the local planning authority to improve the policy and ensure delivery (Diocese of Canterbury).

Policy SS10: Spatial Strategy for Folkestone Seafrost

14.11. Nine representations were received relating to the supporting text of Policy SS10. These raise the following issues:

- Renumbering policies is confusing. Policies should be reviewed where circumstances have changed;
- The policy should remain until the project is complete;

- Any development must recognise that this area has a long history as a place with a nightlife;
- Support the retention of the Harbourmaster's House and the Princess Royal. Would like to see the Fishermen's Museum continue (Go Folkestone Action Group);
- The Seafront scheme will need to complement the town centre shops; the Leas Lift is vital to connect the seafront;
- Support the statement that local partners should work together to improve connectivity between the seafront and town centre;
- Transport links in the harbour area need to be rethought; and
- The proposal to redirect the England Coastal Path along the road was rejected.

14.12. Eight representations were received relating to Policy SS10. These raise the following issues:

- Questions whether the policy is still valid;
- Support the 90 litres/person/day target for water efficiency, but reference to the Code for Sustainable Homes should be deleted (Environment Agency);
- Folkestone and Dover is the most water-stressed area of the UK;
- The policy will need to be updated given the current scheme for the seafront;
- The focus on Folkestone seafront is supported;
- Support the policy and the statement that local partners should work together to improve connectivity; and
- Renumbering the policy is ridiculous. 'Sui generis' and 'A' use classes should be removed. The policy was ignored when granting permissions.

Policy SS11: Spatial Strategy for Shorncliffe Garrison, Folkestone

14.13. Three representations were received relating to the supporting text of Policy SS11. These raise the following issues:

- Adjustments should be made to reflect the consented scheme (removal of the provision of allotments and adjustment of green space at the stadium) (Taylor Wimpey);
- Reference to listed buildings is out-of-date, as four buildings/structures are now grade II listed (The Racquets Court, Concrete Barrack Block, Sir John Moore Library and Risborough Gates) (Taylor Wimpey); and
- Tourism could be greatly improved if the developer was encouraged to retain the last remaining stable block; unfortunately this is destined for demolition.

14.14. Seven representations were received relating to Policy SS11. These raise the following issues:

- The focus on Shorncliffe Garrison is supported;
- The policy should be updated to reflect consented development and national guidance, in particular affordable housing provision and reference to the Code for Sustainable Homes (Taylor Wimpey);

- Support the 90 litres/person/day target for water efficiency, but reference to the Code for Sustainable Homes should be deleted (Environment Agency);
- There is no mention of heritage – the site contains heritage artefacts. Reference should also be made to the Seabrook Valley;
- The National Planning Policy Framework has not been adhered to when it comes to delivering historic interpretation; and
- Renumbering the policy is ridiculous. Heritage features of the site are not being preserved or investigated properly – the policy has not safeguarded these features.

Part 5 – Core Strategy Delivery

15. Section 5.1: Core Policies for Planning

15.1. 62 representations were received relating to Section 5.1. These comprise 37 comments on the supporting text and 25 comments on the policies (CSD1-5).

15.2. Comments on the supporting text raise the following issues:

- More homes should be developed in Folkestone town centre alongside new parking for residents and shoppers – the decline in shopping space needs to be managed (Go Folkestone Action Group);
- Affordable housing targets should remain at 30 per cent;
- The Royal Victoria Hospital site should be used for the elderly;
- Creating travellers' sites is concerning;
- There is a serious lack of public toilets;
- The Heritage Strategy is still in draft and the Destination Management Plan has not been adopted;
- A local list of heritage assets is needed;
- Heritage assets are not being considered positively (Royal Military Canal, Shorncliffe Garrison);
- The windmill at Stanford (Grade II*) needs to be included on Figure 5.2;
- Assessing the suitability of future development must consider the impact on the Kent Downs (e.g. Port Lympne) (Kent Downs AONB Unit);
- Adequate parking needs to be provided for the coastal park;
- Reference to “special water scarcity status” need to be updated (Environment Agency);
- The strategy for water supply and management needs to be comprehensively reviewed and supported by detailed independent studies;
- The draft Water Resources Management Plan currently out for consultation does not cater for the housing growth proposed;
- The district falls within one of the most water-stressed areas of the UK with less fresh water per person than Morocco;
- The use of grey water can play a significant role in new developments;
- The updated Water Cycle Study is needed now;
- Welcome the aspiration for water neutrality, but this needs to be applied at a large scale rather than for individual homes. New water consumption needs to be balanced by reductions elsewhere (Environment Agency; Kent County Council); and
- Occupation of developments needs to be aligned with the delivery of the requisite sewerage infrastructure (Southern Water).

Policy CSD1: Balanced Neighbourhoods

15.3. 10 representations were received relating to Policy CSD1. The representations raise the following issues:

- Smaller scale housing development around Lympne, Westenhanger and Sellindge is needed which suits the rural character and is truly affordable;
- The housing market area should include Ashford (CPRE Shepway);

- House-building should only be allowed where sufficient affordable housing is included;
- The proportion of affordable housing should be maintained at 30 per cent;
- On the Romney Marsh and the AONB the affordable target should be set at 30 per cent with a further 20 per cent for retirement homes;
- The requirement for a 30/70 shared equity/affordable rent-social rent split will be inappropriate for a number of allocations;
- Support the provision of 22 per cent affordable housing, subject to viability and welcome the acknowledgement that the split of tenures is a starting point (Quod on behalf of landowners);
- Support the lower threshold for affordable housing provision in the AONB (Kent Downs AONB Unit);
- There should be more one- and two-bedroom terraced, semi-detached, flats and maisonettes for first-time buyers;
- The policy does not reflect the broader range of affordable housing (starter homes, discounted market sales, shared ownership and rent-to-buy) in the consultation National Planning Policy Framework (NPPF) (Taylor Wimpey); and
- Reference to rent-to-buy should be made within the policy as well as the text (Rentplus Ltd).

Policy CSD2: District Residential Needs

15.4. Five representations were received relating to Policy CSD2. The representations raised the following issues:

- The policy should be updated to reflect the broader definition of affordable housing in the draft NPPF. Requirements for housing mix and tenure should be amended to avoid unnecessary prescription. It is not clear how the policy will be monitored (Taylor Wimpey);
- The housing mix is difficult to forecast too far ahead;
- Units for older people should not be limited to the garden town and Sellindge (CPRE Shepway);
- The policy should indicate what will be done to house the older population;
- The mix at Otterpool Park will look to meet the target mix, dependent on viability and deliverability and ensuring flexibility between phases. Amendments should be made as follows:
 - The requirement for sizes of houses to be split by tenure is too prescriptive; it should be expressed as a maximum percentage of one bed dwellings and a minimum percentage of three bed dwellings;
 - The requirement for specialist units for older people should be widened to include Use Class C2, in addition to Class C3(b) (Quod on behalf of landowners);
- Rents should be capped to help people in low paid jobs; and
- An excess of new property risks creating a stagnant property market.

Policy CSD3: Rural and Tourism Development

15.5. One representation was received relating to Policy CSD3. This states that the policy needs to incorporate the findings of the Heritage Strategy and Destination Management Plan.

Policy CSD4: Green Infrastructure of Natural Networks, Open Spaces and Recreation

15.6. Six representations were received relating to Policy CSD4. These raise the following issues:

- Development that would involve the loss, or prejudice the use, of playing fields is strongly resisted (Sport England);
- References to encouraging healthy living and active lifestyles are welcomed and could be strengthened by referencing Sport England's Active Design Guidance;
- The focus on the natural environment and policies to protect and enhance biodiversity are welcomed (Environment Agency);
- Support the development of a robust strategy for mitigating recreational disturbance to European-designated sites (RSPB);
- The wording and principles should be strengthened to ensure that net gains in biodiversity can be achieved (Natural England); and
- The location, scale and complexity of the garden settlement means that there are significant environmental implications, but the development offers the opportunity for an ambitious blue and green infrastructure strategy for people and wildlife (Natural England).

Policy CSD5: Water and Coastal Environmental Management

15.7. Three representations were received relating to Policy CSD5. These raise the following issues:

- The policy could refer to the Water Framework Directive, as is referenced in the text (Environment Agency);
- Adequate foul sewer capacity must be provided in line with development. Brownfield development must address contamination, however, this can lead to conflicts with sustainable drainage, as infiltration drainage is not always appropriate (Environment Agency); and
- The target for water consumption should be reduced to 90 litres/person/day.

16. Section 5.2: Areas of Strategic Change

16.1. 103 representations were received relating to Section 5.2. These comprise 60 comments on the supporting text and 43 comments on the policies (CSD6-9).

16.2. Six comments were received on the general supporting text. These raise the following issues:

- Support for priority areas of regeneration (Table 5.1);
- Welcome references to improving educational attainment and the need for development to facilitate improvements to education (Education and Skills Funding Agency);
- The text should state that the council will support development proposals associated with the decommissioning of Dungeness 'A' (Nuclear Decommissioning Authority);

- Consents for London Ashford Airport should not be seen as a limit of future expansion, but as an opportunity for further investment in the district and to improve links between the UK and mainland Europe. Planning policy will not be effective without a policy to support this (London Ashford Airport); and
- The Sellindge Strategy must also incorporate the A20 Barrow Hill, which is over one third of the village of Sellindge.

Policy CSD6: Central Folkestone Strategy

16.3. 13 comments were submitted to the supporting text to Policy CSD6. These raise the following issues:

- A university or tertiary education facility should be created, using a combination of development arc, Kent College and Otterpool Park, joined by rail links (Go Folkestone Action Group);
- The University Centre Folkestone is now the Sixth Form Centre;
- The harbour development has failed to make use of the town's coastal location to attract tourists and will harm the setting of The Leas;
- Investment in the restoration of the Leas Lift should be a priority within the first phase of the plan period rather than "over the plan period";
- While Figure 5.5 recognises the cliff as a barrier to movement in Folkestone, the road and rail system also restricts access;
- Folkestone town centre needs new buildings (including large shops and car parks) with appropriate tourist and boutique shops on the seafront and 'click and collect' and retail warehouses at Park Farm (Go Folkestone Action Group);
- Fail to see any contribution by the harbour owner to reintegrating maritime activities;
- Support improved connections to the sea and visitor attractions from the town, but these cannot be delivered by the land at Folkestone seafront alone; and
- While cycling in Folkestone is supported, there are considerable differences in level between the town and the seafront.

16.4. Four representations were received relating to Policy CSD6. These raise the following issues:

- References to meeting needs for education infrastructure are supported; the next version of the plan should include more detail. The Education and Skills Funding Agency would like to be included in discussions on potential site allocations;
- More needs to be done to provide a supportive framework for creative and digital industries (The Creative Foundation);
- Support requirement for new development to improve connectivity to and within the town centre; and
- Heritage policies are too late to avoid destruction of heritage assets.

Policy CSD7: Hythe Strategy

- 16.5. One representation was received relating to the supporting text to Policy CSD7. This raised the following:
- Problems at the A259/A261 junction will be exacerbated by additional traffic from the Martello lakes development and Otterpool Park.
- 16.6. Four representations were received relating to Policy CSD7. These raise the following issues:
- Welcome references to the need for development to improve education facilities. The next version of the plan should clarify requirements, sites and timescales, while retaining a degree of flexibility (Education and Skills Funding Agency);
 - Welcome plans to improve bus links to railway stations, but question the deliverability of this, given that the bus company is privately owned; and
 - Priorities for investment should be identified.

Policy CSD8: New Romney Strategy

- 16.7. Eight representations were received relating to Policy CSD8. These raise the following issues:
- Romney High Street is congested, schools are overcrowded and health facilities are in crisis – developers should be improving infrastructure rather than creating problems and walking away;
 - Impacts on the High Street and public safety need to be seriously considered – provision of a southern by-pass road is fundamental;
 - There is only one road that all residents must use to vacate the whole of Littlestone, Greatstone and Lydd-on-Sea;
 - Romney Marsh should not be seen as suitable for large-scale development;
 - Proposed development in Cockreed Lane, New Romney should be cancelled;
 - Occupation of the development should be aligned with the delivery of sewerage infrastructure, ensure future access to infrastructure and include a buffer between housing and pumping stations (Southern Water);
 - Support policy but question the need for a masterplan, given that parcels already have planning permission (Gladman Developments Ltd.); and
 - Land north of Cockreed Lane should be included within the policy (Christ Church College).

Policy CSD9: Sellindge Strategy

- 16.8. 40 representations were received relating to the supporting text to Policy CSD9. These raise the following issues:
- Ashford and Canterbury hospitals will not cope with all development. Sellindge surgery cannot recruit doctors and serves ten other villages. Concern that a new health centre at Otterpool will also be for the residents of Sellindge but it is not clear when it will be built;

- Barrow Hill is a very valued part of Sellindge village, despite being severed by the motorway and railway bridges (Sellindge Parish Council);
- The description of Barrow Hill as being “severed” with a “poor sense of place” is inaccurate. Barrow Hill must have the same traffic-calming as the rest of the village;
- Existing planned development should be built before considering even more;
- Object to Rhodes House/Homelands Close development;
- The development of high grade agricultural land should be a last resort;
- Development will ruin the rural character of the village;
- Any new homes should be no more than two storeys in height;
- Future development must have the same amount of community engagement as the previous proposals did (they were supported). Community feel that the additional development is being imposed on them. The facilities and infrastructure should be provided for the additional 600 dwellings – residents should not have to travel elsewhere (Sellindge Parish Council);
- Excellent opportunity to have an all-weather footpath/cycleway to Westenhanger station;
- Improved connection to Swan Lane must be a pedestrian/cycleway, not a vehicular link (Sellindge Parish Council);
- Key time to plan a Sellindge bypass as part of the access road into Otterpool, West of Otterpool Lane and the A20, coming out west of Sellindge Church;
- With Brexit the A20 and M20 could be gridlocked with port traffic;
- Having large delivery lorries accessing the site would not be safe;
- A contraflow capability is needed during motorway incidents, maintenance and Operation Stack, to ensure that the M20 can remain operational without having to divert motorway traffic along the A20;
- Woodland planting should be used to the north boundary of Bucknell Trust land and development should only be on land between the A20 and M20 to mitigate any impacts (Sellindge Parish Council);
- The boundary should be heavily landscaped in all locations;
- Land between the M20 and fast rail link, East of Grove Bridge, Barrow Hill, also has significant fauna, flora and habitat. This must be protected (Sellindge Parish Council);
- Support for the use of new technologies to achieve low carbon and low waste with aspiration for carbon neutrality (Sellindge Parish Council);
- Picture 5.8: Sellindge Strategy should identify Places and Policies Local Plan allocations;
- The Taylor Wimpey site (The Lees) is a welcome addition to Sellindge; and
- Proposals that fail to deliver community infrastructure should be resisted (Sellindge Parish Council).

16.9. 27 representations were received relating to Policy CSD9. The representations raised the following issues:

- 600 dwellings represents a major expansion of strategic scale in the rural North Downs area within the Kent Downs AONB and would have potential

- cumulative impacts with the garden town of Otterpool (Kent Downs AONB Unit);
- The building of 1,300-1,600 homes is not sustainable;
 - The big increase in population can only lead to massively increased congestion, noise, pollution and increased consumption of natural resources;
 - The existing masterplan for Sellindge, arrived at through a democratic process, should not be overridden;
 - The northern part of this proposal has already been granted consent, without the grace to wait for this consultation to conclude;
 - Plans should not be expanded from what was originally planned (250 homes) - it will swamp the village out of all recognition;
 - Object to the allocation around Grove House or any site that will turn the village into an ugly suburban settlement;
 - Barrow Hill should be incorporated into the policy, along with the allocated site in the Local Plan⁴. Taking the footpaths away from under Grove Bridge will cause extreme danger to life - Kent County Council state that there is not enough room for two-way traffic and a path. A Sellindge bypass must be considered which would reduce congestion and benefit Otterpool Park (Sellindge Parish Council);
 - Much of the traffic will use the A20 which will be inadequate, particularly at peak times. Those wishing to travel to Canterbury will use the B2068 which has been an accident blackspot for many years;
 - Concern about road safety with more traffic on single track lanes;
 - Key time to plan a Sellindge bypass as part of the access road into Otterpool, West of Otterpool Lane and the A20, coming out west of Sellindge Church;
 - Water supply struggles to meet existing demand - there is a risk of water shortages if there is a substantial increase in housing stock;
 - Strategic-scale sites must be balanced against housing delivery and providing choice so that smaller housebuilders, as well as national operators, can work together;
 - Reference to education infrastructure is welcome but the plan should provide site-specific policies (Education and Skills Funding Agency);
 - Criteria need to be amended to ensure occupation is phased to align with delivery of sewerage infrastructure and ensure future access for maintenance and improvement (Southern Water);
 - Support from landowners of allocated sites;
 - The requirement for a masterplan is unrealistic. The policy should be amended to: refer to 20 per affordable housing; remove reference to the provision of allotments; and refer to payment towards improvement of the doctor's surgery, rather than "expansion" (Taylor Wimpey);
 - Object to the allocation of the land to the west of Sellindge over the more sustainable site of land at Elm Tree Farm to the rear of Sellindge Primary School for the delivery of 188 dwellings (Quinn Estates);
 - Object to the 'double pooling' of the financial contributions and that the development should be CIL exempt (Quinn Estates);
 - Kent County Council:

⁴ Places and Policies Local Plan, Policy ND5: General Sellindge Policy

- Supports criteria for bridleways and cycle routes but would expect the improvements to be fully funded by development contributions;
- Expects improvements to traffic-calming features at key locations and suggests that an off-site shared-use pedestrian and cycle route is considered to provide a realistic alternative to the car, encouraging active travel;
- Suggests amendments with regard to water usage and fibre-to-premise broadband;
- Supports the inclusion of a village green/common and pedestrian and cycle enhancements, but there should be a focus on improving cycle infrastructure within large developments and creating attractive routes between larger settlements; and
- Natural England concurs with the findings drawn in the Sustainability Appraisal regarding Sellindge.

17. Section 5.3: Implementation

17.1. Two representations were received relating to Section 5.3. These raise the following issues:

- Budget constraints are a major risk to the plan; and
- The monitoring of retail provision and the health of centres is essential; however, it is equally important to monitor regularly how changes in the retail sector and the economy may be affecting the demand side (CCPIII Shopping Folkestone S.A.R.L.).

Part 6 – Appendices

18. Appendix 1: Monitoring and Risk

18.1. Three representations were received relating to Appendix 1. These raise the following issues:

- Reference to achieving national Creative Enterprise Zone status should be included (The Creative Foundation);
- The use of vacancy rates to monitor the health of town centres is inadequate – monitoring should be expanded to include changes in retail occupancy, mix of uses and the proportion of national multiple stores, at the very least (CCPIII Shopping Folkestone S.A.R.L.); and
- Risk factors relating to the health of the national economy and the local housing market should be identified as “high” rather than “low”; development should be scaled-back and Otterpool Park abandoned.

19. Appendix 2: Glossary of Terms and Technical Studies

19.1. Two representations were received relating to Appendix 2. These raise the following issues:

- Lack of evidence invalidates the consultation – the period for responses should be extended or consultation repeated; and
- The local list is not mentioned and references to “Shepway” are outdated.

20. Core Strategy Review – Sustainability Appraisal

20.1. Six representations were received relating to the Sustainability Appraisal. These raise the following issues:

- Without knowing what mitigation is proposed, it is impossible to say if the Core Strategy Review is sustainable;
- The impacts of strategic-scale development on Objective 3b: Landscape are significantly underestimated (Kent Downs AONB Unit);
- Several of the objectives are contradictory and not achievable:
 - SA1 – the area needs more truly affordable housing;
 - SA3 – development would cause significant harm to the district’s landscape;
 - SA4 – nothing in the plan takes Folkestone’s heritage into account;
 - SA6 – a large area of greenfield land is to be developed, but this is not mentioned under SA6. Positive effects under SA6 do not match the negative effects for all options for Sellindge;
 - SA7 – does not identify the severity of impacts on agricultural land quality, contaminated sites or the decommissioning of the nuclear power station;
- Reference to the Water Resources Management Plan needs to be updated (Kent County Council);
- With regard to the garden settlement, net biodiversity gains could be achieved if net gain can be secured over and above any residual losses – the policy wording should be strengthened in this respect. Beneficial effects will depend on long-term stewardship (Natural England); and
- The garden settlement will have significant impacts on views from the escarpment – substantial and innovative avoidance and mitigation will be required; not just structural landscaping, but also the design of walls and roofs and the use of ‘green’ roofs and walls. Possible major negative impacts should be recorded for SA3 (Natural England).

21. Core Strategy Review – Habitats Regulations Assessment

21.1. Two representations were received relating to the Habitats Regulations Assessment (HRA). These raise the following issues:

- In relation to in-combination assessment, whilst the Places and Policies Local Plan has been included in terms of air quality, it is less clear whether other impacts, principally recreation pressure, have been included. Also, it is not clear what level of housing has been assessed. Policy SS6 states a minimum of 5,500 homes within the plan period with potential future growth up to 10,000 homes beyond, within the proposed allocation area. We advise the upper limit of 10,000 homes for the garden settlement, in addition to the Sellindge extension, forms the basis of the HRA. Notwithstanding this, Natural England concurs with the findings of the HRA, subject to caveat (Natural England); and
- The HRA is difficult to understand, digest and comment on.