

ID	Organisation Details	What does your comment relate to? - Which Section does your comments relate to?	Which Action - Please state which 'Priority and Opportunities' would you like to comment on?	Your Representation - Please write your comments below.	Response and action
4	Regional Planning Lead Southern Water	Introduction		<p>We support Folkestone & Hythe's development of a Blue Green Infrastructure Strategy. Having reviewed this with interest, Southern Water confirms that we support the majority of content.</p> <p>As you may be aware, Southern Water is progressing consultations on the Water Resources Management Plan and the Drainage and Wastewater Management Plan*, both of which have natural overlaps with this Blue Green Infrastructure Strategy. There are also links to the CSO pathfinders work we are progressing. There will clearly be some opportunities for co-development and funding across these overlaps. We have therefore provided a few comments below in the hope that these are helpful to you in finalising the Strategy.</p> <p>* https://www.southernwater.co.uk/our-story/water-resources-management-plan/wrmp24-survey https://www.southernwater.co.uk/dwmp https://www.southernwater.co.uk/our-performance/storm-overflows</p> <p>Page 2 Strategic Priorities Report (p3 of the Main report): Might clean beaches and bathing water quality be captured somewhere here?</p> <p>Page 6 of main report: Map specific opportunities for the use of 'nature-based solutions' to wider environmental problems like flooding, climate change mitigation and adaptation or poor water quality - Southern Water's DWMP team shared the attached map should this help you identify some of the opportunities for rainwater separation. Please also see - https://www.southernwater.co.uk/our-performance/storm-overflows/pathfinder-projects.</p>	<p>Reference to clean beaches and bathing water quality to be added in Main Report.</p> <p>Further information on Southern Water's Water Resources Management Plan and the Drainage and Wastewater Management Plan to be added to Main Report for completeness.</p> <p>To be referenced in Priorities and Opportunities Report as appropriate.</p> <p>Pathfinder projects noted as potential projects - although none currently within F&HD. These types of projects were discussed with KCC flood management team and potential is identified with an action to further develop this approach.</p>
14	Local resident	Introduction		<p>I appreciate it is a very ambitious strategy which is great but I wonder whether it is really feasible. Since moving to this area ten years ago I have read many strategies from all levels of local government and many seem to come to little or nothing because of lack of commitment, management and governance. This one is very important and I hope it succeeds, maybe there needs to be something in the Introduction to assure people of the Council's commitment.</p> <p>Although a strategy I feel there is a need to explain how things will be achieved ie who is going to implement the actions required and who is going to ensure they happen. Like so many strategies there is little or nothing said about the importance of residents/public playing their part. This is such an important matter for which everybody needs to take responsibility in some way and whilst I note mention is made of engagement I feel residents and community groups especially need to be invited to be actively involved in any discussions, plan making and activities - they should play their part in achieving the actions identified Shouldn't the sea/coast be shown as Blue Infrastructure also? There are historical assets in the sea and on the shoreline, as well as wildlife and these should be covered also.</p> <p>Many parishes and towns have their own strategies/plans as does KCC eg New Romney Socio-Economic Plan which covers some of the areas/topics mentions - I feel it is important that there is joined up activity/thinking to avoid duplication and waste of resources/time/finances.</p> <p>Page 4 - mention is made of supporting people but nothing about involving people, letting people take some responsibility - I see this as a strategic priority - community groups exist who already make efforts to improve the environment bu planting trees, shrubs and plants and they take advantage of the schemes set up by the likes of the Woodland Trust and others offering free packs of trees/shrubs - these groups should be involved, encouraged, supported as should schools and clubs/organisations like scouts, cubs and beavers - mention is made of developers and SuDs but nothing about providing trees on streets and gardens and yet the district has a below average tree canopy, especially on The Marsh - I see this as a strategic priority - it would be good to see an education programme aimed at adults and children especially so that they understand what is going on, the importance of doing something, and what they can do to help the environment and their own health and wellbeing.</p>	<p>BTW3 contains a set of actions which relate to getting people involved in delivery of the GBI strategy, but these are also included throughout, for example FHS2.7, FHS2.16, which cover the points raised. Gardens are referenced in action FHS 2.1, FHS 2.7, RM9, BTW 3.8, BTW5.2, HW 1.6, therefore are covered fairly comprehensively. The sea and coast is included, but more fully in the evidence report.</p> <p>Further information will be included as per comment on bathing waters and reference to Marine Protected Areas within the Priorities and Opportunites Summary document.</p> <p>Street trees are included in action FHS2.4, but are the responsibility of KCC.</p>
34	Local resident	Biodiversity, Trees & Woodlands	Needs, Opportunities and Priorities- Biodiversity, Trees and Woodlands BTW 2.6 - Recommendation	<p>BTW 2.6 - Seek to create mosaics and overall abundance of wildlife alongside the protection of specific habitats and species. Recommended change: BTW 2.6 - Seek to create mosaics and overall abundance of wildlife including in gardens and business parks/industrial estates alongside the protection of specific habitats and species .</p> <p>Gardens Domestic gardens are a key repository of biodiversity but have largely been ignored in this report. Minimalist garden designers, laziness and lack of education are all factors resulting in many gardens being covered with hard standing. This trend needs to be reversed and the Council has a part to play in both educating and actions via the planning system.</p> <p>Business Parks/Industrial Estates Mini Forests Business Parks/Industrial Estates are in the main vast slabs of hard standing. There is no reason for the absence of trees and hedges on these sites. Research in Australia has shown that it is not so much connected wildlife corridors that are necessary but well sited staging posts for flora and fauna. This is sufficient to enable species to function. Industrial Estates have a part to play. When they are being designed from scratch they should include areas set aside for tennis court sized Mini Forests [1] and provide for hedges on the periphery. This would provide staging posts on the site itself. Buildings should be designed around these pocket sized areas and any changes to the site, similarly. On established Industrial Parks there are tennis sized pockets of land available on some sites and the Council, through the planning process, should ensure that these pockets are used for planting. Not only would this enhance biodiversity, it would make the estates better places to work, while for the tenants/owners Mini Forests have the advantage of being low maintenance. Tennis court sized Mini Forests have been grown in inner London on tiny portions of land [2] , albeit that some of these have been in public parks (most recent at Eel Brook Common and Normand Park in Fulham [3]). By being both first mover in a region and specifically targeting Industrial estates - this would provide good publicity for the Council. It is also the type of initiative that could be supported by corporate sponsorship, as is the case in central London.</p> <p>[1] https://earthwatch.org.uk/get-involved/tiny-forest?gclid=EAlaIqobChMIheroZvH_AIVBe3tCh1pRQsvEAAAYASAAEgIffvD_BwE https://www.nationalgeographic.com/environment/article/why-tiny-forests-are-popping-up-in-big-cities [2] https://www.timeout.com/london/news/a-mini-forest-is-being-planted-in-the-middle-of-chelsea-102121 [3] https://www.lbhf.gov.uk/articles/news/2022/03/two-more-tiny-forests-come-fulham</p>	<p>Gardens are referenced in action FHS 2.1, FHS 2.7, RM9, BTW 3.8, BTW5.2, HW 1.6, therefore are covered fairly comprehensively.</p> <p>Industrial areas are included in BIC 2.2 in relation to SuDS schemes but not in relation to trees.</p> <p>Reference to the potential for trees and greening of industrial areas to be included.</p>

10	Local resident	Biodiversity, Trees & Woodlands	Biodiversity, Trees and Woodland section of Priorities and Opportunities Summary p8. Reference to Special Species p32-33. FHS 1.3; FHS 2.1; FHS2.6 Biodiversity, trees and Woodlands section of Main Report p23 Notable Species	Both the Summary document and the Main Report are welcomed and supported. They provide a well laid-out and clear explanation of the needs, opportunities and priorities, as well as setting out excellent details and clarity on the areas for action and key delivery necessary to address the fundamental challenges presented across the District. Biodiversity, Trees and Woodland section of Priorities and Opportunities Summary p8. Reference to Special Species Under the paragraph on the Sussex Emerald moth, a more general reference should be made to the current (2021-2024) National Lottery Heritage Fund project Kent's Magnificent Moths, led by Butterfly Conservation. This is focusing on helping to save and celebrate some of the UK rarest and most beautiful moths that are still present in East Kent (East Kent supports a nationally important assemblage of some of UK's rarest moth species). As well as the Sussex Emerald, other rare moth species recorded in the F&HDC area include Marsh Mallow moth on Dungeness. Under the paragraph on the Short-haired Bumblebee, it would be more correct to say that the reintroduction of the Short-haired bumblebee appears not to have been successful (as of 2022). However, the project has produced evidence to show successes in restoring and enhancing pollinator habitat which appear to be benefitting several other UK rare and vulnerable bumblebee species, for which Romney Marsh and Dungeness are regarded a national stronghold. p32-33. FHS 1.3; FHS 2.1; FHS2.6 Strong support is given to the priorities and opportunities where reference is made to pollinator corridors, pollinator habitats and encouraging people and organisations to take action for pollinators. One of the targets of Kent's Plan Bee - Kent County Council's Pollinator Action Plan - is to encourage and support Kent's District and Borough Councils to produce and deliver their own Pollinator Action Plan. The Priorities and Opportunities Summary could make a commitment to produce such a Pollinator Action Plan for Folkestone and Hythe District, which could strongly support the overall delivery of the F&HDC Green and Blue Infrastructure Strategy. Biodiversity, trees and Woodlands section of Main Report.	Support for the GBI strategy is noted. Kent's Magnificent Moths to be added - specific projects are contained in the Main Report due to space restrictions in Priorities and Opportunities Report. The need for a pollinator network in the Otterpool development is contained in Core Strategy 2022 Policy SS7 and is included in Policy NE2 (Biodiversity) and the supporting text of the Places and Policies Local Plan 2020. A Pollinator Action Plan may be appropriate in the future following further information arising from the forthcoming Local Nature Recovery Strategy developed by the Kent Nature Partnership.
36	Kent Country Council	Access, Recreation and Active Travel		Public Rights of Way (PROW): The County Council welcomes the positive incorporation of the PROW network within the Strategy and is supportive of the relevant policies and objectives that are included. In respect of page 15, KCC would request that the Strategy is amended to include reference to the PROW network as an integral part of the Local Cycling and Walking Infrastructure Plan (LCWIP). The County Council would also request the inclusion of the active travel opportunities and countryside access provided by the PROW network.	Page 15, role of PROW in active travel to be added.
5	Regional Planning Lead Southern Water	Blue Infrastructure and the Coast	We would like to comment on some text on page 82 and 'Priority and Opportunities' BIC1 and BIC2	Page 82 of the main report - please could we amend the following sentence as suggested ' combined with a drainage network that quickly reaches capacity, will lead to <u>more rapid and</u> more frequent <u>overloading of the drainage network and localised flooding.</u> ' Needs, Opportunities and Priorities Blue Infrastructure and the Coast (p24 of the Priorities and Opportunities Summary, p84-85 of the Main report) - BIC1 research has shown that quality of watercourses is largely affected by diffuse sources, and as local authority responsibilities include land and highways drainage, we see BIC1.3 (below) as partly within Folkestone & Hythe's influence. As such the Delivery of this should perhaps be categorised as 'B' rather than 'C'? In addition, local authorities might also influence instances of property misconnections (for example of foul drainage to surface water sewers) that can also affect watercourse quality. 'BIC1.3 - Achieve good status for watercourses. This includes a range of actions - improve fish passage, naturalise hard engineered riverbanks, reduce silt and enrichment from agriculture, improve highway runoff.' BIC2 - could the proposed SuDS commitments eg ' <i>incorporate SuDS schemes into new development and retrofit into existing green infrastructure where such an approach is appropriate to help address flooding issues</i> ' be strengthened with the following additions: - ' <i>Rainwater for new developments will not be connected to the existing foul/combined sewer system.</i> ' - ' <i>We will work with utility partners to encourage property owners to disconnect rainwater at source from foul water system.</i> ' - ' <i>We will progressively increase the green areas in the urban areas to reduce rainwater runoff that causes flooding and discharges from storm overflows to protect homes and businesses and local rivers and the sea</i> ' and - ' <i>We will encourage all developers to design in green roofs and water saving measures to create sustainable homes.</i> '	Page 82 - will amend to 'An increased frequency of intense rainfall events due to climate change will lead to more rapid and more frequent overloading of the drainage network and localised flooding.' The council considers that it is appropriate that this action remains within the 'C' category. Kent County Council is the highways authority with responsibility for highways drainage and the lead local flood authority for sustainable drainage systems (SuDS). Southern Water is investigating misconnections through GIS analysis and is refining a prioritised list of opportunities based on its analysis. While the council will assist other organisations where it has the powers and resources to do so, we consider that these actions are primarily within the remit of other organisations. Places & Policies Local Plan Policy CC3: Sustainable Drainage Systems sets out general principles for sustainable drainage systems (SuDS) that cover some of the points raised here. More detailed guidance is provided by Kent County Council, as the lead local flood authority, in its 'Masterplanning for SuDS' guide and in the 'Kent Design Guide – Making It Happen Sustainability (Drainage Systems)'. The council does not consider that it would be beneficial to repeat that guidance here, but we will amend the Green & Blue Infrastructure Strategy to refer to Kent County Council's detailed SuDS guidance.
18	Local resident	Blue Infrastructure and the Coast		Page 22/23 - I sense a careful use of wording to avoid reference to the wastage of water due to old and burst water supply pipes and the perhaps illegal release of effluents into the waterways and sea - I feel this should be stated and qualified by saying that efforts will be made to support actions and work with those responsible to reduce and eliminate these issues Page 23 - again the public and communities are not involved - they are being encouraged to get out and about, cycling and walking, and they are likely to notice issues, and could be encouraged to be on look out - they should be encouraged to report issues and participate in achieving desired outcomes.	Reference to clean beaches and bathing water quality to be added, as per comment 4. Old pipes and illegal discharge beyond scope of this strategy.
40	Kent Country Council	Blue Infrastructure and the Coast	BIC 2 STRATEGIC PRIORITY: Incorporate SuDS schemes into new development and retrofit into existing green infrastructure where such an approach is appropriate to help address flooding issues	Heritage Conservation: The County Council notes that SuDS may have both direct and indirect unintended adverse impacts on the historic environment. Direct impacts could include damage to known heritage assets, for example, if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, they may directly impact on unknown assets such as when SuDS works damage buried archaeological remains. Indirect impacts are when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. For example, using an area for water storage, or improving an area's drainage can change the moisture level in the local environment. Archaeological remains in particular are highly vulnerable to changing moisture levels which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations. When SuDS are planned, it is therefore important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated. This is best secured by early consideration of the local historic environment following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. KCC has recently produced guidance for SuDS and the historic environment (Appendix A), which provides information about the potential impact of SuDS on the historic environment; the 4 range of mitigation measures available; and how developers should proceed if their schemes are believed likely to impact on heritage assets. The County Council would therefore advise that this guidance is taken into consideration when SuDS are planned.	Noted. The potential for damage to heritage features from SuDS will be added into the Main Report.

39 Kent Country Council	Blue Infrastructure and the Coast	Sustainable Urban Drainage Systems (SuDS)	Sustainable Urban Drainage Systems (SuDS): The County Council, as Lead Local Flood Authority, is generally pleased with the contents of the Strategy, particularly the use of SuDS and seeking to maximise their use to improve and manage the risk of flooding, with the ancillary benefits these features can provide. In respect of page 23 of the document, which states, 'Green infrastructure assets are important areas in which to implement or retrofit SuDS', while KCC supports this principle as it promotes the use of SuDS, it should be emphasised that it is not only Green infrastructure assets where these features can be retrofitted. Certain SuDS features including rain gardens, specialised tree pits and permeable paved surfaces are particularly suited to retrofitting in urbanised areas, and the County Council would recommend that this is mentioned within the text. The Strategy seems to consider this when discussing the spatial areas on page 32, Folkestone town centre regeneration through the Place Plan should incorporate the recommended green and blue infrastructure elements to improve the public realm and make spaces more attractive, although the County Council would encourage the opportunity for the retrofitting of SuDS in the urban landscape to take advantage of the wider benefits they provide. KCC would appreciate the opportunity to attend any workshops or partnership working discussions that Folkestone and Hythe District Council may have in the future with regards to implementing any of the proposals mentioned in the Strategy from a SuDS viewpoint. The County Council would highlight the rain gardens that have been installed with Dolphins Road, Folkestone as an example of the possibilities that can be fitted within the urban environment.	As noted, tree pits, permeable paving is mentioned in Spatial Area actions, but will be made clearer in text as well. Need for Place Plan to incorporate GBI noted. Offer of partnership working and Dolphin Road project noted.
6 Kent Downs AONB	Landscape Character and Heritage	Page 93	Typo - under Environmental opportunities it should state 'Working in partnership with THE Kent Downs Area' of Outstanding Natural Beauty UNIT to identify management opportunities in accordance with their management plans. We would also comment that the Management Plan is the adopted plan of Folkestone and Hythe District Council for the management of the AONB, so would suggest amending 'their' to 'the'.	The Kent Downs AONB Unit' and THE Kent Downs AONB Management Plan amendments to be made.
41 Kent Country Council	Landscape Character and Heritage		Heritage Conservation : The text reviews the historic nature of the district's landscape and correctly highlights the contribution that heritage makes to its attractiveness. The combination of heritage and landscape has other benefits, however, and KCC recommends that these are mentioned in the text. In particular: Heritage can provide strong social and health benefits through improving quality of life and activities that encourage physical and mental health and well-being, reduce social exclusion and crime; and Heritage can provide a valuable educational resource that can contribute local context to curriculums at all stages and an available and accessible resource for local schools and colleges. The emerging Folkestone and Hythe Heritage Strategy reviews the heritage of the district and considers both its vulnerabilities (mostly arising from inappropriate development) and the place-making, economic and social benefits that could arise from managing it sensitively, including during green and blue infrastructure projects. It is therefore advised that the Heritage Strategy is referenced in this text. To fully appreciate Folkestone and Hythe's landscape character and incorporate it into Green infrastructure effectively, it is first important to understand it. The main method for investigating historic landscape character is by Historic Landscape Characterisation. This is a method of assessing the pattern of tracks, lanes, field boundaries and other features that comprise the historic character of the modern landscape. This has been completed for the Hoo Peninsula, but not for Folkestone and Hythe. The Kent Historic Landscape Characterisation (2001) has identified the broad historic character of the landscape of Kent but more detailed refinement is needed to bring the baseline data for Folkestone and Hythe up to a similar standard. The County Council would welcome further engagement on this matter.	Comments as highlighted will be added to the Main Report, and in summary to Priorities and Opportunities Report if room, to reference that - <i>Heritage can provide strong social and health benefits through improving quality of life and activities that encourage physical and mental health and well-being, reduce social exclusion and crime; and Heritage can provide a valuable educational resource that can contribute local context to curriculums at all stages and an available and accessible resource for local schools and colleges.</i> Heritage Strategy is comprehensively referenced in the Main Report. Not all source strategies can be referenced in the Priorities and Opportunities report. Request for more work on baseline Historic Landscape Characterisation noted.
21 Local resident	Folkestone Town, Hythe and Saltwood		Priorities and Opportunities - it would be good to see mention of collaborative thinking/action of the three tiers of local government to achieve the aims mentioned - much of what is said could apply to the other two spatial areas and vice versa.	There are several actions in Spatial Areas which are common to all of them and some are already included in the overarching actions contained within the topic themes. The Spatial Area and overarching theme actions will be reviewed to reduce duplication. Actions which are common to all Spatial Areas will be collated and presented as such.
19 Local resident	Romney Marsh		Priorities and Opportunities - it would be good to see mention of collaborative thinking/action of the three tiers of local government to achieve the aims mentioned - much of what is said could apply to the other two spatial areas and vice versa - reinstating hedgerows/trees and planting more to increase the canopy needs to be mentioned - need to consider ways of getting the older age groups more active and mobile as they probably account for most of the poor health - need to consider ways of looking after the older generations so that they feel more included, less isolated, cared for and respected - consider creating communities eg retirement villages to improve social contact and opportunity to get involved with nature and the environment - housing developments, existing and new, and all residential areas should have wildlife corridors to enable movement of wildlife eg frogs, toads, newts, hedgehogs etc	There are several actions in Spatial Areas which are common to all of them and some are already included in the overarching actions contained within the topic themes. The Spatial Area and overarching theme actions will be reviewed to reduce duplication. Actions which are common to all Spatial Areas will be collated and presented as such. Other comments noted. Provision of wildlife corridors in development is an area for planning policy.
35 Local resident	Romney Marsh	Needs, Opportunities and Priorities - Romney Marsh	There are 4 initiatives in this section characterised as (c) Low Actions whereas 3 should be classed as (B) Medium Actions as the Council certainly has a role to play. Action RM 13 is difficult to understand and needs rewording, albeit that the Ukraine war makes it unlikely that access will be provided to military ranges. The actions should also be more ambitious and there should be more of them. A number of the actions mentioned in Needs, Opportunities and Priorities in relation to Folkestone Town, Hythe and Saltwood should have their equivalent written into the Needs, Opportunities and Priorities for Romney Marsh, for example, FHS1.3, FHS1.4, FHS2.5, FHS2.6, FHS2.7, FHS2.16 and FHS2.17.	Four actions listed as 'C' category - RM 3 - PROW, see comment 43. RM 6 legacy of Fifth Continent - not a FHDC project or role, Kent Wildlife Trust project. RM12 - Golf courses - see next comment. RM 14 work with MOD. All are appropriately category C as not areas in which FHDC is involved or in which it has responsibility. No amendment. RM 13 Suggested amendment underlined to improve clarity - Provide more information in tourism material on the biodiversity value of the area and raise awareness <u>of the biodiversity interest and sensitivity of the area</u> with tourism businesses. Comment suggests the following from the Folkestone and Hythe Spatial Area are included for Romney Marsh. FHS 1.3 Improve biodiversity connections across this area through hedgerows, pollinator corridors and other measures appropriate to the landscape character. FHS 2.5 Incorporate biodiversity features in all parks in the urban area, including playing pitch areas, managed by Folkestone and Hythe District Council. FHS 2.6 Encourage increases in biodiversity in the significant green infrastructure assets which are privately owned, or which are schools ground, playing fields or cemeteries – for example through tree planting, wildflower areas, linkages for wildlife movement, pollinator areas and other measures. Foster collaborative improvements between landowners in areas which are identified as green corridors. FHS 2.7 Enthuse and engage residents to incorporate wildlife features into gardens, to install swift boxes and create hedgehog highways, and to appreciate value of wildflower and unown areas within the urban fabric. FHS 2.16 Engage with active community and environmental groups in this area to take forward projects and generate local ideas and increase environmental volunteering. FHS 2.17 Develop a green schools programme to increase wildlife, plant trees to increase shade, wildflower meadows, bird and bat boxes, bug houses and growing food, to increase awareness and engagement in the natural world and special wildlife of the area There are several actions in Spatial Areas, including these, which are common to all of them and some are already included in the overarching actions contained within the topic themes. The Spatial Area and overarching theme actions will be reviewed to reduce duplication. Actions which are common to all Spatial Areas will be collated and presented as such. Note - FHS 1.4 Ensure core biodiversity sites in good condition – Seabrook Stream SSSI, Lympne Escarpment SSSI, Saltwood Valley LWS, Paraker Wood and Seabrook Stream LWS and Folkswood LWS. Woodland as part of Shornclyffe. See next in reference to

RM 12 and Recommendation RM 12 - Work with golf courses to improve wildlife and pollinator habitats.
This action should be changed to (B) Medium Actions and reworded:

RM 12 - Work with golf courses to improve wildlife and pollinator habitats and agree improvement targets for the next decade .

It should also be complemented with a new point similar to FHS1.4 -Let's call it RM 16 RM16

New Action RM16 - Ensure Dungeness, Romney Marsh and Rye Bay SSSI is in good condition
Note:

- (a) The Focus should be on this large SSSI as its area covers the other core biodiversity sites in the area.
- (b) The additional policy is required since the Dungeness Complex Sustainable Access and Recreation Management Strategy (2017) (SARMS) document is focussed primarily on access to the Dungeness Peninsular and the need to possibly restrict access to prevent damage to protected habitats - not damage arising from irresponsible management.

Comment:

Golf courses are an area in which the Council can have influence outside the planning process. The Council should be more actively supporting Natural England and using its 'soft power'.

For example, The Fifth Continent Landscape Partnership Scheme achieved little despite its laudable ambitions partly because it did not get the support it deserved from essential bodies in the area which punch ahead of their weight in terms of environment and heritage assets, such as Littlestone Golf Club. When the project started, the Council ought to have written to the Golf Club's management, first, to raise awareness of the project, but also to encourage the Golf Club to participate.

Without this support, the scheme manager and biodiversity officer of the Fifth Continent Project faced repeated refusals by Littlestone Golf Club's management to engage with them. This resulted in the Fifth Continent project failing to: (a) include the Golf Club in important environmental work and (b) the extensive history attached to this Golf Course being excluded from the Heritage aspect of the programme. For example, the Golf Club is inextricably linked to the history of Littlestone and was used extensively by previous Prime Ministers - all colour that adds to the historical narrative of Romney Marsh.

Littlestone Golf Course's management of the course from an environmental viewpoint has deteriorated markedly over the last decade, leading to a noticeable decline in biodiversity. The rough on the Club's two courses was covered in wildflowers but after years of saturation with herbicides many of the species have been almost wiped out. There has been wilful lying to Natural England about this spraying and management has misrepresented the advice given by Natural England to its members, both in respect to planning and other issues. By contrast major links courses which Littlestone Golf Club is attempting to emulate have nature stewardship programmes including Royal St George's at Sandwich, the most prestigious course in the region. Even Lydd Golf Club, considered inferior by Littlestone Golf Club, is undertaking work to improve biodiversity on the course.

RM9 and Recommendation

RM9 - Engage with local communities to take action for pollinators in the villages of the Marsh - on verges, gardens, churchyards and open spaces.

Reword to:

RM9 - Engage with local communities to take action for pollinators in the towns and villages of the Marsh - on verges, gardens, churchyards and open spaces.

Comment and Recommendations

Gardens are an important source of biodiversity - and in some cases, an important source of native orchids. This applies to the Littlestone Conservation Area which has historically been an important source of Autumn Ladies Tresses both in the gardens and on the verges. Their incidence is now dying fast because of gardening practices, mostly due to ignorance. There has also been wilful destruction of highly diverse mature gardens within this conservation area with change of ownership. This has at times occurred at the height of the bird nesting season.

The Council must play its part by implementing 'No Mow May' strategies for verges in the towns, villages and roads throughout the district and by informing residents about the reasons for the practice. It should also warn residents that it is an offence to disturb nesting birds Under the Wildlife & Countryside Act 1981 (as amended) and that should residents wish to cut or remove shrubs and trees, this cannot be done during the bird nesting season which is the period from March 1st to July 31st.

Dissemination could be achieved by the Council sending relevant material to the heads of all Residents Associations (for further circulation) in the district, including Littlestone Conservation Area Residents Association (LCARA).

Another addition

RM17- Produce a Place Plan for improving biodiversity on Industrial Estates

Comment

New Romney industrial estate

This large estate has space and lends itself to mini forests and hedging on its periphery. It may in some cases be appropriate and preferred to let nature take its course on tennis court sized plots and allow them to fill with say bramble. Indeed, there are overgrown plots which should be considered for conservation purposes on this estate. The important thing is to have these small plots of biodiversity on site.

Comment re. setting targets against action 'RM12 - Work with golf courses to improve wildlife and pollinator habitats.' This is an 'C' action for FHDC. It is not in remit of FHDC to suggest that targets should be set for a landowner. The condition of the SSSI is the role of Natural England. No amendment.

Request for new action 'RM16 - ensure that core biodiversity sites are in good condition.' This is not needed in the Spatial Area actions as it is covered by action BTW 1 and the associated sub-actions. Duplications like this will be removed in the review of actions.

There are several actions in Spatial Areas which are common to all of them and some are already included in the overarching actions contained within the topic themes. The Spatial Area and overarching theme actions will be reviewed to reduce duplication. Actions which are common to all Spatial Areas will be collated and presented as such.

See above for response to comment re. working with golf course. No amendment.

Amendment to RM9 to include 'towns'.

Gardens are referenced in action FHS 2.1, FHS 2.7, RM9, BTW 3.8, BTW5.2, HW 1.6, therefore are covered fairly comprehensively.

As per comment 34, biodiversity inclusion in industrial estates to be added to Main Report as currently only relates to water quality / water runoff.

An additional action around improving industrial estates would need to be included for all areas. It would be more appropriate to include all businesses as other business premises have green and blue infrastructure. The role of business will be added to overarching theme actions under BTW3 'Linking people and nature'.

Comments around No Mow May noted.

Noted. To amend.

There are several actions in Spatial Areas which are common to all of them and some are already included in the overarching actions contained within the topic themes. The Spatial Area and overarching theme actions will be reviewed to reduce duplication. Actions which are common to all Spatial Areas will be collated and presented as such.

7 Kent Downs AONB The North Downs Page 119

Typo - Should read 'Sites of SPECIAL Scientific Interest' not 'Sites of Special Interest'.

22 Local resident The North Downs

Priorities and Opportunities - it would be good to see mention of collaborative thinking/action of the three tiers of local government to achieve the aims mentioned - much of what is said could apply to the other two spatial areas and vice versa

There are several actions in Spatial Areas which are common to all of them and some are already included in the overarching actions contained within the topic themes. The Spatial Area and overarching theme actions will be reviewed to reduce duplication. Actions which are common to all Spatial Areas will be collated and presented as such.

44 Kent Country Council	The North Downs	ND 14 Investigate natural solutions to flood management	Heritage Conservation: It should be noted that the extreme water movements involved in flood storage, and resulting waterlogging and drying sequences, could damage or even destroy heritage assets, whether built structures, landscape features or buried archaeological remains. KCC would welcome being consulted in advance of any proposed modifications.	Comment 40 along similar lines re. possible damage to heritage features from water and SuDS. Amendment to be made in Main Report.
8 Kent Downs AONB	The North Downs	ND1 Page 122	Typo 'Working in partnership with THE Kent Downs Area's' of Outstanding Natural Beauty to identify management opportunities in accordance with their management plan's . We would also comment that the Management Plan is the adopted plan of Folkestone and Hythe District Council for the management of the AONB, so would suggest amending 'their' to 'the'.	Noted. To amend.