

Preferred Options Policy	Comments received	Response from the Council	Action by the Council	Revised Submission Draft Policy
<p>UA1 Folkestone Town Centre</p> <p>Within the designated town centre area (as identified on the Policies Map), planning permission will be granted for development that provides for a range of town centre uses that adds to the vitality and viability of the town centre, particularly where it can be demonstrated that the proposal would enhance the evening economy.</p> <p>Within the Primary Shopping Frontage (as identified on the Policies Map) within the town centre, development on the ground floor will be permitted for A1 and A3 uses. Other uses will be permitted in the Primary Frontages provided that:</p> <ol style="list-style-type: none"> 1. They fall within the NPPF definition of 'town centre uses'; or 2. They fall under D1 or C1 uses and provide a complimentary function to the town centre; and 3. They would not create a continuous frontage of two or more non A1 uses. <p>Within the Secondary Shopping Frontages (as defined on the Policies Map) proposals for development, redevelopment or change of use for Class A1, A2 and A3 (A4, A5) uses will be permitted, provided that:</p> <ol style="list-style-type: none"> 1. They fall within the NPPF definition of 'town centre uses'; or 2. They fall under B1, C1, D1 or D2 uses, retain an active shop frontage and provide a complimentary function to the town centre: <p>Proposals for larger retail developments will be permitted at:</p> <ol style="list-style-type: none"> 1. The area around and including the bus station, providing that a suitable alternative location for the bus station can be provided; and 2. Through the consolidation of smaller retail properties in Guildhall Street, or the redevelopment of land to the north of St Eanswythe Way (including the car park). <p>For development proposals that fall within the town centre uses definition that cannot be located within the designated town centre area, permission will be permitted provided that:</p> <ol style="list-style-type: none"> 1. The sequential approach set out in the NPPF and the NPPG has been followed; 2. A full impact assessment is provided of the impact that the proposal would have on the retail health of Folkestone Town Centre and other town centres, relating to the scale and the type of development proposed in compliance with the requirements of the NPPF and NPPG; 3. It can be demonstrated that the site is in an accessible location and well connected to the town centre enabling easy access on foot, by bicycle and public transport. 4. The overall design, including parking and landscaping, complies with Policy HB1 of this Plan and reflects the character of the streetscene in which it is located together with the wider built context; 5. Acceptable vehicular access and, if required, service yard, can be provided without harm to the living conditions of local residents. 	<p>Policy focus on larger retail developments risks being outdated. Retail industry is changing; equal or greater weight should be given to other town centre uses such as offices and leisure development.</p>	<p>The Shepway Town Centre Survey (2016) identifies that the majority of Folkestone's retail stock (72%) consists of small and constrained units (generally under 200m²). Small and inflexible retail premises are of limited attractiveness to national retailers, who prefer larger-floorplate stores with maximum street frontage. Whilst evidence shows that the current demand for Folkestone is limited; demand is linked to quality provision.</p> <p>Furthermore, draft Policy UA1: Folkestone Town Centre proposes that other town centre uses that do not fall within the A1 (shops) and A3 (food and drink) use classes (including business and leisure uses) will be permitted in the Primary Shopping Frontage provided that they would not create a continuous frontage of two of more non-A1 uses.</p>	<p>No action proposed.</p>	<p>Officers considered that the Places and Policies Local Plan would read more fluidly if the Policies relating to town centres and retail and leisure development were grouped together. Therefore the decision was taken to move Policies UA1 Folkestone Town Centre, UA2 Cheriton District Centre, UA3 Sandgate Local Centre, UA20 Hythe Town Centre, RM1: New Romney Town Centre; and site policies UA4 and UA5 into a new Retail and Leisure Chapter.</p> <p>RL2 Folkestone Town Centre</p> <p>Within the designated town centre area (as identified on the Policies Map), planning permission will be granted for development that provides for a range of town centre uses that adds to the vitality and viability of the town centre, particularly where it can be demonstrated that the proposal would enhance the evening economy. Residential development will also be permitted on upper floors where it would enhance the vitality and viability of the centre and not lead to the loss of town centre uses or active frontages at street level.</p>
	<p>Folkestone not large enough for 3 commercial areas (Town Centre, Harbour and Park Farm); Park Farm and Folkestone Harbour should complement the town centre and not weaken it.</p>	<p>The ShepwayTown Centre Survey (2016) identifies a requirement for 12,800m² net additional comparison goods floorspace by 2031.</p> <p>The National Planning Policy Framework (23) states that the LPA should 'allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres'. At present, the Town Centre boundary consists mostly of small and constrained premises with limited deliverable opportunities to develop the larger modern footplate stores required by national retailers. Where suitable and viable town centre sites are not available, the National Planning Policy Framework guides LPA's to 'allocate appropriate edge of centre', ... 'or other accessible locations that are well connected to the town centre' having regards to the sequential test.</p> <p>The sequentially preferable sites that could accommodate the identified retail need would be Folkestone Harbour which currently benefits from planning consent for 500m² of A1 comparison retail floorspace; and the former Silver Spring site.</p>	<p>No action proposed.</p>	<ol style="list-style-type: none"> 1. Within the Primary Shopping Frontage (as identified on the Policies Map) development on the ground floor will be permitted for A1 (shops) and A3 (restaurants and cafes) uses. Other uses will be permitted in the Primary Frontages where: <ul style="list-style-type: none"> •They fall within the National Planning Policy Framework definition of town centre uses; or •They fall under D1 (non-residential institutions) or C1 (hotel) uses and provide a complementary function to the town centre; and •They would not create a continuous frontage of two or more non-A1 (shops) uses; and •In the case of appropriate sui generis uses they would create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area. 2. Within the Secondary Shopping Frontages (as defined on the Policies Map) proposals for development, redevelopment or change of use for Class A1 (shops), A2 (financial and professional services) and A3 (restaurants and cafes), A4 (drinking establishments) and A5 (hot food takeaways) uses will be permitted, provided that: <ul style="list-style-type: none"> •They fall within the National Planning Policy Framework definition of town centre uses; or •They fall under B1 (business), C1 (hotels), D1 (non-residential institutions) or D2 (assembly and leisure) uses, retain an active shop frontage and provide a complementary function to the town centre; and •They would not create a continuous frontage of three or more A5 (hot food takeaway) units.
	<p>Internal discussion that the policy as drafted would have precluded certain uses in the town centre that would create an active frontage and positively contribute towards enhancing the vitality and viability of the centre.</p>	<p>The current policy should be amended to be more flexible to allow 'appropriate sui generis uses' in the Town Centre.</p>	<p>Amend Policy UA1 (reassigned Policy RL2) to include the following text as further clarification on the 'other uses permitted in the primary frontage'</p> <p>•In the case of appropriate sui generis uses they would create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area.</p>	<ol style="list-style-type: none"> 3. Proposals for retail development and other town centre uses will be permitted at: <ul style="list-style-type: none"> •The area around and including the bus station, providing that a suitable alternative location for the bus station can be provided; and •Through the consolidation of smaller retail properties in Guildhall Street, or the redevelopment of land to the north of St Eanswythe Way (including the car park). <p>Development proposals within the town centre uses definition that cannot be located within Folkestone Town Centre will be judged against Policy RL8.</p> <p>RL8 Development Outside Town, District and Local Centres</p> <p>Planning permission for town centre uses outside the Major Town Centre, Town Centre, District Centres and Local Centres will be permitted provided that:</p> <ol style="list-style-type: none"> 1. The sequential approach set out in the National Planning Policy Framework and Planning Practice Guidance has been followed; 2. A full assessment is provided of the impact that the proposal would have on the retail health of all centres that are likely to be affected, relating to the scale and the type of development proposed in accordance with the requirements of the National Planning Policy Framework and Planning Practice Guidance. In addition, the assessment should demonstrate: <ul style="list-style-type: none"> - The extent to which the market profile of the development proposed will compete with existing facilities in town centres; - The potential for relocation of businesses currently trading in town centre to out-of-centre locations; - The impact on linked trip spending between different town centre uses or businesses; - The cumulative effect of more than one development coming forward at the same time; and - The impact through trade diversion on the role and function of a centre or centres.
	<p>The quantitative retail capacity figures in Table S.1 need to be updated to include recent permissions. The retail floorspace requirements need to be phased across the plan period as specified by the findings of the Town Centre Study and the draft allocations do not set out the likely quantum of floorspace to be delivered against the phased capacity.</p>	<p>The table sets out and phases the cumulative quantitative retail floorspace requirements for the District over the Plan period to 2031. A paragraph will be inserted into the supporting text to set out the recent permission at Folkestone Harbour. A quantum of floorspace will also be set out in allocations where retail is proposed (former Silver Spring). Any outstanding retail need not identified within the the PPLP will be reviewed as part of the Core Strategy Review.</p>	<p>Insert the following text at paragraph 11.23</p> <p>The district's retail needs are still able to be met in the early stages of the plan period through the planning permission at Folkestone Harbour (Y12/0897/SH), which includes 500sqm of A1 comparison floorspace, in addition to a further 3,100sqm which is proposed as part of the mixed-use allocation at the former Silver Spring site (Policy RL11). The outstanding 9,200sqm retail requirements will be identified through a future plan review.</p>	<ol style="list-style-type: none"> 2. A full assessment is provided of the impact that the proposal would have on the retail health of all centres that are likely to be affected, relating to the scale and the type of development proposed in accordance with the requirements of the National Planning Policy Framework and Planning Practice Guidance. In addition, the assessment should demonstrate: <ul style="list-style-type: none"> - The extent to which the market profile of the development proposed will compete with existing facilities in town centres; - The potential for relocation of businesses currently trading in town centre to out-of-centre locations; - The impact on linked trip spending between different town centre uses or businesses; - The cumulative effect of more than one development coming forward at the same time; and - The impact through trade diversion on the role and function of a centre or centres.
	<p>Supportive of development that provides for a range of town centre uses that adds to the vitality and viability of the town centre; flexible approach to the types of uses that would be permitted within the Primary Shopping Frontage; and larger retail development opportunities for the Bus Station and Guildhall St. However, caution should be exercised not to create a significant number of non-retail uses adjacent to one another.</p>	<p>Support noted. Draft Policy UA1: Folkestone Town Centre proposes that other town centre uses that do not fall within the A1 (shops) and A3 (food and drink) use classes (including business and leisure uses) will be permitted in the Primary Shopping Frontage provided that they would not create a continuous frontage of two of more non-A1 uses.</p>	<p>No action proposed.</p>	<ol style="list-style-type: none"> 3. It can be demonstrated that the site is in an accessible location and well connected to the centre enabling easy access on foot, by bicycle and public transport; 4. The proposed development does not have a significant detrimental impact on the highway network in terms of congestion, road safety and pollution; 5. Acceptable vehicular access and, if required, service space, can be provided without harm to the living conditions of local residents; and 6. The design, including parking and landscaping, complies with Policy HB1 and reflects the character of the local street scene and wider built context.
	<p>Unable to identify any potential 'alternative location for the bus station' to enable the existing site to be redeveloped for larger retail uses.</p>	<p>It would be helpful if going forward Stagecoach could provide some additional context in respect of the current operational requirements for existing (and future) bus services that utilise Bouverie Square. Specifically, it is queried whether there is scope to introduce layover periods on the network at locations away from Bouverie Square, whilst working to the same timetable arrangements</p> <p>It is also noted that the existing stop at the northern extent of the site accessed from Middleburg Square exclusively serves National Express services comprising only 4 departures a day. Accordingly, there could be an opportunity to revised network arrangements to better utilise this stop.</p>	<p>No action proposed.</p>	<p>For the purposes of this policy, the following impact thresholds will be applied:</p> <p>Outside the Major Town Centre, Town Centre and District Centres - 500sqm gross; and Outside Local Centres - 200sqm gross.</p> <p>The threshold will be based on the nearest centre to the proposal.</p> <p>To avoid cumulative developments that exceed these thresholds, an impact assessment will be required if the threshold is breached in one year by more than one planning application.</p>

Consideration should be given to introducing a locally set threshold for requiring retail impact assessment. In the region of 300-500sqm	<p>The Shepway Town Centre Survey (2016) concluded that developments of less than 2,500m² could potentially cause significant adverse affects on some of Shepway's retail centres, depending on the occupier and location. It is agreed that without a locally set threshold such developments would not be required under the National Planning Policy Framework to undertake an impact assessment as part of any planning application.</p> <p>The Town Centre Survey recommends the inclusion of a locally set threshold for requiring a retail impact assessment as follows:</p> <ul style="list-style-type: none"> • Development outside Town or District Centres: Over 500m² Gross; and • Development outside Local Centres: Over 200m² Gross <p>In assessing the likely impact of a proposed retail development as required in paragraph 26 of the National Planning Policy Framework, local authorities have to judge 'the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area'.</p>	Draft new Policy RL8: Development outside Town, District and Local Centres, in a new Retail and Leisure Chapter that sets out the policy position regarding larger retail development proposals that cannot be located within the designated town centre area (previously included in Policy UA1); and sets a locally set threshold for requiring retail impact assessment to be undertaken.
A more integrated approach and improved connectivity for Guildhall Street. Possible measures inc. reducing the number of shops; de-pedestrianisation, allow wider range of uses provided non-retail stretches not too extensive.	The Shepway Town Centre Survey (2016) identified two potential areas for future investment within Folkestone Town Centre - the Bus Station, adjacent to Bouverie Place, and Guildhall / Shellons Street, which have both been promoted through draft Policy UA1. Although it is not possible to allocate these specific sites at this stage, it is hoped that Policy UA1 will draw the attention of possible investors and/or provide the basis for any future masterplanning work that stimulates the regeneration of these areas.	No action proposed.
Policy should reflect positive contribution that residential development can make to enhance the vitality and viability of Folkestone Town Centre	The National Planning Policy Framework (paragraph 23) recognises that residential development can play an important role in ensuring the vitality of centres and sets out policies to encourage residential development on appropriate sites.	Amend Policy UA1 (reassigned Policy RL2) to include the following text: 'Residential development will also be permitted on upper floors where it would enhance the vitality and viability of the centre and not lead to the loss of town centre uses or active frontages at street level'.
An up to date character appraisal and management plan for the Old Town Conservation Area would help to guide development proposals.	Kent County Council is in the process of preparing a Heritage Strategy for Shepway District Council. The Heritage Strategy work to date has fed into the development of the draft Places and Policies Local Plan and the Heritage Strategy will itself be subject to consultation.	No action proposed.
The policy should include mention of the historic character of the town centre so that this is properly taken account of. Within the Conservation Area consideration might be given to the development of specific guidance for Shop Fronts and Signage.	Kent County Council is in the process of preparing a Heritage Strategy for Shepway District Council. The Heritage Strategy work to date has fed into the development of the draft Places and Policies Local Plan and the Heritage Strategy will itself be subject to consultation.	No action proposed.
Folkestone's Town Centre Heritage is in need of widespread protection: The Bayle, The Leas, the Creative Quarter etc. include buildings such as Debenhams and the Post Office.	Kent County Council is in the process of preparing a Heritage Strategy for Shepway District Council. The Heritage Strategy work to date has fed into the development of the draft Places and Policies Local Plan and the Heritage Strategy will itself be subject to consultation.	No action proposed.
The semi-ring road layout around the Town Centre dates back to serving the Ferry terminal – could this be improved / phased out to provide a more attractive approach.	<p>Recent improvements to the historic one-way system have been implemented to provide improved public transport penetration between the town centre and Folkestone Seafront via Tontine Street, alongside making The Tram Road two-way working to improve route choice. These improvements have maximised the benefit derived for users of the local highway network (all modes) and involved minimal physical alterations.</p> <p>The request made to phase out what is referred to as 'the semi ring-road layout' is rather more challenging owing to the demand for on-street parking on typically Victorian residential streets that lack off-street car parking. Furthermore, the orientation/interaction of the road network and junction connections, coupled with changes in topographic height, present further difficulties to remodel the network and actually derive a net benefit in terms of network performance.</p> <p>The District Council will investigate the feasibility/benefit of altering elements of the one-way network, and any identified interventions are expected to be captured as part of the Infrastructure Delivery Plan update currently underway.</p>	No action proposed.
Connections between Town, Station and Seafront (Harbour) need urgent reappraisal.	In 2015, Kent Country Council, in partnership with Shepway District Council, embarked on delivering a network of pedestrian signage in Folkestone to help visitors navigate around the town and explore new areas. The signage focused on getting people from Folkestone Central Station to the town centre, the Harbour and the Leas. The signage has been well recieved.	No action proposed.
Folkestone needs to develop / promote the night-time economy in secondary areas like Rendezvous St.	<p>The Shepway Town Centre Study (2016) identified the absence of an evening economy as one of the key areas which needs to be addressed in order to ensure the long term vitality and viability of the town. It also identifies scope for approximately 4,200 sq.m (gross) of A3-A5 floorspace across the District, with an acute qualitative need for an improved evening economy within Folkestone town centre, particularly in respect of 'family dining' restaurants and multiplex cinema.</p> <p>The Study also identified two potential areas for future investment - The Bus Station and Guildhall / Shellons Street, which in turn have been promoted through draft Policy UA1. Although it is not possible to allocate specific sites at this stage, the policy will hopefully draw the attention of possible investors and/or provide the basis for any future masterplanning work.</p>	No action proposed.

	The town centre outlined does not take into account the retail businesses in Bouverie Road West, Langhorne/Clifton Gardens, The leas Cliff Hall and Channel Suite/ The Leas Pavillion, St Mary's & St Eanswythe Church and Church Street?	The Shepway Town Centre Survey (2016) identified that for the most part, the Secondary Shopping Frontages were struggling with increased levels of vacancy. To address the issue, officers decided to consolidate the Town Centre boundary. This would require businesses looking to set up in areas such as Bouverie Road West to demonstrate that there are no other sequentially preferable sites available in the recognised Primary and Secondary Frontages in the first instance, so as to support and strengthen the existng shopping areas.	No action proposed.	
UA2 Cheriton Local Centre Within the Local Centre of Cheriton, as defined on the Policies Map, proposals for the development, redevelopment or change of use for Class A uses (1 to 5) will be permitted. Other uses will be permitted provided that they would not create a continuous frontage of three or more A3 units and meet the requirements in Policy HW1 Promoting healthier food environments.	Internal discussion it was considered that Policy UA2 as drafted would have precluded certain uses in the town centre that would create an active frontage and positively contribute towards enhancing the vitality and viability of the centre.	The current policy should be amended to be more flexible to allow 'appropriate sui generis uses' in the District Centre.	Amend Policy UA2 (reassigned Policy RL5) to include the following text: 'Appropriate sui generis uses they would create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area'.	RL5 Cheriton District Centre Within the District Centre of Cheriton, as defined on the Policies Map, proposals for the development, redevelopment or change of use to Class A uses (1 to 5) (shops, financial and professional services, restaurants and cafes, drinking establishments and hot food takeaways) will be permitted. Appropriate sui generis uses will be permitted providing they create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area. Other town centre uses will be permitted provided that they would not create a continuous frontage of three or more A5 units and meet the requirements in Policy HW1: Promoting Healthier Food Environments. Planning permission will be granted for change from a town centre use where: 1.The proposed use is not detrimental to residential amenity; 2.There is evidence to demonstrate that there is no demand for the continued use of the premises for retail or community uses; 3.The existing use is no longer viable and the property has been actively marketed at a reasonable rate for a period of at least 12 months and no reasonable offers have been made; and 4.The proposed use does not threaten the vitality and viability of the district centre and retains an active frontage at street level. Development proposals within the town centre uses definition that cannot be located within Cheriton District Centre will be judged against Policy RL8.
	Internal discussion regarding concerns that an increasing number of retail units in Cheriton and Sandgate are being lost to residential dwellings	The current policy should be strenthered to resist the conversion of retail units in the District and Local Centres to residential. New criteria to be added to Policy UA2	Amend Policy UA2 (reassigned Policy RL5) to included the following text Planning permission will be granted for change from a town centre use where: 1.The proposed use is not detrimental to residential amenity; 2.There is evidence to demonstrate that there is no demand for the continued use of the premises for retail or community uses; 3.The existing use is no longer viable and the property has been actively marketed at a reasonable rate for a period of at least 12 months and no reasonable offers have been made; and 4.The proposed use does not threaten the vitality and viability of the district centre and retains an active frontage at street level.	
UA3 Sandgate Local Centre Within the Local Centre of Sandgate, as defined on the Policies Map, proposals for the development, redevelopment or change of use to Class A1 and A3 uses will be permitted. Other non-residential town centre uses will be permitted provided that: 1. They fall under D1 or C1 uses and provide a complimentary function to the village centre: and 2. They would not create a continuous frontage of two or more non A1 uses.	Supportive of the policy to protect the commercial hub of the Sandgate Local Centre Internal discussion it was considered that Policy UA3 as drafted would have precluded certain uses in the town centre that would create an active frontage and positively contribute towards enhancing the vitality and viability of the centre.	Comment noted. The current policy should be amended to be more flexible to allow 'appropriate sui generis uses' in the Local Centre.	No action proposed. Amend Policy UA3 (reassigned Policy RL6) to include the following text: 'Appropriate sui generis uses they would create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area'.	RL6 Sandgate Local Centre 1.Within the Local Centre of Sandgate, as defined on the Policies Map, proposals for the development, redevelopment or change of use to Class A1 (shops) and A3 (restaurants and cafes) uses will be permitted; 2.Appropriate sui-generis uses will be permitted providing they create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area. Other town centre uses will be permitted provided that they would not create a continuous frontage of three or more A5 units and meet the requirements in Policy HW1: Promoting Healthier Food Environments; 3.Other non-residential town centre uses will be permitted provided that: •They fall under D1 (non-residential institutions) or C1 (hotels) uses and provide a complementary function to the local centre; •They would not create a continuous frontage of two or more non-A1 (shops) uses; and 4.Planning permission will be granted for a change from a town centre use where: •The proposed use is not detrimental to residential amenity; •There is evidence to demonstrate that there is no demand for the continued use of the premises for retail or community uses; •The existing use is no longer viable and the property has been actively marketed at a reasonable rate for a period of at least 12 months and no reasonable offers have been made; and •The proposed use does not threaten the vitality and viability of the local centre and retains an active frontage at street level. Development proposals within the town centre uses definition that cannot be located within Sandgate Local Centre will be judged against Policy RL8.
	Internal discussion regarding concerns that an increasing number of retail units in Cheriton and Sandgate are being lost to residential dwellings	The current policy should be strenthered to resist the conversion of retail units in the District and Local Centres to residential. New criteria to be added to Policy UA3	Amend Policy UA3 (reassigned Policy RL6) to included the following text Planning permission will be granted for change from a town centre use where: 1.The proposed use is not detrimental to residential amenity; 2.There is evidence to demonstrate that there is no demand for the continued use of the premises for retail or community uses; 3.The existing use is no longer viable and the property has been actively marketed at a reasonable rate for a period of at least 12 months and no reasonable offers have been made; and 4.The proposed use does not threaten the vitality and viability of the district centre and retains an active frontage at street level.	
UA4 Silverspring Site Park Farm The former Silver Spring site, Park Farm, as defined on the Policies Map, has been allocated for mixed use development consisting of business uses (B1), leisure (D) retail (A1) and hotel (C1). Proposals for mixed use development will be permitted provided that: 1. There is a comprehensive approach to development of the whole site so that any individual elements would not prejudice the implementation of the whole site 2. A suitable access or accesses can be established onto the wider highway network 3. Transport improvements are made to encourage cycling and walking and to provide a bus stop 4. Any potential contamination from earlier uses is investigated and mitigated 5. A full assessment is provided outlining what the impact of any proposed town centre uses would have on the vitality and viability of Folkestone Town Centre and other town centres, relating to the scale and the type of development proposed in compliance with the requirements of the NPPF and NPPG	The policy description should read 'The Former Silver Spring Site'. No guidance is given as to the quantum of floorspace that could be provided on site and therefore the acceptable split of the proposed uses.	Comment noted. Since the publication of the Places and Policies Local Plan (Preferred Options) the site promoter for the former Silver Springs site has suggested that the mix of uses (in particular the A1 element) promoted in Policy UA4 is unviable. An alternative scheme is currently being prepared for consideration. Once the detail of a new scheme emerges the quantum of floorspace to be provided on site and the split between the Use Classes will be set out in the site policy.	Policy description will be amended to read 'The Former Silver Spring Site' Amend Policy UA4 (reassigned Policy RL11) to include the maximum quantum of floorspace for prosoed B1 and A1 Use Classes. A scheme for the regeneration of the former Silver Spring site is currently evolving. Precise floorspaces for uses classes are not yet known, although it is envisaged that it will be predominately employment-led with a mixed of complementary uses. (see Policy RL11: Former Silver Spring Site, Park Farm).	RL11 Former Silver Spring Site, Park Farm The former Silver Spring site, Park Farm, as defined on the Policies Map, is allocated for mixed-use development comprising up to 10,000sqm of office space (B1), 3,100sqm of non-food retail (A1) with supporting leisure (D2), restaurants and café (A3) uses and a hotel (C1). Mixed-use (non-residential) development proposals will be supported where: 1. There is a comprehensive approach to the development of the site so that any individual elements would not prejudice the development of the whole site; 2. The existing access, or any new suitable accesses can be established, onto Park Farm Road is to the satisfaction and approval of the Local Highway Authority; 3. Any required off-site highway improvements are delivered to the satisfaction and approval of the Local Highway Authority; 4. It promotes and encourages the use of sustainable transport, including improvements to

6. The site is investigated and evaluated to establish if it is of archaeological interest and if so an appropriate mitigation strategy is prepared and implemented.	The Council's resistance to any residential development counters the NPPF and Government aspirations for permission in principle on brownfield land.	Local planning authorities are required to publish a 'Brownfield Register' of sites by the end of 2017; Shepway District Council's Brownfield Register is available to view on the Council's website. The Town and Country Planning (Permission in Principle) Order 2017 allows sites entered on part 2 of the registers to be granted permission in principle, a new form of upfront consent. However, Councils will be required to "have regard to" the Local Plan and the National Planning Policy Framework (National Planning Policy Framework) when deciding which sites are suitable for housing and whether to include them on their registers.	No action proposed.	<p>footpaths, cycle facilities and routes in accordance with the Shepway Cycle Strategy, and provides a bus stop(s);</p> <p>5. Appropriate and proportionate contributions, through a Section 106 agreement, are made towards providing improved bus services;</p> <p>6. There is a high quality of design that responds to the site's location within the setting of the AONB, paying particular regards to materiality, massing and roofscape;</p> <p>7. Any potential contamination from former uses is investigated, assessed and if appropriate, mitigated as part of the development;</p> <p>8. An impact assessment is provided, outlining what impact any proposed retail and leisure use would have on the vitality and viability of Folkestone Town Centre and other centres, in accordance with Policy RL8 and the NPPF; and</p> <p>9. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>
Park Farm has increased its market share of retail and leisure uses in recent years, which is having a direct impact on the vitality and viability of Folkestone Town Centre	It is acknowledged that Park Farm has increased its market share of retail and leisure uses in recent years.	Folkestone Town Centre consists mostly of small and constrained premises with limited deliverable opportunities to develop the larger modern footplate stores required by national retailers. Where suitable and viable town centre sites are not available, the National Planning Policy Framework (paragraph 23) guides local planning authorities to 'allocate appropriate edge of centre sites for main town centre uses', ... 'or other accessible locations that are well connected to the town centre' having regards to the sequential and impact tests.	No action proposed.	
Park Farm is not a suitable location for a hotel - catering and hospitality sector is over represented.	Folkestone Town Centre has limited deliverable opportunities to develop main town centre uses including hotels.	The former Silver Spring site is allocated for mixed-use development a significant element of which is likely to be offices. A hotel can be a complementary use to capture the transient business traffic generated by office/conferences.	No action proposed.	
Park Farm is not a suitable location for significant quantum of good quality office development.	Shepway has many assets upon which to build and to attract further investment. We need to capitalise on these to attract new businesses that will bring job opportunities to the district and create confidence so that the private sector continues to invest in Shepway in the future. There is unsatisfied demand across many sectors with many commercial buildings that are available are too old and of poor quality to meet occupier needs. The Shepway Economic Development Strategy 2015-2020 indicates that existing employment land allocations (Local Plan 2013 Review) are in the wrong locations to meet current business demand in the sectors that have been identified as having growth potential. Therefore, the Plan needs to explore opportunities for identifying new employment sites in and around the three M20 junctions. (See Policy RL11: Former Silver Spring Site, Park Farm).	The National Planning Policy Framework (paragraph 23) guides local planning authorities to 'allocate appropriate edge of centre site for main town centre uses', ... 'or other accessible locations that are well connected to the town centre' having regards to the sequential and impact tests. (see Policy RL11: Former Silver Spring Site, Park Farm).	No action proposed.	
Criterion 1 adds an unnecessary and unreasonable layer of restriction and uncertainty to the policy. Limited interest has been shown in the site, therefore vital to capture credible occupier interest to kick-start the redevelopment of the site.	Officers consider that it is important to promote a comprehensive Masterplan approach to the redevelopment of the former Silver Spring site to ensure that if part of the site were to be developed that it would not compromise the remaining parts; and that the new mix of uses can operate alongside one another in a properly planned development that ultimately does not create problems for the end occupants. (See Policy RL11: Former Silver Spring Site, Park Farm).	Shepway has many assets upon which to build and to attract further investment. We need to capitalise on these to attract new businesses that will bring job opportunities to the district and create confidence so that the private sector continues to invest in Shepway in the future. There is unsatisfied demand across many sectors with many commercial buildings that are available are too old and of poor quality to meet occupier needs. The Shepway Economic Development Strategy 2015-2020 indicates that existing employment land allocations (Local Plan 2013 Review) are in the wrong locations to meet current business demand in the sectors that have been identified as having growth potential. Therefore, the Plan needs to explore opportunities for identifying new employment sites in and around the three M20 junctions. (See Policy RL11: Former Silver Spring Site, Park Farm).	No action proposed.	
In criterion 2, the reference to the wider highway network is ill defined and unreasonably related to the site. There is no reference to the existing (established) access to the site. It should refer to the need for any new access proposals onto Park Farm Road to meet the policy requirements and standards of the County Highway Authority .	Given the extent of site's roadside frontage with Park Farm Road and the provision of an existing highway access, it is considered that a highway layout could be promoted to the satisfaction of the local highway authority, subject to further discussion that would occur as/when the site is promoted as a planning application.	Amend Policy UA4 criteria 2 (reassigned Policy RL11) to read: 'The existing access, or any new suitable accesses can be established, onto Park Farm Road is to the satisfaction and approval of the Local Highway Authority.'	Amend Policy UA4 criteria 2 (reassigned Policy RL11) to read: 'The existing access, or any new suitable accesses can be established, onto Park Farm Road is to the satisfaction and approval of the Local Highway Authority.'	
The policy should specify that the cycle improvements should provide facilities and routes in accordance with the Shepway Cycle Strategy. It should enable the completion of the Park Farm Road and Kingsmead segregated cycle paths.	Comment noted.	Amend Policy UA4 criteria 4 (reassigned Policy RL11) to read: 'It promotes and encourages the use of sustainable transport, including improvements footpaths, cycle facilities and routes in accordance with the Shepway Cycle Strategy, and provides a bus stop(s).'	Amend Policy UA4 criteria 4 (reassigned Policy RL11) to read: 'It promotes and encourages the use of sustainable transport, including improvements footpaths, cycle facilities and routes in accordance with the Shepway Cycle Strategy, and provides a bus stop(s).'	
Add new criterion, that requires a high level of design to respond to the sites location within the setting of the AONB.	Comment noted.	Amend Policy UA4 (reassigned Policy RL11) to read: 'There is a high quality of design that responds to the site's location within the setting of the AONB, paying particular regards to materiality, massing and roofscape.'	Amend Policy UA4 (reassigned Policy RL11) to read: 'There is a high quality of design that responds to the site's location within the setting of the AONB, paying particular regards to materiality, massing and roofscape.'	
Development proposals should contribute necessary funds to extend service hours of the No.73 bus (Stagecoach).	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	Amend Policy UA4 (reassigned Policy RL11) to read: 'Appropriate and proportionate contributions, through a Section 106 agreement, are made towards improved bus services.'	Amend Policy UA4 (reassigned Policy RL11) to read: 'Appropriate and proportionate contributions, through a Section 106 agreement, are made towards improved bus services.'	
UA5 Former Harbour Railway Line	Supportive of the protection of the former railway line as a linear park promoting sustainable means of transportation.	Support for Policy UA5 noted.	No action proposed.	RL12 Former Harbour Railway Line

<p>The former Harbour Railway Line, as defined on the Policies Map, has been allocated for a linear park, promoting active travel by providing a cycle and pedestrian route to the harbour area, together with visitor car parking.</p>	<p>The Tram Road Link Walkway and Cycleway is a future scheme in the Local Transport Plan 4 (LTP4). The Local Plan aims to safeguard this to protect it from any incremental development.</p>	<p>Support for Policy UA5 noted. Policy wording to be strengthened further to protect it from any incremental development.</p>	<p>Amend Policy UA5 (reassigned Policy RL12) to include the following text: 'Planning permission will be refused for inappropriate development that would compromise its reuse as an alternative transport link.'</p>	<p>The former Harbour Railway line, as defined on the Policies Map, is allocated for a linear park, promoting active travel by providing a cycle and pedestrian route to the harbour area, together with visitor car parking.</p>
	<p>The option to exploit the existing rail infrastructure as part of an integrated tramway system should not be ignored. Can the Council advise of any evidence that may negate further consideration of such an aspiration through the Plan?</p>	<p>The harbour line was formally closed in May 2014 following a period of consultation by the Department for Transport (DfT). It was concluded that ferry services were no more viable now or in the future than when they ceased to operate in 2001. Consequently, it was maintained that there was little point in re-introducing the train service; and uncertainty about the railways future was inhibiting the regeneration of the seafront.</p>	<p>No action proposed.</p>	<p>Planning permission will be refused for inappropriate development that would compromise its reuse as an alternative transport link.</p>
<p>UA6 East Station Goods Yard, Folkestone</p> <p>The site is allocated for residential led mixed-use development with an estimated capacity of 40 dwellings and 1000 sqm complimentary Class B1/B8 commercial floorspace. Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. Approximately 1000 sqm B1/B8 commercial floorspace is provided in a way that would be compatible with new housing without having an adverse impact on the ongoing viability of the commercial uses or the amenities of future residential occupants 2. There is a comprehensive approach to development of the whole site so that if the employment and residential elements were developed separately each element would not prejudice the implementation of the whole development 3. Access is maintained from Southern Way 4. Any potential contamination from earlier uses is investigated and mitigated 5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest 6. An Acoustic Survey is provided as part of any application to ensure that the noise and vibration from the adjacent railway lines can be satisfactorily mitigated against. 7. Securement of a financial contribution towards the upkeep or improvement of the existing play facilities on Folly Road. 	<p>Consideration should be given to reinstating Folkestone East Station for commuting and/or access to the harbour development.</p>	<p>Folkestone East originally closed as a result on declining passenger traffic due to the opening of other more convenient stations in the town (Folkestone Central and Folkestone West). This in addition to the decline of the harbour means that there is little in the way of demand for the Station to be reinstated and would result in an increase in journey times along the Thanet - London line.</p>	<p>No action proposed.</p>	<p>UA1 East Station Good Yard</p> <p>The site is allocated for residential led mixed-use development with an estimated capacity of 40 dwellings and 1,000sqm complementary Class B1 (office) / B8 (storage and distribution) commercial floorspace.</p> <p>Development proposals will be supported where:</p>
	<p>The Tram Road Link Walkway and Cycleway is a future scheme in the Local Transport Plan (LTP4).</p>	<p>Comment noted.</p>	<p>No action proposed.</p>	<p>1. There is a comprehensive masterplan for the site to ensure that neither the employment nor the residential elements if developed separately would prejudice the implementation of the whole development;</p>
	<p>The proposals will place additional strain on the junction of Tram Road with Southern Way and Warren Road. The policy should give consideration to contributions or measures to improve pedestrian and highway safety at this junction.</p>	<p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.</p>	<p>No action proposed.</p>	<p>2. Approximately 1,000sqm B1/B8 commercial floorspace is provided in a way that would be compatible with new housing without having an adverse impact on the ongoing operation of the commercial uses or the amenities of future residential occupants;</p> <p>3. Vehicular access to the site is from Southern Way;</p> <p>4. Appropriate and proportionate contributions are made towards the upkeep and/or improvement of the existing play facilities on Folly Road;</p> <p>5. Any potential contamination from former use is investigated, assessed and if appropriate, mitigated as part of any development;</p> <p>6. Masterplanning of the site takes account of the nearby Southern Way Waste Water Treatment Works to minimise land-use conflict;</p> <p>7. An acoustic survey is provided as part of any application to ensure that the noise and vibration from the adjacent railway lines can be satisfactorily mitigated;</p> <p>8. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and</p> <p>9. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>
	<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA6 , criterion 9 (reassigned Policy UA1) to read: 'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
	<p>Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.</p>	<p>Comment noted.</p>	<p>Amend Policy UA6 ,criterion 8 (reassigned Policy UA1) to read: 'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes;'</p>	
	<p>The site is in close proximity to Folkestone Wastewater Pumping Station. The following additional criterion should be included within the policy for soundness. "The Masterplanning of the site should take account of nearby wastewater pumping stations to minimise land use conflict" (Southern Water).</p>	<p>Comment noted</p>	<p>Amend Policy UA6 ,criterion 6 (reassigned Policy UA1) to read: 'Masterplanning of the site takes account of the nearby Southern Way Waste Water Treatment Works to minimise land-use conflict;'</p>	
	<p>The access from Southern Way is ideal for a Park and Ride with space for upto 500 vehicles to serve the Remembrance Line vision.</p>	<p>The harbour line was formally closed in May 2014 following a period of consultation by the DfT. It was concluded that ferry services were no more viable now or in the future than when they ceased to operate in 2001. Consequently, it was maintained that there was little point in re-introducing the train service; and uncertainty about the railway's future was inhibiting the regeneration of the seafront.</p>	<p>No action proposed.</p>	
<p>UA7 Rotunda and Marine Parade Car Parks, Lower Sandgate Road</p> <p>The Rotunda Car Park is allocated for residential development with an estimated capacity of 100 dwellings and the Marine Car and Coach Park is allocated for residential development with an estimated capacity of 65 dwellings. Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. The layout enhances the links between the town and the seafront by providing appropriate contributions to fund upgrades to the cliff paths (upgrading the slope access from the seafront site to Road of Remembrance to be step-free and provision of new or upgrades to existing pavement from Leas Cliff Hall to the Site) 2. The existing accesses are retained with new emergency access provided via Lower Sandgate Road 3. The scheme preserves or enhances the character and setting of nearby Heritage Assets, including the Folkestone Conservation Area, the Area of Archaeological Interest and nearby Listed Buildings 4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest 5. A Flood Risk assessment is provided to establish any potential risk associated from the proximity to the Pent Stream 6. Any potential contamination from earlier car parking uses is investigated and mitigated as part of the development proposal 7. Contributions are made towards improvements in connectivity between the seafront and town centre, as required by policy CSD6 8. Any net loss of open space should be provided in the immediate vicinity of the site. 	<p>Supportive of policy, which brings forward PDL that contributes to the regeneration of Folkestone, improves connectivity between town and seafront, provides opportunities to enhance the setting of heritage assets; and providing housing of a mixed type and tenure.</p>	<p>Support noted.</p>	<p>No action proposed.</p>	<p>UA2 Rotunda and Marine Parade Car Parks, Lower Sandgate Road, Folkestone</p> <p>The Rotunda Car Park is allocated for residential development with an estimated capacity of 50 dwellings and the Marine Car and Coach Park is allocated for residential development with an estimated capacity of 65 dwellings.</p>
	<p>Why do the Rotunda and Marine Parade Car Parks not form part of the comprehensive redevelopment of the Harbour?</p>	<p>The Rotunda and Marine Parade Car Parks are not within the ownership/control of the Folkestone Harbour Company; therefore they are unable to form part of the overall Masterplan vision for the regeneration of Folkestone Harbour.</p>	<p>No action proposed.</p>	<p>Development proposals will be supported where:</p>
	<p>The sites should be developed as a mixed use scheme that could include an entertainment venue etc.</p>	<p>At present, Policy UA1 is promoting two potential areas for investment within Folkestone Town Centre for a mixed-use retail/commercial leisure development - the Bus Station and Guildhall Street. These sites are the Council's preferred location(s) in order to help stimulate the evening economy within the town centre and supports its future viability and vitality.</p>	<p>No action proposed</p>	<p>1.The design and layout of any new buildings improves and enhances connectivity between the seafront and Folkestone Town Centre;</p> <p>2.Appropriate and proportionate contributions are made in relation to improvements to connectivity between the seafront and Folkestone Town Centre; a portion of which should be set aside as a payment towards the restoration and/or upgrade of the Leas Lift, or sinking fund for its ongoing maintenance, if required, through a Section 106 agreement;</p> <p>3.The existing accesses are retained with new emergency access provided through Lower Sandgate Road;</p>
	<p>Criterion 1, when considered in conjunction with criterion 7, may prohibit alternative and/or alternative means of connectivity improvements between the seafront and the town centre. These should be combined to read: "The layout enhances the links between the town and the seafront by providing contributions towards improvements in connectivity between the seafront and town centre, as required by policy CSD6".</p>	<p>Comment noted.</p>	<p>Amend Policy UA7 (reassigned Policy UA2) by splitting criteria 1 into two separate criteria as follows: 'The design and layout of any new buildings improves and enhances connectivity between the seafront and Folkestone Town Centre;' 'Appropriate and proportionate contributions are made in relation to improvements to connectivity between the seafront and Folkestone Town Centre; a portion of which should be set aside as a payment towards the restoration and/or upgrade of the Leas Lift, or sinking fund for its ongoing maintenance, if required, through a Section 106 agreement'; Criteria (7) to be deleted from the policy.</p>	<p>4.The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the Folkestone Leas and Bayle Conservation Area and nearby Listed Buildings;</p> <p>5.Mitigation and enhancement measures are incorporated into the design to minimise effects on the local Biodiversity Action Plan Priority Habitat;</p> <p>6.Any potential contamination from former uses is investigated, assessed and if appropriate, mitigated as part of the development;</p> <p>7.Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and</p> <p>8.The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>

<p>In Criterion 1 and/or 3, consideration should be given to the adjacent Grade II* Leas Lift and its role in enhancing connections with the town centre and the need to secure a sustainable future for the heritage asset</p>	<p>Since publication of the Places and Policies Local Plan the Leas Lift's breaking mechanism has been deemed unsafe and shut down. A functioning Leas Lift can still play a key role in providing a sustainable and enhanced connection between the town and seafront in particular those with mobility problems who would be unable to negotiate the slope footpaths, whilst securing the future of a local heritage asset.</p>	<p>Amend Policy UA7 (reassigned Policy UA2) by splitting criteria 1 into two separate criteria as follows:</p> <p>'The design and layout of any new buildings improves and enhances connectivity between the seafront and Folkestone Town Centre;'</p> <p>'Appropriate and proportionate contributions are made in relation to improvements to connectivity between the seafront and Folkestone Town Centre; a portion of which should be set aside as a payment towards the restoration and/or upgrade of the Leas Lift, or sinking fund for its ongoing maintenance, if required, through a Section 106 agreement;'</p>	
<p>A standard archaeological requirement has been applied to the majority of allocation sites. There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA7, criterion 8 (reassigned Policy UA2) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
<p>The Rotunda Car Park may contain priority habitat, deciduous woodland. These potential environmental constraints were not highlighted in the final SHLAA.</p>	<p>A review showed that the Rotunda Car Park site is partly within a Biodiversity Action Plan Priority Habitat (deciduous woodland). Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.</p>	<p>Amend Policy UA7 (reassigned Policy UA2) to include the following additional criterion:</p> <p>'Mitigation and enhancement measures are incorporated into the design to minimise effects on the local Biodiversity Action Plan Priority Habitat;'</p>	
<p>Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes</p>	<p>Comment noted.</p>	<p>Amend Policy UA7 (reassigned Policy UA2) to include the following additional criteria:</p> <p>'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes;'</p>	
<p>Concerns about the availability of car parking spaces once the harbour development is completed.</p>	<p>The detailed design of parking arrangements for the outline planning consent for the harbour development will be subject to approval at reserved matters stage, in accordance with the requirements of the mandatory Design Guidelines and overarching strategy set out within the Transport Assessment and controlled by conditions and the Section 106 agreement.</p>	<p>No action proposed.</p>	
<p></p>	<p>Following an internal discussion concerning the density of the site, the decision was taken to reduce the number of units proposed for the Rotunda Car Park.</p>	<p>Capacity reduced from 100 to 50 dwellings</p>	
<p>UA8 The Royal Victoria Hospital, Radnor Park Avenue</p> <p>The site is allocated for residential development with an estimated capacity of 42 dwellings. Development will be permitted for 16 new homes through residential conversion of the original Victorian building. The rear aspect of the site should be cleared to provide approximately 26 new dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. The converted and new build elements are properly masterplanned to ensure a coherent approach to the redevelopment of this site 2. A high quality conversion is sought that preserves the character and setting of the Victorian element of the building 3. The rear aspect of the site is redeveloped in a manner that would enhance the wider setting of the area 4. Clear regard is demonstrated as to how parking and the flow of traffic will be managed to ensure that the development does not put undue pressure on the local highway network. If required, mitigation measures or parking permit restrictions should be applied to ensure the free flow of traffic 5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest 6. Contributions are to be provided to enhance play and open space at Radnor Park. 7. Contaminated land onsite should be fully remediated prior to construction works. 	<p>Loss of employment and medical services as well as the opportunity to re-provide the jobs and services previously lost at St Saviours in Hythe.</p> <p>Social care and residential homes had been overlooked in the Plan. The Royal Victoria would be an ideal residential care home adjacent to medical facilities.</p> <p>A portion of the site should still be retained for some future limited expansion of the medical facilities.</p> <p>Options should be kept open for a private health company to operate services in the locality.</p> <p>The site would be better allocated for business (office) uses given its proximity to Folkestone Central Station.</p> <p>A standard archaeological requirement has been applied to the majority of allocation sites. There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p> <p>Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes</p> <p>Preserve the cycle/footpath at the rear of the site for access to Radnor Park.</p>	<p>The medical services provided at the Royal Victoria Hospital are now provided in more suitable and up-to-date accommodation. The existing buildings are not appropriate for modern healthcare and are currently a liability for the Trust.</p> <p>The existing buildings are not appropriate for modern healthcare or residential care and are currently a liability for the Trust.</p> <p>The existing buildings are not appropriate for modern healthcare and are currently a liability for the Trust.</p> <p>The existing buildings are not appropriate for modern healthcare and are currently a liability for the Trust.</p> <p>Officers consider that the existing building is not of a design that would be suitable for conversion into modern contemporary office accommodation that is required by employers. Furthermore, it is unlikely that such a scheme would be viable, as office yields would be low and the spaces would be difficult to let.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>The site boundary has been incorrectly digitised. The site boundary will be redrawn to exclude the footpath between Park Farm Road and Beech Close.</p>	<p>UA3 The Royal Victoria Hospital, Radnor Park Avenue, Folkestone</p> <p>The site is allocated for residential development with an estimated capacity of 42 dwellings.</p> <p>Development will be permitted for 16 new homes through residential conversion of the original Victorian building. The rear part of the site should be cleared to provide approximately 26 new build dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. There is a comprehensive masterplan that ensures a coherent approach to both the conversion of the original Victorian building and the redevelopment of the rear aspect of the site; 2. A high quality conversion preserves or enhances the character and setting of the Victorian elements of the original hospital building; 3. The design and scale of proposals to the rear aspect of the site are of a manner that would enhance the wider setting of the area; 4. Traffic flow and parking provision is assessed to ensure that the development does not put undue pressure on the local highway network and that adequate parking provision is provided so that there are no detrimental parking impacts on Radnor Park Avenue. If required, mitigation measures or parking permit restrictions should be applied to ensure the free flow of traffic; 5. Appropriate and proportionate contributions are made towards the upkeep and/or improvement of open space and existing play facilities at Radnor Park; 6. Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat; 7. Any potential contamination from former use is investigated, assessed and if appropriate, mitigated as part of the development; 8. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and 9. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.

	<p>The combination of residential and clinic car parking in the area, will exacerbate congestion in the area.</p>	<p>Any proposal that comes forward for the site should be designed in accordance with Local Parking Standards.</p> <p>Furthermore, Policy UA3 criterion (4) as amended also states that:</p> <p>'Traffic flow and parking provision is assessed to ensure that the development does not put undue pressure on the local highway network and that adequate parking provision is provided so that there are no detrimental parking impacts on Radnor Park Avenue. If required, mitigation measures or parking permit restrictions should be applied to ensure the free flow of traffic.'</p>	<p>No action proposed.</p>	
	<p>A review showed that the Royal Victoria Hospital site is partly within a Biodiversity Action Plan Priority Habitat. Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.</p>	<p>Comment noted.</p>	<p>Amend Policy UA8 (reassigned Policy UA3) to include the following additional criterion:</p> <p>'Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat.'</p>	
<p>UA9 3 to 5 Shorncliffe Road, Folkestone</p> <p>The site is allocated for residential development with an estimated capacity of 20 residential apartments.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. The scale and design of the proposal would be compatible with the character of the surrounding area and would preserve or enhance the setting of the nearby Folkestone Leas and Bayle Conservation Area. 2. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest. 	<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA8, criterion 2 (reassigned Policy UA3) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	<p>UA4 3-5 Shorncliffe Road, Folkestone</p> <p>The site is allocated for residential development with an estimated capacity of 20 residential apartments.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the Folkestone Leas and Bayle Conservation Area; and 2. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.
<p>UA10 Ingles Manor, Castle Hill Avenue</p> <p>Ingles Manor is allocated for mixed development with an estimated capacity of 46 dwellings and 1400sqm of complimentary Class B1a commercial floorspace</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. The proposed design adequately takes account of the sites setting within a conservation area and tree constraints 2. An assessment is carried out of the impact on the setting of the listed buildings within the site and appropriate measures put in place to preserve or enhance the buildings and their settings 3. Approximately 1400 sqm B1a of new commercial floorspace is provided in a way that would be compatible with new housing without having an adverse impact upon the ongoing viability of the commercial uses or the amenities of future residential occupants 4. B1a Office accommodation will be delivered on the site 5. Retention and conversion of existing barns 6. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest. 	<p>Supportive of the policy, which would constitute an effective use of previously developed land within the urban confines of Folkestone, in a highly sustainable location.</p>	<p>Support noted.</p>	<p>No action proposed.</p>	<p>UA5 Ingles Manor, Castle Hill Avenue, Folkestone</p> <p>Ingles Manor is allocated for mixed-use development with an estimated capacity of 46 dwellings and 1,600sqm of complementary Class B1a (office) commercial floorspace.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. A comprehensive masterplan is prepared for the redevelopment of the site in accordance with the total requirements of this and other local plan policies; 2. They are accompanied by a landscape strategy that retains a substantial amount of the existing tree cover including those protected by Tree Preservation Orders or individual or groupings considered to be important to the appearance of the site and which should be integral to the overall design and layout of the scheme; 3. An assessment is carried out of the impact on any heritage assets within the site and appropriate measures put in place to preserve or enhance the buildings and their settings; 4. The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets, including the Folkestone Leas and Bayle Conservation Area; 5. Approximately 1,600sqm B1a additional commercial floorspace is provided in a way that would be compatible with new housing without having an adverse impact on the ongoing viability of the commercial uses or the amenities of future residential occupants; and 6. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.
	<p>Propose that the parcels within the site as defined in extant Local Plan policies FTC3 and HO2(C) should be retained. This identifies between that land for residential and that for employment; and allow them to come forward independently.</p>	<p>It is considered that removing the parcels of land previously defined by Policies FTC3 and HO2(C) of the Local Plan (2006) allows for a more comprehensive Masterplan approach to be adopted for the redevelopment of the site and increases the likelihood of the new commercial floorspace being delivered on site.</p>	<p>Amend Policy UA10 (reassigned Policy UA5) to include the following additional criterion:</p> <p>'A comprehensive masterplan is prepared for the redevelopment of the site in accordance with the total requirements of this and other local plan policies.'</p>	
	<p>Criterion 4 is not necessary given the protection afforded to the employment aspirations of the site elsewhere in the policy. The statement that B1(a) office will be delivered does not meet with NPPF paragraphs 21 and 154 and the potential, albeit not a desired one, that there may be a future need to address the spatial implications of economic and social change.</p>	<p>Comment noted.</p>	<p>Criteria (4) to be deleted from Policy UA10 (reassigned UA5).</p>	
	<p>Criterion 5 is understood to refer to the 'barns' located in and around Ingles Manor and comprising curtilage listed structures. There are also at least two barns within the grounds of the current garden centre. It is unnecessary given the protection afforded to heritage assets in criterion 2; and is potentially damaging to the policy's objective of bringing forward the desired commercial aspect of the mixed use.</p>	<p>Comment noted.</p>	<p>Criteria (5) to be deleted from Policy UA10 (reassigned UA5).</p>	
	<p>This site has an exceptional, heavily treed character and this should be stated more strongly and safeguarded. A tree schedule should be issued to prevent undesirable removals.</p>	<p>Comment noted.</p>	<p>Amend Policy UA10, criteria 2 (reassigned Policy UA5) to read:</p> <p>'They are accompanied by a landscape strategy which retains a substantial amount of the existing tree cover including those protected by Tree Preservation Orders or individual or groupings considered to be important to the appearance of the site and which should be integral to the overall design and layout of the scheme.'</p>	
	<p>The land take for housing should be minimised in view of the open and attractive character of those areas and its popular existing use. It should have a low density of development in line with Jointon Road and the south side of Shorncliffe Road.</p>	<p>Comment noted.</p>	<p>Amend Policy UA10 (reassigned Policy UA5) to include the following additional criterion:</p> <p>The scale, layout and design of any new buildings preserve or enhance the character and setting of nearby heritage assets, including the Folkestone Leas and Bayle Conservation Area.'</p>	
	<p>Ingles Manor and, particularly its subsidiary garden cottage and barns must be safeguarded and given a proper setting.</p>	<p>Policy UA5 (criterion 3) states:</p> <p>'An assessment is carried out of the impact on any heritage assets within the site and appropriate measures put in place to preserve or enhance the buildings and their settings.'</p>	<p>No action proposed.</p>	
	<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place." (Kent Heritage).</p>	<p>Comment noted.</p>	<p>Amend Policy UA10, criteria 6 (reassigned Policy UA5) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
	<p>Poor drainage on corner of Castle Hill Avenue and Shorncliffe Road should be remedied.</p>	<p>All proposals will need to comply with Policy CC3: Sustainable Drainage Systems (SuDs), whereby surface water is managed close to the source. The council has also consulted with Southern Water and Kent County Council, the lead local flood authority, as part of the Places and Policies Local Plan</p>	<p>No action proposed.</p>	
<p>UA11 Shepway Close, Folkestone</p> <p>The site is allocated for residential development with an estimated capacity of 24 dwellings and 0.3ha of public open space.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. An area of 0.3ha is provided as landscaped open space including an area for natural play, which should be linked to the street layout and the landscape scheme for the site. 	<p>Require clarification as to the type, form and extent of open space that should be provided on the site and the policy wording should be amended accordingly.</p>	<p>A meeting was held with the Agent to discuss open space requirements. It was agreed that given the proximity to existing open space on Archer Road it wasn't necessary to allocate a substantial part of the site for further open space provision. It was also considered that a smaller open space for natural play would improve the overall design and ensure a better quality scheme.</p>	<p>Reduce open space requirement to 0.15ha and increase residential capacity of the site to 35 dwellings.</p>	<p>UA6 Shepway Close, Folkestone</p> <p>The site is allocated for residential development with an estimated capacity of 35 dwellings and 0.15ha of public open space.</p> <p>Development proposals will be supported where:</p>

<p>snouia de integral to the overall layout to avoid the long-term pressure for it to be lost to development. A management company should be established for its long term maintenance</p> <p>2. Any planning application should include a full ecological survey with the proposals incorporating biodiversity mitigation measures where necessary</p> <p>3. A strategy for the management of surface water is included within the development proposals</p> <p>4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.</p>	<p>Supportive of policy in principle. Further clarification is needed as to the type, form and extent of Open Space that should be provided on the site. Alternatively, requiring a financial contribution to the improvement of existing Open Space nearby may enable more strategic improvements to play and Open Space provision by pooling contributions.</p>	<p>Whilst the site is fenced off and overgrown, it was previously a playing field and it is designated as Open Space Value or Potential within the Local Plan 2006. Officers are therefore of the opinion that an element of open space should be retained as part of any development proposals rather than a financial contribution to improving the existing open space on Archer Road. However, it is accepted that the 0.3ha suggested is overly generous in the context of the site and therefore this is reduced to 0.15 ha.</p> <p>In regards to the type, form and extent of open space, the Policy requires an area of natural play. These are spaces made of natural components such as boulders, tree trunks, mounds, plants to improve how a playground looks, as well as increasing the scope for imaginative games. This is set out in the supporting text (paragraph 5.49).</p>	<p>No action proposed.</p>	<ol style="list-style-type: none"> 1. An area of 0.15ha is provided as landscaped open space including a natural play area, which should be integral to the overall layout. A management company or other solution should be established for its long term maintenance; 2. They are accompanied by a full ecological survey and adequate biodiversity mitigation measures implemented where necessary; 3. A strategy for the management of surface water is included within the development proposals; 4. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and 5. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.
	<p>Shepway Close is an area of protected open space and should be open to the public.</p>	<p>Although the site is designated as Open Space Value or Potential within the Local Plan (2006), in real terms, it is neither accessible to, nor usable by, the public. Officers are of the opinion that it is necessary to pursue an active approach to developing the site which can provide a meaningful and usable open space alongside new family housing.</p>	<p>No action proposed.</p>	
	<p>Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.</p>	<p>Comment noted.</p>	<p>Amend Policy UA11 (reassigned Policy UA6) to include the following additional criterion:</p> <p>'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes;'</p>	
	<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA11, criterion 5 (reassigned Policy UA6) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
	<p>The site is bordered by Public Footpath HBX16. Request to change criteria 1 to prescribe open space being accessible from the public footpath and along the Western edge of any development.</p>	<p>The open space that is to form part of any future development proposals for the site would be accessible via the public highway. Officers are of the opinion that it would be unreasonable to include an additional criteria to Policy UA6 which would ultimately prescribe the detailed design and layout of any scheme for this site.</p>	<p>No action proposed.</p>	
<p>UA12 Former Gas Works, Ship Street</p> <p>The site is allocated for residential development with an estimated capacity of 100 dwellings and public open space.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. Full ecological and arboricultural investigations are undertaken and adequate mitigation or protection measures identified where necessary 2. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest 3. Contributions will be required to the offsite enhancements of the public open space and play at Radnor Park 4. Appropriate and proportionate contributions are made to Doctors Surgery in Folkestone through a site specific S106 agreement 5. The scale, design and layout of the development should seek to sustain and enhance the setting of the nearby Grade II Listed Railway Viaduct 6. Any potential contamination from earlier uses is investigated and fully mitigated as part of the development 7. The design approach utilises the special characteristics of the site to deliver a high quality and innovative urban development 8. The development demonstrates how each property will benefit from acceptable private amenity space to meet the needs of occupants via innovative design and layout. 9. The development has at least 5 self / custom build plots on site 10. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest. 	<p>Supportive of policy allocation for residential development.</p> <p>This could be a pivotal site for further economic generation in the town, with the emphasis on nurturing new businesses and growing established ones, supported by Local Growth Fund and encouraging training and apprenticeships.</p> <p>Archaeology is repeated in criterion 2 and 10. Criterion 2 should be deleted.</p> <p>Criterion 4 is unnecessary as it is considered that any requirement for a new doctor's surgeries should be met through CIL.</p> <p>Criterion 8 needs to better reflect the supporting text and be clear that Policy HB5 will not be applied. This should be reworded to read: "The development does not have to provide 10m rear gardens as otherwise required by Policy HB5 of this Plan. However, it will need to demonstrate that inter and over looking will not result and that acceptable levels of amenity can be provided for occupants via an innovative design and layout."</p> <p>This site has ongoing monitoring to address historic contamination issues. We reiterate point 6 of Policy UA12 .</p> <p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p> <p>In regards to brownfield sites, assumptions about land values should clearly reflect the levels of mitigation and investment required to bring sites back into use.</p> <p>Given the site's former use as a gas works, preparation of the site for redevelopment has been a costly exercise. Existing structures have had to be removed and the site decontaminated. B Use Classes are unlikely to generate the land value required to make the project viable.</p> <p>Comment noted.</p> <p>The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; other improvements will be provided through the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the district. The NHS Clinical Commissioning Group have currently only identified the Romney Marsh as an area where there is a deficiency of Doctor's and health facilities.</p> <p>The Places and Policies Local Plan should be read as a whole. The supporting text (paragraph 5.55) sets out that Policy UA7: Former Gas Works, Ship Street, Folkestone may not be able to provide garden space as required by Policy HB3: Internal and External Space Standards. HB3 also makes provision that the Council will consider a variation to the external space standards if it can be demonstrated through the Design and Access Statement.</p> <p>Comment noted.</p> <p>Comment noted.</p>	<p>No action proposed.</p> <p>No action proposed.</p> <p>Criterion 2 to be deleted from Policy UA12 (reassigned Policy UA7).</p> <p>Criterion 4, to be deleted from Policy UA12 (reassigned Policy UA7).</p> <p>No action proposed.</p> <p>No action proposed.</p> <p>Amend Policy UA12, criterion 7 (reassigned UA7) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	<p>UA7 Former Gas Works, Ship Street, Folkestone</p> <p>The site is allocated for residential development with an estimated capacity of 100 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. The design approach utilises the special characteristics of the site to deliver a high quality and innovative urban development; 2. The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the nearby Grade II listed Railway Viaduct; 3. Any potential contamination from former use is investigated, assessed and if appropriate, mitigated as part of the development; 4. A full ecological and arboricultural survey is undertaken and adequate biodiversity mitigation measures implemented where necessary; 5. It can be demonstrated that each property will benefit from an acceptable level of private amenity space to meet the needs of occupants through an innovative design and layout; 6. Appropriate and proportionate contributions are made towards the upkeep and/or improvement of open space and existing play facilities at Radnor Park to mitigate any on-site under-provision; 7. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; and 8. At least 5 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development.
<p>UA13 Highview School, Moat Farm Road</p> <p>The site is allocated for residential development with an estimated capacity of 27 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. An appropriate mix of housing is provided at a density consistent and compatible with its surroundings 2. The design includes appropriate links to the local footpath network 3. Adequate parking provision is provided to ensure no undue parking stress is caused on Moat Farm Road 4. Appropriate and proportionate contributions are made to schools in Folkestone through a site specific S106 agreement 5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest. 	<p>Supportive of policy to allocate for residential as it forms previously developed land in a sustainable location with good access to services and community facilities.</p> <p>The proposed housing will increase the foot traffic using an alleyway between two properties on Mead Road. The alleyway already attracts anti-social behaviour. The alley way should be permanently shut to public.</p>	<p>Comment noted.</p> <p>The alleyway between properties on Mead Road is a Public Right of Way; closing the route is not an option. It is considered that the redevelopment of Highview School may actually result in a reduced number of trips and instances of anti-social behaviour.</p> <p>Notwithstanding this, an additional criterion could be included as part of Policy UA8: Highview School, Moat Farm Road, Folkestone that requires the design of any future proposal to minimise the opportunities for anti-social behaviour along the Public Right of Way to Mead Road. Policy HB2: Cohesive Design includes a requirement that development clearly defines public and private spaces and ensures they are attractive, can well managed and are safe.</p>	<p>No action proposed.</p> <p>Amend Policy UA13 (reassigned UA8) to include the following additional criterion:</p> <p>'The design includes appropriate links to the local footpath network that connects Park Farm and Black Bull Road and incorporates measures to minimise opportunities for anti-social behaviour;'</p>	<p>UA8 Highview School, Moat Farm Road, Folkestone</p> <p>The site is allocated for residential development with an estimated capacity of 27 dwellings.</p> <p>Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. The design includes appropriate links to the local footpath network that connects Park Farm and Black Bull Road and incorporates measures to minimise opportunities for anti-social behaviour; 2. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; 3. Traffic flow and parking provision is assessed to ensure that adequate parking provision is provided so that there are no detrimental parking impacts on Moat Farm Road; and 4. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.

	The proximity of any new houses to the back of existing properties could interfere with privacy.	At this stage in the Local Plan process, the detailed layout and design of any of the draft site allocations are unknown. Issues concerning over-looking and loss of privacy of existing properties are 'material considerations' that will be considered during the determination of the planning application.	No action proposed.	
	Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.	Comment noted.	Amend Policy UA13 (reassigned UA8) to include the following additional criterion: 'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'	
	There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."	Comment noted.	Amend Policy UA8, criterion 4 (reassigned UA8) to read: 'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'	
	Criterion 4 is unnecessary as it is considered that any requirement for new schools should be met through CIL (Shepway District Council).	The council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; other improvements will be provided through the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the district.	Criterion 4 to be deleted from Policy UA13 (reassigned Policy UA8).	
UA14 Brockman Family Centre, Cheriton	Given the potential traffic generation from 100 units, plus commercial traffic from Saga and future developments at Cheriton Parc; thought should be made to the possibility of s.106 contributions being pooled to create an extension to the road past Tesco and filtering out traffic to M20 or Hythe	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	No action proposed.	UA9 Brockman Family Centre, Cheriton
The site is allocated for residential development with an estimated capacity of 26 houses or 50 apartments. Development proposals will be supported where: 1. Full ecological investigations of the potential of the existing building and surrounding land is undertaken as part of any development submission and adequate biodiversity mitigation measures implemented if necessary 2. Existing trees and hedgerows around perimeter of site are retained and enhanced 3. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.	There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."	Comment noted.	Amend Policy UA14, criteria 4 (reassigned Policy UA9) to read: 'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'	The site is allocated for residential development with an estimated capacity of 26 houses or 50 apartments. Development proposals will be supported where: 1. A full ecological and arboricultural survey is undertaken and adequate biodiversity mitigation measures implemented where necessary; 2. Existing trees and hedgerows around the perimeter of the site are retained and enhanced; 3. There is on-site provision of open and play space to meet the needs of the development, for which a management company or other solution should also be established for its long term maintenance; and 4. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.
	Following an internal discussion it was agreed that the site should provide an element of open and play space to reflect the findings of the Open Space and Play Space Strategies	Comment noted.	Amend Policy UA14 (reassigned UA9) to include the following additional criteria: 'There is on-site provision of open and play space to meet the needs of the development, for which a management company or other solution should also be established for its long term maintenance.'	
UA15 The Cherry Pickers Public House, Cheriton	Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.	Comment noted.	Amend Policy UA15 (reassigned Policy UA10) to include the following additional criterion: 'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'	UA10 The Cherry Pickers Public House, Cheriton
The site is allocated for residential development with an estimated capacity of 10 houses or 20 apartments. Development proposals will be supported where: 1. Necessary highway mitigation measures are incorporated to ensure safe visibility and access 2. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.	There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."	Comment noted.	Amend Policy UA15, criterion 4 (reassigned Policy UA10) to read: 'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'	The site is allocated for residential development with an estimated capacity of 10 houses or 20 apartments. Development proposals will be supported where: 1. Primary vehicular access is achieved from Ashley Avenue with the necessary highway mitigation measures incorporated to ensure safe visibility and access; 2. Appropriate and proportionate contributions, through a Section 106 agreement, are made towards the upkeep and/or improvement of open space and existing play facilities at Cheriton Recreation Ground; 3. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and 4. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.
	At present, no buses cater for this area. Suggested that every other No.71 bus becomes a 71A and is re-routed along Tile Kiln Lane, Cherry Garden Ave into Folkestone.	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	No action proposed.	

	The current parking situation in Ashley Avenue is severe and displaced onto the adjoining streets. Any new houses should have sufficient parking provision.	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.		
	Following an internal discussion it was agreed that the site should make an off site contribution towards improvements to the Cheriton Recreation Ground to reflect the findings of the Open Space and Play Space Strategies	Comment noted.	Amend Policy UA15 (reassigned Policy UA10) to include the following additional criterion: 'Appropriate and proportionate contributions, through a Section 106 agreement, are made towards the upkeep and/or improvement of open space and existing play facilities at Cheriton Recreation Ground.'	
UA16 Affinity Water, Shearway Road, Cheriton The site is allocated for residential development with an estimated capacity of 70 dwellings and an area of public open space approximately 1 ha in size. Development proposals will be supported where: 1. The proposal forms part of a wider strategy showing how the existing facilities will be reprovided within the area north of Shearway Road 2. A masterplan of the whole site is provided that demonstrates a comprehensive approach to development 3. A new footway is provided along the southern edge of Shearway Road 4. The line of trees along the southern boundary and the tree with the TPO are retained and protected for its amenity value 5. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest 6. The public open space includes publicly accessible on site play equipment and appropriate planting 7. The development has at least 4 self / custom build plots on site.	The policy should be amended as follows: "The site is allocated for residential development with an estimated capacity of 120 dwellings and an area of public open space" .	Officers are unconvinced that the Masterplan proposal that illustrates an increased capacity of 120 dwellings fully takes into consideration the physical constraints of the site as specified in the draft policy (particularly the retention and protection of trees along the southern boundary and the requirement for publically accessible open space). Moreover, additional concerns have been raised during the Places and Policies Local Plan consultation that would need to be addressed as part of any future masterplanning exercise such as flooding from the Pent Stream, the need to retain public rights of way and the electricity pylon and electricity lines that transverse the northern boundary of the site.	No action proposed.	UA11 Affinity Water, Shearway Road, Cheriton The site is allocated for residential development with an estimated capacity of 70 dwellings, 3,500sqm of complementary Class B1a (office) commercial floorspace and an area of public open space. Development proposals will be supported where: 1. A comprehensive masterplan is prepared for the redevelopment of the site, which also demonstrates how the existing facilities will be re-provided within the area north of Shearway Road; 2. Approximately 3,500sqm B1a of new commercial floorspace is provided at the western end of the site in a way that is compatible with the neighbouring commercial uses and new housing, without having an adverse impact on the continuing viability of the commercial uses or the amenities of future residential occupants; 3. The proposals acknowledge the surrounding urban grain by creating a strong residential frontage onto Cherry Garden Lane and ensuring that the design complements the existing development in the locality; 4. Proposals are accompanied by a landscape strategy that retains a substantial amount of the existing tree cover including those protected by Tree Preservation Orders within an area(s) of landscaped open and play space, which should be integral to the overall design and layout of the scheme; 5. Accompanied by a Site-specific Flood Risk Assessment and demonstrate that any potential risks associated with the Pent Stream can be mitigated and/or safely managed; 6. A footpath and appropriate lighting is provided on southern edge of Shearway Road to connect with Cherry Garden Lane; 7. Public footpaths HF19A and HF20 that link Shearway Road and Tile Kiln Lane are reinstated and enhanced; 8. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; 9. There will be no contamination of groundwater sources; 10. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; and 11. At least 4 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development.
	The requirement for 1 ha of open space should be reduced to 0.5 ha (village green). Council's OSS places emphasis should be placed on upgrade existing parks and the area is already well served by parks and formal sports provision (Affinity Water).	The significant proportion of the site is currently made up of a mix of amenity greenspace, natural and semi-natural urban greenspace and outdoor sports facilities. It had previously been considered that 1 ha of open space was necessary to retain the open character of the site. However, in response to the fact that Morehall Recreation Ground is a short distance away, and that a number of trees have recently had Tree Preservation Orders (TPOs) applied to them, the requirement for 1 ha of open space has been removed from the policy in favour of landscaped open space that retains the trees covered by TPOs (that is the avenue of cherry trees on the southern boundary).	Amend Policy UA16, criterion 4 (reassigned Policy UA11) to read: 'Proposals are accompanied by a landscape strategy that retains a substantial amount of the existing tree cover including those protected by Tree Preservation Orders within an area(s) of landscaped open and play space, which should be integral to the overall design and layout of the scheme.'	
	Alternative uses for the site should also be considered such as hotel, business or residential. The policy should be amended to include development opportunity for either B1 Business development or a mixed use development comprising B1(a), Hotel/Leisure and Housing.	The Affinity Water site is designated in the Local Plan (2006) as an Employment Opportunity Site. In the Employment Land Review (2016) Shearway Business Park ranks highly amongst employment sites in Shepway. The Business Park benefits from strong occupation rates and in conjunction with a number of high quality Grade A floorspace units suggests that the site is highly attractive to the market; and opportunities should be considered for a mixed use development. The Shepway Economic Development Strategy 2015-2020 indicates that employment land allocations in the Local Plan 2013 Review are not of a standard to meet current business demand in the sectors that have been identified as having growth potential. Therefore, the Plan needs to explore opportunities for identifying new employment sites with good access to the strategic road network via the three M20 junctions. Officers consider that the site offers the opportunity to enable the delivery of high quality office accommodation in a strategic location as part of a mixed use development.	Amend Policy UA16 (reassigned Policy UA11) to include the following criteria: Approximately 3,500sqm B1a of new commercial floorspace is provided at the western end of the site in a way that is compatible with the neighbouring commercial uses and new housing, without having an adverse impact on the continuing viability of the commercial uses or the amenities of future residential occupants;	
	Southern Water requires access to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.	Comment noted.	Amend Policy UA16 (reassigned Policy UA11) to include the following additional criteria: 'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'	
	Sewage capacity is over-loaded. The Shearway Business Park and Premier in have been connected to the local network since it was put in.	The Council has involved infrastructure providers at all stages in drafting both the Core Strategy and Places and Policies Local Plans, including water and utilities companies. Comments from these providers have been taken into account when drafting the plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies in the Places and Policies Local Plan; other improvements will be provided through the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the district.	No action proposed.	

<p>The flood risk problems associated with North Folkestone have been under-estimated. There is a prevalence of springs; and increased surface run-off in addition to existing drainage issues associated with the Pent Stream could be an issue.</p>	<p>The Council has involved statutory consultees, including the Environment Agency, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. The Environment Agency were consulted for this site allocation and raised no objection other than development proposals are to ensure that there is no contamination of groundwater sources.</p> <p>However, given the concerns raised about the flood risk associated with the Pent Stream by an additional criterion has been added in response.</p>	<p>Amend Policy UA16 (reassigned Policy UA11) to include the following additional criterion:</p> <p>'Accompanied by a Site-specific Flood Risk Assessment and demonstrate that any potential risks associated with the Pent Stream can be mitigated and/or safely managed.'</p>	
<p>The stream should be retained as a wildlife sanctuary, given plenty of space and landscaping as at Broadmead village.</p>	<p>The Pent Stream will be untouched. Moreover, Criteria 4 of Policy UA11 also states that the trees along the southern boundary are to be retained and protected for their amenity value as part of any development proposals. This would also provide a green corridor/ habitat for wildlife associated with the stream.</p>	<p>No action proposed.</p>	
<p>The site lies within Source Protection Zone 1 - groundwater source for drinking water. Any development must ensure that there is no contamination of groundwater (Environment Agency).</p>	<p>Comment noted.</p>	<p>Amend Policy UA16 (reassigned Policy UA11) to include the following additional criterion:</p> <p>'There will be no contamination of groundwater sources.'</p>	
<p>Local primary and secondary schools and doctors surgeries are at capacity; additional development could exacerbate the problem.</p>	<p>The Council has involved statutory consultees, including Kent County Council Education and NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education and NHS support the Council that there is capacity available in existing schools and doctors to cater for the planned additional growth within the Urban Character Area. Where improvements to school and health facilities are necessary to cater for the additional growth, comments from KCC and NHS have been taken into account when drafting the plan.</p>	<p>No action proposed.</p>	
<p>At present, no buses cater for this area. Suggested that every other No.71 bus becomes a 71A and is re-routed along Tile Kiln Lane, Cherry Garden Ave into Folkestone.</p>	<p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.</p>	<p>No action proposed.</p>	
<p>There are a number of mature trees on the proposed site. These should be retained as part of any planning permission.</p>	<p>A tree survey will be undertaken by the Council's tree officer and any trees of note will be afforded additional protection and will become an additional consideration at the planning application stage.</p>	<p>Criterion 4 and 6 to be deleted from Policy UA16 (reassigned Policy UA11) and incorporated into new criterion:</p> <p>'Proposals are accompanied by a landscape strategy that retains a substantial amount of the existing tree cover including those protected by Tree Preservation Orders within an area(s) of landscaped open and play space which should be integral to the overall design and layout of the scheme.'</p>	
<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA16 (reassigned Policy UA11) to include the following additional criterion:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
<p>Compensation should be considered for the bungalows in Cherry Garden Lane – effect on property values, disruption, noise etc.</p>	<p>Problems arising from construction (e.g. noise, dust, construction vehicles, hours of working (covered by Control of Pollution Act) and loss of property value) are not material considerations and therefore not relevant to any decision.</p>	<p>No action proposed.</p>	
<p>Public Footpath's HF20 and HF19A would be directly affected by this development. It is important that these links are retained. Any policy wording that ensures this development contributes to wider pedestrian and cycling network development would be useful.</p>	<p>The Public Footpaths HF20 and HF19A appear to be closed. There is no means to cross the Pent Stream to the south of the site and no visible signs of being able to access and walk through the allotments to Tile Kiln Lane.</p>	<p>Amend Policy UA16 (reassigned Policy UA11) to include the following additional criterion:</p> <p>'Public footpaths HF19A and HF20 that link Shearway Road and Tile Kiln Lane are reinstated and enhanced.'</p>	
<p>UA17 The Shepway Resource Centre, Military Road</p> <p>The site is allocated for residential development with an estimated capacity of 41 dwellings. Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. A high quality design and mix of dwelling types is advanced that would protect the amenities of future occupants without prejudicing the long term viability of the surrounding commercial uses; 2. The design of the development should ensure that the setting of the nearby Roman Catholic Church Grade II Listed Building is enhanced 3. Existing trees and hedgerows around the eastern boundary of site are retained and enhanced 4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest. <p>UA18 Land East of Coolinge Lane, Sandgate - The site is allocated for residential development with an estimated capacity of up to 60 dwellings and approximately 1.2 ha of retained publicly accessible open space. Development proposals will be supported where:</p> <ol style="list-style-type: none"> 1. An area of publicly accessible open space to incorporate natural play, planting, including edible planting and high quality landscaping is provided 2. Access is provided from both Coolinge Lane and either Bathurst or Hardwick Road, with improved cycle and pedestrian connectivity provided from the site to the surrounding area 	<p>Supportive of the policy to allocate for residential.</p> <p>The site would be ideal for social housing of which there is a severe lack of locally.</p> <p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p> <p>Despite there being 2 schools and a lot of new development nearby – further development should be arrested here, and open green spaces should be preserved .</p> <p>Traffic is a major problem here already.</p> <p>No sites including playing fields should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field .</p> <p>It was stated publicly on more than one occasion by KCC when Pent Valley School closed there was no intention of selling any of the school's land. This policy runs counter to that commitment.</p> <p>Support proposals for the retention of, and public access to, a playing pitch that was previously closed off. An alternative pitch such as a hard surface court could be considered.</p>	<p>In 2016, the site was granted planning permission for twenty-three dwellings and eighteen flats Ref: Y16/0463/SH; thirty-five will become Council houses. The site is currently under construction.</p> <p>Sport England raised concern that the existing Playing Pitch Strategy dates back from 2011. Since the publication of the existing Playing Pitch Strategy, Sport England has produced new guidance on the development of Playing Pitch Strategies and recommends that this part of the evidence base is now reviewed in order to ensure that it is both up-to-date and robust.</p> <p>It is therefore considered that there is currently insufficient evidence at this stage of the planning process to continue to allocate the site for development; consequently Policy UA18: Land East of Coolinge Lane, Sandgate is to be deleted from draft Places and Policies Local Plan.</p>	<p>Policy UA17: Shepway Resource Centre, Military Road to be deleted from draft Places and Policies Local Plan</p> <p>Policy UA18: Land East of Coolinge Lane, Sandgate to be deleted from draft Places and Policies Local Plan</p> <p>Policy UA17: Shepway Resource Centre, Military Road to be deleted from the Places and Policies Local Plan.</p> <p>Policy UA18: Land East of Coolinge Lane, Sandgate to be deleted from Places and Policies Local Plan.</p>

<p>5. The design of the development ensures that the setting of the nearby Pentoid House Folkestone School for Girls Grade II Listed Building is sustained and enhanced</p> <p>4. The development has at least 2 self / custom build plots on site</p> <p>5. The mature tree belt across the site is retained and enhanced</p> <p>6. Existing trees and hedgerows around perimeter of site are retained and enhanced</p> <p>7. The ecological potential of the site is fully investigated and mitigated (where necessary) as part of the application proposal</p> <p>8. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</p> <p>9. Proposals include either:</p> <p>a. A strategy to mitigate the loss of playing pitch provision either as a like for like replacement elsewhere, on site provision or via the upgrade of existing off site facilities; or</p> <p>9. Proposals include either:</p> <p>a. A strategy to mitigate the loss of playing pitch provision either as a like for like replacement elsewhere, on site provision or via the upgrade of existing off site facilities; or</p> <p>b. It adequately demonstrated that there is an over provision of playing pitches in the local area and that there would not be a detrimental impact on pitch provision because of the loss of these pitches.</p>	<p>The roads in this area are very busy at school pick up and dropping off times. Additional houses in this location will put more pressure on the local highways network.</p> <p>Support the requirement to enhance pedestrian and cycle routes through to Cooling Lane; development would create opportunities for safer access to schools and lessen the problems of schooltime car traffic in the area.</p> <p>The school should walk to a more suitable collection point or the make off-road provision on school premises. Cooling Lane is too narrow to cope.</p> <p>Local primary and secondary schools and doctors surgeries are at capacity; additional development could exacerbate the problem.</p> <p>The new development will destroy the few remaining larger wildlife habitats left along the road.</p> <p>The proposed housing density is out of keeping with the local area. The land take for housing should be minimised in view of the open and attractive character of those areas and its popular existing use.</p> <p>Cooling Lane used to have a special landscape safeguard and has some listed Georgian buildings from the former hamlet of Cooling. It should still be treated sensitively.</p> <p>Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.</p> <p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place." (Kent Heritage).</p> <p>This site has a mix of TPO's and mature trees; this should be stated more strongly and safeguarded. A tree schedule should be issued to prevent undesirable removals.</p> <p>The local sewer network is at capacity.</p> <p>Local water pressure is falling with each added development in the area.</p>	<p>deleted from the Places and Policies Local Plan.</p> <p>The Playing Pitch Strategy is currently being updated to inform the Core Strategy Review.</p>		
<p>UA19 Encombe House, Sandgate</p> <p>The site is allocated for residential development with an estimated capacity of approximately 36 residential apartments.</p> <p>Development proposals will be supported where:</p> <p>1. The ecological and arboricultural potential of the site is fully investigated and mitigated (where necessary) prior to the commencement of any development here to ensure that the biodiversity of this site is enhanced and TPOs protected</p> <p>2. Proposals would enhance the setting of the nearby Scheduled Ancient Monument and the Sandgate High Street Conservation Area</p> <p>3. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</p> <p>4. The development complies with Policy NE6 Land Stability.</p>	<p>Sandgate has land instability issues. Concern that the proposal will impact negatively on the area and threaten the stability of neighbouring properties.</p> <p>The site Tree Preservation Order's (TPO's) should be retained. They also stabilise the land and prevent flooding.</p> <p>Development of this site would inevitably affect the setting of the scheduled Martello Tower No.7. Any design and layout should seek to minimise impact.</p> <p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p> <p>A review showed that Encombe is partly within a Biodiversity Action Plan Priority Habitat. Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.</p>	<p>The Places and Policies Local Plan should be read as a whole. Any planning application would need to satisfy Policy NE6: Land Stability.</p> <p>Policy UA12 (Criteria 2) states that development proposals will be supported where trees protected by Tree Preservation Orders are retained.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted.</p>	<p>Criteria 4 to be deleted from Policy UA19 (reassigned UA12).</p> <p>No action proposed.</p> <p>Amend Policy UA19, criterion 3 (reassigned Policy UA12) to read:</p> <p>'The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the nearby Scheduled Ancient Monument and the Sandgate High Street Conservation Area.'</p> <p>Amend Policy UA19 (reassigned Policy UA12) to include the following additional criterion:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p> <p>Amend Policy UA19 (reassigned Policy UA12) to include the following additional criteria:</p> <p>'Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat.'</p>	<p>UA12 Encombe House, Sandgate</p> <p>The site is allocated for residential development with an estimated capacity of approximately 36 residential apartments.</p> <p>Development proposals will be supported where:</p> <p>1. Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat;</p> <p>2. There is a landscaping scheme which retains a substantial amount of the existing tree cover including those trees protected by Tree Preservation Orders and any groups or individual trees important to the appearance of the site;</p> <p>3. The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the nearby Scheduled Ancient Monument and the Sandgate High Street Conservation Area; and</p> <p>4. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>
<p>UA20 Hythe Town Centre</p> <p>Within the designated town centre area (identified on the Policies Map), planning permission will be granted for development that provides for a range of town centre uses that adds to the vitality and viability of the town centre.</p> <p>Within the Primary Shopping Frontage (as identified on the Policies Map) within the town centre, development on the ground floor will be permitted for A1 and A3 uses. Other uses will be permitted in the Primary Shopping Frontage provided that:</p> <p>1. They fall within the definition of 'town centre uses' as defined in the NPPF; or</p> <p>2. They fall under D1 uses and provide a complementary function to the town centre; and</p> <p>3. They would not create a continuous frontage of two or more non A1 uses.</p> <p>For development proposals that fall within the town centre uses definition that cannot be located within the designated town centre area, permission will be permitted provided that:</p> <p>1. the sequential approach set out in the National Planning Policy Framework and the Planning Practice Guidance has been followed;</p> <p>2. A full assessment is provided of the impact the proposal would have on Hythe Town Centre and any other town centres, relating to the scale and the type of development proposed in compliance with the National Planning Policy Framework and Planning Practice Guidance;</p> <p>3. It can be demonstrated that the site is in an accessible location and well connected to the town centre that would encourage people to walk, cycle and use public transport;</p> <p>4. The overall design reflects the local character in which it is located and the impact of any car parking is reduced by location and appropriate landscaping; and</p> <p>5. A suitable access and, if required, service yard, can be provided without detrimental impacts to any local residential amenity.</p>	<p>Supportive of the policy which seeks to protect and enhance Hythe Town Centre, as this is a central function and the heart of the town, and needs to remain viable and have continued vitality.</p> <p>Supportive of the policy but would like to see a further criteria protecting the character of the High Street. In particular restricting new or redevelopment to small scale, and restricting the amalgamation of small units.</p> <p>This policy should specify a percentage of A1 retail per frontage so the viability of the retail element in the Town is not undermined by too many A3 uses. Policy SS4 refers to predominantly A1 use but this is not sufficiently specific.</p> <p>The Policy should include mention of the special historic character of Hythe town centre so that this is properly taken account of. Permission for new shopfronts and alterations to existing shopfronts will only be given if the proposals preserve or enhance the character of the High Street. It is also suggested that the Council should consider the development of specific guidance for Shop Fronts and Signage in the Conservation Area.</p> <p>Hythe should include developments including housing and flats to cater for the ageing population</p>	<p>Comment noted.</p> <p>Support noted. The Places and Policies Local Plan should be read as a whole. Any Planning application would need to satisfy Policy HB2: Cohesive Design. A new Policy on Shopfronts will also be drafted as part of the new Retail and Leisure chapter to protect the design and traditional character of shopfronts within the district's Town and Local Centres.</p> <p>The Local Plan (2006) previously set maximum percentage thresholds for non-A1 uses in the street frontage for each of the town centres. However, this created problems when determining planning applications, as it led to instances where town centre uses as defined by the National Planning Policy Framework were being refused in the town centres because it exceeded the percentage threshold for which there was no evidence to justify the level set.</p> <p>Kent County Council is in the process of preparing a Heritage Strategy for Shepway District Council. Heritage Strategy work to date has fed into the development of the draft Places and Policies Local Plan.</p> <p>Policy UA15 allocates land at Saltwood Care Centre for C2/C3 housing and is designed to meet the needs of the ageing population and is restricted to occupation for the over 65 with appropriate communal facilities to meet the needs of an elderly population.</p>	<p>No action proposed</p> <p>Amend Places and Policies Local Plan to include new Policy RL10 on Shopfronts, Blinds and Security Shutters in Chapter 11: Retail and Leisure.</p> <p>No action proposed</p> <p>No action proposed.</p> <p>No action proposed.</p>	<p>UA3 Hythe Town Centre</p> <p>Within the designated town centre area (identified on the Policies Map), planning permission will be granted for development that provides for a range of town centre uses that adds to the vitality and viability of the town centre.</p> <p>Within the Primary Shopping Frontage (as identified on the Policies Map) development on the ground floor will be permitted for A1 (shops) and A3 (restaurants and cafes) uses. Other uses will be permitted in the Primary Shopping Frontage provided that:</p> <p>1. They fall within the definition of town centre uses in the National Planning Policy Framework; or</p> <p>2. They fall under D1 uses and provide a complementary function to the town centre; and</p> <p>3. They would not create a continuous frontage of two or more non-A1 (shops) uses; and</p> <p>4. In the case of appropriate sui generis uses they would create an active frontage with a shopfront display and positively contribute towards providing a high quality environment and enhance the vitality and viability of the area.</p> <p>Development proposals within the town centre uses definition that cannot be located within Hythe Town Centre will be judged against Policy RL8.</p> <p>RL10 Shop Fronts, Blinds and Security Shutters</p> <p>Proposals for new shop fronts, or alterations to shop fronts, will be permitted where:</p> <p>1. The design, materials and proportions of any new, or altered, shop front relates to the character of the building and its locality;</p> <p>2. Proposals that reflect the traditional character of shop fronts must include historically appropriate detailing;</p> <p>3. Any existing features of historic or architectural interest are retained; and</p> <p>4. Proposals affecting Listed Buildings, Conservation Areas or other heritage assets will preserve or</p>

	Improvements to infrastructure are needed	The Council is preparing an Infrastructure Delivery Plan (IDP) for Shepway which will identify all types of infrastructure needed to support new homes and businesses over the course of the Places and Policies Local Plan to 2031. The Planning Act 2008 provides a wide definition of the infrastructure which can be funded by the Community Infrastructure Levy. It can include schools, sports facilities, transport, culture, green infrastructure, community, health and social care facilities. Detail of the CIL in operation in the district is set out on the Council's website.	No action proposed.	enhance the character or appearance of the asset and its setting Proposals for blinds, canopies or awnings which respect the architectural character and features of the building on which they are to be installed will be permitted. Proposals for the use of security measures will be permitted only if they do not involve the introduction of obtrusive features or detract from the character of the street scene.
	The policy should include a specific reference to archaeology potential and assessment as part of development proposals. The following additional criterion should be included: "The effect of the development upon the significance of any archaeological remains is properly considered and measures to either safeguard these or, if appropriate, to record and understand them are agreed".	Comment noted. The Plan should be read as a whole; Policy HE2: Archaeology would also apply to any relevant proposals.	No action proposed.	
	Planning consents given, particularly for residential development, must have sufficient parking within the proposed development so that the existing public car parking spaces are kept open for visitors to the town centre.	The Places and Policies Local Plan should be read as a whole. Any Planning application would need to satisfy Policy T2: Parking Standards.	No action proposed.	
UA21 Smiths Medical Campus, Hythe The site is allocated for mixed residential development with an estimated capacity of approximately 80 dwellings and Commercial use B1/B8. Development proposals will be supported where: 1. The design and layout of the whole site should provide vehicular access for residential and business development from Fort Road with an additional new relief road connection to Range Road. No vehicular access should be from Boundary Road 2. Retention of the established factory unit and car park located at the southern end of the site. 3. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest 4. Any potential contamination from former use is investigated and appropriately mitigated as part of the development 5. Ecological investigations are undertaken adequate mitigation measures identified (if necessary) to ensure development does not have an adverse impact upon the Hythe Ranges Local Wildlife Site 6. The development has at least 4 self / custom build plots on site	A full Transport Assessment should be undertaken to demonstrate the expected vehicle movements on Fort Road and other roads in the vicinity.	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	No action proposed.	UA13 Smiths Medical Campus, Hythe The site is allocated for mixed-use development with an estimated capacity of approximately 80 dwellings and 2,000sqm of B1 (business) / B8 (storage and distribution). Development proposals will be supported where: 1.Primary vehicular access for residential and business is achieved from Fort Road with a secondary vehicular access connection to Range Road. There should be no vehicular access from Boundary Road; 2.Highway improvements at the junction of St Nicholas Road at Dymchurch Road are provided to the satisfaction of the Local Highways Authority; 3.The established factory unit and car park located at the southern extent of the site are retained or replaced; 4.Appropriate and proportionate contributions are made to the expansion of Oaklands Health Centre through a Section 106 agreement; 5.Appropriate and proportionate contributions, through a Section 106 agreement, are made towards the upkeep and/or improvement of open space and existing play facilities in the vicinity; 6.Ecological investigations are undertaken and adequate mitigation and enhancement measures are incorporated into the design to minimise effects on the Hythe Ranges Local Wildlife Site; 7.Proposals are accompanied by a Site-specific Flood Risk Assessment and demonstrate that any risks can be mitigated and/or safely managed; 8.Extra flood resistant and resilient construction measures are incorporated into the design of the development to reduce the risk of life to occupants in an extreme flood event and improve flood risk management; 9.The masterplanning of the site is informed by an odour assessment to take account of nearby wastewater treatment works in order to minimise land use conflict; 10.Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; 11.Any potential contamination from the former use is investigated, assessed and if appropriate, mitigated as part of the development; 12.The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest; and 13.At least 4 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development.
	There should be a higher proportion of appropriate commercial use on the site with around 50% reduction in the number of proposed dwellings given the large amounts of housing proposed elsewhere across Shepway.	The Employment Land Review (2016) concluded that there is sufficient employment land allocated to meet both industrial and office requirements for the remaining plan period. However, the Shepway Economic Development Strategy (2015-2020) suggests that these allocation are in the wrong locations to meet the current business demands for future growth the focus should be around the M20 junctions will strong access to the strategic network. Consequently, officers are of the opinion that the Smith's Medical site is not an appropriate location to be allocating significant new commercial space. The factory unit is being retain as the ELR identified that Shepway contains the second smallest stock of factories in the sub-region. Since publication of the Preferred Options the site promoter has met with the Council to explain that the factory units were designed and built specifically to their operational needs and are therefore unlikely to be of practical use to another company. Therefore, the policy is to be made more flexible to specify a mixed-use development with an estimated capacity of 80 dwellings and 2,000sqm of B1 (business) / B8 (storage and distribution) uses.	Amend Policy UA21, criterion 3 (reassigned Policy UA13) to read: 'The established factory unit and car park located at the southern extent of the site are retained or replaced;'	
	The Council needs to wait and evaluate the impact of the Martello Lakes development before further land is allocated in this area. Taking account of school and doctors places, increased air and noise pollution.	The effects of the Martello Lakes development was fully assessed as part of the planning application and the necessary mitigation measures to address these formed part of the planning consent. The Council has involved statutory consultees, including Kent County Council Education and NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education and NHS support the Council that there is capacity available in existing schools and doctors to cater for the planned additional growth within the Urban Character Area. Where improvements to school and health facilities are necessary to cater for the additional growth, comments from KCC and NHS have been taken into account when preparing the plan. Since the publication of the Preferred Options Local Plan, the Clinical Commissioning Group have identified the Oaklands Health Centre in Hythe for expansion in order to meet the needs of the growing population. A number of site allocations are required to make a financial contribution through a Section 106 agreement in order to facilitate the growth of services.	Amend Policy UA21 (reassigned Policy UA13) to include the following additional criteria: 'Appropriate and proportionate contributions are made to the expansion of Oaklands Health Centre through a Section 106 agreement;'	
	Where the site boundary meets Hythe Green, appropriate measures must be taken to protect the tree line and established habitats.	The established tree line on the eastern boundary with Hythe Green falls outside of the Smith's Medical site boundary.	No action proposed.	
	Development should not take place against the eastern boundary, but should be set back away from it. Development that creates an inward looking estate should be resisted.	The Places and Policies Local Plan should be read as a whole. Any planning application would need to satisfy Policy HB1: Quality Places Through Design and Policy HB2: Cohesive Design. Good quality design is an integral part of sustainable development. The National Planning Policy Framework recognises that design quality matters and that planning should drive up standards across all forms of development. As a core planning principle, plan-makers and decision takers should always seek to secure high quality design. Achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations.	No action proposed.	

	Fort Road should be extended to provide residents with direct access to the seafront. Any such design would need to ensure that this did not create a bypass for the A259.	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.	No action proposed.	
	No housing should be constructed prior to the completion of the link road.	A quantum of housing will need to be built in advance in order to finance the construction of the Fort Road - Range Road link. These trigger points for the delivery of infrastructure will be specified in a Section 106 legal agreement attached to the planning permission.	No action proposed.	
	Following an internal discussion and with Kent Highway it was suggested that some minor highway improvement at the St Nicholas Road junction with Dymchurch Road should form part of the site development proposals.	Comment noted.	Amend Policy UA21 (reassigned Policy UA13) to include the following additional criterion: 'Highway improvements at the junction of St Nicholas Road at Dymchurch Road are provided to the satisfaction of the Local Highways Authority.'	
	This site should be considered as a possible site for the proposed new Hythe leisure centre. More central to Hythe and Romney Marsh. There is no reason why SDC should limit itself to sites within its ownship.	The construction of a new leisure centre for Hythe would be funded by Shepway District Council using the Section 106 financial contributions from the Nickolls Quarry development, and capital land receipts from the sale of the existing swimming pool site on South Road and Princes Parade. The project would be unaffordable if the Council had to factor in the additional cost of purchasing a prime site that is not in its ownship.	No action proposed.	
	The development should include a high proportion of affordable housing.	Any planning application will need to comply with the adopted Policy CSD1 in the Core Strategy (2013) with regard to affordable housing provision.	No action proposed.	
	Given the generous existing employment land allocations in Hythe at Nickolls Quarry and existing sites at Range Road, and Pennypot, and the close proximity of Link Park. We suggest there is potential to increase housing (and/or density?) on this site.	A general calculation of 35 dwellings per hectare was used to inform the number of dwellings proposed on the site based on the site area. Although, the draft Local Plan allocates sufficient land to meet the employment needs of the District, the factory unit is still to be retained as the Employment Land Review identified a shortage in the factory stock for the district in comparison to the sub-region. The number of dwellings is a general guide to inform future planning applications which once tested at the planning application stage may increase or decrease subject to design, layout and siting. However, the level of development proposed is considered appropriate for this site	No action proposed.	
	A review showed that the Smiths Medical site is partly within a Biodiversity Action Plan Priority Habitat. Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.	Comment noted.	Amend Policy UA21 (reassigned Policy UA13) to include the following additional criterion: 'Ecological investigations are undertaken and adequate mitigation and enhancement measures are incorporated into the design to minimise effects on the Hythe Ranges Local Wildlife Site.'	
	Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.	Comment noted.	Amend Policy UA21 (reassigned Policy UA13) to include the following additional criterion: 'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'	
	The site is in close proximity to Hythe Wastewater Treatment Works. The following additional criterion should be included within the policy for soundness. "The Masterplanning of the site should take account of nearby wastewater pumping stations to minimise land use conflict".	Comment noted.	Amend Policy UA21 (reassigned Policy UA13) to include the following additional criterion: 'The masterplanning of the site is informed by an odour assessment to take account of nearby wastewater treatment works in order to minimise land use conflict.'	
	Elements of Hythe Ranges once included this site, Archaeological potential is low but the following additional criterion should be included: "The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest".	Comment noted.	Amend Policy UA21, criterion 12 (reassigned Policy UA13) to read: 'The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.'	
UA22 Land at Station Road, Hythe	The proximity to the AONB means that development could impact on the setting of the Kent Downs AONB, especially in view of the fact that the landscape here is of high quality and shares similar characteristics to the adjacent AONB. Support the inclusion of criterions 1 and 3.	Support noted.	No action proposed.	UA14 Land at Station Road, Hythe
The site is allocated for residential development with an estimated capacity of approximately 40 family sized dwellings. Development proposals will be supported where: 1. Development is designed to a high quality standard that would not have a harmful impact upon the character and setting of the nearby Kent Downs Area of Outstanding Natural Beauty 2. Ecological and arboricultural investigations are undertaken and adequate mitigation measures identified to ensure development does not have an adverse impact upon protected trees or protected species 3. Existing trees and hedgerows within/around perimeter of site are retained and enhanced	Development of this site together with that at Saltwood Care Centre (UA23) will require very careful management of surface water runoff to avoid the flooding found elsewhere in Hythe. The drainage infrastructure and Mill Stream seems unable to cope as flooding is a regular occurrence in the lower half of Station Road all the way down to the junction with the A259 and into Mill Road.	The Places and Policies Local Plan should be read as a whole. Any planning application will need to comply with Policy CC3: Sustainable Drainage Systems (SuDs). The council has also consulted with Southern Water and Kent County Council, the lead local flood authority, as part of the preparation of the Places and Policies Local Plan.	No action proposed.	Development proposals will be supported where: 1. The development is designed to a high standard and would not have a harmful impact on the character and setting of the nearby Kent Downs Area of Outstanding Natural Beauty; 2. An appropriate pedestrian crossing point, in the form of dropped kerbs and tactile paving, is provided;

<p>4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest</p> <p>5. Development directs land to sequentially preferential locations within the site in terms of flood risk.</p>	<p>Station Road is an extremely busy road and safe access for this number of homes will prove challenging. Concerned about sight lines and proximity of the blind bend.</p>	<p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.</p>	<p>No action proposed.</p>	<p>3. Existing trees and hedgerows within and around the perimeter of the site are retained and enhanced;</p> <p>4. Ecological and arboricultural investigations are undertaken and adequate mitigation measures identified to ensure development does not have an adverse impact on protected trees or protected species;</p> <p>5. Appropriate and proportionate contributions are made to the expansion of Oaklands Health Centre through a Section 106 agreement;</p> <p>6. They are accompanied by a Site-specific Flood Risk Assessment with development directed to sequentially preferential locations within the site in terms of flood risk; and</p> <p>7. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>
	<p>An appropriate pedestrian crossing point in the form of dropped kerbs and tactile paving will be required as there is no footpath on the northern side of Station Road.</p>	<p>Comment noted.</p>	<p>Amend Policy UA22 (reassigned Policy UA14) to include the following additional criterion:</p> <p>'An appropriate pedestrian crossing point, in the form of dropped kerbs and tactile paving, is provided.'</p>	
	<p>Blackhouse Hill / Station Road has become unfortunately a preferred route for traffic between Hythe and the Romney Marsh up to The A20/M20 access, the West End of Folkestone and beyond</p>	<p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.</p>	<p>No action proposed.</p>	
	<p>Since the publication of the preferred Options Local Plan, the Clinical Commissioning Group have identified the Oaklands Health Centre in Hythe for expansion in order to meet the needs of the growing population. A number of site allocations are required to make a financial contribution through a s.106 agreement in order to facilitate the growth of services.</p>	<p>Comment noted.</p>	<p>Amend Policy UA22 (reassigned Policy UA14) to include the following additional criterion:</p> <p>'Appropriate and proportionate contributions are made to the expansion of Oaklands Health Centre through a Section 106 agreement.'</p>	
	<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA22, criterion 7 (reassigned Policy UA14) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
	<p>The site is an attractive open green space and wildlife corridor. Land adjacent to Mill Stream should be set aside for open space.</p>	<p>The Council has involved statutory consultees including Natural England, together with specialist consultees including Kent Wildlife Trust and Kent County Council Biodiversity team at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where necessary infrastructure improvements can be provided as part of the allocated sites these are identified in specific policies; other improvements will be provided through the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the district.</p> <p>Policy UA14: Land at Station Road, Hythe (criterion 4) states that development proposals will be supported where ecological and arboricultural investigations are undertaken and adequate mitigation measures identified to ensure development does not have an adverse impact on protected trees or species.</p>	<p>No action proposed.</p>	
	<p>Public Right of Way to Saltwood Castle should be maintained as part of any proposed development.</p>	<p>The Public Right of Way falls outside the site boundary and therefore will not be affected by site proposals</p>	<p>No action proposed.</p>	
	<p>Following an internal discussion it was agreed that the site capacity was too high.</p>	<p>Given the site topography, flood risk and landscaping considerations, and the density of the existing adjacent urban form, it was considered appropriate to reduce the proposed site capacity from 40 to 30 dwellings.</p>	<p>Site capacity reduced from 40 to 30 dwellings.</p>	
<p>UA23 Land at the Saltwood Care Centre</p> <p>The site is allocated for an appropriate quantum of Extra Care (C2/C3) housing. Development proposals will be supported where:</p> <ol style="list-style-type: none"> All properties are designed to wheelchair accessible homes standards (M4(3)3 of the building regulations On site care provision is made via an appropriate contract that requires a minimum of 2 hours of care, to be provided by a CSCI registered provider The development meets the needs of the ageing population and is restricted to occupation for those over 65 Appropriate communal facilities are provided to meet the needs of an elderly population Proposals are landscape led and demonstrate that landscape character is protected Access is provided to meet the needs of residents and to provide connectivity to the surrounding area The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest. 	<p>The proximity to the AONB means that development could impact on the setting of the Kent Downs AONB, especially in view of the fact that the landscape here is of high quality and shares similar characteristics to the adjacent AONB. Support the inclusion of criterions 1 and 3.</p> <p>In regards criterion 6, contributions should be sought towards improving pedestrian safety at the North Road / Tanners Hill junction.</p>	<p>Comment noted.</p> <p>The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids.</p>	<p>No action proposed.</p>	<p>UA15 Land at the Saltwood Care Centre, Hythe</p> <p>The site is allocated for 84 Class C2 or C3 Extra Care Units. Development proposals will be supported where:</p> <ol style="list-style-type: none"> The development meets the needs of the ageing population and is restricted to occupation for those over 65 years of age; On-site care provision is made through an appropriate contract that requires a minimum of 2 hours of care, to be provided by a Care Quality Commission registered provider; All of the Extra Care Units are designed to wheelchair accessible homes standards (M4(3): Category 3) of the Building Regulations; Appropriate communal facilities are provided to meet the needs of the residents; Access is provided to meet the needs of residents and to provide connectivity to the existing care centre site and the surrounding area; Proposals are accompanied by a landscape strategy that retains a substantial amount of the existing tree cover and demonstrates that the landscape character is protected; Appropriate and proportionate contributions, through a Section 106 agreement, are made to the expansion of Oaklands Health Centre; Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat; A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider; and The archaeological potential of the land is properly considered and appropriate archaeological

<p>Since the publication of the preferred Options Local Plan, the Clinical Commissioning Group have identified the Oaklands Health Centre in Hythe for expansion in order to meet the needs of the growing population. A number of site allocations are required to make a financial contribution through a s.106 agreement in order to facilitate the growth of services.</p>	<p>Comment noted.</p>	<p>Amend Policy UA23 (reassigned Policy UA15) to include the following additional criterion: 'Appropriate and proportionate contributions, through a S106 agreement, are made to the expansion of Oaklands Health Centre.'</p>	<p>20. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.</p>
<p>My comments at Picture 5.25 (Station Road) also apply to this site. In fact, the view up the valley from the West side towards the Listed Saltwood Castle is of particular note - part of Hythe's 'Green Belt'! (SA Objective 7 concerning consideration of longer distances to heritage assets being relevant).</p>	<p>The Council has involved statutory consultees including Historic England and Kent Heritage at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Where concerns have been raised in regards to the possible impact on heritage assets, the necessary mitigation measures can be provided as part of the allocated sites; these are identified in specific policies. General policies in Chapter 17: Historic Environment will also apply to relevant proposals, as will national policy set out in the National Planning Policy Framework and Planning Practice Guidance.</p>	<p>No action proposed.</p>	
<p>A review showed that the Land at Saltwood Care Centre is partly within a Biodiversity Action Plan Priority Habitat. Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.</p>	<p>Comment noted.</p>	<p>Amend Policy UA23 (reassigned Policy UA15) to include the following additional criterion: 'Mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat.'</p>	
<p>When assessing the type of care to be provided, consideration should be given to the proximity of local services to ensure that residents are not isolated.</p>	<p>Under the Planning and Compulsory Purchase Act 2004, a Sustainability Appraisal (SA) is mandatory for Local Plans. The SA Framework is formed of 14 SA Objectives, which are applied to the potential site allocations and policies. SA Objective (3) aims to promote community vibrancy, provide opportunities to access services, facilities and environmental assets for all and avoid creating inequalities of opportunity for access. When the appraisal questions for this particular objective were assessed against Policy UA23: Land at Saltwood Care Centre (now renumbered) the site received a positive score.</p>	<p>No action proposed.</p>	
<p>Extra Care (C2/C3) should read "Extra Care C2 or C3". We are concerned that this is outside the Hythe settlement area (contrary to policy CSD3), in a designated local landscape area and where there is a blanket TPO. It is not clear why expansion of the care home is acceptable when market housing wouldn't be acceptable – surely both will damage the countryside/landscape. The policy should state a definite number of new dwellings – "an appropriate quantum" is too vague. Note that the SHLAA assessment refers to "latchgate" i.e. there is a potential landslip risk so the policy should refer to this.</p>	<p>Comment noted. There is currently an outline application for 84 extra care homes (ref 15/0720/SH) with a resolution to grant planning consent subject to finalisation of legal agreements. The perceived impact on the Local Landscape Area, setting of the Area of Outstanding Natural Beauty and blanket Tree Preservation Order trees would not be acceptable for market housing. The current allocation for Extra Care facilities is judged to be a special case given the need to address Hythe's ageing population and that the site adjoins the existing Saltwood Care Centre. The Places and Policies Local Plan should be read as a whole. Where necessary, a planning application would need to satisfy Policy NE6: Land Stability.</p>	<p>No action proposed. No action proposed.</p>	
<p>The following additional criterion should be included within the policy for soundness. "A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider".</p>	<p>Comment noted.</p>	<p>Amend Policy UA23 (reassigned Policy UA15) to include the following additional criterion: 'A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.'</p>	
<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA23, criteria 10 (reassigned Policy UA15) to read: 'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.'</p>	
<p>Land not appropriate for general non-care related residential housing.</p>	<p>There is currently an outline planning application for 84 extra care homes (ref 15/0720/SH).</p>	<p>No action proposed.</p>	
<p>UA24 Foxwood School and St Saviours Hospital, Seabrook Road, Hythe - Foxwood School is allocated for a landscape led residential development with an estimated capacity of approximately 150 dwellings. St Saviours Hospital is allocated for a landscape led residential development with an estimated capacity of approximately 35 dwellings. Development proposals will be supported where: 1. The design proposals are genuinely landscape led to take account of the environmental and topographical features of the sites and to ensure important long and short distance views are retained and the proposal preserves the character and setting of the Kent Downs Area of Outstanding Natural Beauty, the Area of Special Character and the Local Wildlife Site 2. The design of the development should seek to enhance the setting of the nearby Grade II Listed Building The Black Cottage and Scheduled Monument the Royal Military Canal 3. An appropriate mix of housing and/or apartments is provided that respects the constraints of the sites 4. The archaeological potential of the land is properly considered and measures are agreed to monitor and respond to any finds of interest 5. Access is derived from Seabrook Road with no vehicular access via Cliff Road 6. Ecological and arboricultural investigations are undertaken and adequate mitigation measures identified to ensure development does not have an adverse impact upon protected trees or wider established habitats 7. The provision of open space and children's play space being provided and a management company is established for its long term maintenance 8. The Foxwood School site has at least 6-8 self / custom build plots on site 9. The Dutch House (71 Seabrook Road) must be retained and incorporated in to any design.</p>	<p>The access and egress onto Seabrook Road is a concern. The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids. The Policy should impose a maximum number of homes. The loose wording "approximately" should be replaced by "no more than". This would avoid the prospect of the over-intensity of development which characterised the recent application. The statement that there would be no vehicular access to either the St Saviour's site or the Foxwood site from Cliff Road is welcomed.</p>	<p>No action proposed. No action proposed. No action proposed.</p>	<p>Following the publication of the Preferred Options Local Plan it was decided that the joint site allocation policies for St. Saviours and Foxwood would be clearer if split into two separate policies. UA16 St Saviour's Hospital, Seabrook Road, Hythe St. Saviour's Hospital is allocated for a landscape-led residential development with an estimated capacity of approximately 50 dwellings. Development proposals will be supported where: 1. The design is landscape-led to take account of the environmental and topographical features of the site and to ensure important long and short distance views are maintained; 2. The character and setting of the Kent Downs Area of Outstanding Natural Beauty, the Seabrook Road area; and the Royal Military Canal Local Wildlife Site are preserved; 3. The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the Grade II Listed Building, The Black Cottage; and Scheduled Monument, the Royal Military Canal; 4. The Dutch House (71 Seabrook Road) is retained and incorporated into the design; 5. Access is derived from Seabrook Road with no vehicular access from Cliff Road; 6. Appropriate and proportionate contributions, through a S106 agreement, are made to the expansion of Oaklands Health Centre; 7. Appropriate and proportionate contributions are made towards the provision of a controlled crossing on Seabrook Road to improve access to Princes Parade and the seafront; 8. The public highway known as College Bridge that links the A259 with the Royal Military Canal is upgraded to the satisfaction of the Local Highways Authority;</p>

<p>An emergency access is required as the proposal provides for more than 50 dwellings. A controlled crossing should also be provided across Seabrook Road in that residents living at the site can cross Seabrook Road to access Princes Parade and the beach. The policy should require the upgrading of the public highway known as College Bridge, which links the A259 with the Royal Military Canal and will link this site with the Canal and the PROW to the north of the canal.</p>	<p>Comment noted.</p>	<p>Amend Policy UA24 (reassigned Policy 16 St Saviours and 17 Foxwood) to include the following additional criteria:</p> <p>'Appropriate and proportionate contributions are made towards the provision of a controlled crossing on Seabrook Road to improve access Princes Parade and the seafront;'</p> <p>'The public highway known as College Bridge that links the A259 with the Royal Military Canal is upgraded to the satisfaction of the Local Highways Authority;'</p>	<p>9. Appropriate and proportionate contributions, through a S106 agreement, are made towards the upkeep and/or improvement of open space and existing play facilities at Princes Parade;</p> <p>10. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place; and</p> <p>11. An appropriate mix of housing and/or apartments is provided that respects the constraints of the site.</p> <p>UA17 Foxwood School, Seabrook Road, Hythe</p> <p>Foxwood School is allocated for a landscape-led residential development with an estimated capacity of approximately 150 dwellings.</p> <p>Development proposals will be supported where:</p>
<p>It should be a requirement for any new development to introduce an effective drainage system that is not only sufficient for the new scheme but also rectifies the existing surface water drainage deficiencies.</p>	<p>All proposals will need to comply with Policy CC3: Sustainable Drainage Systems (SuDs), whereby surface water is managed close to the source. The council has also consulted with Southern Water and Kent County Council, as lead local flood authority, as part of the preparing Places and Policies Local Plan.</p>	<p>No action proposed.</p>	<p>1. The design is genuinely landscape-led to take account of the environmental and topographical features of the site and to ensure important long and short distance views are maintained and the playing pitches are retained and enhanced as part of the landscape scheme;</p> <p>2. The character and setting of the Kent Downs Area of Outstanding Natural Beauty, the Seabrook Road area and the Royal Military Canal Local Wildlife Site are preserved;</p> <p>3. The scale, design and layout of any new buildings preserve or enhance the character and setting of nearby heritage assets including the Grade II Listed Building, The Black Cottage; and Scheduled Monument, the Royal Military Canal;</p>
<p>The existing line of trees play an important role in giving some stability to the steep bank. Importantly they also provide a screen to the residences below. Under no circumstances should those trees be removed.</p>	<p>The site falls within the latchgate area (land instability) therefore any development should comply with Policy NE6: Land Stability. The trees to the south of the site are also covered by Tree Preservation Orders; Policy UA17 (criteria 8) requires arboricultural investigations to be undertaken and mitigation and enhancement measures to be incorporated into the design to minimise effects on habitat.</p>	<p>No action proposed.</p>	<p>4. Access is derived from Seabrook Road with no vehicular access from Cliff Road;</p> <p>5. Appropriate and proportionate contributions are made towards the provision of a controlled crossing on Seabrook Road to improve access to Princes Parade and the seafront;</p> <p>6. The public highway known as College Bridge that links the A259 with the Royal Military Canal is upgraded to the satisfaction of the Local Highways Authority;</p> <p>7. There is on site provision of play space to meet the needs of the development for which a management company or other solution should also be established for its long term maintenance;</p>
<p>Consideration must be given to the surrounding residential character. The massing should be consistent with the surrounding residential character and not that of the existing main building which dominates the area</p>	<p>The Places and Policies Local Plan should be read as a whole. Any planning application would need to satisfy Policy HB1: Quality Places Through Design criterion 1 which states:</p> <p>'Planning permission will be granted where the proposal: Makes a positive contribution to its location and surroundings, enhancing integration, while also respecting existing buildings and land uses, particularly with regard to layout, scale, form, density, materiality and mix of uses so as to ensure all proposals create places of character;'</p>	<p>No action proposed.</p>	<p>8. Ecological and arboricultural investigations are undertaken and adequate mitigation and enhancement measures are incorporated into the design of the Foxwood School development to minimise effects on the local Biodiversity Action Plan Priority Habitat;</p> <p>9. A connection from the site is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider;</p> <p>10. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place;</p> <p>11. An appropriate mix of housing and/or apartments is provided that respects the constraints of the sites; and</p> <p>12. At least 6-8 self-build or custom build plots are provided on site in accordance with Policy HB4: Self-build and Custom Housebuilding Development.</p>
<p>The Foxwood Site may contain priority habitat, deciduous woodland. These potential environmental constraints were not highlighted in the final SHLAA.</p>	<p>A review showed that the former Foxwood School site is partly within a Biodiversity Action Plan Priority Habitat (deciduous woodland and additional habitats). Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.</p>	<p>Amend Policy 24 (reassigned Policy UA17) to include the following additional criterion:</p> <p>'Ecological and arboricultural investigations are undertaken and adequate mitigation and enhancement measures are incorporated into the design of the Foxwood School development to minimise effects on the local Biodiversity Action Plan Priority Habitat;'</p>	
<p>The old "Seabrook Lodge School House" at Foxwood and St Saviours Hospital should be considered of architectural value are preserved given their distinctiveness on the Hythe scarp.</p>	<p>The buildings, especially St Saviours Hospital, were assessed (at pre-application) for their architectural value; however it was considered by officers that behind the facade the main building was modern in its design and construction and of little heritage value or architectural merit and therefore was not worth retaining as part of any future proposals.</p>	<p>No action proposed.</p>	
<p>Since the publication of the preferred Options Local Plan, the Clinical Commissioning Group have identified the Oaklands Health Centre in Hythe for expansion in order to meet the needs of the growing population. A number of site allocations are required to make a financial contribution through a s.106 agreement in order to facilitate the growth of services.</p>	<p>Comment noted.</p>	<p>Amend Policy UA24 (reassigned Policy UA16) to include the following additional criterion:</p> <p>'Appropriate and proportionate contributions, through a Section 106 agreement, are made to the expansion of Oaklands Health Centre;'</p>	
<p>Following an internal discussion it was agreed that the site should make an off site contribution towards improvements of open space and existing play facilities at Princes Parade to reflect the findings of the Open Space and Play Space Strategies</p>	<p>Comment noted.</p>	<p>Amend Policy UA24 (reassigned Policy UA16) to include the following additional criterion:</p> <p>'Appropriate and proportionate contributions, through a Section 106 agreement, are made towards the upkeep and/or improvement of open space and existing play facilities at Princes Parade;'</p>	
<p>No sites including playing fields should be allocated for development if this would include the loss of playing field or prejudice the use of the playing field.</p>	<p>Foxwood is part of a Federation with Highview School. In September 2016 the schools merged into one new school and moved to new premises on Park Farm Road, Folkestone and is now rebranded as The Beacon, Folkestone. School facilities including playing field facilities were have been reprovided on the new site.</p> <p>It is agreed that the site should provide an element of open and play space to reflect the findings of the Open Space and Play Space Strategies</p>	<p>Amend Policy UA24 (reassigned Policy UA17) to include the following additional criterion:</p> <p>'There is on site provision of play space to meet the needs of the development for which a management company or other solution should also be established for its long term maintenance;'</p>	
<p>The following additional criterion should be included within the policy for soundness. "A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider".</p>	<p>Comment noted.</p>	<p>Amend Policy UA24 (reassigned Policy UA17) to include the following additional criterion:</p> <p>'A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider;'</p>	
<p>There is concern about the specific form of words currently used and therefore the following alternative wording is proposed ... "The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place."</p>	<p>Comment noted.</p>	<p>Amend Policy UA24, criterion 10 (reassigned Policy UA17) to read:</p> <p>'The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place;'</p>	

<p>UA25 Princes Parade, Hythe</p> <p>The site is allocated for mixed use redevelopment to include public open space, leisure, small scale commercial uses and up to 150 residential dwellings.</p> <p>Development proposals will be supported where:</p> <p>1. They form a single comprehensive masterplan of the entire site which meets with the policy requirements of this plan and the Core Strategy (2013). The mix of uses shall include :</p> <p>- A substantial community recreation and leisure offer including an appropriate replacement for Hythe Swimming Pool, with further investigation of the inclusion of other facilities</p> <p>- High quality public open spaces incorporating the enhancement of and linking between the canal and beach front and accessibility east to west along the canal and coast</p> <p>- An appropriate mix of well designed homes within a landscape led setting, including appropriate accommodation for the elderly, affordable housing and self/custom build</p> <p>2. They are accompanied by appropriate heritage assessment to demonstrate that key features of the Royal Military Canal and its setting, which contribute to its significance as a Scheduled Monument would be preserved and enhanced and that the overall scheme would not result in substantial harm to the heritage asset</p> <p>3. Any less than substantial harm is clearly and convincingly demonstrated to be outweighed by the public benefits of the proposal, which should include heritage benefits</p> <p>4. Any potential contamination from former use is investigated and appropriately mitigated as part of the development</p> <p>5. Appropriate protection, preservation and integration of the Royal Military Canal Local Wildlife Site is provided.</p>	<p>The Core Strategy Housing requirement and 5-year housing land supply can be satisfied without relying on Princes Parade;</p>	<p>Princes Parade contributes to providing the housing land supply for the Urban Character Area over the local plan period as set out in the Places and Policy Local Plan (Submission Draft) Table 4.3)</p>	<p>No action proposed.</p>	<p>UA18 Princes Parade, Hythe</p> <p>The site is allocated for mixed-use redevelopment to include up to 150 residential dwellings, a 2,961sqm leisure centre; approximately 1,500sqm of commercial uses including hotel use (Use Class C1 / A1 / A3); and public open space.</p> <p>Development proposals will be supported where:</p> <p>1.They form a single comprehensive masterplan of the entire site which meets with the policy requirements of this plan and the Core Strategy. The mix of uses shall include:•A substantial community recreation and leisure facility including an appropriate replacement for Hythe Swimming Pool, with further investigation of the inclusion of other facilities;</p> <p>•High quality public open and play space of at least 45 per cent of the site area (including the promenade); incorporating the enhancement of, and linking between, the canal and beach front and accessibility east to west along the canal and coast; and</p> <p>•An appropriate mix of well designed homes within a landscape-led setting, including appropriate accommodation for the elderly, affordable housing and self-build and custom build plots in accordance with Policy HB4: Self-build and Custom Housebuilding Development;</p> <p>2.They are accompanied by an appropriate heritage assessment to demonstrate that the harm to key features of the Royal Military Canal and its historic setting, which contribute to its significance as a Scheduled Ancient Monument, would be minimised and that the overall scheme would not result in substantial harm to the heritage asset;</p> <p>3.Any less than substantial harm is clearly demonstrated to be outweighed by the public benefits of the proposal, which should include heritage benefits;</p> <p>4.The design creates a sense of place by taking account of opportunities to draw on the heritage of the Royal Military Canal and its setting, including the retention of key vistas and physical links with the coast;</p> <p>5.A new accessible Destination Play Space is created to replace the existing Royal Military Canal Play Area;</p> <p>6.Any potential contamination from its former use is investigated, assessed and if appropriate, mitigated as part of the development;</p> <p>7.Highway and junction improvements are provided as required to the satisfaction of the Local Highways Authority;</p> <p>8.Traffic flow and parking provision is assessed to ensure that the development does not put undue pressure on the local highway network and that adequate parking provision is provided so that there are no detrimental parking impacts on Princes Parade;</p> <p>9.Improvements are delivered to the public bridleway along the north side of the canal to enhance its amenity value;</p> <p>10.At least two links between the canal crossings and Princes Parade are provided as dedicated public footpaths or bridleways;</p> <p>11.A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider;</p> <p>12.The masterplanning of the site takes account of the nearby pumping station to allow for odour dispersal and help prevent unnecessary unacceptable impact from vibration;</p> <p>13.Access is maintained to the existing or reconfigured underground sewerage infrastructure for maintenance and up-sizing purposes;</p> <p>14.Ecological and arboricultural investigations are undertaken and adequate mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat; and</p> <p>15.Appropriate protection, preservation and integration of the Royal Military Canal Local Wildlife Site is provided and there is a demonstrable net gain in the protection of wildlife.</p>
	<p>Housing development rejected previously by Local Plan Inspectors.</p>	<p>The policy as drafted seeks to address the concerns raised by previous Planning Inspectors by seeking to mitigate and/or minimise the perceived adverse impacts of developing the site to the point whereby a scheme could be considered acceptable. The Council has also been working closely with Historic England to address specific concerns in regards to the Hythe Royal Military Canal.</p>	<p>No action proposed.</p>	
	<p>Conflicts with current National and Local Plan Policies LR9, TM8 & BE13.</p>	<p>The Places and Policies Local Plan is looking to the future. The current saved policies in the Local Plan Review (2006) are out-of-date and not National Planning Policy Framework compliant; as a consequence these will be superseded by the Places and Policies Local Plan when adopted. Regardless, officers consider that the objectives of the existing saved Policies TM8, LR8 and BE13 are still covered by the draft Policy UA18: Princes Parade of the Places and Policies Local Plan.</p>	<p>No action proposed.</p>	
	<p>The Sustainability Appraisal scored the site a significant negative effect due to loss of designated green open space, failing to meet local needs, and in regard to flood risk issues.</p>	<p>The Sustainability Appraisal (SA) is a tool used at the plan-making stage to assess the likely effects of potential allocations in the Places and Policies Local Plan against the 'reasonable alternatives'. It is also a means of identifying any significant negative effects that site allocations might have and provides an opportunity to mitigate and/or minimise these through the drafting of the site-specific policies.</p>	<p>No action proposed.</p>	
	<p>An accurate description and assessment of the current state and value of the site is not included in the guidelines.</p>	<p>Comment noted.</p>	<p>No action proposed.</p>	
	<p>Urbanisation by amalgamating Hythe with Sandgate and may set a precedence for future development of the Imperial Golf Course.</p>	<p>The Hythe Imperial Golf Course has previously been submitted as part of the Strategic Housing Land Availability Assessment (SHLAA). It was assessed for its suitability for housing and was considered to be 'more sensitive' to development than the adjacent site on Princes Parade in regard to the setting of the Hythe Royal Military Canal.</p>	<p>No action proposed.</p>	
	<p>Proposed gaps within development and end vistas will be not be sufficient to overcome concerns about the impact on the character of the area and loss of important open views.</p>	<p>Comment noted.</p>	<p>No action proposed.</p>	
	<p>The site is visible in longer views and enhances the ambience of the canal setting which would be destroyed by buildings.</p>	<p>The Places and Policies Local Plan should be read as a whole. Any planning application would need to satisfy Policies HB1: Quality Places Through Design and HB2: Cohesive Design. The Council has also been working closely with Historic England in ensure that the policy and any future development minimises the harm to the Royal Military Canal and its setting.</p>	<p>No action proposed.</p>	
	<p>Development should deliver improvements to the Public Bridleway along the southside the canal to enhance its amenity value. It is also advised that the policy specifies at least two links between the canal crossings and princes parade as dedicated Public Footpaths or Bridleways</p>	<p>Comment noted.</p>	<p>Amend Policy UA25 (reassigned Policy UA18) to include the following additional criteria:</p> <p>'Improvements are delivered to the public bridleway along the north side of the canal to enhance its amenity value;'</p> <p>'At least two links between the canal crossings and Princes Parade are provided as dedicated public footpaths or bridleways;'</p>	
	<p>A review showed that the Princes Parade site is partly within a Biodiversity Action Plan Priority Habitat. Therefore, development should be informed by an assessment to identify features of ecological interest and conserve and enhance biodiversity within the site.</p>	<p>Comment noted.</p>	<p>Amend Policy UA25 (reassigned Policy UA18) to include the following additional criteria:</p> <p>'Ecological and arboricultural investigations are undertaken and adequate mitigation and enhancement measures are incorporated into the design of the development to minimise effects on the local Biodiversity Action Plan Priority Habitat;'</p>	
<p>Kent Wildlife Trust requires policy to demonstrate net gain in protection of wildlife (Bullet 5).</p>	<p>Comment noted.</p>	<p>Amend Policy UA25 (reassigned Policy UA18) to read:</p> <p>'Appropriate protection, preservation and integration of the Royal Military Canal Local Wildlife Site is provided and there is demonstratable net gain in the protection of wildlife.'</p>		
<p>This land at Prince's Parade is naturalised now and is teeming with flora and fauna.</p>	<p>Former Policy UA25 (criterion 5) stated that appropriate protection, preservation and integration of Royal Military Canal Local Wildlife Site (LWS) is provided. See additional change to the policy to demonstrate a net gain in protection of wildlife in response to comments made by the Kent Wildlife Trust (KWT).</p>	<p>Amend Policy UA25 (reassigned Policy UA18) to read:</p> <p>'Appropriate protection, preservation and integration of the Royal Military Canal Local Wildlife Site is provided and there is demonstratable net gain in the protection of wildlife.'</p>		
<p>Building construction on the scale proposed will affect all wildlife adversely.</p>	<p>Former Policy UA25 (criterion 5) stated that appropriate protection, preservation and integration of Royal Military Canal Local Wildlife Site (LWS) is provided. See additional change to the policy to demonstrate a net gain in protection of wildlife in response to comments made by the Kent Wildlife Trust (KWT).</p>	<p>Amend Policy UA25 (reassigned Policy UA18) to read:</p> <p>'Appropriate protection, preservation and integration of the Royal Military Canal Local Wildlife Site is provided and there is demonstratable net gain in the protection of wildlife.'</p>		
<p>This green open space is an important stopping off and departing site for migrating birds, holds a range of nesting species and is also an important feeding site for breeding and wintering birds.</p>	<p>The Council has consulted with statutory consultees including Natural England, together with specialist consultees including Kent Wildlife Trust and Kent County Council Biodiversity team at all stages in drafting both the Core Strategy and Places and Policies Local Plans.</p>	<p>No action proposed.</p>		

<p>This is not a sustainable location for major new buildings due to likely effect on Royal Military Canal which is a Scheduled Ancient Monument. The Policy should objectively provide a framework and guidance about how a sustainable future for the Princes Parade site might be possible taking into account the advice of the NPPF.</p>	<p>Since the Preferred Options Local Plan, Historic England now consider that proposals for Princes Parade would equate to less than substantial harm to the significance of the designated heritage asset.</p> <p>The Princes Parade site has been tested through the Sustainability Appraisal. The Council acknowledges that the historic environment forms part of one of the three key strands of sustainable development. In regards to protecting and enhancing the historic environment, Policy UA18: Princes Parade, Hythe and its supporting text has been redrafted to reflect comments made by Historic England. The supporting text includes a more detailed acknowledgement and understanding of the importance setting of the Scheduled Ancient Monument and the public benefit resultant from the proposed development. The policy also sets out a more objective framework for achieving a sustainable future for Princes Parade.</p>	<p>The supporting text for Princes Parade will be expanded further to provide a better understanding/acknowledgement of the contribution that the site makes to the significance of the setting of the Scheduled Monument as well as the public benefits that would be associated with the redevelopment of the site.</p> <p>Amend Policy UA18: Princes Parade, Hythe (criterion 2) to read:</p> <p>'They are accompanied by an appropriate heritage assessment to demonstrate that the harm to key features of the Royal Military Canal and its historic setting, which contribute to its significance as a Scheduled Ancient Monument, would be minimised and that the overall scheme would not result in substantial harm to the heritage asset.'</p> <p>Amend Policy UA18: Princes Parade to include the following new criterion:</p> <p>'The design creates a sense of place by taking account of opportunities to draw on the heritage of the Royal Military Canal and its setting including the retention of key vistas and physical links with the coast.'</p>
<p>The policy as worded needs to express a better understanding of the contribution that the site makes to the significance of the Scheduled Monument. A mixed-use development here of the type described in Policy UA25 could cause very great harm to the significance of the Scheduled Royal Military Canal by change in its setting. The openness between the canal and the coast is especially important in telling the story of the canal, its purpose and its specific design</p>	<p>The supporting text for Princes Parade will be expanded further to provide a better understanding/acknowledgement of the contribution that the site makes to the significance of the setting of the Scheduled Monument.</p> <p>However, officers consider that the setting of the Canal to be already significantly altered at the eastern extent of Princes Parade as a result of a combination of developments over the past century, including the creation of a new sealed road and sea wall and the use of the site as a refuse tip in the 1960s have reduced people's ability to appreciate the defensive logic of this part of the canal and have had a negative impact on its significance as a historically important site. It is considered that any development proposal for the site should seek to identify specific opportunities within the area for the conservation and enhancement of the Royal Military Canal to better reveal its significance.</p>	<p>The supporting text for Princes Parade will be expanded further to provide a better understanding/acknowledgement of the contribution that the site makes to the significance of the setting of the Scheduled Monument.</p>
<p>Criterion 2 requires that "key features of the Royal Military Canal and its setting, which contribute to its significance as a Scheduled Monument would be preserved and enhanced". Development within the setting of the canal, even if the harmful effects of such development are minimized, cannot preserve the setting of the canal, which we feel is a key feature that makes an important contribution to the monument's significance.</p>	<p>Since the Preferred Options Local Plan, Historic England now consider that proposals for Princes Parade would equate to less than substantial harm to the significance of the designated heritage asset.</p> <p>Officers consider that the setting of the Canal to be already significantly altered at the eastern extent of Princes Parade as a result of a combination of developments over the past century, in particular the creation of a new sealed road and sea wall and the use of the site as a refuse tip in the 1960s have reduced people's ability to appreciate the defensive logic of this part of the canal and have had a negative impact on its significance as a historically important site.</p> <p>It is accepted that development cannot 'preserve the setting of the Canal'. Criterion 2 of the policy will be amended to reflect this.</p>	<p>Amend Policy UA25, criterion 2 (reassigned Policy UA18) to read:</p> <p>'They are accompanied by an appropriate heritage assessment to demonstrate that the harm to key features of the Royal Military Canal and its historic setting, which contribute to its significance as a Scheduled Ancient Monument, would be minimised and that the overall scheme would not result in substantial harm to the heritage asset.'</p>
<p>Criterion 3 requires that "any less than substantial harm is clearly and convincingly demonstrated to be outweighed by the public benefits of the proposal, which should include heritage benefits". We would see such public benefits as being ones that fulfill one or more of the objectives of sustainable development as set out in the NPPF. The NPPF requires both that the harm is necessary to achieve the public benefits and that these outweigh the harm or loss. In this instance we feel that the potential for harm to the significance of the Royal Military Canal would be very great and remain unconvinced that sufficient benefits could be delivered or have yet been identified to outweigh this very great harm .</p>	<p>Since the publication of the Places and Policies Local Plan, Historic England consider that the effect of development on the setting of the Royal Military Canal would not be 'Substantial' but 'Less than Significant'.</p> <p>Policy UA18: Princes Parade, Hythe proposes a mix of uses that includes a substantial community recreation and leisure facility including an appropriate replacement for Hythe Swimming Pool.</p> <p>Inspection work of Hythe Pool showed that the pool require extensive maintenance and repairs to comply with health and safety standards and to ensure that it can stay open in the short to medium term. The Council has accepted the need to replace Hythe Swimming Pool.</p> <p>Lee Evans were appointed in 2015 to prepare the Options Appraisal and Site Analysis, for the provision of a Leisure Centre for Hythe (2015). The study concluded that of the available sites within Hythe, Hythe Green was the preferred site followed by Princes Parade.</p> <p>Given this and the lack of deliverable alternative sites, Princes Parade is allocated for a replacement leisure facility to provide a sustainable and efficient facility to meet the needs of the present and future population.</p>	<p>The supporting text for Princes Parade will be expanded further to provide a better understanding/acknowledgement of the public benefits that would be associated with the redevelopment of the site.</p>

The site is located in a flood risk area. Unsuitable site for development due to coastal exposure, including high winds and wave over-topping.	The Princes Parade site is located within Flood Risk Zones 2 and 3 as well as being in an area at risk of wave overtopping. Consequently, it will need to be demonstrated that the site meets the sequential and exceptions test set out in the National Planning Policy Framework. With a significant proportion of the district in Flood Risk Zone 3, the Shepway Strategic Flood Risk Assessment sub-divides this area into varying levels of hazard so that the sequential test can be applied more easily and development within FR23 can be steered towards the areas of least risk. Policy S53 of the Shepway Core Strategy (2013) is explicit that new dwellings (other than replacements) will not be allowed within areas of 'severe or extreme risk' on the SFRA 2115 climate change map. The SFRA 2115 hazard mapping shows the Princes Parade site as being at Nil value.	No action proposed.
The Seabrook/Hythe section of the Royal Military Canal has been awarded Green Flag Status in recognition of its 'value to local people as a recreational resource'.	The canal walks and bridleway between Hythe and Seabrook will be maintained and enhanced; it is considered that there will be no loss of recreational value to local people.	No action proposed.
With increasing development the residents of Sandgate, Seabrook and Hythe won't have sufficient public open green space for informal recreation.	The open space at Princes Parade has not been publically accessible for a number of years. The Open Space and Play Space Strategies identify Princes Parade as an opportunity to create a 'destination play space'. Therefore, the policy seeks to ensure that a high quality and usable public open space(s) linking the canal and the coast is delivered as part of a comprehensive redevelopment scheme for the site.	No action proposed.
Site was used extensively by public for recreational purposes over many years prior to silt dumping in 2002.	The open space at Princes Parade has not been publically accessible for a number of years. The Open Space and Play Space Strategies identify Princes Parade as an opportunity to create a 'destination play space'. Therefore, the policy seeks to ensure that a high quality and usable public open space(s) linking the canal and the coast is delivered as part of a comprehensive redevelopment scheme for the site.	No action proposed.
Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.	Comment noted.	Amend Policy UA25 (reassigned Policy UA18) to include the following additional criterion: 'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'
Southern Water requires a connection is provided to the local sewerage system at the nearest point of adequate capacity	Comment noted.	Amend Policy UA25 (reassigned Policy UA18) to include the following additional criterion: 'A connection is provided to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.'
Southern Water requires that the masterplanning of the site takes account of the nearby pumping station to allow for odour dispersal and help prevent unnecessary unacceptable impact from vibration;	Comment noted.	Amend Policy UA25 (reassigned Policy UA18) to include the following additional criterion: 'The masterplanning of the site takes account of the nearby pumping station to allow for odour dispersal and help prevent unnecessary unacceptable impact from vibration.'
Additional houses in this location will put increased pressure on the local highways network - A259, Horn Street, Princes Parade etc.	The Council has involved infrastructure providers at all stages in drafting the Places and Policies Local Plan, including Kent County Council (the local highway authority), and Highways England (the organisation with responsibility for the Strategic Road Network) on highways and transportation matters. Comments from these organisations have been taken into account when drafting the plan. Where necessary improvements to the road and public transport network are required to mitigate the direct highway impact of specific allocated site(s) these are identified in specific policies within the Places and Policies Local Plan. General improvements to the highway network (non site-specific) identified by the 2016 district Transport Study will be implemented through funding secured via the Community Infrastructure Levy (CIL), which is a flat-rate charge payable as part of most new development in the District, or from the Local Growth Fund which allocates Government funding to successful project bids. Following an internal discussion and with Kent Highway it was suggested that some traffic flow and parking assessment and some minor highway improvements should form part of the site development proposals.	Amend Policy UA25 (reassigned Policy UA18) to include the following criteria in response to ongoing discussions with the Local Highways Authority: 'Highway and junction improvements are provided as required to the satisfaction of the Local Highways Authority.' 'Traffic flow and parking provision is assessed to ensure that the development does not put undue pressure on the local highway network and that adequate parking provision is provided so that there are no detrimental parking impacts on Princes Parade.'
There is lack of infrastructure such as schools and doctors surgeries in Hythe to cope with 150 new dwellings.	The Council has involved statutory consultees, including Kent County Council Education and NHS Clinical Commissioning Group, at all stages in drafting both the Core Strategy and Places and Policies Local Plans. Overall, KCC Education and NHS support the Council that there is capacity available in existing schools and doctors to cater for the planned additional growth within the Urban Character Area. Where improvements to school and health facilities are necessary to cater for the additional growth, comments from KCC and NHS have been taken into account when preparing the plan.	No action proposed.
There are alternative locations where the swimming pool could be built i.e. Martello Lakes, Smiths Medical; and which could better serve Romney Marsh Residents.	Lee Evans were appointed in 2015 to prepare the Options Appraisal and Site Analysis, for the provision of a Leisure Centre for Hythe (2015). The study concluded that of the available sites within Hythe, Hythe Green was the preferred site followed by Princes Parade. Alternative sites considered included Nickolls Quarry (Martello Lakes). Whilst the Council had an option for a leisure centre on the site there were concerns regarding deliverability as the timings are not within Shepway District Council control. The Smith's Medical site was not available for redevelopment for a new leisure centre.	No action proposed.

	Princes Parade could be used for other more appropriate uses such as a visitor centre, nature reserve, coastal park and leisure centre - not housing.	The financial cost of remediating and bringing contaminated sites such as the former landfill site at Princes Parade back into use is high. Only a residential use on a portion of the site will generate a land value high enough that will make the decontamination process and redevelopment of the site viable.	No action proposed.	
	Unstable land conditions given its former use as a landfill site.	There are a number of engineering techniques available for redeveloping former landfill sites. Depending on the type of facility being built, it may be necessary to extend pilings through the landfill and into the underlying base material or it may be possible to employ special foundations or footings to support the load(s) being placed on the former landfill.	No action proposed.	
	Health hazard and risk to residents and wildlife due to disturbance of contaminated land.	Policy UA18: Princes Parade, Hythe (criterion 4) states that: 'Development proposals will be supported where: Any potential contamination from former use is investigated, assessed and if appropriate mitigated as part of the development.'	No action proposed.	
	Two, three or four storey buildings would visually impact the landscape.	The Places and Policies Local Plan should be read as a whole. Therefore, any application would need to satisfy Policy HB1: Quality Places Through Design criterion 1 which states: 'Planning permission will be granted where proposals: Make a positive contribution to its location and surroundings, enhancing integration, while also respecting existing buildings and land uses, particularly with regards to layout, scale, form, density, materiality and mix of uses so as to ensure all proposals create places of character.'	No action proposed.	
	There is a lack of SDC evidence in support of this policy to show it is viable.	A Viability Appraisal of Sites Proposed for Shepway Local Plan has been prepared to support the allocations included within the Places and Policies Local Plan. However, sites that are currently being actively promoted by the landowner/developer (such as Princes Parade) have not been included as part of this work as a site specific viability appraisal will form part of the planning application.	No action proposed.	
	The proposed housing will not be affordable	Any planning application will need to comply with the adopted Policy CSD1 in the Core Strategy (2013) and/or the most recent government guidance position in the Planning Practice Guidance.	No action proposed.	
UA26 Hythe Swimming Pool, Hythe The site is allocated for residential development with an estimated capacity of approximately 50 dwellings. Development proposals will be supported where: 1. Contributions are made, through S106, for off site play and open space at the South Road Recreation ground 2. It can be demonstrated that a replacement facility is to be provided or is to be delivered 3. The café, public toilets and beach huts are retained 4. The archaeological potential of the land is properly considered and measures agreed to monitor and respond to any finds of interest.	The most sensible and economic option is for the swimming pool to be retained and improved on the current site - expanding to include the beach huts and existing cafe.	To make the construction of a new leisure centre viable, the proposal would be funded by Shepway District Council including the use of a receipt from the sale of the existing swimming pool site, part of the Princes Parade site and Section 106 planning agreement monies available from the Nickolls Quarry development.	No action proposed.	UA19 Hythe Swimming Pool, Hythe The site is allocated for residential development with an estimated capacity of approximately 50 dwellings. Development proposals will be supported where: 1. Appropriate and proportionate contributions, through a S106 agreement, are made towards the upkeep and/or improvement of open space and existing play facilities at Hythe Recreation Ground; 2. It can be demonstrated that a replacement facility is to be delivered locally; 3. The café, public toilets and beach huts are retained or replaced; 4. Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes; and 5. The archaeological potential of the land is properly considered and appropriate archaeological mitigation measures are put in place.
	There are alternative locations where the swimming pool could be built i.e. Martello Lakes, Smiths Medical; and could better serve Romney Marsh Residents.	Lee Evans were appointed in 2015 to prepare the Options Appraisal and Site Analysis, for the provision of a Leisure Centre for Hythe (2015). The study concluded that of the available sites within Hythe, Hythe Green was the preferred site, followed by Princes Parade. Alternative sites considered included Nickolls Quarry (Martello Lakes). Whilst the Council had an option for a leisure centre on the site there were concerns regarding deliverability as the timings are not within Shepway District Council control. The Smith's Medical site was not available for redevelopment for a new leisure centre.	No action proposed.	
	The public toilets should be refurbished as part of any development proposal.	Comment noted.	Amend Policy UA26, criterion 3 (reassigned Policy UA19) to read: 'The cafe, public toilets and beach huts are to be retained or replaced.'	
	The current, recently refurbished pool is in a highly sustainable location within walking or cycling distance of many Hythe residents including children and young people.	The construction of a new leisure centre for Hythe would be funded by Shepway District Council using Section 106 financial contributions from the Nickolls Quarry development and capital land receipts from the sale of the existing swimming pool site on South Road and Princes Parade. Therefore, it is unviable to redevelop the existing site for a new facility - there is also not sufficient land to provided the number of parking spaces requirement to serve the facility. Lee Evans were appointed in 2015 to prepare the Options Appraisal and Site Analysis, for the provision of a Leisure Centre for Hythe (2015). The study considered the Hythe Recreation Ground, but was ruled out because of the impact on the adjacent Conservation Area and amenity of residents.	No action proposed.	
	It should be referenced in the supporting text and/or policy that funds from the sale of the site will be used to develop a new leisure centre elsewhere.	Comment noted.	Amend the supporting text to include details about how the new leisure centre will be financed. The proposal would be funded by Shepway District Council including the use of a receipt from the sale of the existing swimming pool site, part of the Princes Parade site and use of Section 106 planning agreement monies available from the Nickolls Quarry development.	
	Criterion 2 should be amended to read: "A replacement facility will be provided" and a timescale given for delivery.	Policy UA19: Hythe Swimming Pool, Hythe is unable to ensure that a leisure centre 'will' be provided; as the only way this could be guaranteed is by the construction of the facility itself. The policy states that 'It can be demonstrated that a replacement swimming pool is to be delivered locally'.	No action proposed.	
	Southern Water requires access to the existing underground sewerage infrastructure for maintenance and upsizing purposes.	Comment noted	Amend Policy UA26 (reassigned Policy UA19) to include the following additional criterion: 'Access is maintained to the existing underground sewerage infrastructure for maintenance and up-sizing purposes.'	

